Agenda Report

MEETING DATE: **Meeting Date**

TO: **Planning Commission**

FROM: **COMMUNITY DEVELOPMENT DIRECTOR MERRIAM**
PRINCIPAL PLANNER, JUSTIN MEEK, AICP

THROUGH: **CITY MANAGER MENDEZ**

SUBJECT: **PLANNING COMMISSION RECOMMENDATION TO CITY COUNCIL FOR ADOPTION OF A MITIGATED NEGATIVE DECLARATION AND APPROVAL OF A PLANNED DEVELOPMENT OVERLAY DISTRICT, SPECIFIC DEVELOPMENT PLAN AND SPECIAL USE PERMIT WITH DESIGN REVIEW TO ALLOW THE CONSTRUCTION OF 1,072 SELF-STORAGE UNITS AND MANAGER'S APARTMENT ON A 4.4± ACRE SITE LOCATED AT 70 NIELSON STREET (APN 015-111-49)**

RECOMMENDED ACTION

Staff recommends that the Planning Commission (a) adopt a Resolution recommending that the City Council adopt a Mitigated Negative Declaration and (b) adopt a Resolution recommending that the City Council approve a Planned Development Overlay District, Specific Development Plan and Special Use Permit with Design Review to allow the construction of the 1,072 self-storage units and manager's apartment on a 4.4± acre site located at 70 Nielson Street (APN 015-111-49).

BASICE PROJECT DATA

Application: 1656
Location: 70 Nielson Street
APN: 015-111-49
Lot Size: 4.4± acre

Project: The project proposes to construct 1,072 self-storage units and one two-story manager's office with an apartment above on a 4.4± acre site located at 70 Nielson Street. Overall development includes installing new landscaping, fencing, stormwater facilities, trash enclosures, and signage. The proposed development includes new onsite circulation consisting of drive aisles ranging in width from 25'-0" to 32'-0" and 22 parking stalls (located mainly along the drive aisles). The applicant has requested the establishment of a PD Overlay District

to allow for parking stall reductions and a Special Use Permit to allow a mini-warehouse facility within the existing IP Zoning District. A Design Review and Specific Development Plan are also required for the project.

General Plan: Industrial
Zoning: Industrial Park (IP)
Surrounding: Industrial in the IP Zoning District (north & east), Public/Quasi-Public in the Institutional (N) Zoning District (south), and Transportation, Communication, and Utilities in the Public Facilities (PF) Zoning District (west)

Existing Use: Parking lot
Proposed: Mini-storage facility and manager's unit
Surrounding: Light industrial, hospital, Municipal Airport

Flood Zone: The project site is not within a 100-year floodplain.

Airport Zones: The project is located within Airport Safety Zones 2, 5, and 6.

CEQA Review: An Initial Study/Mitigated Negative Declaration has been prepared for this project, in accordance with the provisions of the California Environmental Quality Act (CEQA). The public comment period ended August 12, 2022, and was extended to August 26, 2022, to allow receipt of a comment letter by the California Department of Fish and Wildlife.

Applicant: Ed Boersma, 5 Meadowbrook Lane, Danville, CA 94526
Property Owner: Ted Crocker, 9502 Alder Court, Carmel, CA 93923

BACKGROUND

On January 15, 2021, the City provided Ed Boersma a pre-application letter (No.857) for the construction of 1,072 self-storage units on a 4.4± acre site located at 70 Nielson Street.

On May 25, 2021, Ed Boersma, applicant, applied for a Planned Development and Special Use Permit/Specific Development Plan with Design Review and Environmental review to allow construction of the mini-warehouse facility (Crocker's Lockers).

On June 8, 2021, the project was referred to the Watsonville Airport Advisory Committee.

On July 16, 2021, Staff provided the applicant an incomplete letter outlining issues that needed to be addressed for moving forward with the project.

On October 12, 2021, the applicant submitted revised plans in response to the incomplete letter.

On November 12, 2021, the application was deemed complete.

On December 6, 2021, the applicant entered into a reimbursement agreement with the City of Watsonville for preparation of an Initial Study/Mitigated Negative Declaration for the project. The draft Initial Study and proposed Mitigated Negative Declaration were available for a 30-day review period beginning July 13, 2022 and ending August 12, 2022; requested by the California Department of Fish and Wildlife, the review period was extended to August 26, 2022.

PROCESS

Planned Development Overlay District and Special Use Permit

The purpose of the Planned Development (PD) Overlay District is to provide a technique to foster development plans for eligible lands which serve public objectives more fully than development plans permitted under conventional zoning regulations; and to establish criteria for identifying those parcels of land which are eligible for the special procedures available for creative development plans requiring special review and approval procedures.

The PD District is an "overlay" or "combining" district which is placed over or covers an existing base residential, commercial, or industrial districts.[1] The PD Overlay District shall be designated by the use of the letters PD following the underlying zoning designation. The regulations of the underlying district may be superseded, modified or amended upon approval of the planned development as provided in Part 25 of WMC Chapter 14-16. A PD Overlay District may provide for modifications on district regulations, where appropriate, in areas such as building setbacks, building height, lot area, parking, and use. WMC § 14-16.2503.

The Planning Commission shall review the request for the establishment of a PD Overlay District and make a recommendation to the City Council, which shall review the matter at a public hearing and establish the PD Overlay District by ordinance. After adoption of a PD Overlay District, a Special Use Permit issued by the City Council shall be required for any and all uses in a PD Overlay District. An application for a Special Use Permit in a PD Overlay District shall include and be accompanied by a Specific Development Plan which, if approved by the City Council, shall become a part of the Use Permit. The recommendation by the Planning Commission, adoption by Ordinance of a PD Overlay District by the City Council, and issuance of a Special Use Permit by the City Council after adoption of a PD Overlay District shall in each instance be passed by at least five affirmative votes.

Before recommending or approving any PD Overlay District and related development plan, the Planning Commission and the City Council shall make the findings set forth in WMC Section 14-16.2508.

The purpose of the Special Use Permit is to ensure the proper integration of uses which, because of their special nature, may be suitable only in certain locations or zoning districts or only if such uses are arranged or designed in a particular manner. WMC § 14-12.500. This special review shall be for the purpose of determining that the proposed use is, and will continue to be, compatible with surrounding, existing, or planned uses; and for the further purpose of

[1] See American Planning Association "Property Topics and Concepts" website for more information on overlay zoning, https://www.planning.org/divisions/planningandlaw/propertytopics.htm#Overlay.

establishing such special conditions as may be necessary to ensure the harmonious integration and compatibility of uses in the neighborhood and with the surrounding area. WMC § 14-12.501

Design Review

All new construction, exterior remodeling, additions, or changes in use requiring additional parking, which involve structures used for multi-family residential, commercial, industrial or public purpose are subject to Design Review. WMC § 14-12.400. No Building Permit shall be issued for a development subject to Design Review until a Design Review Permit has been approved in accordance with WMC Chapter 14-12 and conditions of approval have been met.

When considering applications for Design Review, the Planning Commission shall evaluate the impact of the Design Review on and its compatibility with surrounding properties and neighborhoods to ensure the appropriateness of the development and make the findings set forth in WMC Section 14-12.403. The findings for a Design Review Permit are substantially similar to those required for Special Use Permits.

Environmental Review

The California Environmental Quality Act requires local and state governments to consider the potential environmental effects of a project before making a decision on it. CEQA's purpose is to disclose the potential impacts of a project and suggest methods to minimize those impacts so that decision-makers will have full information upon which to base their decision. Below is a summary of key provisions for the consideration and adoption of a negative declaration or mitigated negative for a project.

