



2.0 REVISIONS TO THE DRAFT EIR

The following text changes to the Draft EIR are organized by: Draft EIR headings (e.g., Section 3.8: Hydrology and Water Quality), page number, paragraph number and/or location on the page, and location within the paragraph. As noted in Chapter 1 of this document, changes in the text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added.

Executive Summary

The second paragraph on Page S-1, 2nd paragraph, 2nd sentence is revised as follows:

“The proposed Specific Plan and PUD designates approximately 34.7 net-acres for residential uses for the construction of a maximum of ~~approximately~~ 450 units, ...”

Page S-1, 3rd paragraph, 2nd sentence is revised as follows:

“The Specific Plan is required for implementation of the project by the City of Watsonville upon annexation of the planning area to the City of Watsonville. The PUD would serve for implementation ...”

Page S-2, 1st paragraph, last sentence is revised as follows:

“The following alternatives are evaluated in this EIR in ~~the~~ Chapter 4 – CEQA Considerations.”

Table S-1: Executive Summary of Project Impacts has been modified by reference to include the changes to mitigation measures incorporated within this section.

Section 1.0: Introduction

The third paragraph on page 1-3 is revised as follows:

“Certification of the Final EIR

If the County of Santa Cruz finds that the Final EIR is “adequate and complete,” the County of Santa Cruz may certify the Final EIR. The rule of adequacy generally holds that the EIR can be certified if: 1) it shows a good faith effort at full disclosure of environmental information, and 2) provides sufficient analysis to allow decisions to be made regarding the project in contemplation of environmental considerations. As a responsible agency, the City of Watsonville may consider adoption of the Specific Plan following certification of the EIR by the County of Santa Cruz ~~also certify the Final EIR prior to adoption of the Specific Plan.~~”

Section 2.0: Project Description

The fourth sentence of the first paragraph on page 2-1 is revised as follows:

“The proposed Specific Plan and PUD designates approximately 34.7 net-acres for residential uses for the construction of a maximum of ~~approximately~~ 450 units....”

Page 2-1 2nd paragraph, 2nd sentence has been revised as follows:

“The Specific Plan is required for implementation of the project by the City of Watsonville upon annexation of the planning area to the City of Watsonville. The ~~proposed Specific Plan will also serve as a~~ Planned Unit Development (PUD) ~~for implementation by the County of Santa Cruz~~ is required for implementation by the



County of Santa Cruz for rezoning of a 16-acre portion of the planning area (County site).
The PUD would serve for implementation ...”

Page 2-1 and page S-1 in the Executive Summary is modified as follows:

2.4.1 Future Approvals within the Planning Area

Future approvals within the planning area may require additional site planning and related permits by the County of Santa Cruz and the City of Watsonville, and may include, but are not limited to:

- General Plan Amendment;
- Approval of Subdivision Map(s), pursuant to the Subdivision Map Act;
- Demolition Permits;
- All Final Improvement Plans;
- Utility Plans;
- Construction Phasing and Duration;
- Architectural and Site Plan Review;
- Landscaping and Lighting Plans;
- Grading and Building Permits;
- LAFCO approvals, including Extraterritorial Water Service from the City of Watsonville and Extraterritorial sewer service from the City of Watsonville for County Phases 1 and 2; Amendment of the City of Watsonville Sphere of Influence; Annexation to the City of Watsonville; and Detachments from Various Special Districts for Phase 2 (City site);
- Santa Cruz County Riparian Corridor and Wetlands Protection Ordinance Exception for the PUD;
- Santa Cruz County Roadway/Roadside Exception for the width of the Brewington Avenue Extension Right of Way;
- Annexation and Sphere of Influence Amendments; and/or
- All related subsequent actions to the greatest extent possible.

Subsequent development may also require obtaining a National Pollution Discharge Elimination System (NPDES) permits from the Regional Water Quality Control Board, a streambed alteration agreement from the California Department of Fish and Game (CDFG), and completion of a Section 7 consultation with the U.S. Fish and Wildlife Service, ~~which would be a responsible agency under CEQA.~~



Page 2-7 in Section 2.0: Project Description of the Draft EIR is modified as follows:

Table 2-2: ~~Buildout~~ Buildout Summary

Phase 1	Acreage	Density Range/Acre	Anticipated Units
Residential High Density (R-HD) ¹	4.5	20	90
Residential – High Density (R-HD) ²	0.5	20	10
Residential – Low Density (R-LD) ²	1	8-10	8-10-9
<u>Maximum</u> Total Phase 1	6.0	--	109
Phase 2	Acreage	Density Range/Acre	Anticipated Units
Residential – High Density (R-HD) ¹	5.5	20	110
Residential – Low Density (R-LD) ²	9.0	8-10	72-90 -84
Residential – Medium Density (R-MD) ²	14.2	10-12	142-170 456
<u>Maximum</u> Total Phase 2	28.7	--	341
<u>Total Allowable Units³ Grand Total</u>	34.7	--	450³
Notes:			
<ol style="list-style-type: none"> 1. County Site 2. City Site 3. While the site capacity allows for 456 <u>480</u> units, the maximum allowable number of total units for the Planning Area is 450. 			

The second sentence in the third paragraph on page 2-9 is revised as follows:

“The County of Santa Cruz determined that the proposed project is eligible for an exception to the ~~would not be required to provide a 100 foot setback, as long as the proposed project was consistent with the Riparian Corridor and Wetlands Protection Ordinance, which requires a 100 foot buffer from the wetland.”~~

The PG&E parcel in Figure 2-14 is modified to blue by reference to include in Phase 2 as indicated on Figure 3-2 in the Specific Plan.

Page 2-14 of the EIR is revised as follows:

The County of Santa Cruz will consider certification of the Final EIR, approval of Phase 1 and 2 (County site), and adoption of the PUD as the lead agency under CEQA in support of adoption of the PUD. As defined by Measure U, the City ~~will~~ may consider adoption of the Specific Plan, as a responsible agency under CEQA following certification of the EIR by the County of Santa Cruz. Upon adoption of the Specific Plan, the proposed project would require an annexation and a Sphere of Influence Amendment (SOI) request for those portions of the planning area located outside of the City limits and the SOI. The annexation and the SOI amendment would require approval by the Santa Cruz County Local Agency Formation Commission (LAFCO). Once the Final EIR is certified by the County of Santa Cruz, the City of Watsonville as a responsible agency under CEQA, would consider approval of the Specific Plan. Following approval of the Specific Plan and EIR, a petition may be filed to LAFCO for the annexation and SOI amendment. ~~The City’s adoption of the Specific Plan, however, would require an annexation and SOI amendment request for those portions of the planning area that located outside of the City limits and SOI. The annexation and SOI amendment would require approval by the Santa Cruz County Local Agency Formation Commission~~



(LAFCO), which would be a responsible agency under CEQA. Following approval of the annexation and SOI amendment, projects may proceed in the City portion of the proposed project after January 2010.

Section 3.2: Agricultural Resources

Mitigation measures 3.2-2a and 3.2-2b is modified as follows:

Mitigation Measures

MM 3.2-2a Consistent with Policy 5.13.23 (Agricultural Buffers Required) in the *Santa Cruz County General Plan* and Section 16.50.095 in the *Santa Cruz County Code* project applicants shall demonstrate adequate land use separation in conjunction with Final Map consistent with the proposed Specific Plan and PUD for Phase 2 (County site) subject to review and approval by the County of Santa Cruz Planning Department. Final site plans shall include an interim 200-foot agricultural buffer within Phase 2 (County site) consistent with the conceptual land use plan for the proposed Specific Plan and PUD. The buffer distance shall be measured from the edge of the parcel to the nearest residential property line and shall include a six to eight foot barrier (e.g. vegetated fencing) adjacent to the agricultural uses. Outdoor areas designed for intensive human use shall be restricted within the buffer zone. Other than fencing, regional drainage facilities, and underground utilities, only landscape and related non accessible open space components are allowed within the first 150 feet of the buffer. Within the remaining 50 feet of buffer, adjacent to the proposed development area, uses such as public streets and roads, regional and local storm drainage improvements, and other underground utilities; and pedestrian and bicycle trails are allowed. Sidewalks and bicycle lanes shall be allowed on the western portion of the public streets located within the buffer, but restricted on the eastern portion of the street. Upon annexation of the adjacent commercial agricultural use and rezoning of Phase 2 by the City, the interim 200-foot agricultural buffer within the Phase 2 (County site) development area shall terminate.

