

City of Watsonville
M E M O R A N D U M



DATE: August 12, 2020

TO: Planning Commission

FROM: Suzi Merriam, Community Development Director
Justin Meek, AICP, Principal Planner

SUBJECT: Public Hearing to consider Special Use Permit with Design Review and Environmental Review (PP2019-18) to allow the establishment of a propane storage and transfer facility (aka bulk propane plant) on a 0.7± acre property located at 950 W Beach Street (APN 018-331-28; formerly APNs 018-331-05 and -06).

AGENDA ITEM: September 1, 2020

Planning Commission

RECOMMENDATION:

The Planning Commission may adopt a Resolution recommending City Council approval or denial of Special Use Permit with Design Review and Environmental Review (PP2019-18) to allow or deny the establishment of a propane storage and transfer facility (aka bulk propane plant) on a 0.7± acre property located at 950 W Beach Street (APN 018-331-28; formerly APNs 018-331-05 and -06).

BASIC PROJECT DATA

APPLICATION NO.: PP2019-18 **APN:** 018-331-28 (formerly 018-331-05 and -06)

LOCATION: 950 W Beach Street

LOT SIZE: 0.7± acre

PROJECT DESCRIPTION: The project involves the installation of a 50,000-gallon propane tank and appurtenant piping, a new railcar unloading tower, two new tank unloading stations, new asphalt-concrete (AC) paving for transporters vehicle access (e.g., bobtail propane trucks, intermediate semitrailers [WB-40]), new bollards, two new parking spaces, new fencing and gates, new lighting and security cameras, new landscaping, and new stormwater facilities. Future buildout includes the installation of four new 30,000-gallon tanks for a total expansion potential of an additional 120,000 gallons. Project entitlements consist of a Special Use Permit with Design Review and Environmental Review.

GENERAL PLAN: Industrial

ZONING: IG (General Industrial)

SURROUNDING GENERAL PLAN/ZONING: Industrial in the IG Zoning District (south, east, and northeast) and Industrial in the Manabe-Ow Business Park Specific Plan area (west and northwest)

EXISTING USE: Vacant

PROPOSED USE: Bulk propane plant

SURROUNDING USES: Industrial and vacant

FLOOD ZONE: The site is within the 100-year floodplain with a base flood elevation of 25± feet (FEMA Flood Map Panel 0394E, Map No. 06087C0394E, revised May 16, 2012)

CEQA REVIEW: The project qualifies for an infill (class 32) exemption from the provisions of the California Environmental Quality Act (CEQA) because it meets the conditions listed in Section 15332 of the State CEQA Guidelines. The project also qualifies for a “common sense” exemption because it can be seen with certainty that there is no possibility the project would have a significant effect on the environment. CEQA Guidelines § 15061(b)(3). Technical studies have been prepared that provide substantial evidence in support of this finding.

APPLICANT: Richard Kojak, Mountain Propane Service, 6576 HWY 9, Felton, CA

PROPERTY OWNER: Richard Kojak, Mountain Propane Service, 6576 HWY 9, Felton, CA

BACKGROUND

The subject site was previously owned by Venture Oil Company and contained four underground fuel storage tanks. Investigation reports indicated that the tanks were leaking, and the project site was listed as a LUST Cleanup Site by the State Water Resources Control Board. Cleanup was completed under the review of the State Water Resources Control Board and the case closed in 2014 (Attachment 7). The site has been vacant for a number of years.

Up until recently, two properties comprised the 0.7± acre site (APNs 018-331-05 & -06). According to the County Assessor’s Office records, the two properties were sold by Venture Oil Company to Richard Kojak on January 9, 2017.

On June 8, 2017, Richard Kojak on behalf of Mountain Propane Service, Inc., a corporation (Mountain Propane) of Felton, California, applied for an Administrative Use Permit (PP2017-182) for temporary storage of an empty 50,000 gallon propane tank onsite. This application was not fully acted upon and expired on January 23, 2018.

On June 13, 2018, Santa Cruz County Regional Transportation Commission staff contacted City staff to inquire about a reported propane tank stored onsite. City staff visited the site on June 14, 2018, and confirmed the presence of an unpermitted storage tank (Figure 1). The same day, Code Enforcement staff issued a notice of violation, indicating that a propane tank was being stored without the required Administrative Use Permit.



FIGURE 1 Photograph of storage tank on the subject site

Source: Staff visit (June 14, 2018)

On July 3, 2018, Mountain Propane applied for an Administrative Use Permit (PP2018-181) to allow the temporary storage of a 50,000 gallon propane tank located at 950-950X West Beach Street. Mountain Propane's owner, Richard Kojak, said he planned to apply for a Special Use Permit with Design Review and Environmental Review to allow the establishment of a permanent propane storage tank facility onsite.

On July 19, 2018, the Zoning Administrator approved Administrative Use Permit (PP2018-181) to allow the temporary storage of the empty 50,000 gallon propane tank located at 950-950X West Beach Street (APNs 018-331-05 & -06). A condition of approval required that Mountain Propane apply for a Special Use Permit with Design Review and Environmental Review for the establishment of a permanent propane storage and transfer facility (aka bulk facility plant). Another condition of approval required the applicant to obtain approval of a Lot Consolidation to consolidate the two subject parcels into one.

On July 20, 2018, the Community Development Director approved Lot Consolidation (PP2018-99) of APNs 018-331-05 and 018-331-06 into one parcel. The Lot Consolidation was so temporary storage of the propane tank would not cross existing property lines. The County of Santa Cruz assigned Assessor's Parcel Number (018-331-28) to the consolidated lot.

On January 18, 2019, an application for Special Use Permit with Design Review and Environmental Review (PP2019-18) to allow the establishment of a propane storage and transfer facility (aka bulk propane plant) on a 0.7± acre property located at 950 W Beach Street (APN 018-331-28; formerly APNs 018-331-05 and -06), was filed by David Dauphin with C2G on behalf of Richard Kojak with Mountain Propane Service, applicant and property owner.

PROCESS

Special Use Permit

Pursuant to [Section 14-16.603\(b\)](#) of the Watsonville Municipal Code (WMC), a petroleum bulk station and terminal (DLU 152) for the purpose of storage and wholesale distribution of gasoline and other petroleum-based fuels, such as propane, is allowed conditionally in the IG Zoning District with issuance of a Special Use Permit. The Planning Commission is typically the decision-making body for considering a Special Use Permit application. The Planning Commission is authorized to approve Special Use Permits in accordance with the procedures set forth in WMC Sections [14-12.509](#) through [14-12.512](#). However, in 1990, the City Council adopted an ordinance concerning onshore oil facilities in response to potential offshore oil and gas drilling and production facilities in the Monterey Bay and the associated risks to the quality of life, the environment, and the long-term economic well-being of adjoining communities (Ordinance No. 851-90 (CM)). This ordinance stipulates that the City Council shall consider a request for a Special Use Permit for development involving the storing, transporting, or processing of liquid petroleum products. [WMC § 14-44.010\(b\)](#). Therefore, the Planning Commission shall act as an advisory body, making a recommendation to the City Council for approval or denial of the Special Use Permit concerning the proposed propane storage and transfer facility (aka bulk propane plan).

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 provided that 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 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](#).

The Planning Commission in recommending, and the City Council in making a final decision, shall render its decision based on making findings in [WMC Section 14-12.513](#) and conditions necessary to make the use compatible with surrounding uses. If the appropriateness of the use cannot be assured at the proposed location, the application for a Special Use Permit shall be denied as being incompatible with existing uses or uses permitted by right in the district. [WMC § 14-12.510](#).

Two of the basic criteria guiding the Planning Commission in discharging its function are the “compatibility between the proposed development and adjacent development and neighborhoods” and “protection of the health, safety and general welfare of the citizens of the City.” [WMC § 14-10.800](#).

The concept of public welfare is broad and inclusive. Were the Planning Commission in recommending, and the City Council in making the final decision to determine, based on substantial evidence, that it could not make the finding that the project is compatible with adjacent development or protects public health, safety and welfare, it could not support approval of the project. The failure to find this or any one of the required findings would cause denial of the requested Special Use Permit.

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 require a Design Review permit. [WMC § 14-12.400](#).

When considering applications for Design Review, the decision-making body 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 the same as those required for Special Use Permits, except for the finding set forth in subdivision (e) of [WMC Section 14-12.403](#), which requires consideration of additional design elements to minimize adverse effects of the proposed development on adjacent properties.

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. Certain classes of projects, however, have been identified that do not have a significant effect on the environment, and are considered categorically exempt from the requirement for the preparation of environmental documents. [State CEQA Guidelines § 15300](#). In addition, a project is exempt from CEQA if the activity is covered by the commons sense exemption (i.e., CEQA applies only to projects which have the potential for causing a significant effect on the environment). Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. [State CEQA Guidelines § 15061\(b\)\(3\)](#).

STANDARD OF REVIEW & APPEAL PROCESS

The decision whether to approve this Special Use Permit with Design Review and Environmental Review is adjudicative, sometimes referred to as quasi-judicial. The City is called upon to determine whether this project complies with State law and local ordinances.

Whether a particular decision is adjudicative or legislative determines the requirements for findings to support the decision. Legislative decisions involve the adoption of broad policies applicable to many situations (for example, general plan or 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.¹

¹ 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.

The final decision before the City Council—a Special Use Permit with Design Review—is an adjudicative/quasi-judicial decision and requires findings, either for approval or for denial and be supported by substantial evidence. *Toigo v Town of Ross* (1998) 70 Cal App 4th 309

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 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). Court's reviewing adjudicative/quasi-judicial decisions look to make sure the decision is supported by substantial evidence. Denied applicants argue the substantial evidence does not 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 by those presenting at the hearing, and (3) the words of the Planning Commission or Council.

DISCUSSION

Existing Site

The project site is a single 0.7± acre parcel located at 950 West Beach Street. While now vacant, the site was previously developed and has remaining impervious surfaces of pavement and concrete (Attachment 3, sheet C1.1). An empty 50,000-gallon propane tank currently exists on the site. The site is bordered by a rail spur that connects to the Santa Cruz Branch Rail Line owned by the Santa Cruz County Regional Transportation Commission.² The Monterey Bay Sanctuary Scenic Trail (MBSST) Network Final Master Plan indicates that new trail will follow this rail line.³ The City's Public Works Department is working on securing funding and permits to construct the trail.

The surrounding area is predominantly industrial. Adjacent and to the south and east of the project site are existing industrial businesses on land designated for industrial use. To the north and west of the project site is vacant land that is part of the Manabe-Ow Business Park Specific Plan and intended for future industrial park development. No development is currently proposed on this portion of the Specific Plan area.

Also within the general vicinity of the site are two facilities that produce, store and/or wholesale hazardous materials (Attachment 2). Agron Bionergy, LLC, operates a biodiesel manufacturing plant approximately 300 feet northeast of the site at 860 West Beach Street (APNs 018-321-01 & -02). This facility produces approximately 65,000 gallons of biodiesel a day within a 19,924± square-foot building. Biodiesel is stored temporarily in three 100,000-gallon tanks before distribution offsite. In addition, Commercial Fueling Network (CFN) operates a bulk fueling

² SCCRTC website, <https://sccrtc.org/projects/rail/rail-line-purchase/> (visited on June 19, 2020)

³ SCCRTC website, <https://sccrtc.org/projects/multi-modal/monterey-bay-sanctuary-scenic-trail/mbsst-master-plan/> (visited on June 26, 2020)

station with multiple gas and diesel pumps approximately 600 feet southeast of the site at 1164 West Beach Street (APN 018-481-04).

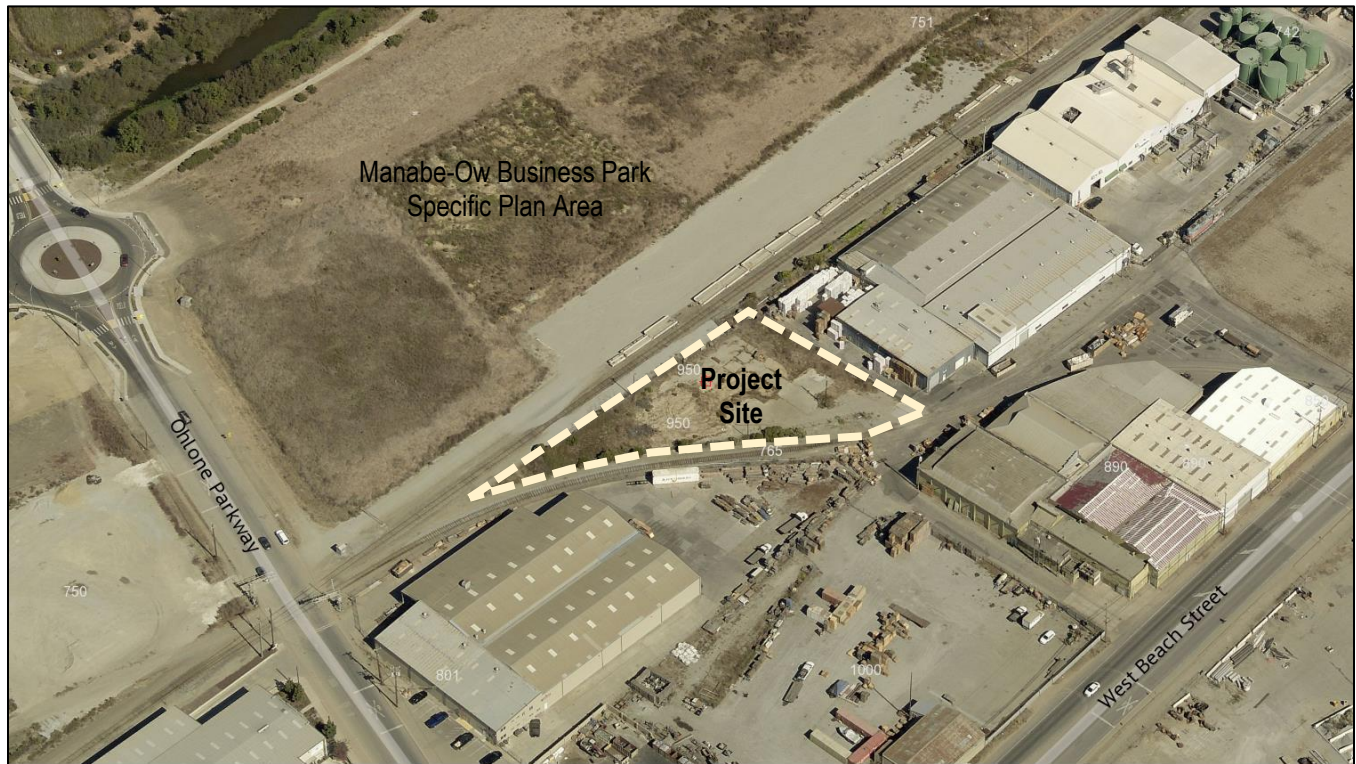


FIGURE 2 Aerial view of the project site and surrounding area

Source: EagleView ConnectEmployer (2016)

Sensitive wetland habitat and residences are located to the northwest. The project site is located approximately 580 feet away from the Watsonville Slough, an estuarine habitat that supports many federal and state listed threatened and endangered species. The Watsonville Sloughs ecosystem is recognized as the largest and most significant wetland habitat between Pescadero Marsh (San Mateo County) and Elkhorn Slough (Monterey County).⁴ The Las Brisas neighborhood borders the Watsonville Slough and is a little over 700 feet away from the project site (Attachment 2).

The site and much of the surrounding area is a FEMA designated 100-year flood zone (Zone AE).

Proposed Project

The applicant proposes to relocate the onsite 50,000-gallon propane storage tank to the middle of the project site for establishing a propane storage and transfer facility (Attachment 3, sheet

⁴ The Watsonville Sloughs include approximately 800 acres of freshwater marsh, seasonal wetland, and estuarine habitat with six major slough branches, which drain to the Pajaro River. The slough system supports over 249 permanent and migratory bird species, 5 federally listed fish and wildlife species, and 16 species of special concern, including the federally threatened California red-legged frog, California species of special concern tricolored blackbird, and the federally listed endangered Santa Cruz tarplant.