1. **Consideration prior to approval.** Prior to approving a project, the decision-making body shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process.

2. **Standard.** The decision-making body can adopt the negative declaration or mitigated negative declaration only if it finds there is no substantial evidence that the project will have a significant effect on the environment.

3. **The Record.** The lead agency is to specify the location of the documents and materials constituting the record.

4. **Mitigation Monitoring and Reporting.** When adopting a mitigated negative declaration, the lead agency must also adopt a program for reporting or monitoring the changes it has required or made conditional on approval.

STANDARD OF REVIEW & APPEAL PROCESS

Whether a particular decision is adjudicative or legislative determines the requirements to support the decision. Legislative decisions involve the adoption of broad policies applicable to many situations (for example, general plan and zoning amendments). Legislative decisions generally require few, if any, findings.

Adjudicative (or "quasi-judicial") decisions, on the other hand, are not policy decisions. Adjudicative/quasi-judicial decisions apply already adopted policies or standards to individual cases, such as a variance or conditional use permit application. Adjudicative/quasi-judicial decisions are based on evidence and must always be supported by findings.[2]

The proposed Planned Development is a legislative decision as it involves amending Zoning Map with a PD Overlay District for the site. This legislative decision requires certain findings, as set forth in WMC Section 14-12.708 and WMC Section 14-16.2508.

The remaining decisions before the Planning Commission—a Special Use Permit/Specific Development Plan with Design Review—are adjudicative/quasi-judicial decisions and require findings, either for denial, or as recommended, for approval and be supported by substantial evidence. *Toigo v Town of Ross* (1998) 70 Cal App 4th 309.

If the Planning Commission's decision is appealed, the City Council will consider whether the action taken by the Planning Commission was erroneously taken and may sustain, modify or overrule Planning Commission's action. In order for the Planning Commission's decision to be overturned on appeal, the City Council must find that the action taken by the Planning Commission was erroneous and inconsistent with the intent of the Zoning District regulations that regulate the proposed action. WMC § 14-10.1106.

A lawsuit is required to challenge a Council's decision. A reviewing court will consider whether an adjudicative/quasi-judicial decision by the Council was supported by adequate findings. Courts scrutinize adjudicative/quasi-judicial decisions closely. An action may be overturned if the City (1) exceeded its authority, (2) failed to provide a fair hearing, or (3) or made a decision not supported by substantial evidence (also called "a prejudicial abuse of discretion").

Another important difference between legislative and adjudicative/quasi-judicial decisions on appeal is the substantial evidence standard: in weighing evidence of what happened at the Council meeting, courts go beyond whether a decision was "reasonable" (the legislative standard). Courts reviewing adjudicative/quasi-judicial decisions look to make sure the decision is supported by substantial evidence. Denied applicants argue that there is no substantial evidence to support the decision. Cities usually assert there is substantial evidence to support the decision and rely on (1) the written words in the staff findings, (2) the statements and letters presented at the hearing, and (3) the words of the Planning Commission or Council.

DISCUSSION

Existing Site

The 4.4± acre project site is roughly rectangular-shaped and developed as a parking lot with landscaping and two driveways off Nielson Street. The parking lot is used and gates restrict access. The site is mostly flat, with a moderate slope in a southerly/southwesterly direction. Curb, gutter, sidewalk, and mature landscaping with ten- to 50-foot tall trees surround the site

[2] Quasi-judicial decisions require the decision-making body to take evidence and use its judgment to make factual as well as legal determinations about whether a particular property or project meets the standards established by the land use ordinance.

along Nielson Street and Airport Boulevard. The lot contains landscaped medians with lighting, including 176 trees; three are located just outside the property line at the northwest side. Tree types include pine, eucalyptus, cedar, and Chinese pistache.

The site is nearby to the Watsonville Municipal Airport and is within three Airport Safety Zones: the Inner Approach/Departure (Zone 2), Sideline (Zone 5), and Traffic Pattern (Zone 6), as defined in the California Airport Land Use Planning Handbook (Caltrans, 2011) for the Airport. The area is developed with a mix of commercial, industrial, and quasi-public uses. Surrounding uses include an existing construction yard to the north (595 Airport Boulevard), light industrial to the east (26 through 42 Hangar Way), Watsonville Community Hospital to the south (75 Nielson Street), and Watsonville Municipal Airport to the west.

FIGURE 1 Aerial view of the project site and surrounding area
Source: Watsonville GIS Viewer, 2021

Nielson Street is a local street with a speed limit of 25 miles per hour (mph). It is approximately 40 feet wide with one travel lane in each direction; on-street parking is generally permitted on both sides of the street. Airport Boulevard to the west, has a posted speed limit of 45 mph and is approximately 60 feet wide with two travel lanes in each direction. Sidewalks exist on both sides of Nielson Street and Airport Boulevard.

Proposed Project

The project involves new construction of a self-storage facility with 1,072 storage units in 149,796± square feet of building area and would be staffed one full-time employee. The project consists of seven (7) new, detached structures, Buildings A through F and a manager's building. Three of the proposed structures would be two stories and four structures would be one story. See table 1 below for a breakdown of the number of stories, building size, and number of storage units by building.

TABLE 1 Building Information

Building	# of Stories	Size (sf)	# of Units
A	1	13,717	86
B	1	13,700	84
C	1	13,200	84
D	2	59,400	453
E	1	4,800	12
F	2	42,580	353
Manager's Bldg.	2	2,360	N/A

Buildings A, B, E, F, and the manager's building would be located along the perimeter of the project site. Buildings C and D would be centrally located and within the interior of the subject property. Buildings A, B and part of E would be along street frontages.

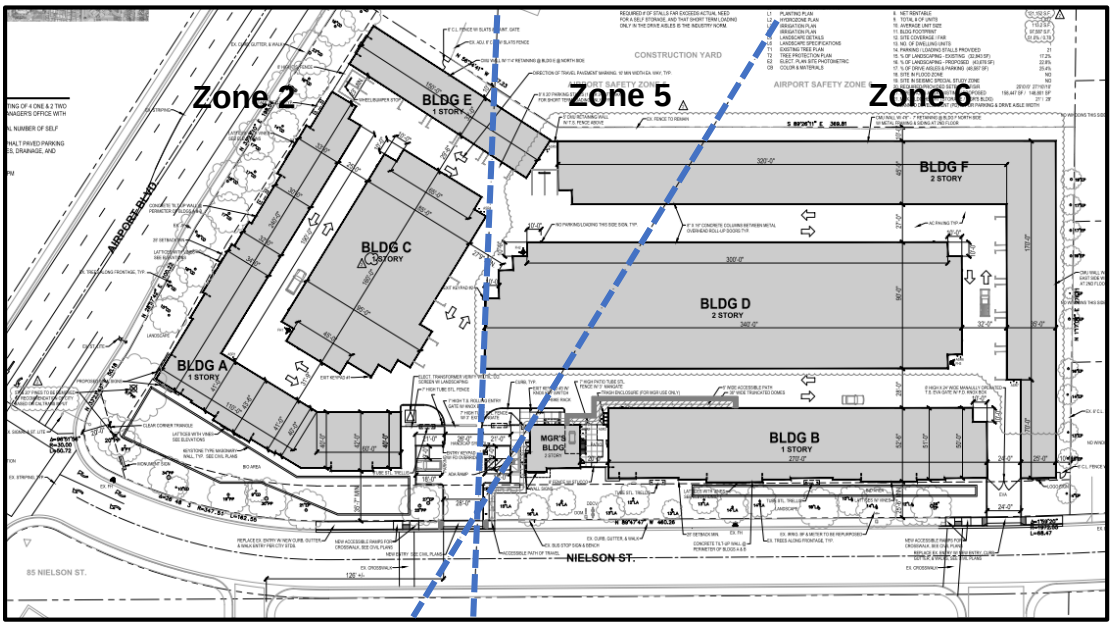

FIGURE 2 Airport Safety Zones overlain on the proposed Site Plan
Source: Watsonville GIS View, 2021

As shown on Figure 2, Buildings A, C and a portion of E would be located within Airport Safety Zone 2. As indicated in Table 1, these structures will be one story in height. Portions of Buildings D, E and F would be located within Airport Safety Zone 5. Building B, the manager's building and the remaining portions of Buildings D and F would be located within Airport Safety Zone 6. Aside from Building B, these remaining buildings are proposed to be two stories in height.