MM 3.2-2b Consistent with the *City of Watsonville Agricultural Buffer Policy*, project applicants shall demonstrate adequate land use separation in conjunction with Final Map consistent with the proposed Specific Plan and PUD for Phase 2 (City site) subject to review and approval by the City of Watsonville Community Development Department. Final site plans shall include a 200-foot minimum land use buffer along the eastern boundary of the planning area within Phase 2 (City site) of the proposed project consistent with the conceptual land use plan. The buffer distance shall be measured from the edge of the parcel to the nearest residential property line and shall include a six to eight foot barrier (e.g. vegetated fencing) adjacent to the commercial agricultural uses. Other than fencing, regional drainage facilities, and underground utilities, only landscape and related non-accessible open space components are allowed within the first 150 feet of the buffer. Within the remaining 50 feet of buffer, adjacent to the proposed development area, uses such as public streets and roads, regional and local storm-drainage improvements, and other underground utilities; and pedestrian and bicycle trails are allowed. Sidewalks and bicycle trails shall only be allowed on the western portion (development side) of the street within the remaining 50-feet of the buffer, but restricted on the eastern portion of the street. Any other pedestrian trails, such as one along Corralitos Creek, within the 200-



foot agricultural buffer area shall only be permitted once a regional system has been developed adjacent to the planning area and a management plan has been developed with adjacent farm operators.

Section 3.3: Air Quality

The second paragraph on page 3.3-16 is modified as follows:

The MBUAPCD also uses many EPA and state requirements as the basis for determining the significance of air quality impacts under CEQA, including:

- Ambient Air Quality Standards. Exceedance of any national AAQS is considered a significant impact to air quality.
- New Source Review Offset Requirements. The MBUAPCD uses federal offset thresholds for PM₁₀ and CO as criteria for significance (82 and 550 lb/day, respectively).
- ~~Conformity. Federal regulations requiring that certain general and transportation projects conform with the State Implementation Plan (SIP) are used to help determine the cumulative significance of air quality impacts.~~
- Air Quality Management Plans. Project emissions that are not accounted for in the AQMP's emissions inventory are considered a significant cumulative impact to regional air quality.
- New Source Review Offset Requirements. Under State regulations, new or modified stationary sources that would emit 137 pounds per day or more of VOC or NO_x are required to offset their emissions.

Mitigation Measure 3.3-1a on page 3.3-19 is modified by reference herein to take off the “a.”

The second paragraph on Page 3.3-21 is modified as follows:

“The proposed project is subject to the asbestos NESHAP, and thus would be required to comply with these specified work practices. The proposed project must also comply with MBUAPCD Rule 424 (National Emission Standards for Hazardous Air Pollutants (NESHAPS) 304 (Asbestos NESHAP Fees)), which determines fees for asbestos removal. Additionally, the proposed project shall comply with the NESHAP as established by the EPA. NESHAP specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos containing materials. The requirements for demolition and renovation activities include asbestos surveying, notification, asbestos containing materials removal procedures and time schedules, asbestos containing materials handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. In addition, mitigation measures **MM 3.7-3a** and **MM 3.7-3b** in **Section 3.7, Hazards and Hazardous Materials** would require that each structure is inspected by a qualified environmental specialist for the presence of asbestos containing materials (ACMs) and lead based paints (LBPs). If ACMs and LBPs are found during the investigations, a remediation program shall be developed to ensure that these materials



are removed and disposed of by a licensed contractor in accordance with all federal, state and local laws and regulations, subject to approval by the MBUAPCD, City of Watsonville, and the Santa Cruz County Environmental Health Department, as applicable. Any hazardous materials that are removed from the structures will be disposed of at an approved landfill facility in accordance with federal, state and local laws and regulations. With implementation of this mitigation measure, the proposed project would not result in the emission of asbestos or lead based paint.”

Mitigation measure MM 3.3-3 on page 3.3-24 is modified as follows:

Mitigation Measure

MM 3.3-3 Fireplaces proposed for future residential development within the planning area shall be gas-fired and meet U.S. Environmental Protection Agency (EPA) certification requirements. The use of wood-burning fireplaces or wood burning stoves shall be prohibited in perpetuity on all residential properties included within the proposed project and shall be recorded on the title of all parcels and run with the land. This measure shall be demonstrated on all proposed tentative maps and improvement plans prior to approval of building permits within the planning area. In addition, project applicants within the planning area shall consider implementation of MBUAPCD-recommended mitigation. The City of Watsonville Community Development Department and the County of Santa Cruz Planning Department shall review proposed tentative maps and improvement plans to identify emission reduction measures that are incorporated into the plans and staff may recommend additional measures as practical and feasible including the following:

- Incorporate energy-efficient appliances into residential uses.
- Orient buildings to minimize heating and cooling needs;
- Provide shade trees to reduce cooling needs;
- Include energy-efficient lighting systems;
- Include solar water heaters or centralized water heating systems; and
- Increase insulation beyond Title 24 requirements to minimize heating and cooling needs.

Section 3.4: Biological Resources

The following text has been added to page 3.4-20 of the Draft EIR as follows:

The historic range of the CRLF extended southward from Marin County coast, and inland from Shasta County south to Baja California (Jennings and Hayes 1994). The CRLF has been extirpated from 70 percent of its former range (USFWS 1996). Presently, CRLF is found primarily in central coastal California in natural and artificial ponds, quiet pools along streams and in coastal marshes (USFWS 1996). In the breeding season, CRLF mostly inhabit pools greater than two feet deep, although shallow, perennial marsh habitat may also be productive if it is free of non-native aquatic predators (Hayes and Jennings 1988; B. Mori, pers. obs.). Optimal aquatic habitat is characterized by dense emergent or shoreline vegetation for cover. Seasonal ponds with little emergent/shoreline cover located in grasslands, however, may also be used for breeding, where water levels permit the metamorphosis of larvae and rodent burrows offer cover (USFWS 2002). Breeding typically occurs between December and April, depending on annual



environmental conditions and locality. Radio-telemetry data indicate that adults engage in straight-line movements irrespective of riparian corridors or topography, and they may move up to 1.7 miles between non-breeding and breeding sites (Bulger, et al. 2003; Fellers and Kleeman 2007). Much of this species' habitat has undergone significant alteration by agricultural, urban development and water projects, leading to exit of many populations (USFWS 1996). Other factors contributing to the decline of red-legged frogs include its historical exploitation as food; competition and predation by bullfrogs (*Rana catesbeiana*) and introduced predatory fishes (Jennings and Hayes 1985; Hayes and Jennings 1988; Lawler, et al. 1999); and salinization of coastal breeding habitat (Jennings and Hayes 1990).

Mitigation measure 3.4-1 on page 3.4-25 is modified as follows:

Mitigation Measures

MM 3.4-1 Subject to review and approval by the County of Santa Cruz Planning Department and the City of Watsonville Community Development Department, project applicants shall ensure that all construction and staging activities occur outside of APN 048-211-24 (PG&E parcel) containing Santa Cruz tarplant during all phases of the proposed project. Prior to construction activities, project applicants shall install temporary construction fencing and informative signs around the perimeter of APN 048-211-24 as construction occurs in the vicinity of this parcel. The location and integrity of the fence shall be verified in the field by County or City staff prior to grading and periodically checked throughout the construction period. Following construction, project applicants within Phase 1 (County site) and Phase 2 (City site) shall install permanent fencing around ~~of~~ the perimeter of APN 048-211-24.