C2.1). The project also includes the installation of four new 30,000-gallon propane storage tanks to occur in future phases, resulting in a total of 170,000 gallons of storage at project buildout (Attachment 3, sheet C0.2). The tanks would cover 1,750± square feet and are 15 feet in height. Approximately 156 cubic yards of fill would be brought to the site to create a finished grade of 21 feet above mean sea level (AMSL) for installing the tanks, which together with 5± feet tall concrete piers would bring the bottom of the tank to approximately 26 feet AMSL or one foot above the base flood elevation of 25± feet AMSL (Attachment 3, sheets C3.1 & C5.1).

The proposed project would use an adjacent rail line for delivering propane to the site for storage and subsequent transfer to bobtail trucks or larger transporter trucks (i.e., intermediate semitrailers [WB-40]) for final delivery to customers. Additional site improvements include asphalt paving, bollard installation, foundation construction for the propane tanks, tank unloading stations, irrigation, landscaping, gate, and fencing installation, liquefied petroleum gas (LPG) piping and appurtenance installation, and private fire hydrant installation. A 1,076± square-foot infiltration area and three 3,525-gallon, below-ground cisterns would serve to collect and store rainwater for irrigating the landscape area (Attachment 3, sheet C4.1).

The project would be implemented in two phases.

- Phase 1 involves relocating the existing 50,000-gallon storage tank and installing the aforementioned site improvements this year (2020).
- Phase 2 involves adding 120,000 gallons of storage (in four new 30,000-gallon tanks) and would be implemented within 2-3 years, contingent on the market demand for propane.

At full buildout, the project is anticipated to generate 10 roundtrips for bobtail trucks, four daily roundtrips for passenger vehicles, and up to one heavy-duty truck trip daily. These 15 roundtrips would occur throughout the workday for the purpose of filling and distributing propane to and from the onsite storage tanks and customers.

Project Operations and Safety Measures

The propane storage tanks and LPG piping and appurtenant equipment would be installed and maintained in accordance with the piping standards set forth in Title 8 of the California Code of Regulations [Section 536](#) under Article 7 (Compressed and Liquefied Natural Gas System). The tanks and LPG piping would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keeps errant propane from being released. The site would be under video monitoring when company personnel are not onsite and throughout the evening.

The transport rail and truck facilities would be operated and maintained in accordance with Title 49, Code of Federal Regulations, [Part 174](#) (Carriage by Rail) and CHP [Form 800C](#) (Vehicles Transporting Hazardous Materials).

A condition of approval requires the applicant to obtain a permit to store hazardous materials from Santa Cruz County Environmental Health prior to storing propane at the site.

General Plan

The project site is designated Industrial on the General Plan Land Use Diagram. Categories of allowed uses for Industrial designated land include:

- whole-sale sales, storage, heavy commercial, transportation services, warehousing;
- construction, fabrication and trade shops;
- general manufacturing;
- food processing; and
- related services, businesses and uses.

The intent of the Industrial land use category is to serve the industrial needs of the community. The building intensity in these areas are permitted to have a Floor Area Ratio up to 1.50.

General Plan Consistency

The proposed project is consistent with the following General Plan goals and policies concerning industrial land uses, land use suitability, and site improvement.

- **Goal 4.4 Industrial Land Use** – Achieve economic diversification, living wage employment, the preservation of the agricultural economic base of the Pajaro Valley, and maintain a balance among jobs, housing, and other urban land uses.
- **Policy 4.D Industrial Land Use** – The City shall promote modernization of existing industrial plants and the location of new industrial facilities on lands planned for industry in *Watsonville 2005*.
- **Implementation Measure 4.D.1 Modernization** – The City shall encourage existing industrial plants to maintain high standards for public safety and environmental quality consistent with economic feasibility. These standards include emission reduction, noise reduction, built-in fire protection, water conservation, and the safe use, storage, and disposal of hazardous materials.
- **Implementation Measure 4D.2 Design and Open Space** – The City shall require that new industrial development be designed to blend with the natural environment and incorporate adequate open space and landscaping to provide an aesthetically pleasing buffer from residential land use. Additionally, on-site recreational space for employees and resource protection for environmentally sensitive habitats shall be required, where appropriate.
- **Goal 4.7 Land Use Suitability** – Ensure that the orderly development of land for the needs of the existing and projected population within in the City limit and Sphere of Influence is based on the land's overall suitability, including: the accessibility of existing and proposed public facilities, services, and utilities, physical and financial constraints; and/or growth inducing impacts.

- **Policy 4.G Land Use Suitability** – The City shall encourage the development of urban uses on those lands best suited for urban uses and discourage it on lands unsuited for urban uses.

The proposed project would establish a propane storage and transfer facility on land designated for industrial uses. The project site is surrounded by existing industrial uses and/or vacant land intended for future industrial park development. The project would adhere to state and federal law concerning the safe transport of propane and preventing its accidental release from storage tanks.

In addition to being compatible with other industrial uses in the area, the proposed use is well suited for this location, in that it would take advantage of the existing rail line bordering the site. Propane would be delivered by train to the site for storage and subsequent transfer to trucks for delivery to customers via arterial roadways.

While not directly abutting any residential properties, the project design includes landscaping along the property boundary facing the Santa Cruz Branch line to enhance views of the site and thereby provide an aesthetically pleasing buffer between a propane storage/transfer facility and the adjacent rail/trail corridor.

The project is not anticipated to result in growth inducing impacts, as it does not include residential development or involve any extension of roadways or other public infrastructure. In addition, the project would generate only a small amount of traffic and not be a regionally significant employer.

In summary, the proposed project, with implementation of conditions of approval, would be generally consistent with policies in the 2005 General Plan. Because general plans often contain numerous policies emphasizing differing legislative goals, a development project may be consistent with a general plan, taken as a whole, even if the project appears to be inconsistent with some of its policies. 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 industrial land uses, land use suitability, and site improvement. It is within the Planning Commission's adjudicative authority to decide if the proposed project is consistent or inconsistent with any applicable City goals or policies. The Commission would have to make findings to deny.

Although generally consistent with the aforementioned City goals and policies, the nature of the project raises concerns. Propane is an explosive petroleum-based fuel and the project is located in an industrial zone with other existing facilities that produce, store and/or wholesale large quantities of petroleum products. A manufacturing plant that produces approximately 65,000 gallons of biodiesel a day is located approximately 300 feet away. Its proximity to the project site presents a potential safety hazard. In the case of an accidental release from or failure of the proposed propane storage tank(s) that results in a fire or explosion, this in turn might result in a larger and more catastrophic fire and property damage and/or loss of life were it to spread to the nearby biodiesel plant. Under this scenario, the proposed project would be considered an incompatible land use as it would be detrimental to the public health, safety and welfare. Were

the Planning Commission to make this determination, it must recommend denial of the Special Use Permit because it could not support making the finding that the proposed special use will not be detrimental to the public health, safety, and welfare—i.e., finding “g” set forth in [WMC Section 14-12.513](#).

Zoning

The Zoning Ordinance implements the General Plan, regulates the future growth of the City, and promotes orderly community development.⁵ It includes the Zoning Map, which establishes zoning districts throughout the community. The proposed project is located within the IG Zoning District.

The purpose of the IG Zoning District is to provide and protect an environment which will encourage sound industrial development. [WMC § 14-16.600](#). The regulations set forth for the IG zone are intended to facilitate industrial operations to the highest degree while protecting the district and adjacent land uses, persons, and property from excessive noise, odor, dust, dirt, smoke, vibration, heat, glare, heavy traffic, and other objectionable influences and from fire, explosion, fumes, radiation, and other hazards.

The proposed project is consistent with the list of allowable uses for and general purpose of the IG Zoning District, in that the project would allow the establishment of a *petroleum bulk station and terminal* type use (DLU 152)—a conditionally permitted use—on a property in an industrial area and protect the district and adjacent land uses by adhering to safety regulations. As previously mentioned, however, because of the potential safety hazard of the proposed use and the proximity to other facilities that produce, store and/or wholesale large quantities of petroleum products, the Planning Commission may determine that the project is incompatible with nearby land uses and not suitable for the project site.

Conformity with Zoning District Regulations

The proposed project is consistent with all development regulations for the IG Zoning District. Table 1 provides a summary.

TABLE 1 Proposed project conformity with development regulations

Regulation	Standard	Proposed Project
Maximum Development Intensity (FAR) ¹	1.50	0.10 ²
Maximum Building Height (feet) ³	35	15
Minimum Building Setbacks (feet)		
Front/Exterior Side ⁴	0	n/a ⁶
Rear/Interior Side ⁵	0	15 to 30 ⁷

Notes:

1. The intensity of use of land for industrial or commercial development is described as a floor area ratio (FAR). FAR is defined as the total floor area of a building (or structure) on a lot divided by the total area of the lot. For land with an Industrial designation, the maximum FAR is 1.50.

⁵ 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 maximum building height, minimum building setback, minimum lot size, and a list of allowable uses.

2. FAR calculation: tanks floor area ÷ site area = 2,919 sf ÷ 30,149 sf = 0.10.
3. The maximum building height permitted within the IG Zoning District is 35 feet, except as may be approved by exception by Special Use Permit, pursuant to WMC § 14-16.604(c).
4. There is no minimum front and exterior side yard setback requirement for buildings or structures within the IG Zoning District, pursuant to WMC § 14-16.604(b).
5. There are no required interior side or rear yard setbacks, unless when the property abuts the boundary of any other zoning district, then not less than the minimum yard required to the adjacent yard in said abutting zoning district.
6. The site does not abut a street and is over 200 feet from W Beach Street (Attachment 3 Site Plan Access, sheet C2.2.).
7. The proposed tanks are located towards the middle of the site and range from 15 to 30 feet from the interior side and rear property lines (Attachment 3, Phasing Plan, sheet C0.2).

Vehicle Access/Circulation

The project does not involve the construction of a new access road or alteration of nearby roadways. The project site is currently accessed via an existing driveway off West Beach Street and 30' private right-of-way across the properties at 890 and 1000 West Beach Street (Attachment 3, sheet C2.2; Attachment 4). A secondary access is provided from a driveway/road located near the Industrial Road/West Beach Street intersection, which parallels the railroad spur that runs to the site. Nearby primary roadways that may be used to travel to and from the project site include West Beach Street, Industrial Road, and Riverside Drive (SR 129). These roadways are designated major or minor arterials in the City's General Plan and are intended to move large to medium volumes of traffic within an urbanized area and provide freeway access. These roadways can accommodate the 15 trips generated by the project, and no roadway improvements, traffic control devices, or access restrictions to control or divert traffic traveling to and from the site are needed.

Parking

No parking is required for the proposed project as employees of Mountain Propane would visit the site only temporarily and not be located permanently onsite. The project does involve constructing a warehouse building or structure with an office space for employee use and, therefore, does not trigger the parking requirement of 1 space per each employee for a *petroleum bulk station and terminal* type use (DLU 152), pursuant to [WMC Section 14-17.401\(f\)](#). Employees of the bulk propane plant would primarily visit the site by truck for the purpose of transferring propane to and from the storage tanks and delivering it to customers; occasional employee trips by passenger vehicle may use the two parking spaces provided.

Landscaping

The project involves installing new landscaping along the rear property line bordered by the Santa Cruz Branch Rail Line (Attachment 3, sheet C2.1). The proposed plant list includes a mix of grasses, groundcovers, shrubs and trees, including blue fescue (*festuca ovina 'glauca'*), giant ryegrass (*elymus condensatus*), salt grass (*distichlis spicata*), common rush (*juncus patens*), society garlic (*tulbaghia violacea*), winter creeper (*euonymus fortunei 'emerald gaiety'*), Japanese barberry (*berberis thunbergii 'atropurpurea'*), escallonia (*escallonia rubra*), Pacific wax myrtle (*myrica californica*), and crape myrtle (*lagerstroemia hybrid 'tuscarora'*). The proposed landscape area is 10 feet in width and would enhance the public view of the site from the rail/trail corridor.

All proposed plantings have low to moderate water demands and would be irrigated using a drip irrigation system. A condition of approval requires that the landscaping and irrigation design

comply with the California Model Water Efficient Landscape Ordinance, in accordance with [WMC Section 6-3.801](#).

A condition of approval requires that all plants be maintained in a healthy and growing condition. Therefore, if there is inadequate precipitation to fill the cisterns for meeting the irrigation demand, the property owner shall be responsible for trucking water to the site to fill the cisterns to full capacity and ensure they can provide an adequate water supply for irrigating landscaped areas.

Fencing

The project includes add new fencing and gates. A 50-foot wide (double leaf) sliding gate would be installed at the main entrance to the site with cyclone fencing 6 feet in height on either side to connect to existing fencing nearby. An 8-foot high black no-climb metal fence and 12-foot wide swing gate are proposed along the rear property line bordering the Santa Cruz Branch Line (Attachment 3, sheet C2.1). All fencing along the entire perimeter would include barbed wire for security (Attachment 3, sheets C2.3 and C6.1).

Lighting/Visual Impact

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") may 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 project increases ambient lighting conditions beyond its property line and project lighting routinely spills over into adjacent light-sensitive land use areas.

The proposed project includes the installation of five pole-mounted light fixtures and security cameras. As shown on the Security and Lighting Plan, they are located along the perimeter of the site to illuminate the propane tanks and entrances and deter trespassing (Attachment 3, sheet C2.3).

The project site is located in an industrial area and is not next to any light-sensitive land uses. The project site is approximately 580 feet away from the Watsonville Slough. The nearest residence is over 700 feet to the northwest of the site. Therefore, the project is not anticipated to create a glare nuisance.

Drainage

In 2014, the City adopted post-construction stormwater management requirements (PCRs) for applicable new development and redevelopment construction projects (Ordinance No. 1299-14; Resolution No. 4-14). [WMC § 6-3.535](#). The project must comply with the PCRs. The primary

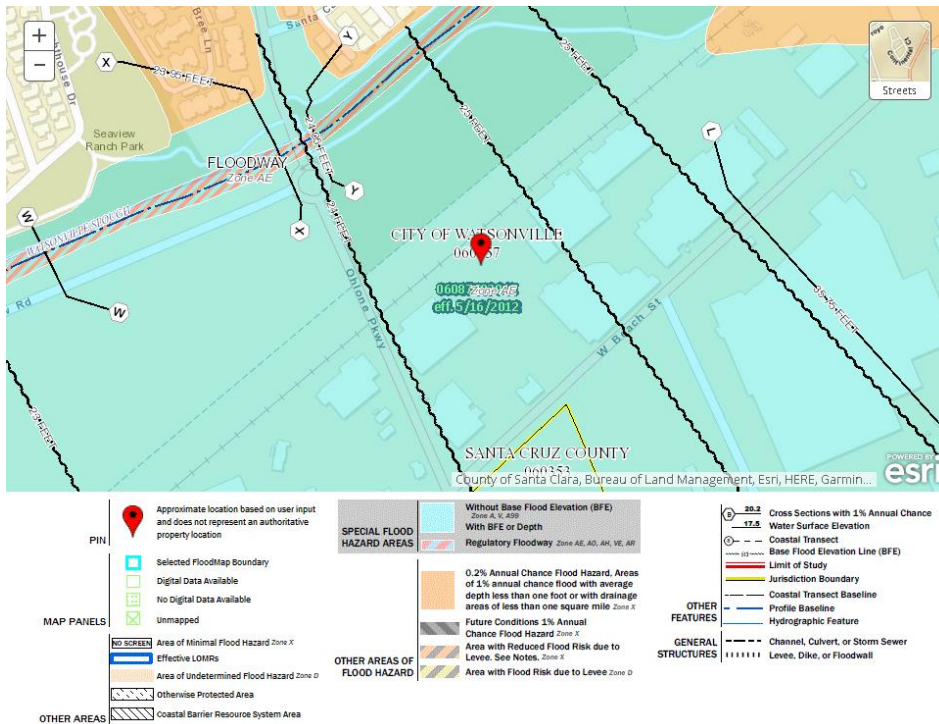
objective of the PCRs is to ensure the reduction of pollutant discharges to the maximum extent possible and prevent stormwater runoff from causing or contributing to a violation of water quality standards. The PCRs categorize projects into four primary tiers based mainly on the net increase in impervious 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. Attachment 3 provides a summary of these PCR tiers and their associated performance requirements for stormwater management and treatment.