The following is a detailed description of each building:

- **Building A.** Building A would be a one-story, L-shaped structure located at the southwest corner of the project site at Airport Boulevard and Nielson Street. Building A would contain 86 storage units in a building approximately 12 feet in height with architectural façade elements facing the street ranging in height between 14'-6" to 18'-6". The portion of the structure fronting Airport Boulevard would be approximately 33'-0" wide by 240'-0"

long. The portion of the structure fronting Nielson Street would be approximately 40'-0" wide by 170'-0" long. The building would be set back approximately 25 feet from Airport Boulevard and a minimum of 35 feet from Nielson Street, widening to a larger setback at the southwest corner of the project site, to include a bioretention area and monument sign. All structures would incorporate façade step backs along portions of each structure that face street frontages. The project includes a variety of materials and finishes including 7' tall tube steel fencing, a concrete tilt-up wall, stucco siding, a steel trellis, and metal lattice for vines. Finishes are comprised of sand finish stucco siding, corrugated metal, faux wood tile, steel awnings, cultured stone and tube steel trellises and decorative lighting. Colors include light tan, charcoal gray, and sand.

- **Building B.** Building B would be a one-story structure, located east of Building A, front along Nielson Street, and contain 84 storage units in a building approximately 12 feet in height with architectural façade elements facing the street ranging in height between 14'-0" and 16'-6". The structure would be approximately 50'-0" wide by 270'-0" long and set back approximately 25 feet from Nielson Street. The structure would incorporate façade step backs along portions of the structure that face the street and include a variety of finishes including decorative lighting, sand finish stucco siding, corrugated metal, faux wood tile, steel awnings, tube steel trellises, and 7' tube steel fencing.

- **Building C.** Building C would be a one-story, centrally located structure, approximately 85'-0" wide by 160'-0" long and contain 84 storage units. The maximum height would be 12'-0". (Please note that the applicant elected to reduce the height of Building C from two stories to one to ensure that any structure within Airport Safety Zone 2 is only one level.)

- **Building D.** Building D would be a two-story, centrally located structure, approximately 90'-0" wide by 340'-0" long and contain 190 storage units on the first level and 263 storage units on the second level for a total of 453 storage units. The maximum height would be 23'-0".

- **Building E.** Building E would be a one-story structure, set back 10 feet from the north property line and north of Building A. The western façade of Building E would front along Airport Boulevard. The structure would be 32'-0" wide by 150'-0" long, contain 12 storage units and have a maximum height of 10'-2¼" next to a wall 13'-9" tall.

- **Building F.** Building F would be a two-story, L-shaped structure located at the northeast corner of the project site. Building F would contain 233 storage units on the first level and 120 storage units on the second level for a total of 353 storage unites. The maximum height would be 22'-3".

- **Manager's Building.** The two-story Manager's Building would be located east of the primary entrance/exit, fronting along Nielson Street and would include a fenced patio area. The structure would be a maximum of 29'-0" tall, the tallest structure on the project site, and setback from Nielson Street approximately 34 feet. The first floor of the Manager's Building would include a public entry area, reception/waiting area, office, back office, restroom, a one-car garage and interior stairs to the second level. The second

floor would be the residential quarters for the storage facility manager and include a foyer, kitchen, living room, den, bedroom, bathroom and entry to the residence from an exterior stair along the east wall of the structure.

Other key project components are as follows:

- **Airport Land Use Compatibility.** Buildings A and C would be fully contained in Airport Safety Zone 2 which is located on the western portion of the site. The proposed buildings are approximately 12 feet in height and architectural elements facing the street at the maximum height are 18'-6" tall. Building E would run along the northwestern border of the site and straddle Airport Safety Zones 2 and 5. Building D would be centrally located on site and be in Airport Safety Zones 5 and 6. Building F frames Building D and runs along the northern and eastern border of the site, also in Safety Zones 5 and 6. Building B would run along the southern portion of the site and be entirely in Airport Safety Zone 6. Wall heights in Safety Zones 5 and 6 would range between 11' and 23'-0". Zone 6 would also include the manager's unit, at the southern portion of the lot; wall heights for the manager's unit would range from 23' to 29'.

- **Access and Traffic Safety**. Two driveways off Nielson Street would access the storage units and vehicle parking spaces. The western driveway would serve as the main entry into the facility. This driveway would be relocated approximately 50 feet to the east of its existing location and reconstructed at 28 feet wide. In its new location, the main entry would be located approximately 300 feet east of the crosswalk on the east leg of the intersection with Airport Boulevard. The driveway on the eastern portion of the lot would be gated and would provide as a secondary entrance for people with storage units. The driveway at the eastern portion of Nielson Street would be replaced with a new driveway 24 feet wide. Emergency vehicles would enter through the main vehicle entry and exit via the secondary driveway (Attachment 2, sheet 7).

- **Parking and Circulation.** New onsite circulation would consist of drive aisles ranging in width from 25 to 32 feet to provide access to the storage units and 22 parking spaces, located throughout the site and along the drive aisles. One disabled parking space would be provided in front of the office and another parking space would be provided within the garage of the manager's building for the onsite manager.

- **Drainage and Runoff.** The project would create and/or replace more than 22,500 square feet of impervious surfaces to the project site. The proposed drainage facilities and post-construction features include dividing the site into two drainage management areas (DMAs) and directing runoff from impervious surfaces (e.g., roof, hardscape, parking areas) to bioretention basins. The project would result in 148,555± square feet (3.41 acres) of impervious surfaces, a 9,892± square-foot net reduction from existing conditions. Stormwater runoff would be treated by two aboveground bioretention basins at the southwest and southeast portions of the site. These basins have a combined area of 6,680± square feet and would be incorporated into the landscaping along Nielson Street (Attachment 2, sheet C4).

- **Utilities.** The proposed project would connect to existing water, wastewater, storm drainage, electricity, and telecommunication infrastructure. Water service, wastewater treatment, stormwater management, and solid waste collection are provided by the City.

- **Trash Enclosure.** A 24-square-foot trash enclosure would be located east of the Manager's Building.

- **Lighting.** The project would include wall mounted lights, as well as a single 20-foot-tall light standard at the western driveway. Lighting fixtures include one pole-mounted light fixture at the main entrance, 66 interior facing LED wall lights, six wall sconces at the manager's building, four exterior facing LED downlights, and four downward casting security lights. The Photometric Site Plan provides the anticipated light intensity (Attachment 2, sheet E2).

- **Landscaping.** Additional site improvements would include a variety of low to medium, water use shrubs and ground cover along the site's perimeter. Eight fern pine trees would be planted along the northern perimeter and six dwarf apple trees will be planted near the eastern entrance. Low water use shrubs and ground cover would be planted along the perimeter of the site, with an emphasis on the east and southern portions along Airport Boulevard and Nielson Street. Two bioretention basis will be incorporated into the landscaped areas at the southeast and southwest portions of the site, and include plant species such as Juncus patens and Chondropetalum tectorum (Attachment 2, sheet L1).