Mitigation measure 3.4-3a and mitigation measure 3.4-3b on page 3.4-28 are modified as follows:

MM 3.4-3a Prior to the construction of the Phase 1 (County site) project, a qualified herpetologist shall conduct three consecutive days of pond turtle trapping within the freshwater marsh to evaluate the existing turtle population and to determine its viability. If it is determined that a viable western pond turtle population is present, a Western Pond Turtle Habitat Enhancement Plan shall be prepared and implemented as described in MM 3.4-3b. If it is determined that no pond turtles are present, or that the existing population is no longer viable, all captured western pond turtles shall be permanently relocated under the direction of the qualified herpetologist in consultation with the CDFG. In addition, a Habitat Enhancement Plan shall be prepared by a qualified wetland ecologist, hydrologist and landscape architect that includes the following improvements to the wetland:

- (a) Removal of non-native vegetation;
- (b) Development of a wetland and upland planting plan to benefit wetland functions and values;
- (c) Revegetation of the wetland buffer with native riparian and upland species;
- (d) Development of a monitoring program and;
- (e) Development of success criteria for habitat enhancement.



MM 3.4 -3b If it is determined that a viable western pond turtle population is present, a Habitat Enhancement Plan shall be prepared and implemented prior to the construction of Phase 1 for the western pond turtle by a qualified herpetologist, wetland ecologist, hydrologist, and landscape architect. The plan shall provide specific habitat enhancement strategies intended to improve breeding, basking, aestivating, and reduced predation potential. The plan shall also specify the location of the temporary holding area and care requirements for captured pond turtles. The habitat enhancement plan may include the following improvements:

- (a) Removal of non-native species;
- (b) Removal of the earthen berm dividing the freshwater marsh from the seasonal wetland to create additional freshwater marsh habitat;
- (c) Eradication of bullfrogs from the pond to reduce predation and competition;
- (d) Placement of logs (living downed willows) and rocks at strategic locations to improve basking opportunities that are protected from predators;
- (e) Development of a wetland and upland planting plan;
- (f) Revegetation of the wetland buffer with native riparian and upland species to provide greater opportunity for breeding and aestivation;
- (g) Development of hydrologic requirements for freshwater marsh and western pond turtle;
- (h) Development of a monitoring program and;
- (i) Development of success criteria for habitat enhancement.

The Habitat Enhancement Plan shall be provided to the County of Santa Cruz Planning Department, and the City of Watsonville Community Development Department for review and approval in consultation with the CDFG prior to issuance of the building permit.

Mitigation measure MM 3.4-3c on page 3.4-29 is modified as follows:

MM 3.4-3c If the existing pond turtle population is determined to be viable as a result of data collection during trapping, all captured western pond turtles shall be temporarily relocated to ~~the~~ a holding area until Phase 1 construction and habitat enhancement has been completed. Temporary relocation may be needed for up to two years. Upon completion of the construction and implementation of the Habitat Enhancement Plan, all relocated pond turtles shall be returned to the enhanced freshwater marsh within the planning area outside of the breeding season when the turtles are active. All turtle relocations efforts shall be coordinated with the CDFG.

Mitigation measure 3.4-2h on page 3.4-29 is changed to MM 3.4-3h and is revised as follows:

MM 3.4-3h To avoid harming WPT that may have evaded trapping (MM 3.4-3c), project applicants shall implement the following measures during Phase 1 and Phase 2 construction. ~~These measures shall also be implemented during Phase 2:~~



Mitigation measure 3.4-6a on page 3.4-34 has been revised as follows:

Mitigation Measures

MM 3.4-6a The County of Santa Cruz Planning Department and the City of Watsonville Community Development Department shall require that project applicants have a qualified biologist examine the planning area for San Francisco dusky footed woodrats before and during any initial vegetation, woody debris, and/or tree removal, or other initial ground disturbing activities. If a woodrat nest/house structure is encountered in the area of disturbance, avoid disturbing the structure or evicting the individuals. Project applicants shall coordinate with CDFG to establish protective buffer widths around the structures and install exclusion zones around each structure before initiating tree/vegetation removal and ground disturbing activities. If a woodrat is incidentally encountered in the work area and does not voluntarily move out of the area, a biological monitor, with the appropriate CDFG permits, shall be on call during project activities to relocate the animal out of the construction area to the nearest safe location (as approved and authorized by CDFG). Woodrats shall not be handled without prior agency authorization from CDFG. ~~If project activities cannot avoid any existing, underground, or unidentified woodrat nest structure in the work area, notify and coordinate with CDFG to develop appropriate avoidance and/or alternative habitat creation and recovery strategies.~~

Mitigation measure 3.4-8a on page 3.4-36 has been revised as follows:

MM 3.4-8a Project applicants within Phase 2 (City site) shall provide replacement wetland acreage that shall be created at a ratio of 2:1 acceptable to the City of Watsonville and the CDFG for removal of the agricultural basin in the northeastern portion of the planning area. Because the agricultural basin is man-made and actively flooded by mechanical pumps, replacement wetlands shall not be required to support “in-kind” freshwater marsh habitat. Created wetland habitat will be designed by a certified landscape architect and wetland specialist to function as wetlands, support wetland vegetation during the rainy season, and will be planted with native wetland vegetation typical of the Central California coast region (e.g., *Typha angustifolia*, *Scirpus californicus*, *Salix* spp., etc.) at the ~~existing~~ stormwater detention basin in the southern portion of the planning area within the expanded Crestview Park.

Long-term monitoring of mitigation wetlands and existing wetlands within the planning area shall be conducted for a period of five years or until the time the established success criteria are met (see Table 3.4-3). Monitoring will be performed annually by a qualified botanist/wetland specialist to determine whether mitigation wetlands meet or exceed pre-established performance criteria. The success of wetland creation will be evaluated on the basis of density and diversity of native plant species at the wetland creation site. If excessive mortality occurs, plantings will be replaced at a 1:1 ratio. The wetland specialist will be responsible for selecting the species for replacement plantings. Recommendations for enhancement and continued long-term success of created wetlands will be included in annual monitoring reports submitted to the City of Watsonville, and CDFG, ~~and/or other regulatory agencies the RWQCB (if applicable).~~



Table 3.4-3: Success Criteria for Wetland Creation Site

<u>Year</u>	<u>Type of Criterion Used</u>	<u>Success Criterion</u>
<u>1</u>	<u>Percent of Plants Surviving</u>	<u>90% Survival in Good or Fair Condition</u>
<u>2</u>	<u>Percent of Plants Surviving</u>	<u>80% Survival in Good or Fair Condition</u>
<u>3</u>	<u>Percent of Plants Surviving</u>	<u>75% Survival in Good or Fair Condition</u>
<u>4</u>	<u>Percent of Plants Surviving</u>	<u>70% Survival in Good or Fair Condition</u>
<u>5</u>	<u>Percent of Plants Surviving</u>	<u>65% Survival in Good or Fair Condition with 75% Vegetative Cover</u>

Mitigation measure MM 3.4-5a on page 3.4-32 has been modified to eliminate the “a.”

Section 3.6: Geology and Soils

Mitigation measure 3.6-2 on page 3.6-13 has been revised as follows:

Mitigation Measure

MM 3.6-2 Project applicants shall consult with a qualified engineer to perform a quantitative evaluation of liquefaction and liquefaction-induced lateral spreading in conjunction with a design level geotechnical report for future development within the planning area. The evaluation shall be in accordance with the recommendations contained within the Feasibility Level Geotechnical Investigation and Engineering Geology Report prepared by Pacific Crest Engineering in March 2009. The design level geotechnical report shall also specify foundations and structural elements that are designed to resist forces and potential ground settlement generated by liquefaction and lateral spreading and shall incorporate the following into the final site plans, unless the additional analysis indicates it is not necessary:

- Development shall be set-back a minimum of 150 feet from the southern “top of bank” for Corralitos Creek and 50 feet from the delineated wetland boundary (Appendix D) for the pond located in the western portion of the planning area. The 50 foot set back should apply to the 100-year flood plain elevation or ordinary high water mark of the pond, and
- Development shall be constructed upon a structural mat foundation system; likely consisting of a 12-inch thick concrete slab, with one or two layers of reinforcing steel placed within the mat.