The proposed project includes the removal of 7,617± square feet of pavement and concrete and the installation of 4,780± square feet of pavement and, therefore, is a PCR tier 2 type project, as it would create and/or replace between 5,000 and 15,000 square feet of impervious surfaces on the project site. As such, the project is subject to compliance with the performance requirements of PCR tier 1 and 2. The project plans include a preliminary Grading Plan and preliminary Site Utility Plan (Attachment 3, sheet C3.1 & C4.1) and Storm Water Control Plan. As shown on these plans, proposed drainage facilities and post-construction features include dividing the site into three drainage management areas (DMAs), directing runoff to the infiltration pit, and providing three underground storage cisterns. These drainage management features are intended to control the flow rate and pollutant load to pre-project levels.

Flood Hazard Prevention

The project site is in a Federal Emergency Management Agency (FEMA) flood zone. As shown on Figure 3, the entire project site is within FEMA Zone AE and therefore is in an area prone to flooding. Zone AE represents the 100-year floodplain with an established base flood elevation of approximately 25 feet AMSL. As such, the project must minimize potential flood damage by elevating the proposed storage tanks. In compliance with the City's provisions for flood hazard reduction, codified in [WMC Section 9-2.500](#), the tanks would be elevated on concrete piers to an elevation of 26± feet AMSL and thereby provide a one-foot freeboard above the base flood elevation (Attachment 3, sheets C3.1 & C5.1).

In accordance with [WMC Section 9-2.400](#), a condition of approval requires the applicant to obtain a Floodplain Development Permit before a building permit will be issued.



Environmental Review

The proposed project is exempt from the California Environmental Quality Act (CEQA), in that the project meets the conditions listed in Section 15332 of the State CEQA Guidelines and, further, may be considered covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment and it can be seen with certainty that there is no possibility that the project would have a significant effect on the environment. [CEQA Guidelines § 15061\(b\)\(3\)](#).

Pursuant to Section 15332 of the State CEQA Guidelines, projects characterized as in-fill development meeting the following conditions are considered exempt:

- The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations;
- The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- The project site has no value as habitat for endangered, rare or threatened species.
- Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- The site can be adequately served by all required utilities and public services.

The project is located within the city limits surrounded by industrial or vacant land uses on land designated for industrial development. According to a biotic resources report prepared for project, the entire site is categorized as developed or disturbed and does not provide suitable habitat for special status species. The anticipated 15 trips/day generated by the project is not

expected to result in increased traffic congestion or significant delay(s) upon existing local or regional roadways, change the level of service on the surrounding roadways, result in a significant vehicle miles traveled (VMT) increase, or necessitate roadway improvements or expansion. According to an air quality analysis, the project would not result in air quality or greenhouse gas emissions that would exceed applicable thresholds. Utilities and public services exist and are available. As such, the project qualifies for an infill (class 32) categorical exemption.

To confirm whether or not the “common sense” exemption applies, a review was conducted of the following five environmental topics based on the questions outlined in CEQA Guidelines Appendix G, Environmental Checklist Form:

- Air Quality/Greenhouse Gases
- Archeological/Cultural Resources
- Biological Resources
- Hazardous Materials
- Traffic/Transportation

Results from this review are documented in technical memoranda (Attachment 6). The analyses all conclude that the project would have either “no impact” or a “less than significant impact” on the environment as outlined in Appendix G of the CEQA Guidelines. No mitigation measures are recommended or required to reduce potential impacts to a less than significant level for any of the environmental topics analyzed. Therefore, it is clear, based on the evidence on the record, that the project can be considered exempt from CEQA under Section 15061(b)(3)—the “common sense” exemption— as it can be seen with certainty that there is no possibility that the activity (project) in question would have a significant effect on the environment requiring further review and mitigation.

Best Management Practices and Avoidance Measures

Where applicable, the technical memoranda provided recommended best management practices and avoidance measures. All recommended measures are included as conditions of approval, including taking appropriate precautions if contaminated soils are encountered during excavation activities, obtaining a hazardous materials storage permit from Santa Cruz County Environmental Health, conducting a preconstruction surveys for California red-legged frogs, Western pond turtle, nesting birds and special status plants, presenting a construction education program by a qualified biologist for all construction workers and site visitors before the start of construction, and installing fencing to exclude special status species during construction activities.

CONCLUSION

Approval of the Special Use Permit with Design Review and Environmental Review (PP2019-18), subject to the recommended conditions would allow the establishment of a propane storage and transfer facility (aka bulk propane plant) on a 0.7± acre property located at 950 W Beach Street (APN 018-331-28; formerly APNs 018-331-05 and -06). The project is consistent with certain General Plan goals and policies regarding industrial land uses, and a *petroleum bulk station and terminal* type use is a conditionally permitted use in the IG Zoning District. However, the project may be considered incompatible with existing nearby industrial uses that involve the

production, storage and/or wholesaling of hazardous materials (e.g., biodiesel). While the project may not be subject to further environmental review per CEQA, the Planning Commission may find that the facility may pose a public health and safety hazard.

ACTION

1. Public Hearing - Accept public testimony
2. Special Use Permit with Design Review - Adoption of Resolution

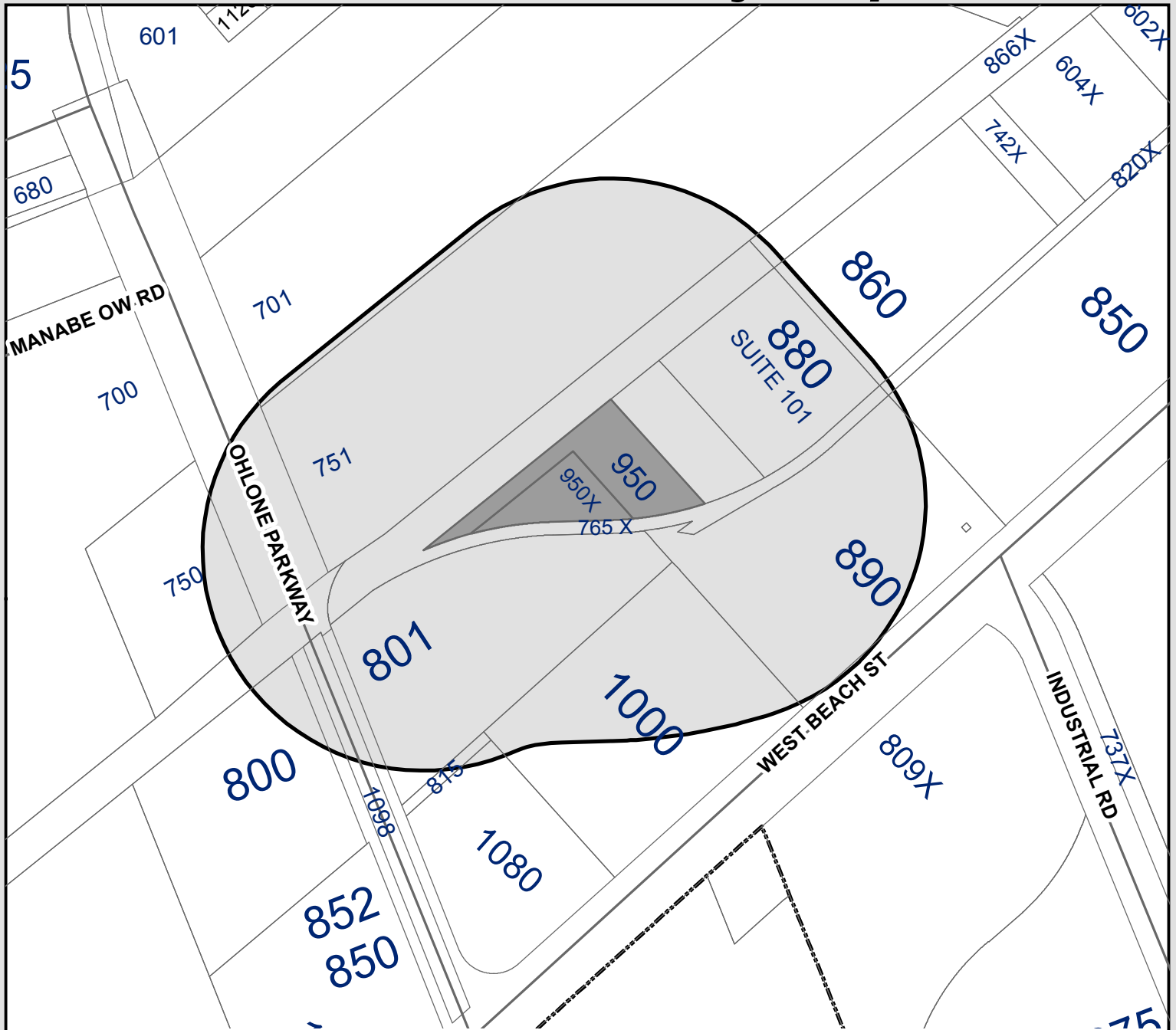
ATTACHMENTS

1. Site and Vicinity Map
2. Proximity to Nearby Land Uses Map
3. Plan Set
4. Reference maps and recorded documents showing site access
5. Post-construction Stormwater Requirements Summary
6. Mountain Propane Environmental Guidance Memorandum (dated June 4, 2020)
7. Water Board Case Closure Transmittal (dated July 15, 2014)
8. Public comments received to date




Electronic copies of the above attachments for the Mountain Propane project at 950 W Beach Street are available on the City's website at:

<https://www.cityofwatsonville.org/DocumentCenter/Index/157>

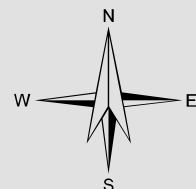
Site and Vicinity Map



Legend

- | | | |
|--|--|---|
|  Street |  Parcel |  300' Buffer Zone |
|  Watsonville City Limit |  Project Site | |

PROJECT: PP2019-18
 APPLICANT: David Dauphin
 APN#s: 018-331-28 (formerly 018-331-05; 06)
 LOCATION OF PROJECT: 950 West Beach St

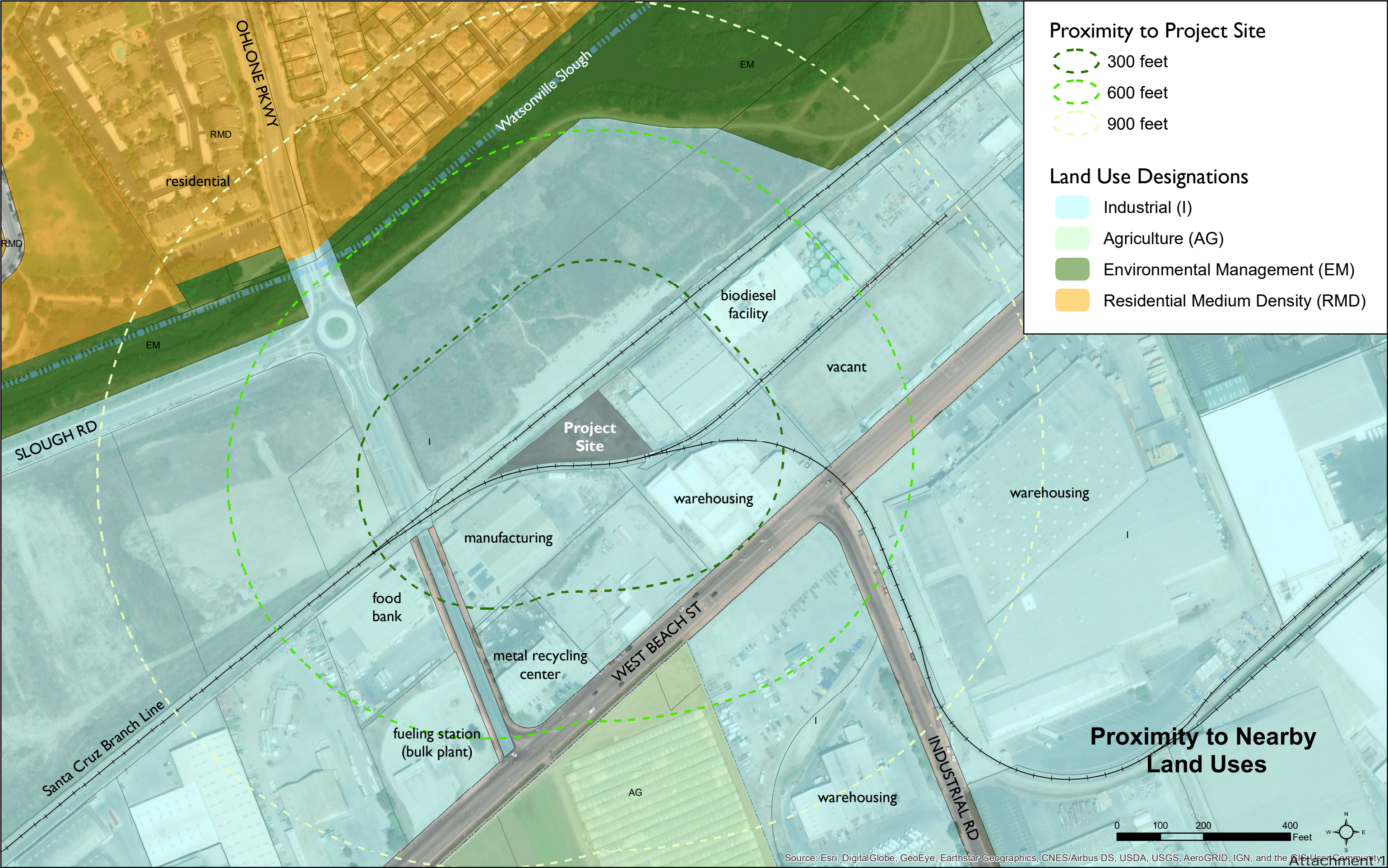


Prepared by Watsonville GIS Center 1/22/2019 (CDD1905).

This Document is a graphic representation only of best available sources.
 The City of Watsonville assumes no responsibility for any errors.

Attachment 1
 page 1 of 1

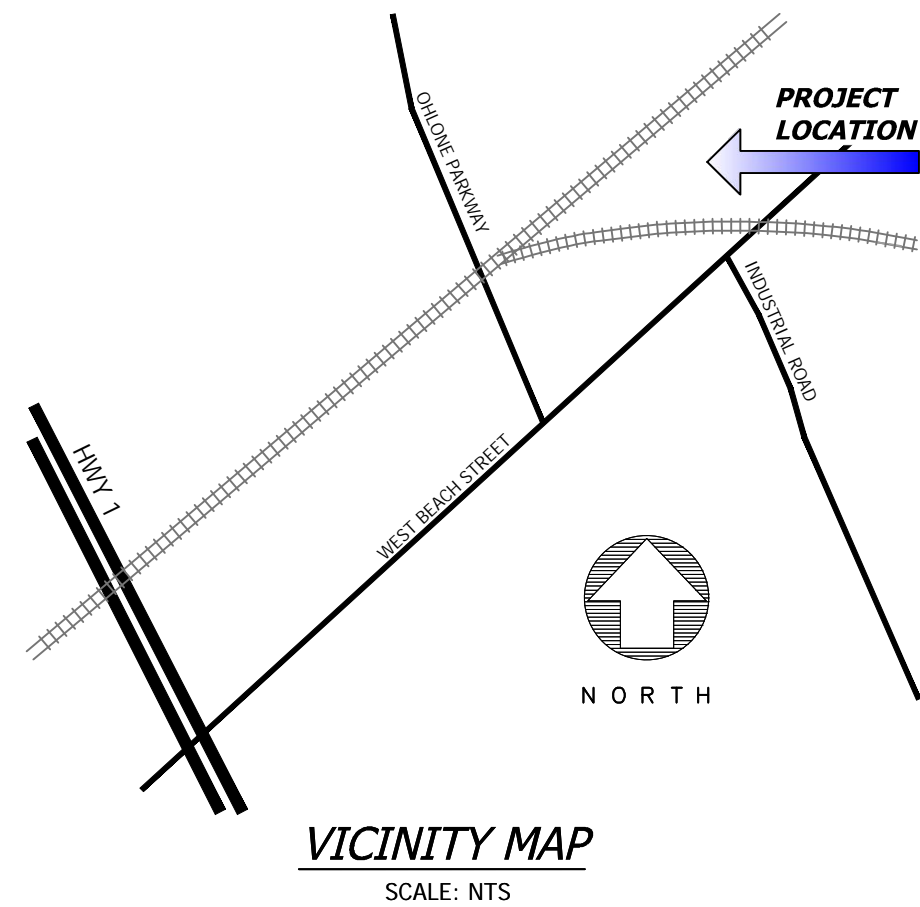
Attachment 1
 Page 18 of 412



TENTATIVE SITE IMPROVEMENT PLANS

950 WEST BEACH STREET, WATSONVILLE, CA

APN: 018-331-28



GENERAL NOTES

NO CHANGE TO THE GRADING PLAN SHALL BE PERMITTED WITHOUT PRIOR APPROVAL BY THE OWNER OR OWNERS REPRESENTATIVES.