- **Fencing.** Screening the north and east facing exterior would be 10- to 13-foot concrete walls framing buildings E and F. A small portion at the northern perimeter would consist of a 7-foot concrete wall with 4' tube steel fencing on top. The south and west facing exteriors would include 8-foot tube steel fencing at the ends of buildings A and B. A 7-foot-tall tube steel fence would be constructed at the main entrance (Attachment 2, sheet 3A).

- **Signage.** The project includes a 10' long by 6'-9" tall, including the base, monument sign, located at the corner of Airport Boulevard and Nielson Street, at the southwest corner of the project site. The base would be constructed of cast-in-place concrete with faux stone veneer and the sign with clear anodized aluminum. Key features of the monument sign include a faux stone base to tie into the wainscot on the buildings with acrylic letters that are pushed through cut outs so they stand proud of the face. The monument sign is designed to avoid the glare of light from a typical translucent face, and instead to create a subtle halo effect around the letters as light is emitted through the translucent sides or edges of the script (Attachment 2, sheet 6).

- **Tree Removal & Retention.** The project would result in the removal 125± trees. Approximately 51 trees would be retained, primarily in the landscaped area bordering Airport Boulevard and Nielson Street. No trees would be located within a public right-of-way (Attachment 2, sheet T1).

- **Cut & Fill.** The project proposes approximately 22,383 cubic yards (CY) of cut, and 331 CY of fill (Attachment 2, sheet C2). The excess 22,052 CY of cut would be hauled offsite to be used at another local site. The grading, cuts, and fills require the issuance of a grading permit.

General Plan/Zoning

The project site is designated Industrial on the General Plan Land Use Diagram and is within the IP Zoning District. The intent of this land use designation is to serve the industrial needs of the community and the purpose of the IP Zoning District is to provide a separate and exclusive district for light, non-nuisance industry, business, service, and research work; to promote an industrial business, service, and research area which is not dependent on rail transport and not requiring outdoor storage; to foster and encourage the development of specialized manufacturing, business, service, and research institutions; to promote and protect design and landscape qualities in the district; to minimize traffic congestion through the provision of adequate off-street parking and loading; and to protect the district and surrounding area and any adjacent residential or commercial property from noise, illumination, glare, and unsightliness, including outdoor storage, odors, dust, dirt, litter, smoke, fumes, vibration, heat, fire, and other hazards. WMC § 14-16.500. General categories of allowed uses include wholesale sales, heavy commercial, construction and trade shops, general manufacturing, food processing, and related services, businesses and uses. A mini-warehouse or self-storage facility is allowed conditionally with issuance of a Special Use Permit.

The applicant is requesting the establishment of a PD Overlay District to allow for a reduction in the required number of parking stalls. The project proposes 22 total parking stalls, a significant decrease from the 152 total parking stalls required for mini-warehouse use (DLU 114) on the site per WMC § 14-17.401(b). With the establishment of a PD Overlay District, the site's zoning designation would change from Industrial Park to Industrial Park/Planned Development (IP to IP/PD).

The purpose of the Planned Development designation is to provide a technique to foster development plans for eligible lands that serve public objectives more fully than development plans permitted under conventional zoning regulations. The strict application of the minimum parking requirement for a mini-warehouse type use would result in an oversupply of parking and limit the number of storage units that could be provided onsite. To allow for the proposed number of storage units, the Planned Development process enables the City to modify the parking standard for this type of development. As further discussed in this report, mini-warehouse facilities provide a valuable service for the community and is complementary with existing land uses nearby.

Land Use Compatibility

The site is located within an industrial area, bordered on the north and east by industrial properties (zoned IP: Industrial Park) and by the Watsonville Community Hospital (zoned N: Institutional) to the south. Across Airport Boulevard is the Watsonville Municipal Airport (zoned PF: Public Facilities). A min-warehouse facility is a compatible use with the existing light manufacturing buildings to the east and north and the Watsonville Community Hospital to the south. The proposed mini-warehouse facility would operate in a manner consistent with other

Industrial Park uses. Residential development are not located directly adjacent or in close proximity to the site. The nearest residential units are along Airport Boulevard at Colonial Manor Mobile Home Park (0.3 miles northeast of the site) and single-family residential homes along Anna Street (0.34 miles southeast of the site).

General Plan Consistency

The proposed project is consistent with the following General Plan goals, policies and implementation measures concerning land use compatibility, design, site improvement, and airport compatibility and public safety.

- **Policy 4.I: Land Use Regulation** – The City shall regulate future urban development to be consistent with the goals of this General Plan.

- **Implementation Measures 4.I.4: Environmental Review** – The City shall use the environmental review process to ensure that project mitigations sustain and implement the policies of this General Plan, reduce environmental impacts to acceptable levels, and make adequate provisions for public safety.

- **Goal 5.1: Visual Resources** – Preserve and enhance the built and natural visual resources within Watsonville.

- **Goal 5.2: Community Appearance** – Blend new development with recognized values of community appearance and scenic qualities, and ensure that new development enhances, rather than detracts from, its surroundings.

- **Goal 5.6: Urban Design** – Achieve high standards of street, site and building design that are both efficient, and aesthetically pleasing.

- **Policy 5.A: Project Design Review** – The preservation of visual resources shall be accomplished through the design review process.

- **Policy 5.B: Design Consistency** – The City shall review new development proposals to encourage high standards of urban design and to ensure that elements of architectural design and site orientation do not degrade or conflict with the appearance of existing structures.

- **Implementation Measure 5.B.3: Enhancement** – The City shall utilize the development standards, zoning ordinance regulations for each district, and the design review guidelines to ensure that new development is an asset to the existing neighborhood and community with regard to parking, landscaping, open space, and project design.

- **Goal 10.6: Aviation Facilities** – Maintain, protect, and improve the facilities and services of the Watsonville Municipal Airport as part of the regional transportation network.

- **Policy 10.Q: Aviation Facilities** – As the only general aviation airport in Santa Cruz County, the Watsonville Airport shall be protected from adjacent development which is

incompatible with existing and future services as outlined in the Airport master Plan and Regional Airport System Plan.

- **Implementation Measure 10.Q.3: State Guidelines** – The City shall use the State's guidelines to review and manage development within the airport's area of influence.

- **Goal 12.1: Land Use Safety** – Plan for and regulate the uses of land in order to provide a pattern of urban development that will minimize exposure to hazards from either natural or human-related causes.

- **Policy 12.A: Environmental and Public Safety** – The City shall plan for and maintain development standards that minimize risk to human lives and property resulting from environmental and man-cause hazards. The City shall protect neighboring residential development from the immediate threats of potentially hazardous industrial or agricultural materials and airport hazards through careful land use planning.

- **Implementation Measure 12.A.1: Airport Compatibility** – The City shall use its development review process to ensure that proposals within the Airport Operations Impact Area are carefully analyzed to prevent and minimize potential hazards. Projects shall be consistent with the city and state's guidelines for buildings and land uses compatible with airports.

- **Policy 12.M: Noise** – The City shall utilize land use regulations and enforcement to ensure that noise levels in developed areas are kept at acceptable levels, and that future noise-sensitive land uses are protected from noise that is harmful.

- **Implementation Measure 12.M.1: Traffic Noise** – The City shall enforce provisions of the California Vehicle Code and local ordinances to reduce vehicular noise intrusion in residential areas and near other noise sensitive land uses such as schools and hospitals.