The second paragraph on page 3.6-16 is modified as follows:

Septic Systems

Development resulting from the proposed Specific Plan and PUD would connect to the City of Watsonville sewer system and therefore would not involve the construction of septic tanks or an alternative wastewater treatment system. Therefore, the proposed development would have ~~not~~no impact on soils necessary to support septic systems within the planning area.

Section 3.8: Hydrology and Water Quality

The third paragraph on page 3.8-9 of the Draft EIR is modified as follows:



The County of Santa Cruz, led by the Storm Water Management Unit and Environmental Health Services watershed staff, and the City of Capitola submitted the proposed Stormwater Management Program (SWMP) and application for a Phase II permit to the SWRCB in October 2008. The final *Santa Cruz County and City of Capitola Stormwater Management Program* was adopted by the Board of Supervisors on May 12, 2009. The SWMP builds on locally popular efforts to preserve and enhance Santa Cruz County watersheds and in the County and the City's response to the new statewide National Pollutant Discharge Elimination System (NPDES) General Permit requirements for agencies designated by the SWRCB. Under this General Permit, the County of Santa Cruz and the City of Capitola would implement specific types of urban runoff pollutant control measures and submit reports to the RWQCB.

~~The objectives of the SWMP are to:~~

The Stormwater Phase II Final Rule requires that construction activities resulting in a land disturbance of greater or equal to one acre adhere to a site runoff program implemented by the local agency. The following objectives of the Construction Site Runoff Control Program are designated to reduce pollutants generated by construction activities:

- Effectively prohibit non-stormwater discharges and require controls to reduce the discharge of pollutants during construction;
- Minimize land disturbance at construction sites;
- ~~Reduce the discharge of pollutants to stormwater to the maximum extent practicable (MEP);~~
- Protect water quality from pollutants generated by construction activities; and
- Develop and implement Measurable Goals to evaluate the success of the Best Management Practices (BMPs)

The Stormwater Phase II Final Rule requires that new or redevelopment projects resulting in a land disturbance of greater than or equal to one acre adhere to a post construction stormwater management program implemented by the local Agency. The primary objectives of the Post Construction Program are as follows:

- Reduce the potential for discharge of pollutants into urban runoff from new development and redevelopment areas;
- Manage site runoff volumes and flow rates such that they are similar to pre-construction levels; and
- Treat as appropriate.
- ~~Long term protection;~~
- ~~Satisfy the appropriate water quality requirements of the Clean Water Act; and~~
- ~~Educate residents and businesses about stormwater pollution and efforts being made to improve water quality.~~

The activities included in the SWMP are based on the USEPA stormwater regulations, the SWRCB General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer System (Small MS4) and the Model Urban Runoff Program (MURP).”



Mitigation measure 3.8-1a on page 3.8-15 has been revised as follows:

MM 3.8-1a: Future development within Phase 1 of the planning area shall identify, with Tentative Map submittals, a detailed final drainage plan designed to control the rate and volume of stormwater runoff to pre-development conditions for a variety of storm event recurrences up to the 10-year storm consistent with the conceptual stormwater plan in the proposed Specific Plan and PUD and the County of Santa Cruz performance standards or equivalent methods. The final drainage control plans shall include: detailed hydrologic modeling, existing facilities, soil and topographic data; erosion control and best management practices; descriptions of proposed flood control facilities; Low Impact Development (LID) techniques; compliance with waste discharge requirements; phasing and implementation; identification of the entity that is responsible for facility design and construction; Clean Water Program compliance; and facility maintenance to ensure for long-term vegetation maintenance and access. As part of the final drainage plan, the culvert connecting the freshwater marsh to the temporary detention basin shall be designed to reduce the potential for flooding of existing and future development by passing the 100-year peak spill rate and controlling the surcharge elevation in the freshwater marsh/seasonal wetland. All drainage improvements shall be subject to review and approval by the County of Santa Cruz Public Works Director and the City of Watsonville Public Works Director and shall be consistent with the conceptual drainage plans in the proposed Specific Plan and PUD. Prior to final inspection, the project applicant(s) shall provide the County of Santa Cruz with certification from a registered Civil Engineer or licensed contractor that the stormwater detention facilities have been constructed in accordance with approved plans.

The first paragraph on page 3.8-18 is revised as follows:

Result in Long-term Urban Non-Point Source Pollution

Impact 3.8-3: The proposed project would generate urban non-point contaminants, which may be carried in stormwater runoff from paved surfaces to downstream water bodies. This is considered a potentially significant impact.

The proposed Specific Plan and PUD includes a Conceptual Water Quality Improvement Plan in order to reduce pollutant loads to receiving waters. A number of Low Impact Development (LID) techniques are included in the proposed Specific Plan and PUD including: bioretention/bioswales, soil amendments, rain barrels and cisterns, permeable pavers, and tree box filters. Incorporation of these LIDs into future development within the planning area would ensure that the proposed project meets the County of Santa Cruz and the City of Watsonville Stormwater Management Plan's performance standards. Implementation of mitigation measures **MM 3.8-1a** and **MM 3.8-1b** would require that future development prepare a detailed final drainage plan designed to control the rate and volume of stormwater runoff to pre-development conditions for a variety of storm event recurrences up to the 10-year storm event for Phase 1 (County site) and the 25-year storm event consistent with the conceptual stormwater plan in the proposed Specific Plan. Implementation of these mitigation measures would ensure that both phases of the proposed project would have a **less than significant impact** on long-term urban non-point source pollution.



Section 3.9: Land Use and Planning

The first paragraph on page 3.9-5 of the Draft EIR is revised as follows:

City of Watsonville

Measure U

On November 5, 2002, the voters of the City of Watsonville approved voter initiative Measure U, the “Watsonville Urban Limit Line and Development Timing Initiative,” formulated by Action Pajaro Valley. By defining a new ULL area, Measure U was designed to protect commercial agriculture lands and environmentally sensitive areas while providing the means for the City to address housing and jobs needs for the next 20 to 25 years.

- The Measure U-designated ULL allows the planning and development of Future Growth Areas, including the project site. Measure U amended the City’s General Plan to define a new urban limit line (ULL) and make related policy changes to the City’s General Plan policies and land use designations. Specifically, Measure U calls for:
 - Annexation of the planning area to the City of Watsonville following adoption of a Specific Plan;
 - No development to be allowed by the City of Watsonville within the planning area before January 1, 2010; and
 - A minimum 50-percent of the units to be affordable work force housing.