CONTRACTOR SHALL VERIFY LOCATIONS, ELEVATIONS AND INVERTS OF EXISTING UTILITY PRIOR TO COMMENCEMENT OF WORK AND SHALL NOTIFY OWNER OR OWNERS REPRESENTATIVES OF VARIANCE FROM THOSE SHOWN ON THE PLANS.

UNDERGROUND FACILITIES AND UTILITIES HAVE BEEN SHOWN BASED ON RECORD DRAWINGS AND VISIBLE EVIDENCE FOUND IN FIELD. NO WARRANTY IS MADE REGARDING THE COMPLETENESS OR ACCURACY OF SUCH INFORMATION. PRIOR TO CONSTRUCTION, DETERMINE THE EXACT LOCATION OF UNDERGROUND FACILITIES AND UTILITIES, AND PRESERVE SAME FROM DAMAGE. PRIOR TO CONSTRUCTION, VERIFY LOCATION AND ELEVATION OF EXISTING UNDERGROUND UTILITIES AT THE CROSSING POINTS WITH PROPOSED UTILITIES. THE CONTRACTOR SHALL NOTIFY THE OWNER OR OWNERS REPRESENTATIVES IF CONDITIONS DIFFER FROM THOSE SHOWN ON THE DRAWINGS AND SHALL NOT BEGIN CONSTRUCTION UNTIL THE CHANGED CONDITION HAS BEEN EVALUATED. CONTACT UNDERGROUND SERVICES ALERT (USA) (1-800-227-2600) TWO (2) WEEKS PRIOR TO DIGGING. REPAIR UNDERGROUND UTILITIES DAMAGED BY CONSTRUCTION OPERATIONS. CONTRACTOR SHALL BE RESPONSIBLE FOR ANY AND ALL DAMAGES ASSOCIATED WITH CONTRACTOR'S FAILURE TO EXACTLY LOCATED AND PRESERVE UNDERGROUND FACILITIES AND UTILITIES.

CONTRACTOR SHALL BE RESPONSIBLE FOR ALL COORDINATION WITH THE APPROPRIATE UTILITY COMPANIES AND/OR AGENCIES TO VERIFY THE EXISTENCE AND/OR LOCATION OF ALL UNDERGROUND UTILITIES PRIOR TO COMMENCEMENT OF WORK.

IF ANY INDICATIONS OF ARCHEOLOGICAL REMIANS ARE ENCOUNTERED DURING GRADING ACTIVITIES FOR ANY DEVELOPMENT WITHIN THE PROJECT SITE, ALL WORK SHALL BE HALTED WITHIN 200 FOOT RADIUS OF THE FIND. OWNER SHALL RETAIN A QUALIFIED ARCHEOLOGIST RETAINED TO DETERMINE THE NATURE OF THE DISCOVERY AND RECOMMEND APPROPRIATE EVALUATION PROCEDURES.

CONTRACTOR RESPONSIBILITY

CONTRACTOR AGREES THAT HE SHOULD ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS, INCLUDING THE SAFETY OF ALL PERSONS AND PROPERTY, DURING THE COURSE OF CONSTRUCTION OF THIS PROJECT, AND THAT REQUIREMENT SHALL APPLY CONTINUOUSLY AND NOT BE LIMITED DURING WORKING HOURS. THE CONTRACTOR SHALL DEFEND, INDEMNIFY AND HOLD THE OWNER AND THE DESIGN PROFESSIONALS HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT, EXCEPTING FOR LIABILITY ARISING FROM THE SOLE NEGLIGENCE OF THE OWNER OR DESIGN PROFESSIONAL.

DISCREPANCIES

IF THERE ARE ANY DISCREPANCIES BETWEEN THE CONSTRUCTION DOCUMENTS AND EXISTING CONDITIONS WHICH WILL AFFECT THE WORK, THE CONTRACTOR SHALL BRING SUCH DISCREPANCIES TO THE DESIGN PROFESSIONAL FOR ADJUSTMENT BEFORE PROCEEDING WITH THE WORK. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROPER FITTING OF ALL WORK AND FOR THE COORDINATION OF ALL TRADES, SUBCONTRACTORS, AND PERSONS ENGAGED UPON THIS CONTRACT.

EROSION CONTROL NOTE

IT IS THE CONTRACTOR'S RESPONSIBILITY TO PROVIDE AND MAINTAIN EROSION CONTROL MEASURES AS REQUIRED THROUGHOUT THE LIFE OF THE PROJECT IN CONFORMANCE WITH THE CITY OF WATSONVILLE AND THE ASSOCIATION OF BAY AREA GOVERNMENTS

CONTRACTOR TO PROVIDE BACK-UP EROSION PREVENTION MEASURES (SOIL STABILIZATION) WITH SEDIMENT CONTROL MEASURES SUCH AS STRAW WATTLES, SILT FENCE, GRAVEL INLET FILTERS, AND/OR SEDIMENT TRAPS OR BASINS. ENSURE CONTROL MEASURES ARE ADEQUATE, IN PLACE, AND IN OPERABLE CONDITIONS. SEDIMENT CONTROLS, INCLUDING INLET PROTECTION, ARE NECESSARY BUT SHOULD BE A SECONDARY DEFENSE BEHIND GOOD EROSION CONTROL MEASURES.

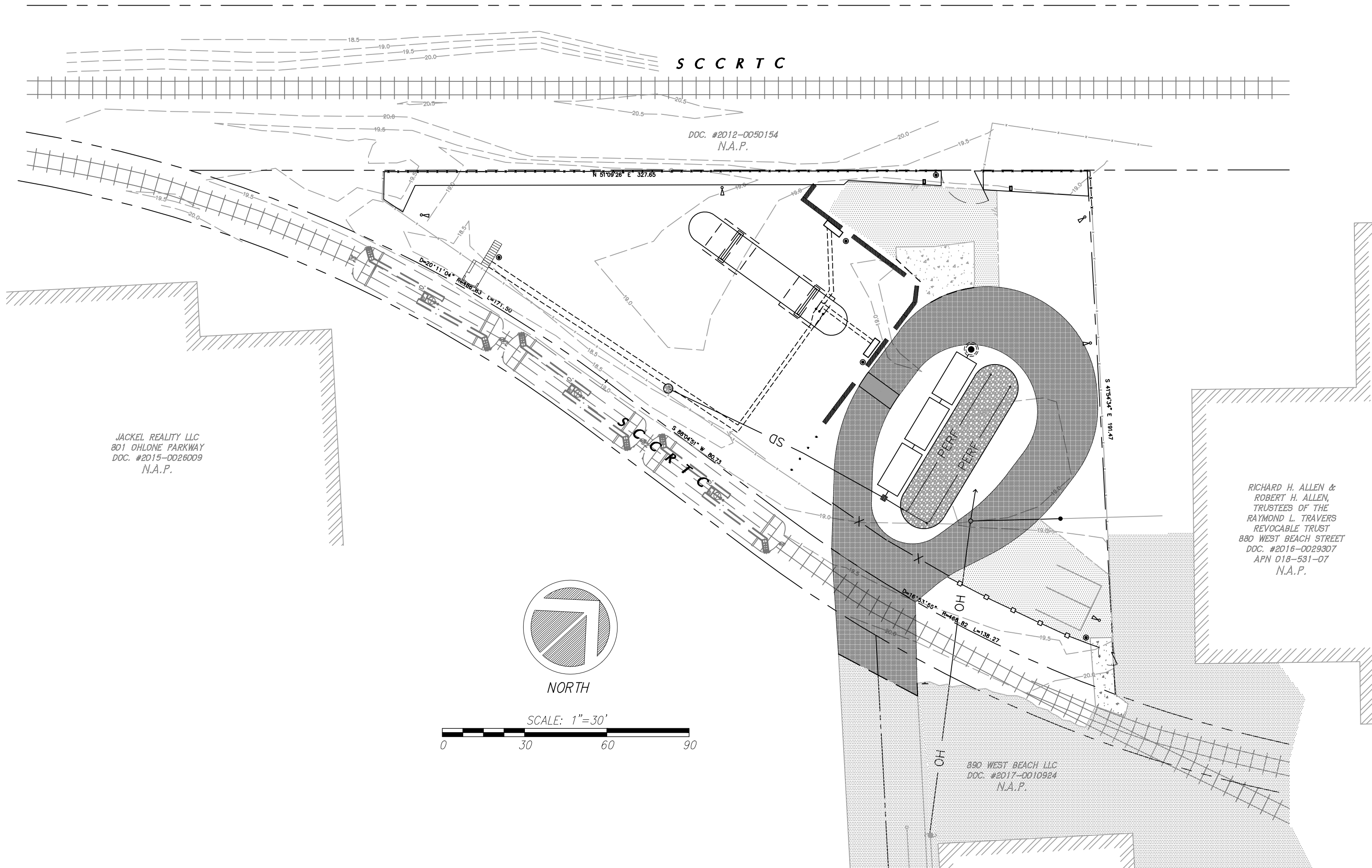
ALL EROSION PREVENTION AND SEDIMENT CONTROL MEASURES SHALL BE MAINTAINED AND REPAIRED THROUGHOUT THE SEASON. REPLACEMENT SUPPLIES SHOULD BE KEPT ON SITE.

SITE INSPECTIONS SHALL BE CONDUCTED BEFORE AND AFTER EACH STORM EVENT, AND EVERY 24 HOURS FOR EXTENDED STORM EVENTS, TO IDENTIFY AREAS THAT CONTRIBUTE TO EROSION AND SEDIMENT PROBLEMS OR ANY OTHER POLLUTANT DISCHARGES. IF ADDITIONAL MEASURES ARE NEEDED, REVISE THE EROSION CONTROL PLAN AND IMPLEMENT THE MEASURES IMMEDIATELY. DOCUMENT ALL INSPECTION FINDINGS AND ACTIONS TAKEN.

CONTRACTOR SHALL USE BEST MANAGEMENT PRACTICES DURING CONSTRUCTION FOR CONTROL OF STORM WATER RUNOFF (E.G. GRAVEL BAGS AT CATCH BASIN INLETS).

CONSTRUCTION SURVEYING / STAKING

CONTRACTOR IS RESPONSIBLE TO PROVIDE ALL SURVEYING AND OR STAKING BY A LICENSED SURVEYOR FOR ALL CONSTRUCTION PURPOSES.



GENERAL NOTES

- EXISTING PUBLIC FACILITIES DAMAGED DURING THE COURSE OF CONSTRUCTION OR IN EXISTING STATE OF DISREPAIR SHALL BE REPAIRED BY THE APPLICANT, AT THE APPLICANT'S EXPENSE, TO THE SATISFACTION OF THE CITY. (CDD-E)
- APPLICANT SHALL HAVE ONSITE AT ALL TIMES, A SUPERINTENDENT THAT SHALL ACT AS THE OWNERS' REPRESENTATIVE AND AS A POINT OF CONTACT FOR THE CITY'S PUBLIC WORK INSPECTOR. THE SUPERINTENDENT SHALL BE AUTHORIZED BY THE OWNER TO DIRECT THE WORK OF ALL CONTRACTORS DOING WORK ON PUBLIC AND PRIVATE IMPROVEMENTS. (CDD-E,PW)
- TO MINIMIZE DUST / GRADING IMPACTS DURING CONSTRUCTION THE APPLICANT SHALL:
 - TIME ACTIVITIES SO THAT PAVING AND BUILDING CONSTRUCTION BEGINS AS SOON AS POSSIBLE AFTER GRADING IS COMPLETED.
 - PROVIDE AND UTILITIZE WATER TRUCKS ON-SITE (BUT NOT ON PUBLIC STREETS) TO SPRAY WATER ON ALL EXPOSED EARTH SURFACES DURING CLEARING, GRADING, EARTH MOVING AND OTHER SITE PREPARATION ACTIVITIES THROUGHOUT THE DAY.
 - USE TARPULINS OR OTHER EFFECTIVE COVERS ON ALL STOCKPILED EARTH MATERIAL AND ON ALL HAUL TRUCKS TO MINIMIZE DUST
 - LANDSCAPE DISTURBED SOILS AS SOON AS POSSIBLE
 - SWEEP THE ADJACENT STREET FRONTAGES AT LEAST ONCE A DAY OR AS NEEDED TO REMOVE SILT AND OTHER DIRT WHICH IS EVIDENT FROM CONSTRUCTION ACTIVITIES.
 - ENSURE THAT CONSTRUCTION VEHICLES ARE CLEANED PRIOR TO LEAVING THE CONSTRUCTION SITE TO PREVENT THE DUST AND DIRT FROM BEING TRACKED OFF-SITE.
 - THE CITY SHALL HAVE THE AUTHORITY TO STOP ALL GRADING OPERATIONS, IF IN OPINION OF CITY STAFF, INADEQUATE DUST CONTROL OR EXCESSIVE WIND CONDITIONS CONTRIBUTE TO FUGITIVE DUST EMISSIONS. (CDD-E)
- ALL FILL SHALL BE PLACED IN STANDARD LIFTS, AND SHALL BE COMPACTED TO A MINIMUM OF 90% RELATIVE COMPACTION OR IN ACCORDANCE WITH THE DIRECTIONS OF THE GEOTECHNICAL REPORT. PRIOR TO THE APPROVAL AND ACCEPTANCE OF THE GRADING OPERATION AS COMPLETE, THE APPLICANT SHALL PROVIDE A SOILS REPORT GENERATED FROM A REGISTERED GEOTECHNICAL ENGINEER CERTIFYING THAT THE FILL HAS BEEN PROPERLY CONSTRUCTED. (CDD-E)
- THE GENERAL CONTRACTOR SHALL PROVIDE QUALIFIED SUPERVISION ON THE JOB SITE AT ALL TIMES DURING CONSTRUCTION. (CDD-E)
- PROVIDE A CONSTRUCTION HAUL ROUTE THAT CONSIDERS PEAK TRAFFIC PERIODS AND HAZARDS TO PEDESTRIAN AND BICYCLE TRAFFIC. (CDD-E)
- CONTRACTOR SHALL PROVIDE A MINIMUM OF 48 HOURS NOTICE IN ADVANCE OF ANY REQUIRED INSPECTION. ANY TEMPORARY SUSPENSION OF WORK OR RETURNING TO WORK FOR ANY REASON SHALL BE CAUSE FOR THE DEVELOPER OR CONTRACTOR TO TELEPHONE THE PUBLIC WORKS INSPECTOR AT 786-3100. (CDD-E)
- ATTENTION IS DIRECTED FOR ALL PERSONNEL WORKING ON THIS PROJECT TO SECTION 7-1.011, 7-1.09 AND SECTION 7-1.13 OF THE STATE STANDARD SPECIFICATIONS, LATEST EDITION AND THE FOLLOWING SPECIAL PROVISIONS REGARDING TRAFFIC MAINTENANCE AND CONTROL:
 - SIGNS, TRAFFIC CONES AND LIGHTED BARRICADES AT NIGHT SHALL BE PROVIDED BY THE CONTRACTOR TO ENCLOSURE THE WORK SITE AT ALL TIMES
 - FLAGMEN ARE REQUIRED WHEN TRAFFIC IS RESTRICTED TO THE USE OF ONE LANE, MAXIMUM 12 FOOT WIDE
 - STREET CLOSING IS PROHIBITED UNLESS PERMISSION IS GRANTED BY THE COMMUNITY DEVELOPMENT ADMINISTRATOR ONE WEEK IN ADVANCE IN ADVANCE OF THE CLOSURE. CONTRACTOR SHALL CONTACT ALL EMERGENCY SERVICES. DETOUR SIGN PLACEMENT SHALL BE APPROVED BY THE CITY
 - PROVISION SHALL BE MADE BY THE CONTRACTOR TO MAINTAIN PEDESTRIAN FACILITIES DURING CONSTRUCTION.
 - ACCESS TO DRIVEWAYS AND BUSINESS ESTABLISHMENTS SHALL BE MAINTAINED AT ALL TIMES BY USE OF STEEL PLATES OR MEANS ACCEPTABLE TO THE CITY INSPECTOR. (CDD-E)
- PRIOR TO EXCAVATION, CONTRACTOR SHALL LOCATE ALL EXISTING UNDERGROUND UTILITIES. CALL UNDERGROUND SERVICE ALERT (U.S.A.) AT 1-800-642-2444 TO HAVE UTILITIES LOCATED AND MARKED IN THE FIELD. (CDD-E)
- NO WORK FOR WHICH A BUILDING PERMIT IS REQUIRED SHALL BE PERFORMED WITHIN THE HOURS OF 7:00PM TO 7:00AM MONDAY - FRIDAY, NOR PRIOR TO 8:00AM OR AFTER 5:00PM ON SATURDAY, NO WORK SHALL BE PERFORMED ON SUNDAYS OR HOLIDAYS. A SIGN SHALL BE POSTED AT A CONSPICUOUS LOCATION NEAT THE MAIN ENTRY TO THE SITE, PROMINENTLY DISPLAYING THESE HOUR RESTRICTIONS. (CDD-B)