The project would provide a mini-storage facility on land designated for light industrial use. A mini-warehouse facility is a compatible use with the surrounding low-intensity, light manufacturing buildings and hospital. The project will consist of seven, one-and-two story buildings totaling 149,796 square feet of floor area. These buildings range from 10'-2¼" to 21'-3" feet in height, and similar in height and scale to adjacent structures which generally consist of two-story buildings on 20,000 to 35,000 square-foot lots. The proposed manager's unit would be 29' tall. The buildings would have a simple contemporary design and provide new vegetative screening along Neilson Street and Airport Boulevard. As further discussed under Access and Traffic Safety, the proposed project would not generate traffic in such an amount that would overload the street network outside the development.

The project is not consistent with all objectives in the General Plan, especially those concerning job creation and maximizing the economic opportunities for a site. In particular, the project is not consistent with General Plan Goal 4.4 since the project would provide only one job and not help the City achieve economic diversity and a better jobs/housing balance. While not consistent with this goal, the development potential for the project site is limited by its proximity to the Airport.

The Caltrans Division of Aeronautics Handbook establishes criteria for appropriate height, use, noise, safety, density, and intensity for Airport Safety Zones to ensure future development is compatible with airports. As detailed further in the Airport Land Use Compatibility discussion on page 16, the project would meet all established criteria set forth in the Handbook. Additionally, the project is consistent with all development regulations in the IP Zoning District except for parking, and the applicant has requested a reduction through its application for a PD Overlay District.

Based on a review of the General Plan's goals and policies, the proposed project is in harmony with the overall intent of the City's General Plan goals and policies, including those pertaining to land use compatibility, design, site improvement, and airport compatibility and public safety. It is within the Planning Commission's purview to decide if the proposed project is consistent or inconsistent with any applicable City goals or policies. Based on the analysis presented above, however, the project meets the intent of the City's General Plan goals and policies.

Zoning Consistency

The Zoning Ordinance implements the General Plan, regulates the future growth of the City, and promotes orderly community development.[3] It includes the Zoning Map, which sets forth the designations, locations and boundaries of zoning districts.

The project site is within the IP Zoning District. The project is consistent with the list of allowable uses for and general purpose of the IP Zoning District, in that a mini warehouse is allowed conditionally with approval of a Special Use Permit. The project would include a one-bedroom apartment on the second floor of the manager's unit. Residential quarters for a manager is considered accessory and may be included within mini warehouse developments, per WMC Section 14-36.050(c). The project is consistent with all other development standards for the IP Zoning District and Mini-Warehouse Development. As part of the Planned Development Process, the application requests onsite parking to be reduced to 22 from the minimum required 152 stalls.

Minimum Building Setbacks and Maximum Building Height. The project plans show the location of the buildings in relation to property boundaries and public roadways (Attachment 2, Site Plan). Table 2 provides a summary of these buildings in relation to required front, side and rear yard setback requirements. As shown in Table 2, the project conforms to the City's setback and other requirements for the IP District.

TABLE 2 Consistency of Buildings with IP District Regulations

Provision	Standard	Proposed	Consistent
Minimum lot area (corner lot)	20,000 sf	191,290 sf	Yes

[3] The General Plan and Zoning are not the same. A general plan is a set of long-term goals and policies that a community uses to guide development decisions. Although the plan establishes standards for the location and density of land uses, it does not directly regulate land use. Zoning, on the other hand, is regulatory. Under the zoning ordinance, development must comply with specific, enforceable standards such as minimum lot size, maximum building height, minimum building setback, and a list of allowable uses.

Provision	Standard	Proposed	Consistent
Frontage (feet)	100	200+	Yes
Distance between buildings	10	20	Yes
Lot Coverage (max)	60%	52%	Yes
Minimum Setbacks (feet) Front Interior Side Exterior Side Rear	 25 n/a 20 0	 25'-6" n/a 25 10	 Yes -- Yes Yes
Maximum Building Height (feet)	35	29	Yes

Minimum Parking Spaces. The minimum parking requirement for a mini-warehouse use (DLU 114) is one parking space for each 10 storage cubicles distributed throughout the facility, two spaces for the manager's quarters, and one space for every 25 storage cubicles near the manager's office for prospective renters, pursuant to WMC Section 14-17.401(b). Based on the proposed number of storage units (1,072), the proposed project would have to provide 152 parking spaces to meet the City's minimum parking standard for this type of use. The project includes a Planned Development application to reduce the City's parking standard.

The project proposes 22 onsite parking stalls located primarily along drive aisles. One parking space would be provided in the first floor of the manager's building. The applicant provided examples of other comparable self-storage facilities with reduced parking to demonstrate that 152 spaces would not be needed for this location (Attachment 4). In addition, the Transportation Study for the project (W-Trans, 2021) indicates that the proposed project is not expected to general a large number of trips. Given the temporary nature of mini-warehouse visits, the 22 proposed onsite parking stalls are expected to be sufficient to accommodate the estimated number of trips to the site. The project operations are estimated to generate an average of 227 daily vehicle trips, including 15 AM peak hour trips and 24 PM peak hour trips during the weekday commuter periods. The average stay is estimated to be 20 minutes or less (Attachment 5).

Design Review

The project is designed to be compatible with the surrounding neighborhood. Buildings are balanced and appropriately articulated on street-facing sides. The massing of wall and roof planes are broken up by trim, offsets in surfaces, and varying roof heights. Building materials are primarily corrugated metal and concrete tilt up walls with wood tile and stucco interspersed. Metal lattices and wooden trellises are included to provide visual interest. The project proposes single-story storage buildings near the perimeter, facing Airport Boulevard and Nielson Street, and two-story buildings toward the center of the parcel, creating a stepped back appearance to minimize their mass and bulk. Building A will be approximately six feet below street level at Airport Boulevard, further reducing the perceived mass and bulk. Parking would be unobtrusively tucked onsite along the drive aisles and an assortment of drought tolerant shrubs and trees are

provided around the east, south, and western perimeters to screen the buildings and provide visual interest.

Airport Land Use Compatibility

The California Airport Land Use Planning Handbook (Caltrans, 2011) provides guidance for airport land use compatibility planning. The Handbook is intended to guide compatible on- and off-airport land uses to ensure the safe and efficient operation of airports and the safety of people living and/or working near airports. City staff use the Handbook when reviewing individual development proposals on land within the Airport Influence Area, as the Handbook provides appropriate height, use, noise, safety, density, and intensity criteria to ensure future development would be compatible with the airport. The Handbook defines six Airport Safety Zones, ranging from Zone 1 (Runway Protection Zone) to Zone 6 (Traffic Pattern Zone), and outlines land use restrictions for each zone. As shown in Figure 3, portions of the project site are within Airport Safety Zones 2, 5, and 6.