Section 3.12: Public Services, Utilities, and Recreation

Table 3.12-1 on page 3.12-4 of the Draft EIR is modified as follows:

Table 3.12-1: Pajaro Valley Unified School District Enrollment

Schools	98/99	99/00	00/01	01/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09
Elementary	9,373 <u>11,182</u>	9,313 <u>11,270</u>	9,297 <u>11,235</u>	9,236 <u>11,180</u>	9,056 <u>11,063</u>	8,744 <u>10,826</u>	8,957 <u>10,711</u>	9,349 <u>10,588</u>	9,823 <u>10,495</u>	8,841 <u>10,696</u>	8,983 <u>10,790</u>
Middle	3,762 <u>2,842</u>	3,808 <u>2,806</u>	3,773 <u>2,826</u>	3,765 <u>2,885</u>	3,821 <u>2,843</u>	3,942 <u>2,935</u>	3,944 <u>3,053</u>	4,041 <u>2,865</u>	3,825 <u>2,827</u>	3,653 <u>2,856</u>	3,660 <u>2,821</u>
High	4,927 <u>4,981</u>	5,153 <u>5,288</u>	5,243 <u>5,398</u>	5,232 <u>5,393</u>	5,173 <u>5,354</u>	5,122 <u>5,363</u>	5,045 <u>5,282</u>	5,509 <u>5,482</u>	5,429 <u>5,450</u>	5,471 <u>5,440</u>	5,085 <u>5,372</u>
Other	1,341 <u>395</u>	1,520 <u>403</u>	1,589 <u>405</u>	1,649 <u>405</u>	1,638 <u>401</u>	1,760 <u>398</u>	1,591 <u>396</u>	— <u>394</u>	252 <u>390</u>	1,194 <u>395</u>	1,659 <u>392</u>
Total	19,403 <u>19,400</u>	19,794 <u>19,767</u>	19,902 <u>19,864</u>	19,882 <u>19,863</u>	19,688 <u>19,661</u>	19,568 <u>19,522</u>	19,537 <u>19,442</u>	18,899 <u>19,329</u>	19,329 <u>19,162</u>	19,159 <u>19,387</u>	19,387 <u>19,375</u>
Change from previous year 589		391 <u>367</u>	408 <u>97</u>	-20 <u>-1</u>	-194 <u>-202</u>	-120 <u>-139</u>	-31 <u>-80</u>	-638 <u>-113</u>	430 <u>-167</u>	-170 <u>225</u>	228 <u>-12</u>

Source: Terry McHenry, Pajaro Valley Unified School District, Office of the Associate Superintendent, June 24, 2005; the Pajaro Valley Unified School District Facility Master Plan, 2007,2008.



Table 3.12-2 on page 3.12-6 is modified as follows:

Table 3.12-2: Current Capacity of Schools Serving the Planning Area—2008

Grade Level and School Name	Current Enrollment (Students) in 2008	Maximum Capacity (Students)	Current Capacity (Students)	Average Class Size (Students)
Elementary School				
H.A. Hyde	592 607	616	24 9	29
Ann Soldo	596 614	556	40 58	29
MacQuiddy	629 662	602	27 60	29
Current Capacity Total	—	—	43 109	—
Middle School				
Cesar Chavez	565 572	740	175 168	—
Lakeview	624 641	772	148 131	—
E.A. Hall	597 630	728	131 98	—
Current Capacity Total	—	—	454 397	—
High School				
Pajaro Valley	1,563 1,610	2,200	637 590	—
Watsonville High	2,105 2,160	2,464	359 304	—
Current Capacity Total	—	—	996 930	—

Source: PVUSD Facility Master Plan 2008, PVUSD 2009

Table 3.12-8: Proposed Project School Generation on page 3.12-32 is modified as follows:

Table 3.12-8: Proposed Project Student Generation

School Type	Generation Rate	Proposed Project Population ¹	Projected Students Generated by the Project
Elementary	0.321	1,679	539
Middle	0.085		143
High School	0.144 0.114		241 191
Total			923 873

Notes:
¹ Population is based on the Department of Finance rate of 3.73 persons per housing unit multiplied by the 450 units proposed by the proposed project.

Source: PVUSD 2008

The second paragraph on page 3.12-14 and Table 3.12-7: Existing Water Use on page 3.12-15 is modified as follows:

Existing Water Demand-Use

The majority of the City Phase 2 of the planning area is currently in agricultural production as strawberries and apple orchards on Assessor Parcel Number 048-251-09, which is owned by Grimmer Orchards and on Assessor Parcel Numbers 048-231-17 and 048-231-18, which are owned by Israel Zepeda Farms, Inc. The other parcels within the planning area, including the County and the City Phase 1 sites are not in agricultural production (e.g. and/or do not require water). The following provides a description of existing and historical water demand by the main arable parcels within the planning area:

- Lamb property (APN 048-221-09) – This 15.4 acre parcel was planted in strawberries as late as 1987. The size of the plantation was approximately ten acres which would have



- had a water demand of 30 AFY. Currently it is not farmed and no water demand was attributed to it as part of the existing water demand.
- Zepeda Farms (APN 048-231-01) – This 2.2 acre parcel was farmed in strawberries as late as 2003. When farmed the parcel would have a water demand of 6 AFY. Currently it is not farmed and no water demand was attributed as part of the existing water demand.
 - Zepeda Farms (APN 048-231-17) – This 11.8 acre parcel is currently farmed in strawberries. Its water demand is estimated to be 35.4 AFY.
 - Zepeda Farms (APN 048-231-18, portion) – 5.9 acres of this parcel is located in the planning area. Its water demand is estimated to be 17.7 AFY.
 - Grimmer Orchards leased to Zepeda Farms (APN 048-251-09) – Approximately 16.8 acres of this 25.1 acre parcel is planted in strawberries. In the first few months of 2009 the remaining orchard was razed, and in May 2009 the field was being prepared for strawberries. For the EIR water demand is for 16.8 acres of strawberries and 8.3 of orchard for a total water demand estimated to be 58.6 AFY.

~~Water demand for lands owned by Israel Zepeda Farms, Inc. are based on billing data provided by the owner. Water demands for lands owned by Grimmer Orchards were estimated using “Consumptive Use Program + (CUP+), a tool developed by the California Department of Water Resources (DWR), which helps growers and water agencies determine estimates of the irrigation requirements needed to produce a crop. The tool provides an estimated water demand for an agricultural area based on a range of criteria, such as climate, method of irrigation, size of agricultural area, type of crop, etc. The demand provided by this estimation would not take into account farming inefficiencies such as over irrigation or water used for other purposes on a farm, which would be accounted for in the billing data. In addition to the agricultural uses, there are four single-family residences, which that contribute to the water demand within the planning area at the project site. As shown in **Table 3.12-7: Existing Water Use Demand**, the total existing water use within the planning area is approximately ~~164.8~~ 113.0 AFY acre feet per year (AFY).~~



Table 3.12-7: Existing Water Use Demand

Phase 1 (County site)				
Type	Units	Area	Demand Factor	Demand
Single Family Homes (APN 048-211-25)	2	2.3 acres	0.322 AFY/unit ¹	.644 AFY
Fallow Agricultural Land ² (APN 048-221-09)	--	5 acres	0 AFY	0 AFY
Phase 1 (City site)				
Type	Units	Area	Demand Factor	Demand
Single Family Homes (APN 019-226-43 and 019-226-44)	2	.5 acres	0.322 AFY/unit ¹	.644 AFY
Vacant Land (APN 019-236-01 and 019-226-42)	--	1.8 acres	0 AFY	0 AFY
Subtotal				1.29 AFY
Phase 2 (City site)				
Type	Units	Area	Demand Factor	Demand
Strawberries (APN 048-231-17 and 048-231-18)	--	17.7 acres 19.9 acres	3 AFY Drip Irrigation	53.1 AFY 109.9 AFY
Strawberries (APN 048-251-09) ^{3,5}	--	16.8 acres	3 AFY	50.4 AFY
Apples (APN 048-251-09) ^{3,5}	--	8.3 acres 17.6 acres	1 AFY Sprinklers	8.3 AFY 53.5 AFY
Fallow Agricultural Land (048-231-01)	--	2.5 acres	0 AFY	0 AFY
Phase 2 (County site)				
Type	Units	Area	Irrigation Type	Demand
Fallow Agricultural Land ² (APN 048-221-09)	--	5.5 acres 0 acres	0 AFY	0 AFY
Subtotal				111.7 AFY 163.5 AFY
Total Existing Water Demand				112.99 AFY 164.8 AFY

Notes:
¹ Demand factor determined by dividing water deliveries to single family homes (3,868 AFY) by the number of single family accounts (11,920 accounts) for 2005 as shown in Table 11 of the *City of Watsonville UWMP*. This demand factor should represent a conservative water demand estimate since single family homes (low density residential) typically have larger lots (higher landscaping demand) and higher occupancy compared to low, medium, and high density homes based on the *City of Watsonville General Plan*.
² Fallow agricultural land within the planning area is not irrigated.
³ Irrigation estimates for strawberries and orchards provided by the Pajaro Valley Water Management Agency and the Santa Cruz County Farm Bureau
⁴ Water use on the PG&E parcel (APN 048-211-24) is not included in the existing water use as no changes are proposed on this parcel.
⁵ Approximately two thirds of Assessor's Parcel Number 048-251-09 was converted to strawberries two years ago. The remainder of the parcel is in apple orchards (Personal communication with Joe Rodgers, Grimmer Orchards on May 7, 2009).