ABBREVIATIONS

AB	AGGREGATE BASE
AC	ASPHALT CONCRETE
BFC	BOTTOM FACE OF CURB
BFS	BOTTOM FACE OF STEP
B/STEP	BOTTOM OF STEP
BFW	BACK FACE OF WALL
BW	BACK OF WALL
BFP	BACKFLOW PREVENTER
E	ELECTRICAL (PG&E)
(E)	EXISTING
EP	EDGE OF PAVEMENT
CB	CATCH BASIN
FH	FIRE HYDRANT
FL	FLOW LINE
FG	FINISHED GROUND
FS	FINISHED SURFACE
G	GAS
GV	GATE VALVE
HYD	HYDRANT
ME	MATCH EXISTING
OH	OVERHEAD LINES
POC	POINT OF CONNECTION
SS	SANITARY SEWER
SSCO	SANITARY SEWER CLEAN OUT
SCCRTC	SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION
SD	STORM DRAIN
SDDI	STORM DRAIN DROP INLET
STA	STATION
TC	TOP OF CURB
TOW	TOP OF WALL
T/STEP	TOP OF STEP
SW	TOP OF SIDEWALK
W	WATER
WM	WATER METER
WV	WATER VALVE

PROPANE PIPING AND PNEUMATIC SYSTEM INSTALLATION NOTE:

GENERAL CONTRACTOR SHALL BE RESPONSIBLE IN COORDINATING ALL WORK WITH PRE-SELECTED SUBCONTRACTOR INSTALLING ALL PROPANE PIPING & PNEUMATIC SYSTEMS & ALL APPURTENANCES THEREOF, SHOWN ON, BUT NOT LIMITED TO, SHEETS C6-1 TO C6-4

CIVIL SHEET INDEX

- C0.1 - COVER SHEET
- C0.2 - PHASING PLAN
- C1.1 - EXISTING SITE/DEMOLITION PLAN
- C2.1 - SITE & LANDSCAPE PLAN
- C2.2 - SITE ACCESS PLAN
- C2.3 - LIGHT SECURITY PLAN
- C3.1 - GRADING PLAN
- C4.1 - PIPING AND UTILITY PLAN
- C4.2 - PNEUMATIC SYSTEM
- C5.1 - PROPANE TANK ELEVATIONS & PIPING DETAILS
- C6.1 - DETAILS
- C7.1 - SAFETY PLAN
- C8.1 - EROSION CONTROL PLAN

CIVIL ENGINEER:

C2G/CIVIL CONSULTANTS GROUP, INC.
4444 SCOTTS VALLEY DRIVE STE. 6
SCOTTS VALLEY, CA 95066
831.438.4420

GEOTECHNICAL:

DEES & ASSOCIATES, INC.
501 MISSION STREET, SUITE 8A
SANTA CRUZ, CA 95060
831.427.1770

SURVEYOR:

ROPER ENGINEERING
64 PENNY LANE, SUITE A
WATSONVILLE, CA 95076
831.724.5300

SURVEY DATA:

BASIS OF BEARINGS AND COORDINATES IS NAD 83 CCS 23 (207.750) ACCESSED USING GPS METHODS AND THE NOR CAL SMART NETWORK.

BENCHMARK FOR THIS SURVEY: W-781 EL= 18.94 DATUM=NAVD 88 PER 115 M 7.

ZONING:

IG - GENERAL INDUSTRIAL
(NO ZONING CHANGES REQUIRED)

FEMA DATA:

FLOOD ZONE: AE
BASE FLOOD ELEVATION (BFE): 25'
EFFECTIVE DATE: 06087C0394E
05/16/2012

LEGEND

PROPOSED	EXISTING	DESCRIPTION
		STORM MANHOLE
		DRAIN/DROP INLET
		AREA DRAIN
		SEWER MANHOLE
		GATE VALVE
		UTILITY POLE
		SEWER LATERAL
		WET UTILITY POINT OF CONNECTION
		WATER SERVICE & WATER METER
		FIRE HYDRANT
		CLEAN OUT
		STORM DRAIN
		SANITARY SEWER
		WATER MAIN
		ELECTRICAL
		FIRE SUPPRESSION
		JOINT TRENCH
		PROPERTY LINE
		CENTER LINE
		CONTOURS

NOTE:

CONTRACTOR SHALL VERIFY ALL UTILITY LOCATIONS. CALL USA (800) 227-3600. CONTRACTOR TO NOTIFY ENGINEER OF ANY APPARENT CONFLICTS FOR RESOLUTION PRIOR TO START OF CONSTRUCTION.



REVISIONS	BY
1 CITY COMMENTS DATED 3/15/19	DD
2 CITY COMMENTS DATED 7/30/19	JW
3 CITY COMMENTS DATED 1/20/20	DD

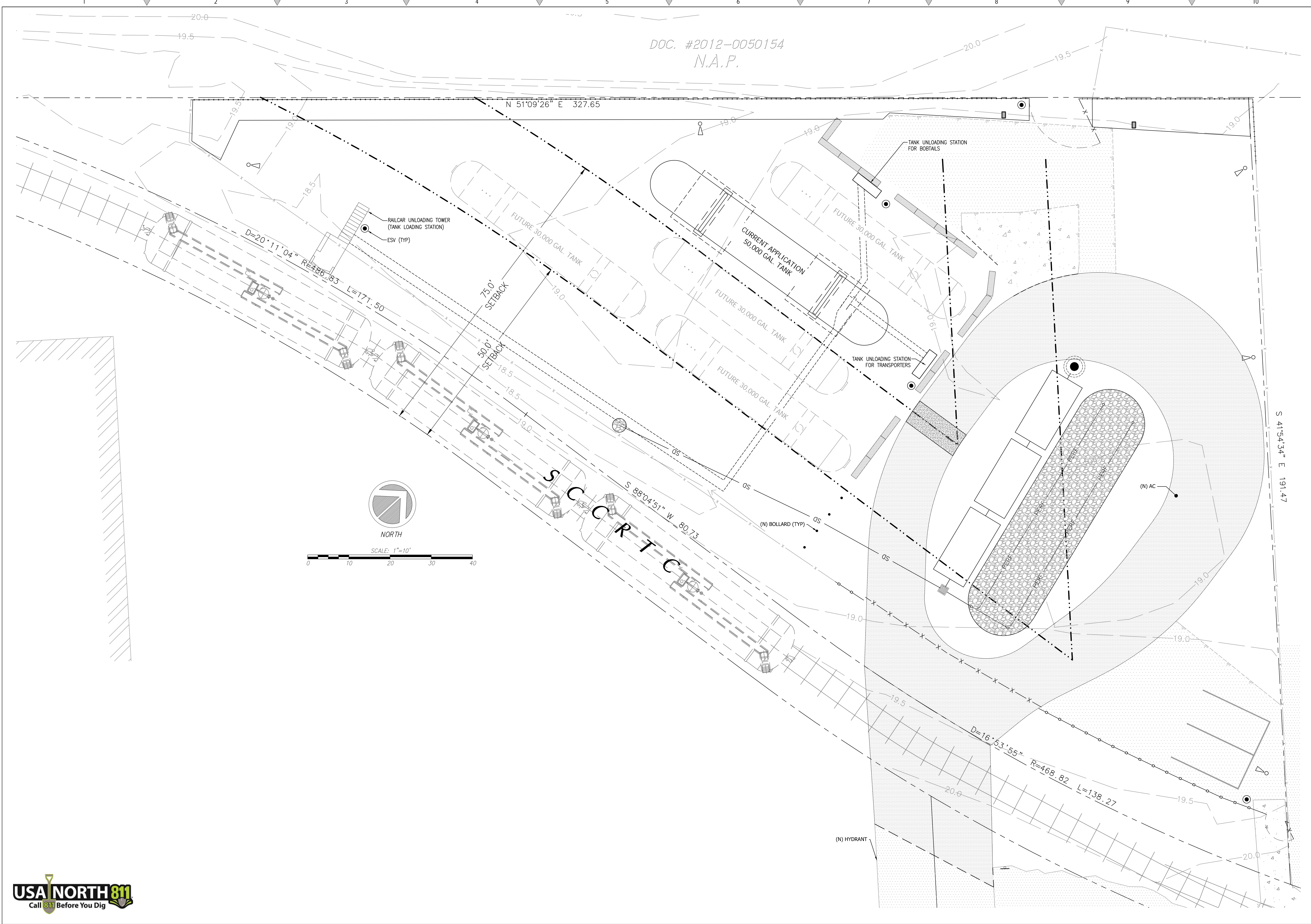
COVER

C2G/CIVIL CONSULTANTS GROUP, INC.
Engineers/Planners
4444 Scotts Valley Drive, Suite 6
Scotts Valley, CA 95066
T (831) 438-4420 F (831) 438-4420

MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA
APP # PP2019-18
APN 018-331-28

Date: 11.16.18
Scale: 1" = 30'
Drawn: JB/DD
Job: 485-00
Sheet: C0.1
or 13 Sheets

Attachment 3 page 1 of 13



REVISIONS		BY
1	CITY COMMENTS DATED 3/15/19	DD
2	CITY COMMENTS DATED 7/30/19	JW
3	CITY COMMENTS DATED 1/20/20	DD

PHASING PLAN

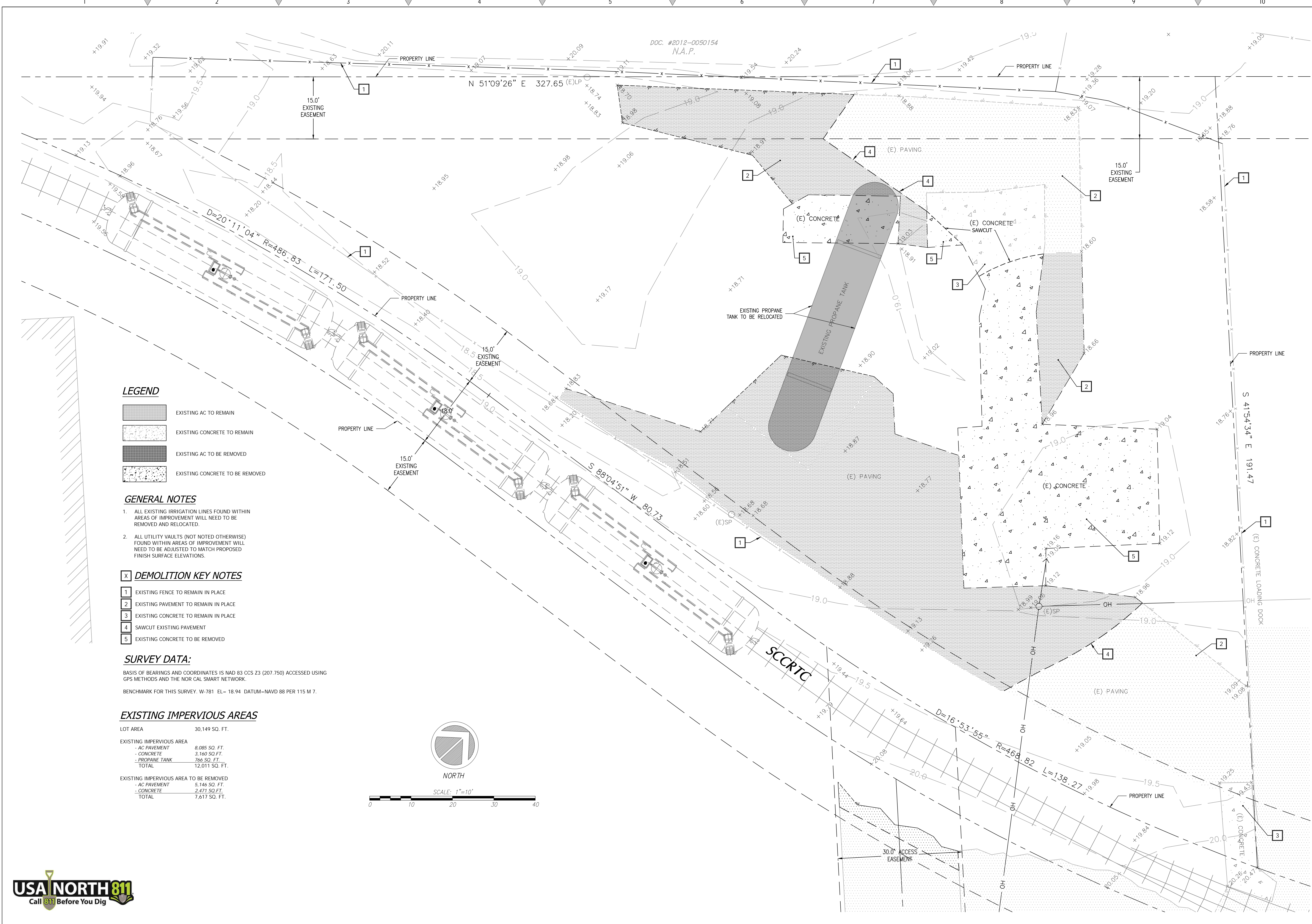
REGISTERED PROFESSIONAL ENGINEER
TODD R. CREMER
No. C 64561
Exp. 6/30/19
CIVIL
STATE OF CALIFORNIA

C2G CIVIL CONSULTANTS GROUP, INC.
Engineers/Planners
4400 Scotts Valley Road / Suite 6
Scotts Valley, CA 95066
T (831) 438-4420 F (831) 438-4420

MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA
APN 018-331-28 APP # PP2019-18

Date: 11.16.18
Scale: 1" = 10'
Drawn: JB/DD
Job: 485-00
Sheet: C0.2
Of 13 Sheets

Attachment 3
Page 21 of 412



- LEGEND**
- EXISTING AC TO REMAIN
 - EXISTING CONCRETE TO REMAIN
 - EXISTING AC TO BE REMOVED
 - EXISTING CONCRETE TO BE REMOVED

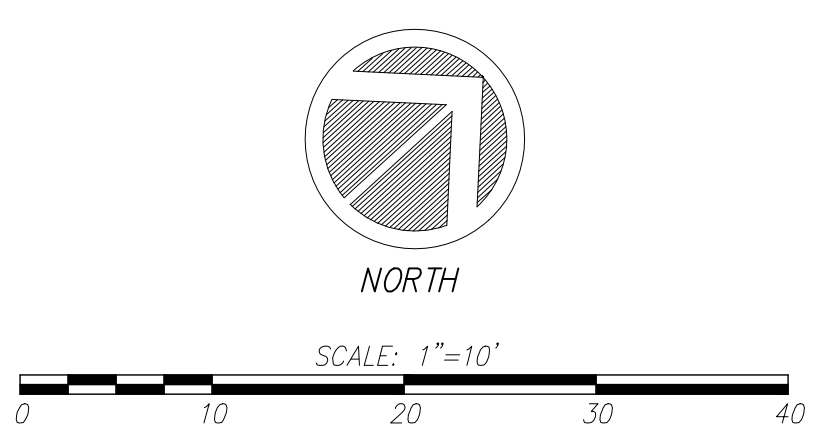
- GENERAL NOTES**
- ALL EXISTING IRRIGATION LINES FOUND WITHIN AREAS OF IMPROVEMENT WILL NEED TO BE REMOVED AND RELOCATED.
 - ALL UTILITY VAULTS (NOT NOTED OTHERWISE) FOUND WITHIN AREAS OF IMPROVEMENT WILL NEED TO BE ADJUSTED TO MATCH PROPOSED FINISH SURFACE ELEVATIONS.