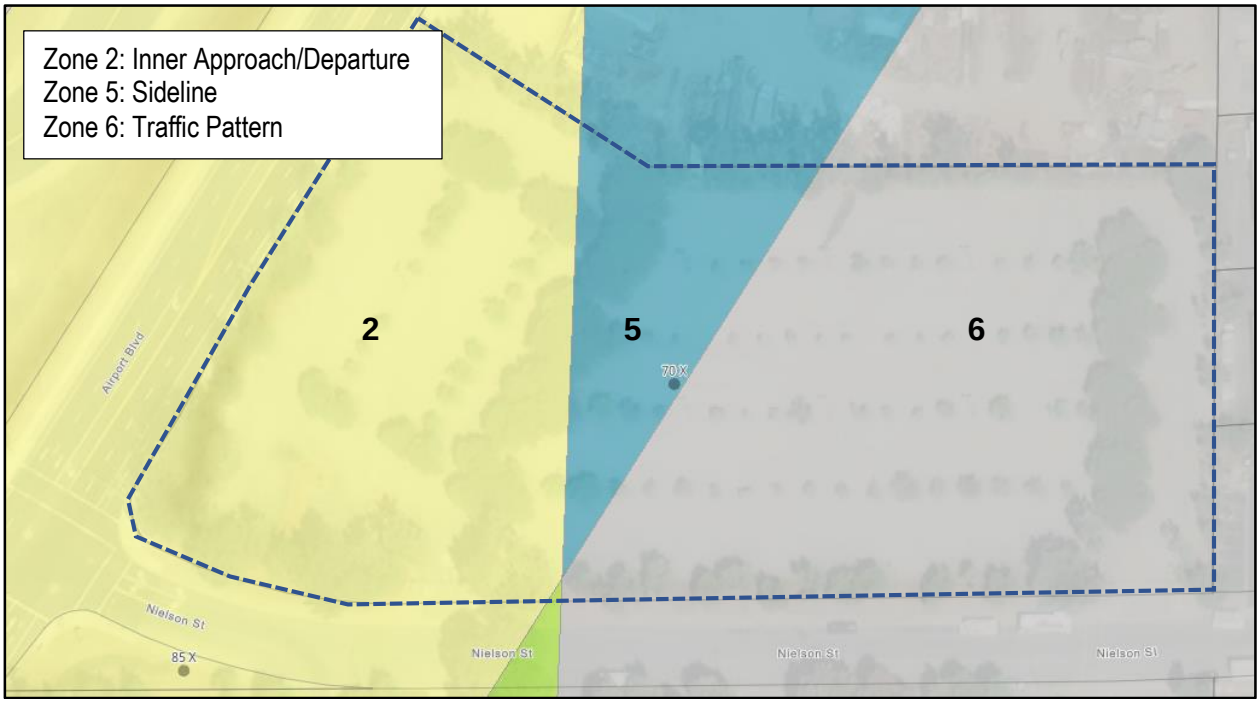

Figure 3 Airport Safety Zones
Source: City of Watsonville, GIS database (2021)

Safety

To minimize risks to people and property on the ground and to people on board aircraft, the Handbook includes safety compatibility criteria to set limits on the intensity of nonresidential development measured in terms of the number of people concentrated in areas most susceptible to aircraft accidents. Each safety zone indicates average-acre and single-acre intensity limitations which cannot be exceeded. As shown in Table 3, the lower limit for the average number of people allowed in the Handbook for Zones 2, 5, and 6, are 40, 70, and 200 people per acre, respectively.

The Handbook provides various methods for calculating average-acre intensities for non-residential uses, including using local parking standards. Average-acre intensities for non-residential uses have been estimated by multiplying local parking requirements by the estimated number of persons per vehicle. According to a 2017 survey conducted by the Federal Highway Administration titled, "National Household Travel Survey," the average light-occupancy vehicle carries 1.67 passengers. The project would supply 22 onsite parking stalls. In addition, the average household size (3.63, according to the US Census) was used to calculate the average acre density for the manager's unit. Based on the number of parking spaces provided onsite and the household size for the manager's unit, the project would average 10 persons per acre[4] and would be consistent with the average-acre intensity limitations in the Handbook.

TABLE 3 Consistency with average acre intensities in Airport Safety Zones

	Zone 2	Zone 5	Zone 6
Maximum Allowable Non-Residential Intensities (average number of people per gross acre)	40 – 60 people/acre	70 – 100 people/acre	200 – 300 people/acre
Proposed Average-Acre Intensity	10 people/acre	10 people/acre	10 people/acre

Single-acre intensities were calculated using Uniform Building Code occupancy levels and Appendix G of the Handbook. Calculating the single-acre intensity of a non-residential use is estimated by dividing the total building square footage by the typical square footage occupied by each person (i.e., occupancy load factor). For a mini-warehouse, the occupancy load factor ratio is 1 person for every 300 square feet of gross floor area. This total is based on Building and Fire codes and represents the maximum number of occupants allowed rather than the average. As a result, the total occupancy using this methodology is reduced by a set factor of 50%. Total intensity of a building is then estimated as follows:

Building Square Footage / Occupancy Load Factor x 0.50

Table 4 provides a breakdown of the portions of the buildings within Airport Safety Zones 2, 5, and 6.

TABLE 4 Consistency with single-acre intensities per Airport Safety Zone

	Zone 2	Zone 5	zone 6
Maximum Allowable Single-Acre intensities	80 – 120 people/acre	210 – 300 people/acre	800 – 1,200 people/acre
Building Area (sf)	30,490	22,963	96,304
Building Code Category	Storage	Storage	Storage
Occupant Load Factor	300 sf/occupant	300 sf/occupant	300 sf/occupant

[4] Calculation: 41 people ÷ 4.4-acre site = 9.3 persons per acre (rounded up to 10)

	Zone 2	Zone 5	zone 6
Adjustment	0.5	0.5	0.5
Estimated Maximum Occupants	51	39	161
Site Area (acres)	1.70	0.50	2.19
Proposed Single-Acre Intensity	51 people/acre[2]	76 people/acre[1]	73 people/acre[3]

1. For sites less than 1.0 acre, the single-acre intensity equals the total number of people on the site divided by the site size in acres.
2. For sites less than 1.0 acre and a building footprint less than 1.0 acre, the single-acre intensity equals the total number of building occupants.
3. For sites having both site size and building footprint of more than 1.0 acre, the single-acre intensity shall be calculated as the total number of building occupants divided by the building square footage in acres.

The proposed manager's unit would be located within Airport Safety Zone 6. The Handbook recommends converting residential densities into intensity levels (person per acre) when part of a mixed-use development. As identified in the table below, residential intensities are calculated using the Uniform Building Code standards as described in Appendix G of the Handbook and is consistent with the maximum residential intensities for Airport Safety Zone 6.

TABLE 5 Consistency with allowable residential intensities

	Zone 6
Maximum Single-Acre intensities	800 – 1,200 people/acre
Building Area (sf)	2,360
Building Code Category	Residence
Occupant Load Factor	200 sf/occupant
Adjustment	0.5
Estimated Occupants	6
Site Area (acre)	2.19
Proposed Intensity (Single-acre)	6 people/acre
Proposed Intensity (Average-acre)	3 people/acre

In summary, as shown in above tables, the proposed project plans comply with the average and single-acre intensity limitations in the Handbook for Airport Safety Zones 2, 5, and 6.

Airspace Protection

Tall structures, trees, and other objects, particularly when located near airports or on high terrain, may constitute hazards to aircraft in flight. Other land use features can also create hazards to flight by attracting wildlife, causing visual impairment, or generating electronic interference. Federal regulations establish the criteria for evaluating these hazards, but the federal

government does not have the authority to prevent their creation. The purpose of these airspace protection policies, together with regulations established by the state government, is to ensure that hazards to the navigable airspace do not occur.

The criteria for determining the acceptability of a project with respect to height is based upon the standards set forth in Federal Aviation Regulations (FAR) Part 77, Subpart C, Standards for Determining Obstructions to Air Navigation and applicable airport design standards published by the Federal Aviation Administration (FAA). Because the project is located within the Airport Influence Area, it is subject to 14 Code of Federal Regulations, part 77, concerning the safe and efficient use of airspace. The FAA conducted an aeronautical study on the site and issued a letter on February 25, 2022 titled, "Determination of No Hazard to Air Navigation" which revealed that the proposed structures will not exceed obstruction standards and will not be a hazard to air navigation (Attachment 5). In accordance with the FAA's recommended condition, a Condition of Approval requires that a FAA Form 7460-2, Notice of Actual Construction or Alteration, be filed within five (5) days after the construction reaches its greatest height.