Source: RBF Consulting 2009 ~~2008~~

The third paragraph on page 3.12-27 is revised as follows:

Project Revenues

At project buildout, project revenues totaling ~~\$990,326~~ approximately \$1.0 million per year would be generated by the proposed project for the ~~City of Watsonville~~ provision of municipal services. This is comprised of property taxes, sales taxes, and other taxes and fees. In current (2009) dollars, the proposed project is projected to increase the total assessed values by about \$122 million at buildout. This would generate and estimated ~~\$241,765~~ \$260,000 per year in property tax revenue for the City of Watsonville after annexation. In the case of the affordable units developed by non-profit agencies, they are often exempted under state law from paying property taxes. To address this deficiency and to ensure the that entire project pays it fair share to support municipal services such as fire and police protection, the City and the County would need to work with the property owners and/or developers to establish a payments in lieu of taxes (often referred to as PILOT) or similar agreement that would equal the ~~City~~ local share of the normal property tax allocation for the affordable units.

The sixth paragraph on page 3.12-27 is revised as follows:



Fiscal Mitigation

At project buildout, the proposed project is projected ~~the~~ to generate \$990,326 approximately \$1.0 million per year in general fund revenues and require about ~~\$1,104,964~~ \$1.1 million in general fund service costs, resulting in an annual funding gap (deficit) of ~~\$114,750~~ approximately \$100,000. This funding gap can be mitigated through several financing mechanisms including increased PILOT payments on the affordable units, special taxes through a Community Facilities District (CFD), or other financing program, which would need to be established between the City and the County. ~~This funding gap would be paid by each unit of the project at an average rate of \$255 at project buildout.~~ Through this mechanism the overall project would pay the full cost for municipal services. In the event that a non-profit developer is exempted from property tax payments, they would be required to cover the local cost of services.

Mitigation Measure 3.12-1 on page 3.12-30 is revised as follows:

Mitigation Measure

MM 3.12-1 To fund a potential gap in funding for municipal services, if deemed necessary the City of Watsonville and the County of Santa Cruz shall work cooperatively to define and implement the appropriate funding mechanism(s) (e.g. a payment-in-lieu of taxes [PILOT] agreement, establishment of a community facilities district [CFD], a Mello Roos, etc.) to ensure that the proposed project pays its fair share to support municipal services.

Table 3.8-10 on page 3.12-17 is changed to Table 3.12-10 by reference.

The first paragraph on 3.12-33 is revised as follows:

In addition, future development within the planning area would be required by law to pay development impact fees at the time of the building permit issuance. The PVUSD currently charges development fees in the amount of \$4.43 per square foot of residential development, \$0.47 for commercial and/or senior housing developments, and \$0.10 per square foot for parking and/or storage. These fees are used by the PVUSD to mitigate impacts associated with long-term operation and maintenance of school facilities. The project applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the PVUSD. Project applicants within the planning area would also be required to pay any additional applicable fees, if the PVUSD implements additional funding measures, including those described in the Facilities Master Plan (refer to the Environmental Setting section). Pursuant to Section 65996(3)(h) of the California Government Code, payment of these fees "is deemed to be full and complete mitigation of impacts of any legislative or adjudicative act, or both, involving but not limited to, the planning, use, or development of real property, or any change in government organization or reorganization." Any environmental impacts resulting from the construction of new schools would be analyzed by the PVUSD prior to construction. Therefore, the increased demand on the PVUSD is considered a **less than significant impact** on school services.

Page 3.12-35 through page 3.12-38 is revised as follows:



Increased Water Demand

Impact 3.12-7: Implementation of the proposed project would result in construction of on-site infrastructure and potable water demand of approximately 107.22 acre feet of water per year. Implementation of the proposed project would convert land currently in agricultural production, rural residential uses, and fallow agricultural land to primarily residential uses. The proposed conversion would result in an overall reduction of water use within the planning area by approximately 57.88 6 AFY in comparison to the historical water use within the planning area. However Phase 1 (County site) would not convert existing agricultural fields to urban use and therefore would result in a short-term increase in water use over existing conditions prior to buildout of the planning area. Future development on Phase 1 (County site) and the remainder of the planning area would be required to pay the City's water connection fee, which is used in part to retrofit water fixtures (e.g. toilets, showerheads, etc.) within the City and would reduce the impact of future development on the groundwater basin, which would ensure that the proposed project would have a less than significant impact on water supply and the groundwater basin.

The majority of the planning area is currently in agricultural production as strawberries and apple orchards on Assessor Parcel Number 048-251-09, which is owned by Grimmer Orchards and on Assessor Parcel Numbers 048-231-17, and 048-231-18, which is owned by Israel Zepeda Farms, Inc. In addition to the agricultural uses within the planning area there are also four existing single family homes, which consume water typical of similar residential uses in the City of Watsonville. The total existing water use within the planning area is approximately ~~164.8~~ 113 acre feet per year as shown in **Table 3.12-7: Existing Water Demand**.

The proposed Specific Plan and PUD would convert the existing agricultural, fallow agricultural, and rural residential uses to urban uses. A water demand analysis was performed by RBF Consulting for the proposed Specific Plan and PUD. As shown in **Table 3.12-10: Projected Water Demand** below, the analysis estimates that buildout of the proposed Specific Plan would generate a water demand of approximately 107.22 acre feet of potable water every year. This demand is approximately ~~57.58~~ 6 AFY less than historic water demand of approximately 113 ~~164.8~~ AFY within the planning area. However, Phase 1 (County site) would result in a water demand of approximately ~~22.90~~ 23 AFY which would result in a demand of approximately ~~22.25~~ AFY over the existing water use within this portion of the planning area.



Table 3.12-10: Projected Water Demand

Land Use ^{1,2}	Net Acreage/ Units	Demand Factors	Ultimate Projected Water Demand
Phase 1			
Residential - High Density (County)	90 units 4.5 acres	0.2 AFY/unit ³	18.0 AFY
Residential - High Density (City)	10 units 1.0 acres	0.2 AFY/unit ³	2.00 AFY
Residential – Low Density (City)	9 units 1.0 acres	0.322 AFY/unit ⁴	2.90 AFY
<i>Subtotal</i>			22.90 AFY
Phase 2			
Park	3.5 acres	1.300 AFY/acre ⁵	4.55 AFY
Stormwater Swales	1.3 acres	1.300 AFY/acre ⁵	1.69 AFY
Residential - High Density (County)	110 units 5.5 acres	0.2 AFY/unit ³	22.0 AFY
Residential – Medium Density (City)	150 units 14.2 acres	0.2 AFY/unit ³	30.00 AFY
Residential – Low Density (City)	81 units 9.0 acres	0.322 AFY/unit ⁴	26.08 AFY
<i>Subtotal</i>			74.32 AFY
Total Project			107.22 AFY
Notes:			
1. Landscaping within the Specific Plan is proposed to be drought tolerant and therefore was not included in the long-term water demand estimates.			
2. The PG&E parcel, riparian area and buffer, freshwater marsh and buffer, and agricultural buffer were not included in the projected long-term water demand as they would not require a long-term water supply.			
3. Demand factors were provided by the City of Watsonville per the Atkinson Lane Water Supply Assessment Memorandum, dated December 16, 2008.			
4. Demand factors were determined by dividing water deliveries to single family homes (3,868 AFY) by the number of family accounts (11,920 accounts) for 2005 as shown in Table 11 in the UWMP. This demand factor should represent a conservative water demand estimate since single family homes (low density residential) typically have larger lots (higher landscaping demand) and higher occupancy compared to low, medium, and high density homes based on the <i>City of Watsonville General Plan</i> .			
5. Demand factors determined by dividing deliveries to landscaping/agricultural accounts in 2005 (405 AF, UWMP) by the developed landscaping/agriculture area in 200 (311 acres in the <i>City of Watsonville General Plan</i>).			