- DEMOLITION KEY NOTES**
- EXISTING FENCE TO REMAIN IN PLACE
 - EXISTING PAVEMENT TO REMAIN IN PLACE
 - EXISTING CONCRETE TO REMAIN IN PLACE
 - SAWCUT EXISTING PAVEMENT
 - EXISTING CONCRETE TO BE REMOVED

SURVEY DATA:
BASIS OF BEARINGS AND COORDINATES IS NAD 83 CCS Z3 (207.750) ACCESSED USING GPS METHODS AND THE NOR CAL SMART NETWORK.
BENCHMARK FOR THIS SURVEY: W-781 EL= 18.94 DATUM=NAVD 88 PER 115 M 7.

EXISTING IMPERVIOUS AREAS

LOT AREA	30,149 SQ. FT.
EXISTING IMPERVIOUS AREA	
- AC PAVEMENT	8,085 SQ. FT.
- CONCRETE	3,160 SQ. FT.
- PROpane TANK	766 SQ. FT.
TOTAL	12,011 SQ. FT.
EXISTING IMPERVIOUS AREA TO BE REMOVED	
- AC PAVEMENT	5,146 SQ. FT.
- CONCRETE	2,471 SQ. FT.
TOTAL	7,617 SQ. FT.



REVISIONS		BY
1	CITY COMMENTS DATED 3/15/19	DD
2	CITY COMMENTS DATED 7/30/19	JW
3	CITY COMMENTS DATED 1/20/20	DD

EXISTING SITE & DEMOLITION PLAN

REGISTERED PROFESSIONAL ENGINEER
TODD R. CREMER
No. C 64561
Exp. 6/30/19
CIVIL
STATE OF CALIFORNIA

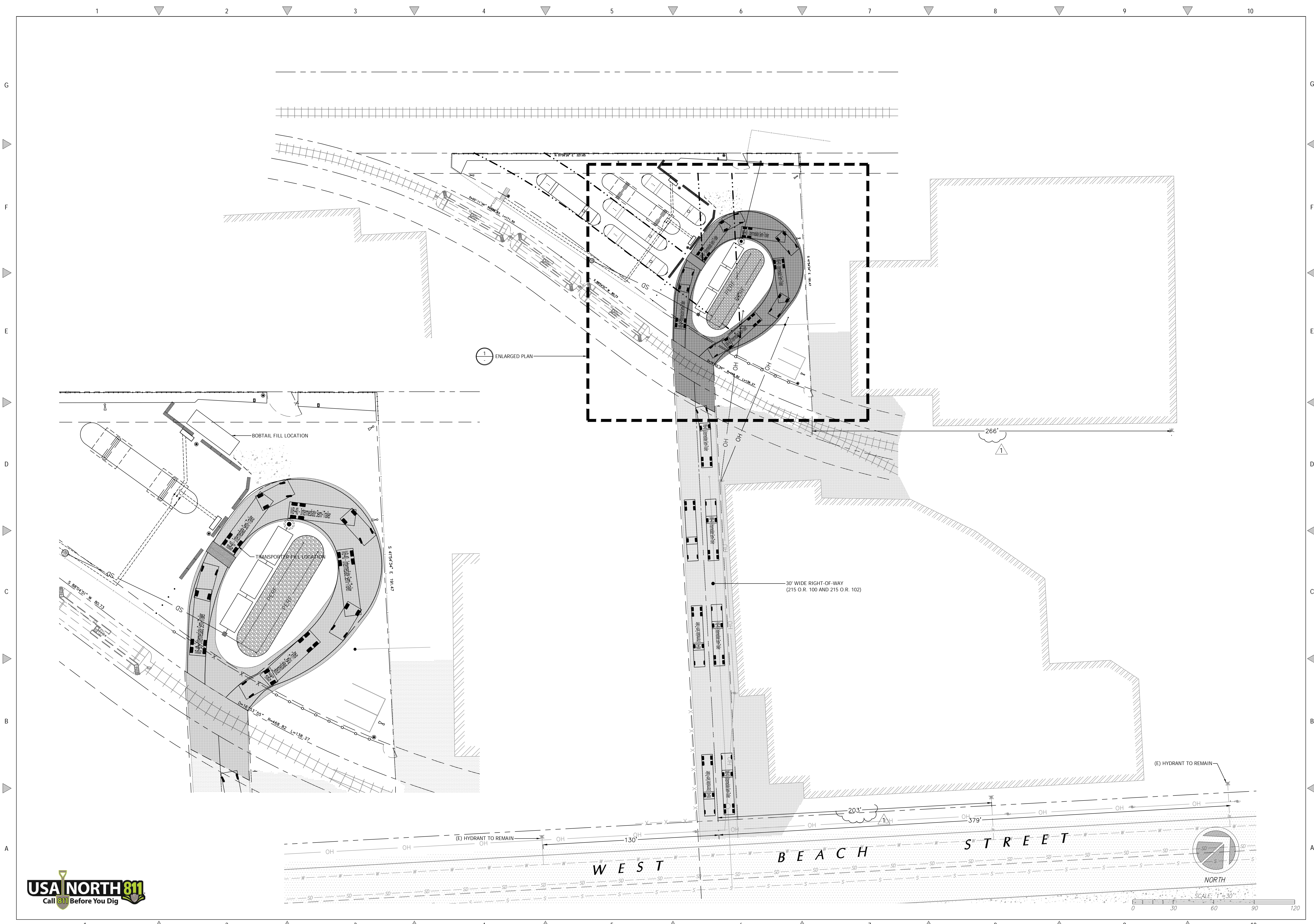
C2G CIVIL CONSULTANTS GROUP, INC.
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4400 River Street / Suite 6
Scotts Valley, CA 95066
T (831) 438-4420 F (831) 438-4420

MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA

APN 018-331-28 APP # PP2019-18

Date:	11.16.18
Scale:	1" = 20'
Drawn:	JB/DD
Job:	485-00
Sheet:	C1.1
Of 13 Sheets	

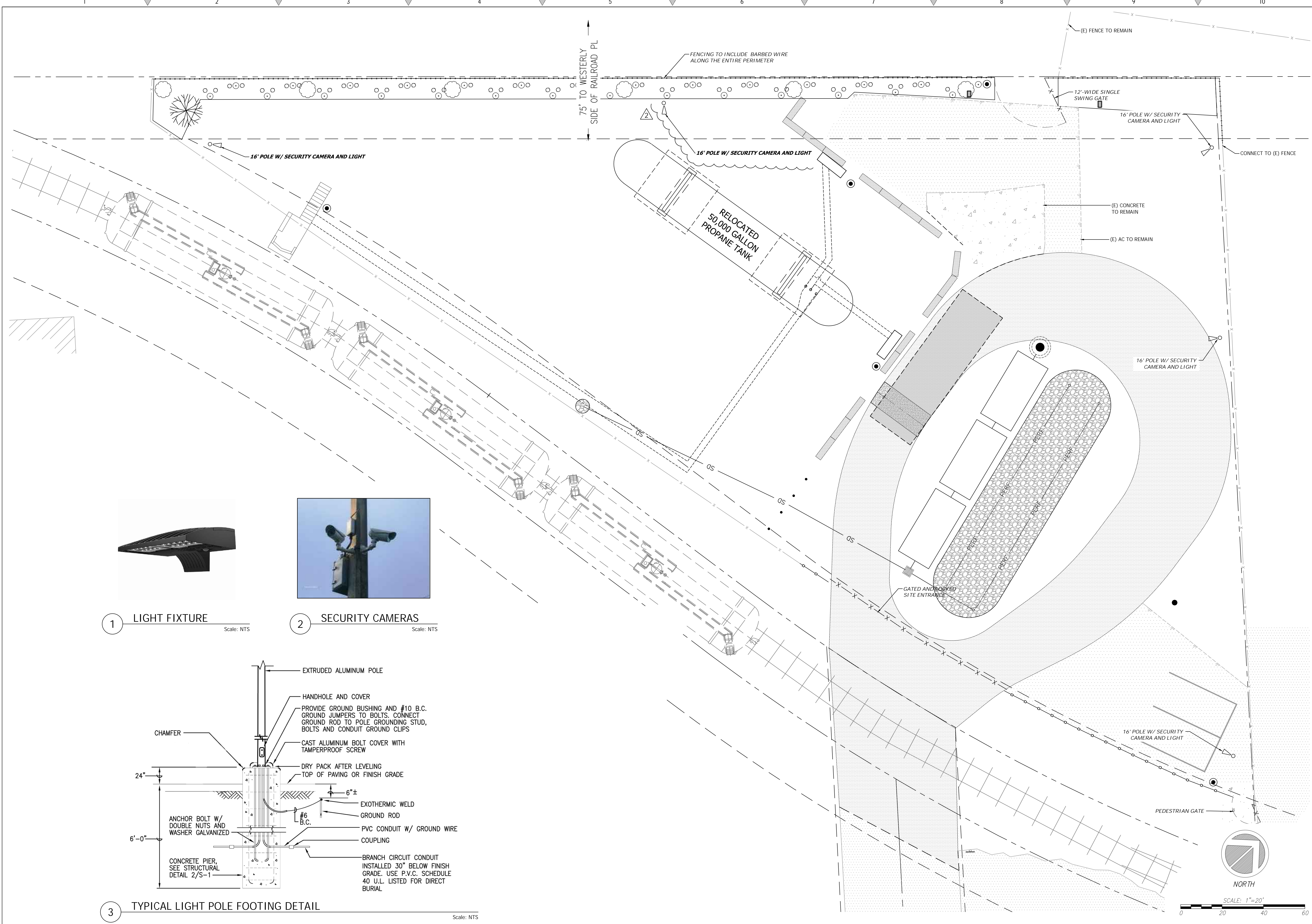
Attachment 3



REVISIONS		BY
1	CITY COMMENTS DATED 3/15/19	DD
2	CITY COMMENTS DATED 7/30/19	JW
3	CITY COMMENTS DATED 1/20/20	DD

SITE ACCESS PLAN	
REGISTERED PROFESSIONAL ENGINEER TODD R. CREMER No. C 64561 Exp. 6/30/19 CIVIL STATE OF CALIFORNIA	
C2G/CIVIL CONSULTANTS GROUP, INC. Engineers/Planners 4400 Highway 1 / Suite 6 Scotts Valley, CA 95066 T (831) 438-4420 F (831) 438-4420	
MOUNTAIN PROPANE COMPANY 950 WEST BEACH STREET WATSONVILLE, CA APP # PP2019-18 APN 018-331-28	
Date:	11.16.18
Scale:	1" = 20'
Drawn:	JB/DD
Job:	485-00
Sheet:	C2.2
Of 13 Sheets	

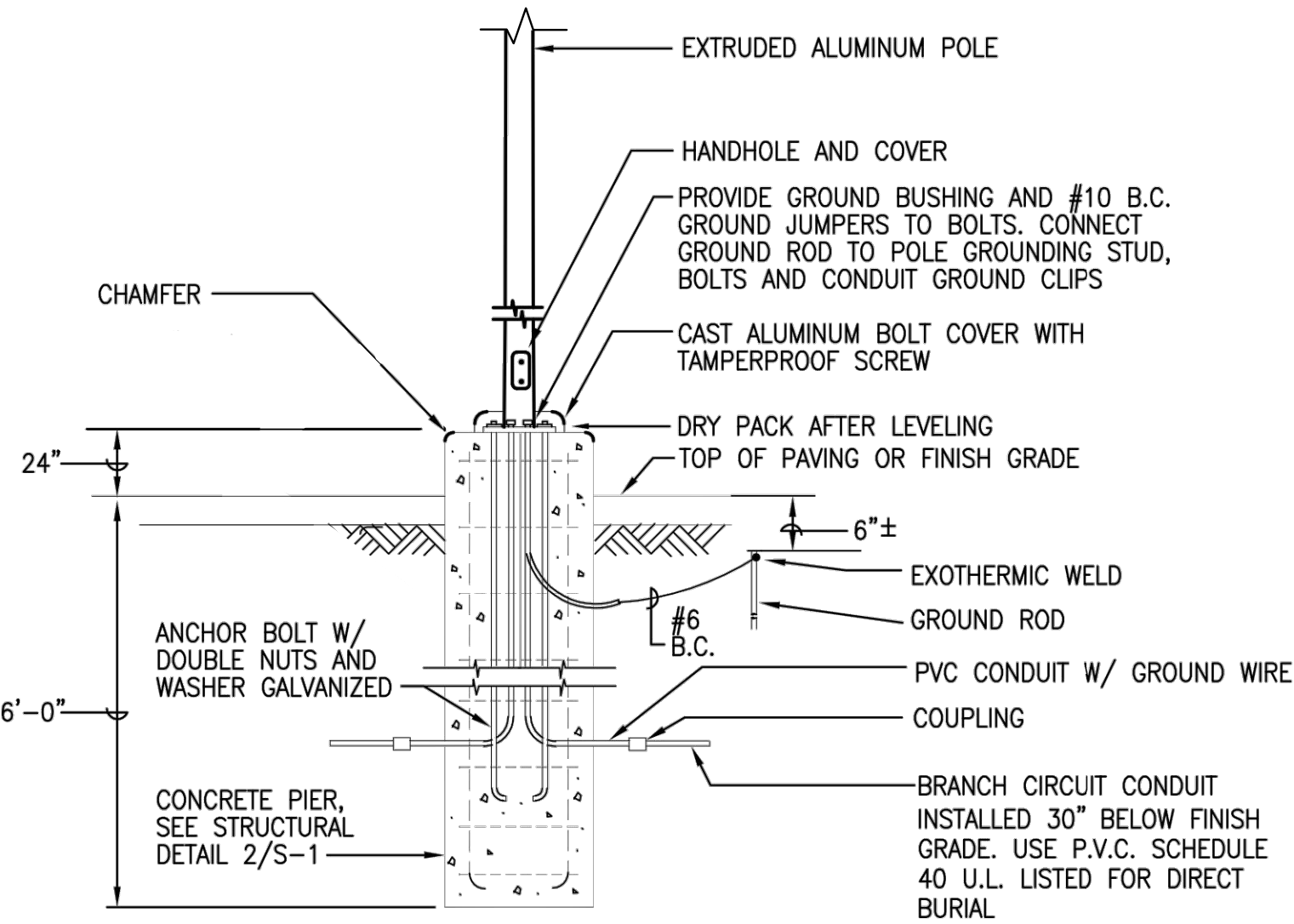
Attachment 3 page 5 of 13



1 LIGHT FIXTURE
Scale: NTS



2 SECURITY CAMERAS
Scale: NTS



3 TYPICAL LIGHT POLE FOOTING DETAIL
Scale: NTS

REVISIONS		BY
1	CITY COMMENTS DATED 3/15/19	DD
2	CITY COMMENTS DATED 7/30/19	JW
3	CITY COMMENTS DATED 1/20/20	DD

LIGHT & SECURITY PLAN

REGISTERED PROFESSIONAL ENGINEER
TODD R. CREMER
No. C 64561
Exp. 6/30/19
CIVIL
STATE OF CALIFORNIA

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MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA

APN 018-331-28 APP # PP2019-18

Date: 11.16.18

Scale: 1" = 20'