The Caltrans Division of Aeronautics conducts a compliance inspection of the Airport every year. During an inspection in April 2021, they surveyed existing trees that extend into the airport's navigable airspace (per Part 77 Regulations) and identified two trees located on the project site as potential obstructions (see Figure 4). According to Airport Operations Manager Sam Rosas, trees T15 and T17 on the Existing Tree Plan (Attachment 2, sheet T1) should be trimmed or removed. To ensure that the trees do not pose an airspace obstruction hazard, a Condition of Approval requires that these two trees shall be removed. In addition, another Condition of Approval requires the applicant to record an Avigation Easement, which conveys certain rights to the Airport, including, but not limited to, restricting the height of trees and permitting access for their removal if they exceed the established height limit (per FAR Part 77).

Figure 4 Trees that should be trimmed or removed
Source: Catrans Division of Aeronautics (2021); Airport Operations Manager Sam Rosas (2021)

Noise

The purpose of noise compatibility policies is to avoid establishment of noise-sensitive land uses in the portions of airport environs that are exposed to significant levels of aircraft noise. Noise compatibility is measured in terms of Community Noise Equivalent Level (CNEL). The State of California and the FAA consider areas outside the 65 dB CNEL contour to have an acceptable aircraft noise exposure under normal conditions for noise compatibility planning purposes.

The project site is not located under the recommended flight paths as shown on the Watsonville Municipal Airport Noise Abatement Map. Based on the Aircraft Noise Monitoring Report prepared by WJV Acoustics in 2018, the project site is located outside of the Airport's 65 dB CNEL noise exposure contour under both existing (2016) and future (2036) conditions. The western portion of the site, which is approximately 500 feet southwest of the Runway 2 centerline, may be exposed to airport noise levels of 60 dB CNEL under existing and future conditions; however, the majority of the site would be exposed to aircraft noise levels less than 60 dB CNEL (WJV Acoustics, 2018). The onsite manager's residence would be located in the eastern part of the site, outside of the 60 dB CNEL noise exposure contour mapped for the Airport.

Ambient noise monitoring conducted at the site indicates that individual aircraft approaches and departures at Runway 2 may generate noise levels up to 85 dBA L_{max}. Such single noise level events are short in duration and do not approach noise levels that would be considered excessive on a short-term basis. While maximum noise levels recorded at the site were associated with aircraft operations, traffic on Airport Boulevard and, to a lesser degree, Nielson Street are the primary contributors to measured ambient noise levels of 68.3 dBA L_{eq} near Airport Boulevard and 60.7 dBA L_{eq} near Nielson Street. The lowest measured noise level at the site (47.7 dBA L_{min}) is representative of quiet conditions when there is no nearby traffic or aircraft approaching the Airport.

The Public Safety Element in the General Plan identifies the City's noise compatibility guidelines for different land uses. According to Figure 12-6 of the General Plan, the normally acceptable noise limit for industrial land uses is 80 dB CNEL. A lower limit of 65 dB CNEL is multi-family residential development, such as the manager's building. Based on the Aircraft Noise Monitoring Report (WVJ Acoustics, 2018) and ambient noise monitoring conducted at the site, the project would not expose people working or residing at the site to noise at unacceptable levels.

Access and Traffic Safety

For motorists to safely enter/exit the project site, City and state regulations are in place to regulate sight distance and site obstructions. Based on criteria published by Caltrans, the minimum stopping sight distance needed along Nielson Street is 150 feet. Sight lines to and from the eastern driveway extend 170 feet to the west, which is adequate for the posted 25 mph speed limit. Site lines from this driveway only extend 119 feet to the east however. It is recommended that on-street parking be restricted on Nielson Street for 25 feet on either side of the eastern driveway to achieve a minimum sight distance of 150 feet at each driveway access point.

The City also requires that “clear corner triangle” regulations be maintained so that no obstruction between two feet and eight feet above grade are placed on any corner lot in any zoning district in which a minimum front yard is established,2 per WMC Section 14-40.060. As shown on the proposed Site Plan, the proposed 6'-9" monument sign in the southwest portion of the site near Airport Boulevard and Nielson Street is located outside the “clear corner triangle” area, in compliance with City regulations (Attachment 2, sheet 1A).

In addition to sight distance and sight vision compliance, the project will have access to existing pedestrian facilities. Sidewalks exist on both sides of Airport Boulevard, Nielson Street, and Hangar Way, effectively linking the project site to the surrounding pedestrian network. Signalized crosswalks are present on the north and east legs of the Airport Boulevard/Nielson Way intersection. Overhead streetlights exist along Airport Boulevard, Nielson Street, and Hangar Way. Overall, the existing facilities provide adequate pedestrian access and connections between the project site and surrounding industrial development, the hospital, and residential neighborhoods within walking distance.

Parking and Circulation

As mentioned above, the project applicant is requesting to establish a PD Overlay District for the site to allow 22 total off street parking spaces. Based on the estimated number of average daily vehicle trips (227), including 15 AM peak hour trips and 24 PM peak hour trips during the weekday commuter periods, and the temporary nature of mini-warehouse visits (on average 20 minutes or less), the 22 proposed parking stalls will be sufficient for the site. Onsite circulation will consist of drive aisles between 25 to 32 feet wide, which will meet City standards as well as the California Fire Code requirement of minimum 20-foot-wide fire lanes. The project will also replace and relocate the existing driveways. Emergency vehicles would enter through the main vehicle entry and exit via the secondary driveway (Attachment 2, sheet 7).

Lighting

Nighttime illumination has the potential to change ambient lighting conditions and create a visual nuisance or hazard. The impact of nighttime lighting depends upon the type of use affected, the proximity to the affected use, the intensity of specific lighting, and the background or ambient level of the combined nighttime lighting. Nighttime ambient light levels may vary considerably depending upon the age, condition, and abundance of point-of-light sources present in a particular view. The use of exterior lighting for security and aesthetic illumination of architectural features may contribute substantially to ambient nighttime lighting conditions.

Spillover of light onto adjacent properties (“light trespass”) has the potential to interfere with certain activities including vision, sleep, privacy and general enjoyment of the natural nighttime condition. Light sensitive uses include residential, some commercial and institutional uses and natural areas. Changes in nighttime lighting may significantly impact sensitive land uses if a proposed project increases ambient lighting conditions beyond its property line and project lighting routinely spills over into adjacent light-sensitive land use areas.

The project will include wall mounted lights, as well as a single 20-foot-tall light standard at the main driveway entrance. Lighting fixtures will include one pole-mounted light fixture, 66 interior facing LED wall lights, six wall sconces at the manager’s building, four exterior facing LED

downlights, and four downward casting security lights. In response to a comment by the CDWF, a Condition of Approval requires all exterior lighting fixtures shall be shielded and downcast.

The Photometric Site Plan (Attachment 2, sheet E2) provides the anticipated light intensity. As shown on this plan, the proposed lighting would provide low to moderate light intensities around the buildings and within parking areas. The greatest light intensity results from the 20-foot light fixture to illuminate the western entrance and parking spaces. Anticipated light levels would range from 3.3 foot candles (fc) to 17.2 fc in these areas. Wall-mounted lighting would illuminate the remaining surface parking spaces and drive aisles with light intensities ranging between approximately 1 fc and 7 fc, with higher intensity directly below the fixtures. Lower lighting intensities would be created by the wall-mounted fixtures to illuminate the sides of buildings with light less than 2 fc. These lighting levels would provide adequate light to illuminate the site, consistent with light levels in a parking lot and for site circulation.