As shown in **Table 3.12-6: Projected Supply and Demand Comparison for Multiple Dry Years (AFY)**, the City is able to meet its water demands through the use of surface water and groundwater. The existing water system has sufficient capacity to provide water to the proposed project and the necessary infrastructure to serve the project site. The City of Watsonville, as the water purveyor determined that the proposed project would not require preparation of a Water Supply Assessment (WSA) as the proposed project would not demand an amount of water equivalent to, or greater than, the amount of water required by a residential development of more than 500 units and would not result in an increase of ten percent or more in the number of public water systems existing service connections.

The PVWMD is continuing to implement the Basin Plan in order to address the long-term impact of the groundwater basin, including completion of several water supply and distribution projects, including 20 miles of a distribution pipeline and a Recycled Water Facility with the City of Watsonville, which will provide 4,000 acre feet of new, drought proof, reliable irrigation supply to the coast. The PVWMD is also currently beginning a rate re-establishment process so that the Basin Plan can be implemented.

Implementation of the proposed project would result in an increase in the amount of impervious surfaces within the planning area. However, since the proposed project would result in a



reduction in the overall amount of water use within the planning area over existing conditions, the proposed project would not substantially deplete groundwater supplies or interfere with groundwater recharge to the extent that it would result in lowering of the groundwater table. In addition, future development on Phase 1 (County site) and the remainder of the planning area would be required to pay the City's groundwater impact fee, which is currently set at \$347.56 per bedroom and is used to retrofit water fixtures (e.g. toilets, showerheads, etc.) within the City. The water retrofit program, which is funded by the groundwater impact fees results in a savings of 748 gallons of water per unit per month, would offset approximately 70 to 100 percent of the water consumption of new homes within the planning area. With implementation of the City's groundwater impact fee, the impact of the proposed project on water supply would be considered **less than significant** under buildout of the proposed Specific Plan and PUD and for implementation of the Phase 1 (County site). Cumulative impacts to the overdraft conditions in the Pajaro Valley groundwater basin are addressed in **Section 4: CEQA Considerations**. Mitigation Measure 4-3 would require that the groundwater impact fee program for the planning area is fully offset by a ratio of 1:2:1.

Page 3.12-33 is modified as follows:

In addition, future development within the planning area would be required by law to pay development impact fees at the time of the building permit issuance. The PVUSD currently charges development fees in the amount of \$4.43 per square foot of residential development, \$0.47 for commercial and/or senior housing developments, and \$0.10 per square foot for parking and/or storage. These fees are used by the PVUSD to mitigate impacts associated with long-term operation and maintenance of school facilities. The project applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the PVUSD. Project applicants within the planning area would also be required to pay any additional applicable fees, if the PVUSD implements additional funding measures, including those described in the Facilities Master Plan (refer to the Environmental Setting section). Pursuant to Section 65996(3)(h) of the California Government Code, payment of these fees "is deemed to be full and complete mitigation of impacts of any legislative or adjudicative act, or both, involving but not limited to, the planning, use, or development of real property, or any change in government organization or reorganization." Any environmental impacts resulting from the construction of new schools would be analyzed by the PVUSD prior to construction. Therefore, the increased demand on the PVUSD is considered a **less than significant impact** on school services.

Impact 3.12-6 on page 3.12-35 is revised as follows:

Increased Wastewater Demand

Impact 3.12-6: The proposed project would generate approximately ~~180,000~~ 90,000 gallons a day of wastewater, increasing the demand on the Watsonville Wastewater Treatment Plant (WWTP). However, the existing service provider has an adequate capacity to meet this demand. Therefore, this would be considered a less than significant impact.

The proposed project would generate up to ~~180,000~~ 90,000 gallons per day of wastewater, which is based on 450 units x ~~400~~ 200 gallons per unit per day). The Watsonville WWTP, which would serve the proposed project, has the capacity to treat 12.1 million gallons per day. However, the WWTP treats on average seven million



gallons of wastewater from residential, commercial and industrial sources. The wastewater contribution of the proposed project to the WWTP would represent approximately ~~1.4~~ 0.7 percent of the total daily wastewater treated at the wastewater treatment plant.

Section 3.13: Transportation and Circulation

Mitigation measure MM 3.13-6 on page 3.13-22 is modified as follows:

Mitigation Measure

MM 3.13-6 Prior to occupancy of the proposed project, project applicants within the planning area shall pay their proportional fair share towards installation of a traffic signal at the Highway 1 NB Ramps/Harkin Slough Road and the Highway 1 SB Ramps/Harkin Slough Road intersections. This signal shall be coordinated/interconnected with the intersection of Harkins Slough Road/Green Valley Road due to the close spacing of these intersections and the potential overflow of queues and the new signal at the southbound ramp terminal. The estimated cost of this improvement is approximately \$520,000 dollars. The proposed project shall pay a fair share contribution of 2.36 percent of the estimated improvement cost, which is \$12,272. The fair share contribution is calculated as the project portion of all future traffic that would be added to the intersection for both peak hours. To fund this improvement, project applicants shall pay applicable traffic impact fees to the City of Watsonville towards construction of this improvement prior to issuance of building permits ~~occupancy of the proposed project~~. The City of Watsonville is updating their fee program and fee ordinance and will adopt the program prior to implementation of the first phase of the proposed project. The City of Watsonville shall coordinate with Caltrans on improvements to this intersection.

Mitigation measure MM 3.13-7 on page 3.13-23 is modified as follows:

Mitigation Measure

MM 3.13-7 Prior to occupancy of the proposed project, project applicants within the planning area shall pay their proportional fair share towards installation of a second through and right-turn lane on the Airport Boulevard approach from Highway 1 and a second left-turn lane on Freedom Boulevard at the Airport Boulevard/Freedom Boulevard intersection. The receiving leg on Airport Boulevard shall be widened in order to accommodate the additional through-lanes. The estimated cost of these improvements is approximately \$1,047,000 dollars. The project would pay a fair share contribution of 7.57 percent of the estimated improvement cost, which is \$79,257. The fair share contribution is calculated as the project portion of all future traffic that would be added to the intersection for both peak hours. The City of Watsonville is updating their fee program and fee ordinance and will adopt the program prior to implementation of the first phase of the proposed project. To fund this improvement, project applicants shall pay applicable traffic impact fees to the City of Watsonville towards construction of this improvement prior to issuance of building permits ~~occupancy of the proposed project~~.



Mitigation measure 3.13-8 on page 3.13-23 is modified as follows:

Mitigation Measure

MM 3.13-8 Prior to occupancy of the proposed project, project applicants within the planning area shall pay their proportional fair share towards installation of two roundabouts (one at the northbound hook ramp terminal and one at the Airport Boulevard/Larkin Valley intersection) at the Highway 1 NB Ramps/Larkin Valley Road Intersection. Since the ramp terminal and the intersection of Airport Boulevard/Larkin Valley Road are closely spaced, improvements shall take both intersection operations into consideration when constructing the proposed improvements. The estimated cost of these improvements is \$1,260,000 dollars. The project would pay a fair share contribution of 8.70 percent of the estimated improvement cost, which is \$109,620. The fair share contribution is calculated as the project portion of all future traffic that would be added to the intersection for both peak hours. To fund this improvement, project applicants shall pay applicable traffic impact fees to the City of Watsonville towards construction of this improvement. The City of Watsonville is updating their fee program and fee ordinance and will adopt the program prior to implementation of the first phase of the proposed project. The City of Watsonville shall coordinate with Caltrans and prepare a Project Study Report for improvements to this intersection.