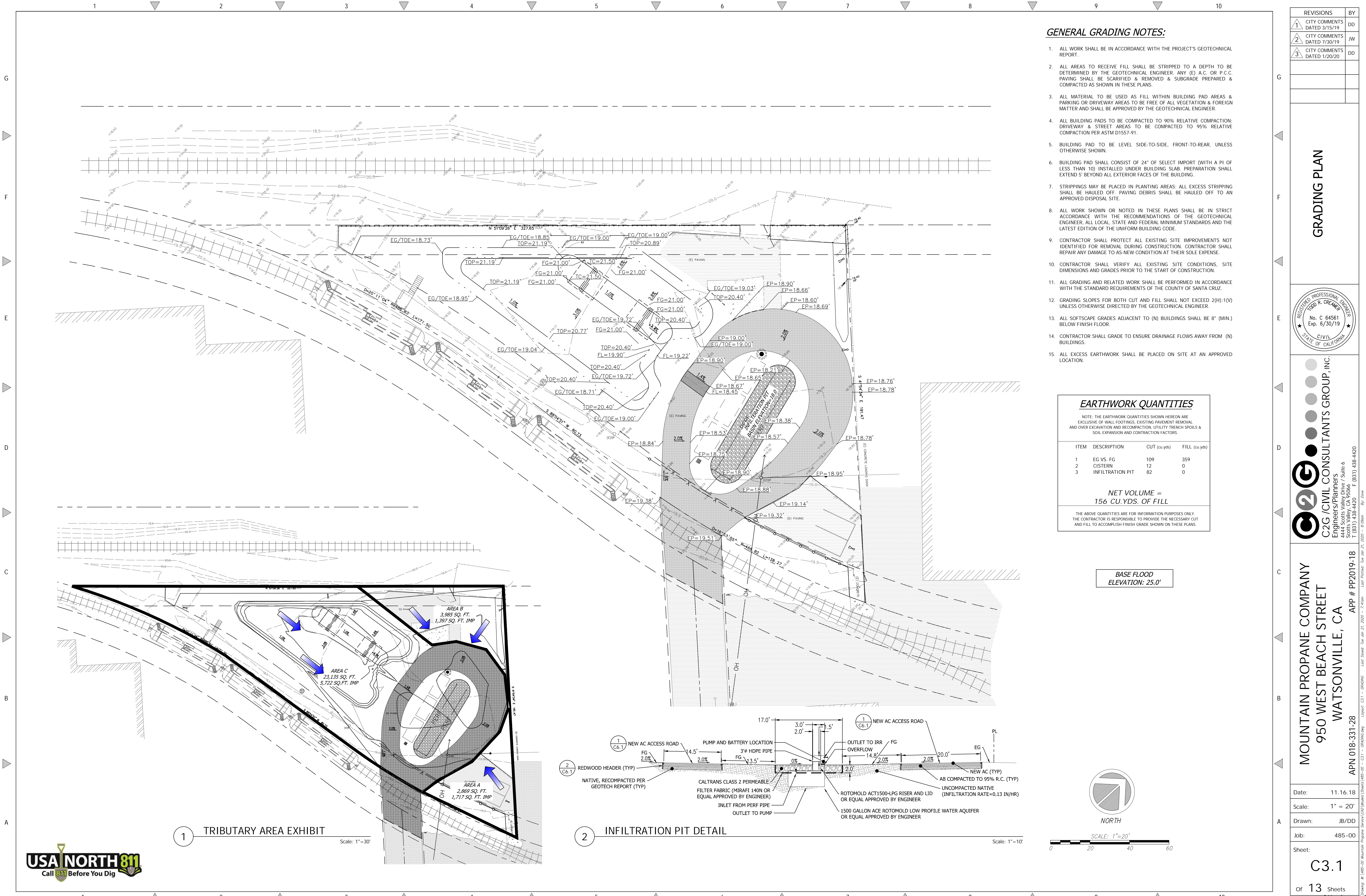
Drawn: JB/DD

Job: 485-00

Sheet: C2.3

Of 13 Sheets

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GENERAL GRADING NOTES:

- 1. ALL WORK SHALL BE IN ACCORDANCE WITH THE PROJECT'S GEOTECHNICAL REPORT.
- 2. ALL AREAS TO RECEIVE FILL SHALL BE STRIPPED TO A DEPTH TO BE DETERMINED BY THE GEOTECHNICAL ENGINEER. ANY (E) A.C. OR P.C.C. PAVING SHALL BE SCARIFIED & REMOVED & SUBGRADE PREPARED & COMPACTED AS SHOWN IN THESE PLANS.
- 3. ALL MATERIAL TO BE USED AS FILL WITHIN BUILDING PAD AREAS & PARKING OR DRIVEWAY AREAS TO BE FREE OF ALL VEGETATION & FOREIGN MATTER AND SHALL BE APPROVED BY THE GEOTECHNICAL ENGINEER.
- 4. ALL BUILDING PADS TO BE COMPACTED TO 90% RELATIVE COMPACTION; DRIVEWAY & STREET AREAS TO BE COMPACTED TO 95% RELATIVE COMPACTION PER ASTM D1557-91.
- 5. BUILDING PAD TO BE LEVEL SIDE-TO-SIDE, FRONT-TO-REAR, UNLESS OTHERWISE SHOWN.
- 6. BUILDING PAD SHALL CONSIST OF 24" OF SELECT IMPORT (WITH A PI OF LESS THAN 10) INSTALLED UNDER BUILDING SLAB. PREPARATION SHALL EXTEND 5' BEYOND ALL EXTERIOR FACES OF THE BUILDING.
- 7. STRIPPINGS MAY BE PLACED IN PLANTING AREAS; ALL EXCESS STRIPPING SHALL BE HAULED OFF. PAVING DEBRIS SHALL BE HAULED OFF TO AN APPROVED DISPOSAL SITE.
- 8. ALL WORK SHOWN OR NOTED IN THESE PLANS SHALL BE IN STRICT ACCORDANCE WITH THE RECOMMENDATIONS OF THE GEOTECHNICAL ENGINEER, ALL LOCAL, STATE AND FEDERAL MINIMUM STANDARDS AND THE LATEST EDITION OF THE UNIFORM BUILDING CODE.
- 9. CONTRACTOR SHALL PROTECT ALL EXISTING SITE IMPROVEMENTS NOT IDENTIFIED FOR REMOVAL DURING CONSTRUCTION. CONTRACTOR SHALL REPAIR ANY DAMAGE TO AS-NEW CONDITION AT THEIR SOLE EXPENSE.
- 10. CONTRACTOR SHALL VERIFY ALL EXISTING SITE CONDITIONS, SITE DIMENSIONS AND GRADES PRIOR TO THE START OF CONSTRUCTION.
- 11. ALL GRADING AND RELATED WORK SHALL BE PERFORMED IN ACCORDANCE WITH THE STANDARD REQUIREMENTS OF THE COUNTY OF SANTA CRUZ.
- 12. GRADING SLOPES FOR BOTH CUT AND FILL SHALL NOT EXCEED 2(H):1(V) UNLESS OTHERWISE DIRECTED BY THE GEOTECHNICAL ENGINEER.
- 13. ALL SOFTSCAPE GRADES ADJACENT TO (N) BUILDINGS SHALL BE 8" (MIN.) BELOW FINISH FLOOR.
- 14. CONTRACTOR SHALL GRADE TO ENSURE DRAINAGE FLOWS AWAY FROM (N) BUILDINGS.
- 15. ALL EXCESS EARTHWORK SHALL BE PLACED ON SITE AT AN APPROVED LOCATION.

EARTHWORK QUANTITIES

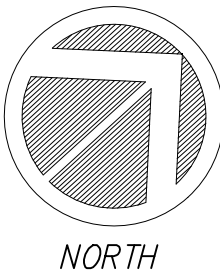
NOTE: THE EARTHWORK QUANTITIES SHOWN HEREON ARE EXCLUSIVE OF WALL FOOTINGS, EXISTING PAVEMENT REMOVAL AND OVER EXCAVATION AND RECOMPACTION, UTILITY TRENCH SPOILS & SOIL EXPANSION AND CONTRACTION FACTORS.

ITEM	DESCRIPTION	CUT (cu yds)	FILL (cu yds)
1	EG VS. FG	109	359
2	CISTERN	12	0
3	INFILTRATION PIT	82	0

NET VOLUME =
156 CU.YDS. OF FILL

THE ABOVE QUANTITIES ARE FOR INFORMATION PURPOSES ONLY. THE CONTRACTOR IS RESPONSIBLE TO PROVIDE THE NECESSARY CUT AND FILL TO ACCOMPLISH FINISH GRADE SHOWN ON THESE PLANS.

BASE FLOOD
ELEVATION: 25.0'



SCALE: 1"=20'

1 TRIBUTARY AREA EXHIBIT

Scale: 1"=30'

2 INFILTRATION PIT DETAIL

Scale: 1"=10'



REVISIONS

1	CITY COMMENTS DATED 3/15/19	DD
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GRADING PLAN

REGISTERED PROFESSIONAL ENGINEER
TODD R. CREMER
No. C 64561
Exp. 6/30/19
CIVIL
STATE OF CALIFORNIA

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MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA

APN 018-331-28 APP # PP2019-18

Date: 11.16.18

Scale: 1" = 20'

Drawn: JB/DD

Job: 485-00

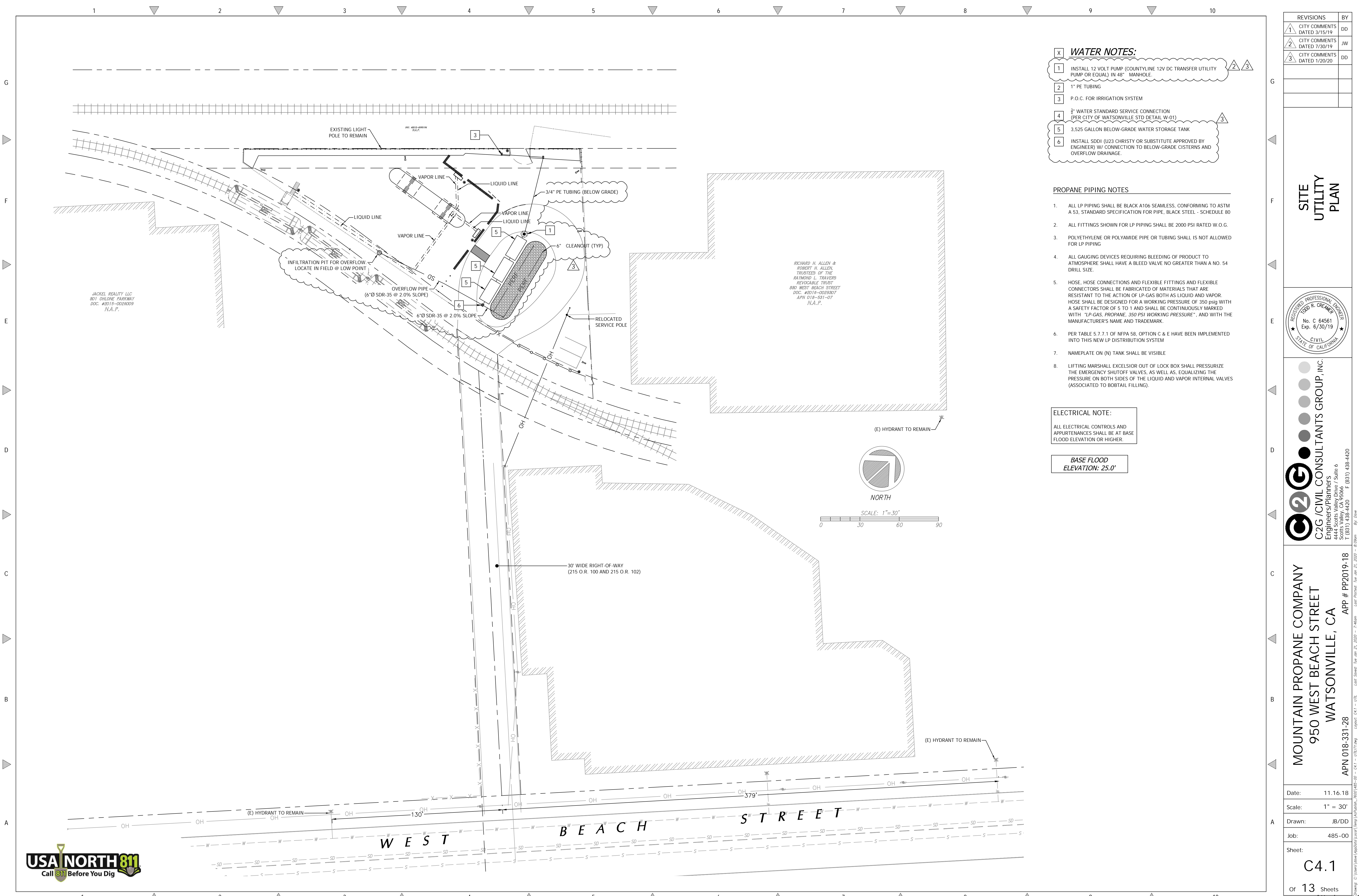
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Of 13 Sheets

Attachment 3

page 7 of 13

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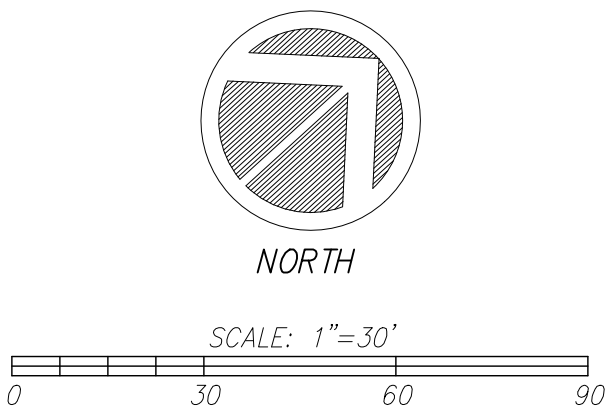


- WATER NOTES:**
- 1. INSTALL 12 VOLT PUMP (COUNTYLINE 12V DC TRANSFER UTILITY PUMP OR EQUAL) IN 48" MANHOLE.
 - 2. 1" PE TUBING
 - 3. P.O.C. FOR IRRIGATION SYSTEM
 - 4. 2" WATER STANDARD SERVICE CONNECTION (PER CITY OF WATSONVILLE STD DETAIL W-01)
 - 5. 3,525 GALLON BELOW-GRADE WATER STORAGE TANK
 - 6. INSTALL SDD1 (U23 CHRISTY OR SUBSTITUTE APPROVED BY ENGINEER) W/ CONNECTION TO BELOW-GRADE CISTERN AND OVERFLOW DRAINAGE.

- PROPANE PIPING NOTES**
- 1. ALL LP PIPING SHALL BE BLACK A106 SEAMLESS, CONFORMING TO ASTM A 53, STANDARD SPECIFICATION FOR PIPE, BLACK STEEL - SCHEDULE 80
 - 2. ALL FITTINGS SHOWN FOR LP PIPING SHALL BE 2000 PSI RATED W.O.G.
 - 3. POLYETHYLENE OR POLYAMIDE PIPE OR TUBING SHALL IS NOT ALLOWED FOR LP PIPING
 - 4. ALL GAUGING DEVICES REQUIRING BLEEDING OF PRODUCT TO ATMOSPHERE SHALL HAVE A BLEED VALVE NO GREATER THAN A NO. 54 DRILL SIZE.
 - 5. HOSE, HOSE CONNECTIONS AND FLEXIBLE FITTINGS AND FLEXIBLE CONNECTORS SHALL BE FABRICATED OF MATERIALS THAT ARE RESISTANT TO THE ACTION OF LP-GAS BOTH AS LIQUID AND VAPOR. HOSE SHALL BE DESIGNED FOR A WORKING PRESSURE OF 350 psig WITH A SAFETY FACTOR OF 5 TO 1 AND SHALL BE CONTINUOUSLY MARKED WITH "LP-GAS, PROPANE, 350 PSI WORKING PRESSURE", AND WITH THE MANUFACTURER'S NAME AND TRADEMARK.
 - 6. PER TABLE 5.7.7.1 OF NFPA 58, OPTION C & E HAVE BEEN IMPLEMENTED INTO THIS NEW LP DISTRIBUTION SYSTEM
 - 7. NAMEPLATE ON (N) TANK SHALL BE VISIBLE
 - 8. LIFTING MARSHALL EXCELSIOR OUT OF LOCK BOX SHALL PRESSURIZE THE EMERGENCY SHUTOFF VALVES, AS WELL AS, EQUALIZING THE PRESSURE ON BOTH SIDES OF THE LIQUID AND VAPOR INTERNAL VALVES (ASSOCIATED TO BOBTAIL FILLING).