The photometric analysis also demonstrates that anticipated light intensities would not result in a visual nuisance. Little to no light would spill over onto adjoining properties and roadways. Any potential spillover light would be further obscured from view by buildings, landscape plantings and fencing. Therefore, the project is not anticipated to create a glare nuisance.

Drainage and Runoff

New development and redevelopment construction projects are subject to the City's post-construction stormwater management requirements (PCRs).[5] WMC § 6-3.535. The proposed project is a PCR tier 4 type project, as it would create and/or replace more than 22,500 square feet of impervious surfaces to the project site. Attachment 6 provides a summary of PCR tiers 1 through 4 and their associated performance requirements for stormwater management and treatment.

The project plans include a preliminary Grading and Utility Plan (Attachment 2, sheet C2) and Stormwater Control Plan (Attachment 2, sheet C4). As shown on these plans, proposed drainage facilities and post-construction features include dividing the site into two drainage management areas (DMAs), directing runoff from impervious surfaces (e.g., roof, hardscape, parking areas) to bioretention basins. These drainage management features are intended to control the flow rate and pollutant load to pre-project levels. The project would create 148,555± square feet of impervious surfaces, representing a 9,892± square-foot net reduction from existing conditions to further help reduce stormwater runoff.

Engineering staff has reviewed the project's proposed drainage plans. A Condition of Approval requires the applicant to revise the plans in accordance with detailed comments prior to issuance of a building permit.

[5] The primary objective of the City's PCRs is to ensure the reduction of pollutant discharges to the maximum extent possible and prevent stormwater runoff from causing or contributing to a violation of water quality standards. The PCRs categorize projects into four primary tiers based mainly on the net increase in impervious surfaces that would result from a project (i.e., the amount of new and replaced impervious surfaces). Each PCR tier is linked to increasingly stringent performance requirements for stormwater management and treatment. Each PCR tier is subject to the performance requirements of that tier, plus the performance requirements of the lower tiers, as applicable.

Environmental Review

An Initial Study has been prepared for the project in accordance with the provisions of CEQA (Attachment 6). The Initial Study addresses the potential physical environmental effects of the project for each of the environmental topics outlined in Appendix G of the CEQA Guidelines. Impacts to biological resources, cultural and tribal resources, geology and soils, and transportation were found to be potentially significant but mitigable to a less than significant level. Impacts to other resource areas and environmental topics were found to be less than significant without mitigation.

The Initial Study was made available for public review and comment from July 13, 2022, to August 12, 2022 and extended to August 26, 2022. Hardcopies of the Initial Study were available for public review at the Community Development Department and Watsonville Public Library. Table 6 provides a list of the federal, state, regional and/or local agencies along with private organizations and individuals that commented on the Initial Study.

TABLE 6 List of Commenters

Commenter	Agency/Group/Organization
Federal Agencies	
None	None
State Agencies	
Erin Chappell, Regional Manager, Bay Delta Region	California Department of Fish and Wildlife ("CDFW")
Regional and Local Agencies	
None	None
Private Groups and Organizations	
William P. Parkin, of WITTWER PARKIN LLP	Watsonville Pilots Association ("WPA")

Comments received from CDFW include the potential for the Santa Cruz Tarplant to occur in unpaved areas of the project site, the potential for the site site to provide suitable foraging and dispersal habitat for California red-legged frogs, and the potential for the project to cause an increase in the amount of artificial night lighting that could affect fish and wildlife resources. Responses to Comments were prepared in October 2022 to address comments received from CDFW (Attachment 10). Although the level of impact would not be greater than originally identified, four (4) additional mitigation measures were recommended to be incorporated into the IS/MND, including a pre-activity survey for the Santa Cruz Tarplant, avoidance buffers, construction best management practices, and measures to prevent glare and light pollution. An errata to the IS/MND includes these additional mitigation measure.

Comments received from the WPA concern whether the IS/MND failed to completely analyze the levels of risks posed by the project's proximity to the Airport, multi-story structures should be avoided within Airport Safety Zone 2, and the IS/MND analysis of potential safety hazards is inadequate because the City has not incorporated the California Airport Land Use Planning Handbook (Caltrans, 2011) into the General Plan. While there are numerous cases that provide

direction on thresholds for challenging CEQA documents, the IS/MND Section 6.9(e), Hazards and Hazardous Materials, specifically addresses safety hazards for people residing or working in the project area of projects located within an airport land use plan, and the City must submit future general and specific plans for review by the Caltrans Division of Aeronautics. Further, the IS/MND used the objective standards contained in the Handbook to consider risk tolerance and perception. Though not a CEQA issue, in an abundance of caution, the applicant has reduced the height of all structures, including Building C, located within Airport Safety Zone 2 from two stories to one. Therefore, the IS/MND project analysis is consistent with the Handbook, and correctly concludes that the proposed Project would not expose people visiting, working, or residing in the project area to excessive airport-related noise levels; the IS/MND correctly concludes the project is consistent with the General Plan, including the land use designation and policies.

There is not substantial evidence in the record that the project, as mitigated, will have a significant effect on the environment for areas analyzed within the Initial Study, and mitigation measures have been identified that, when implemented, will avoid or reduce potential impacts to less-than-significant levels.

CONCLUSION

The proposed Planned Development Overlay District, Specific Development Plan and Special Use Permit with Design Review would allow the construction of 1,072 self-storage units and manager's apartment on a 4.4± acre site located at 70 Nielson Street (APN 015-111-49). The project is consistent with the General Plan and Zoning Ordinance with approval of the requested PD Overlay District and would help accomplish multiple goals, policies, and implementation measures in the City's General Plan. Mini-warehouse facilities provide a valuable service for the community and is complementary with existing land uses nearby. The project design is consistent with the City's Design Review findings. An Initial Study has been prepared for the project in accordance with the provisions of CEQA, which provides substantial evidence that the project would not have a significant effect on the environment. Therefore, staff recommends that the Planning Commission (a) adopt a Resolution recommending that the City Council adopt a Mitigated Negative Declaration and (b) adopt a Resolution recommending that the City Council approve a Planned Development Overlay District, Specific Development Plan and Special Use Permit with Design Review, subject to findings and conditions.

REFERENCES

Caltrans. 2011. California Airport Land Use Planning Handbook. Prepared by the State of California Department of Transportation, Division of Aeronautics. Accessible at: https://dot.ca.gov/programs/aeronautics/airport-land-use-planning

City of Watsonville. 1994. Watsonville 2005 General Plan. Accessible at: https://www.cityofwatsonville.org/160/2005-General-Plan

_____. 2019. Flying Quietly: Noise Abatement Map. Accessible at: https://www.cityofwatsonville.org/332/Flying-Quietly

WJV Acoustics. 2018. Aircraft Noise Monitoring Report, Watsonville Municipal Airport. Accessible at: https://www.cityofwatsonville.org/DocumentCenter/View/12654/Watsonville-Airport-Noise-Report-8-29-18

W-Trans. 2022. Focused Transportation Study for the 70 Nielson Street Project. Accessible at: https://www.cityofwatsonville.org/DocumentCenter/View/19402/Appendix-G---Transportation-Study

ATTACHMENTS

1. Site and Vicinity Map
2. Plan Set and Color Board (October 18, 2022)
3. Renderings
4. Comparable self-storage facilities with limited parking
5. Parking Reduction Justification (October 13, 2020)
6. Summary of the City's PCR Requirements
7. Stormwater Control Plan (May 12, 2021)
8. FAA Letter Hazard to Air Navigation (February 25, 2022)
9. Initial Study/Mitigated Negative Declaration (July 13, 2022)
10. Responses to Comments & Errata (October 2022)
11. Acoustical Terminology