Mitigation measure 3.13-11 on page 3.13-25 is modified as follows:

Mitigation Measures

MM 3.13-11a The first project applicant on APNs 048-221-09, 048-251-09, 048-231-17, or 048-231-18 within the planning area shall design, fund and implement the southbound left-turn pocket from Freedom Boulevard to Crestview Drive by at least 50-feet. The estimated cost of this improvement is \$20,000 and shall be funded by the first applicant within the planning area. This improvement shall be installed prior to occupancy of any portion of these parcels. The first applicant within the planning area shall fund and implement this improvement and shall be credited against the projects fair share contribution of traffic impact fees by implementing this improvement. A cost share agreement will be developed by both the City and the County to ensure that these improvements are fully implemented

MM 3.13-11b All project applicants shall contribute their fair share toward the installation of traffic improvements in MM 3.13-11a through the collection of TIA fees and/or any other fees through the cost sharing agreement.

Mitigation measure 3.13-12 on page 3.13-27 is modified as follows:

Mitigation Measures

MM 3.13-12a: Prior to occupancy of any project on APNs 048-211-25, 019-226-42, 019-226-44, 019-236-01, or 048-231-01, the proposed project project applicants shall develop and implement a traffic calming plan on: 1) Atkinson Lane, east of Freedom Boulevard and 2) Gardner Avenue, east of Freedom Boulevard 1) Brewington Avenue north of Crestview Drive; 2) Gardner Avenue, east of Freedom Boulevard, and 3) Atkinson lane, east of Freedom Boulevard along the streets that are affected by the proposed project. The estimated cost of this improvement is \$200,000. A cost share agreement will be developed by both the City and the



~~County to ensure that these improvements are fully implemented. The first applicant within the planning area on any of these parcels shall fund and implement this improvement and shall be credited against the projects fair share contribution of traffic impact fees to the City of Watsonville for implementation of this improvement.~~

MM 3.13-12b: Prior to occupancy of any project on APNs 048-221-09, 048-251-09, 048-231-17, or 048-231-18, project applicants shall develop and implement a traffic calming plan on Brewington Avenue north of Crestview Drive along the streets that are affected by the proposed project. The estimated cost of this improvement is \$160,000. A cost share agreement will be developed by both the City and the County to ensure that these improvements are fully implemented.

Section 4.0: CEQA Considerations

The first paragraph on page 4-35 is modified as follows:

- Alternative #1 – No Project/~~No Development~~ Alternative;
- Alternative #2 – Proposed Project without the Wagner ~~Road~~ Avenue Extension;
- Alternative #3 – Reduced Project Density (Six to Nine Units Per Acre); and
- Alternative #4 – Alternative Project Design

Page 4-26, No Project Alternative, 5th sentence is revised as follows:

The remainder of the planning area within Phase 2 (City site ~~County site~~) is designated Agriculture Commercial (CA) in accordance with the County of Santa Cruz County Code.

The last sentence in the first paragraph in Section 4.6.4 on Page 4-33 is revised as follows:

Alternative #3 – Reduced Density (Six to Nine Units per Acre) would reduce the proposed residential density within the planning area to six to nine units per acre. This level of residential development would be similar to the existing residential development densities that currently surround the planning area and would include a maximum of 317 residential units within the planning area. Due to the reduced density of this alternative, the residential units under this alternative would not ~~be~~ likely be able to accommodate a range of income levels for affordable housing.

Page 4-20 through 4-20 of Section 4.0: CEQA Considerations is revised as follows:

Water Supply

The water supply for the City of Watsonville and surrounding unincorporated Santa Cruz County is drawn solely from surface water and the Pajaro Valley Groundwater basin, which as a whole is currently experiencing overdraft conditions and seawater intrusion. Implementation of the proposed project, in combination with foreseeable future growth would increase the cumulative demand for groundwater resources. The City of Watsonville, as the water purveyor for the proposed project, is able to meet its water demands through the use of surface water and groundwater. The existing water system has sufficient capacity to provide water to the proposed project and the necessary infrastructure to serve the proposed project. The PVWMD is continuing to implement their Basin Plan in order to address the long-term impact of the



groundwater basin, including completion of several water supply and distribution projects, including 20 miles of a distribution pipeline and a Recycled Water Facility with the City of Watsonville, which will provide 4,000 acre feet of new, drought proof, reliable irrigation supply to the coast. The PVWMD is also currently beginning a rate re-establishment process so that the Basin Plan can be implemented.

Conclusion: Implementation of the proposed project would result in a significant increase in the amount of impervious surfaces at the project site. However, since the proposed project would result in a reduction in the amount of water use within the planning area over existing conditions, the proposed project would not substantially contribute to a depletion of groundwater supplies or interfere with groundwater recharge to the extent that it would result in lowering of the groundwater table.

In addition, future development on Phase 1 (County site) and the remainder of the planning area would be required to pay the City's groundwater impact fee, which is currently set at \$347.56 per bedroom and is used to retrofit water fixtures (e.g. toilets, showerheads, etc.) within the City. The water retrofit program, which is funded by the groundwater impact fees results in a savings of 748 gallons of water per month, would offset approximately 70 to 100 percent of the water consumption of new homes within the planning area and would reduce future development's impact on the groundwater basin. However, the proposed project in combination with reasonably foreseeable future growth would result in an incremental increase of water use that would continue to contribute to the depletion of water supply within the Pajaro Valley Groundwater basin, which is currently in overdraft condition. The following mitigation measure would ensure that the proposed project does not contribute to cumulative impacts to the groundwater basin. This would be considered a **significant and unavoidable cumulative impact.**

Mitigation Measure

MM 4-3 The City's groundwater impact fee program for the project area shall be modified to ensure that project water demand is fully offset (at a ratio of 1.2:1) either by comparing pre-development water demand to post development water demand or by participating in a water offset program with fixture and landscaping replacements in the City's water service area or, a combination of both. The project applicants shall be responsible for working with the City, or their designee, in developing an offset program that achieves the water saving objectives and shall bear the costs associated with the offset program including any additional replacement of plumbing fixtures and landscaping retrofits identified in the City water service area to meet the stated goals. Pre-development water demand shall be accounted for on a per parcel basis.

The second paragraph on page 4-24 is modified as follows:

Mitigation measures **MM 3.153-5** through **MM 3.13-8** that are incorporated herein under project conditions that would mitigate the cumulative impacts to the East Lake Avenue/Holohan Road; Airport Boulevard/Freedom Boulevard, Highway 1 NB and SB Ramps/Harkins Slough Road, and Highway 1 NB Ramps/Larkin Valley Road intersections to a less than significant level.



Mitigation measure MM 4-1 on page 4-24 is modified as follows:

Mitigation Measure

MM 4-1 Project applicants within the planning area shall pay their proportionate fair share of \$81,250 towards installation of a traffic signal at the East Lake Avenue/Wagner Avenue intersection prior to occupancy of the proposed project. The estimated cost of this improvement is \$325,000. The City of Watsonville is updating their fee program and fee ordinance and will adopt the program prior issuance of a building permit. ~~first phase of the proposed project.~~ The City of Watsonville shall coordinate with Caltrans to approve design and installation of the signal.

Mitigation measure MM 4-2 on page 4-24 is modified as follows:

MM 4-2: Project applicants within the planning area shall pay their proportionate fair share contribution towards a traffic calming plan on Brewington Avenue, south of Crestview Drive. The estimated cost of this improvement is \$500,000. A cost share program will be developed by both the City and the County to ensure that these improvements are fully implemented. ~~The City of Watsonville is updating their fee program and will adopt the program prior to implementation of the first phase of the proposed project.~~