ELECTRICAL NOTE:
ALL ELECTRICAL CONTROLS AND APPURTENANCES SHALL BE AT BASE FLOOD ELEVATION OR HIGHER.

BASE FLOOD ELEVATION: 25.0'



REVISIONS		BY
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3	CITY COMMENTS DATED 1/20/20	DD

SITE UTILITY PLAN

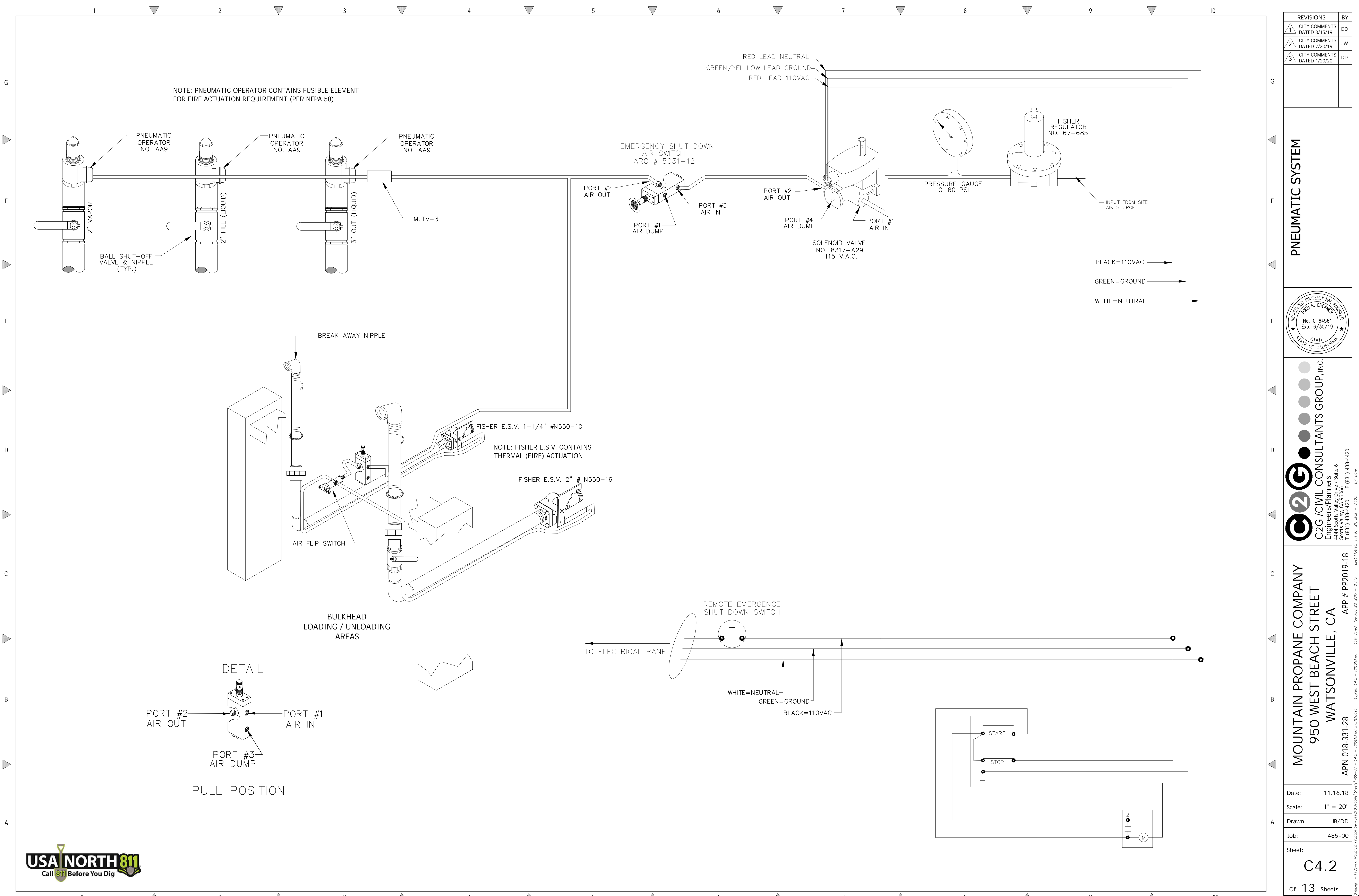
REGISTERED PROFESSIONAL ENGINEER
TODD R. CREAGER
No. C 64561
Exp. 6/30/19
CIVIL
STATE OF CALIFORNIA

C2G/CIVIL CONSULTANTS GROUP, INC.
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MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA
APN 018-331-28 APP # PP2019-18

Date: 11.16.18
Scale: 1" = 30'
Drawn: JB/DD
Job: 485-00
Sheet: C4.1
Of 13 Sheets

Attachment 3
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REVISIONS		BY
1	CITY COMMENTS DATED 3/15/19	DD
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3	CITY COMMENTS DATED 1/20/20	DD

PNEUMATIC SYSTEM

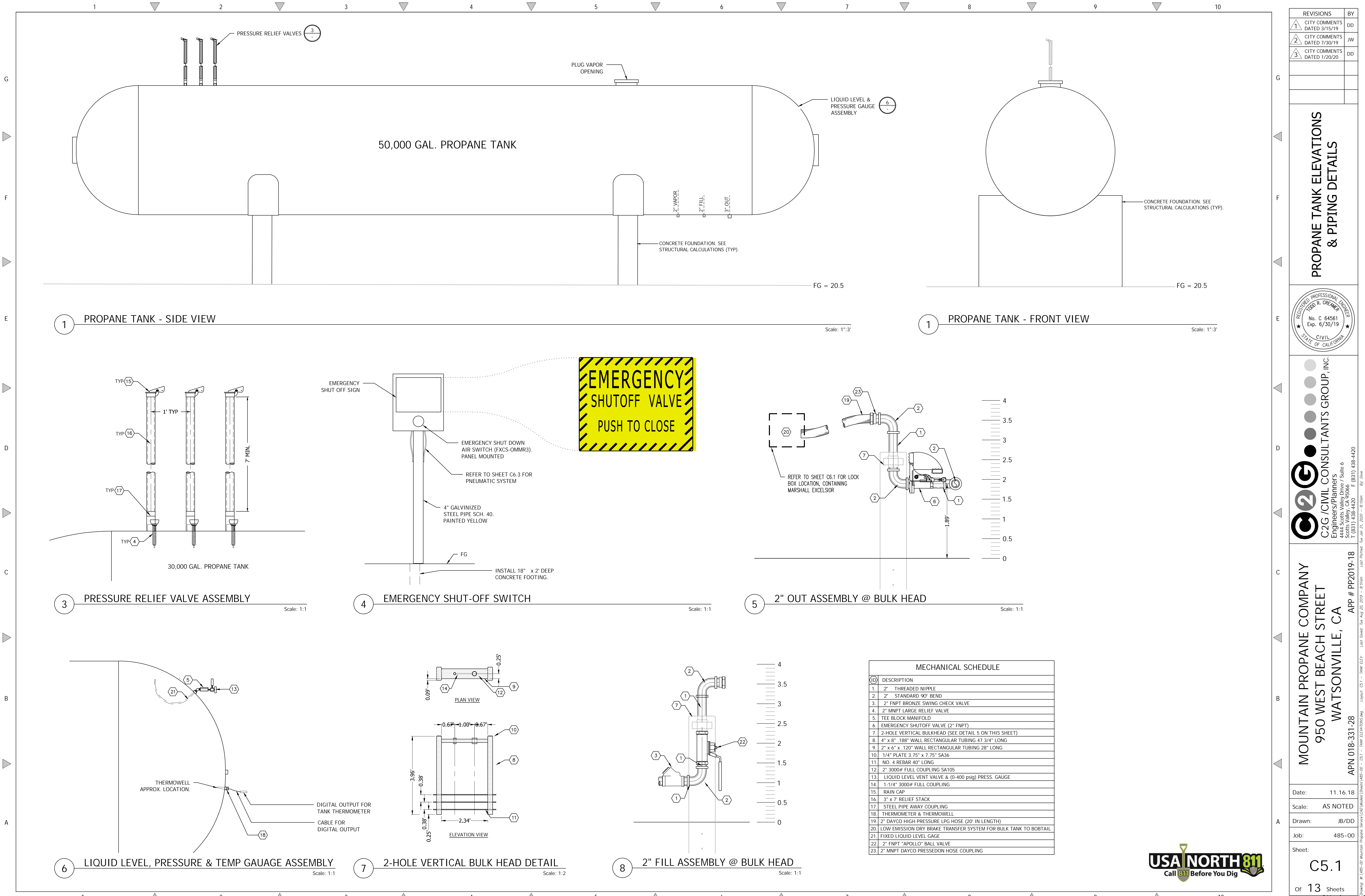
REGISTERED PROFESSIONAL ENGINEER
TODD R. CREAGER
No. C 64561
Exp. 6/30/19
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C2G CIVIL CONSULTANTS GROUP, INC.
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Last Printed: Tue Jan 21, 2020 - 8:10am By: Dave

MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA
APP # PP2019-18
APN 018-331-28

Date: 11.16.18
Scale: 1" = 20'
Drawn: JB/DD
Job: 485-00
Sheet: C4.2
Of 13 Sheets

Attachment 3
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REVISIONS

BY

1	CITY COMMENTS DATED 3/15/19	DD
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3	CITY COMMENTS DATED 1/20/20	DD

PROPANE TANK ELEVATIONS & PIPING DETAILS

REGISTERED PROFESSIONAL ENGINEER

TODD R. CREAGER

No. C 64561

Exp. 6/30/19

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MOUNTAIN PROPANE COMPANY

950 WEST BEACH STREET

WATSONVILLE, CA

APN 018-331-28

APP # PP2019-18

Date: 11.16.18

Scale: AS NOTED

Drawn: JB/DD

Job: 485-00

Sheet: C5.1

Of 13 Sheets

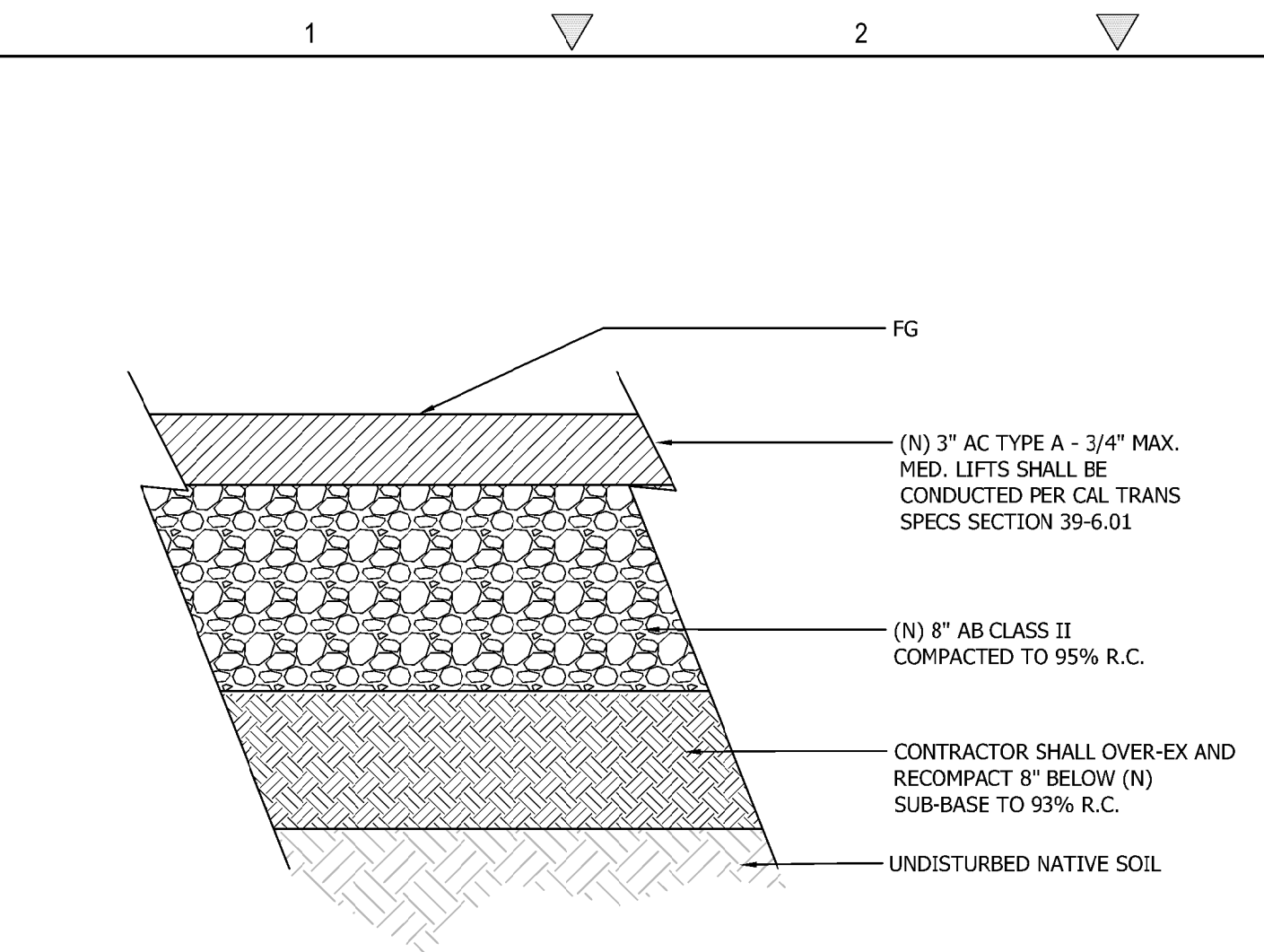
USA NORTH 811

Call 811 Before You Dig

Attachment 3

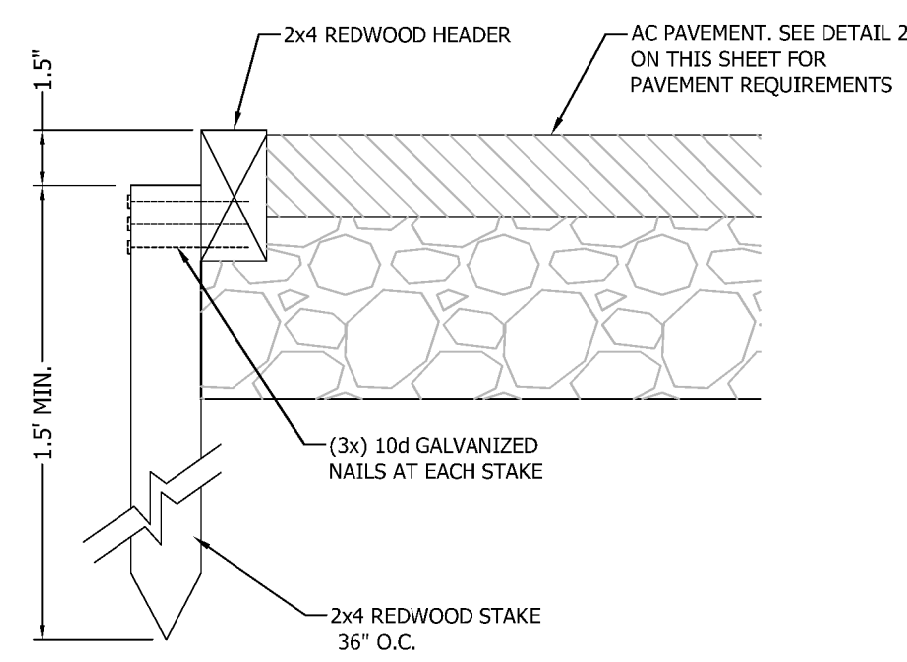
page 10 of 13

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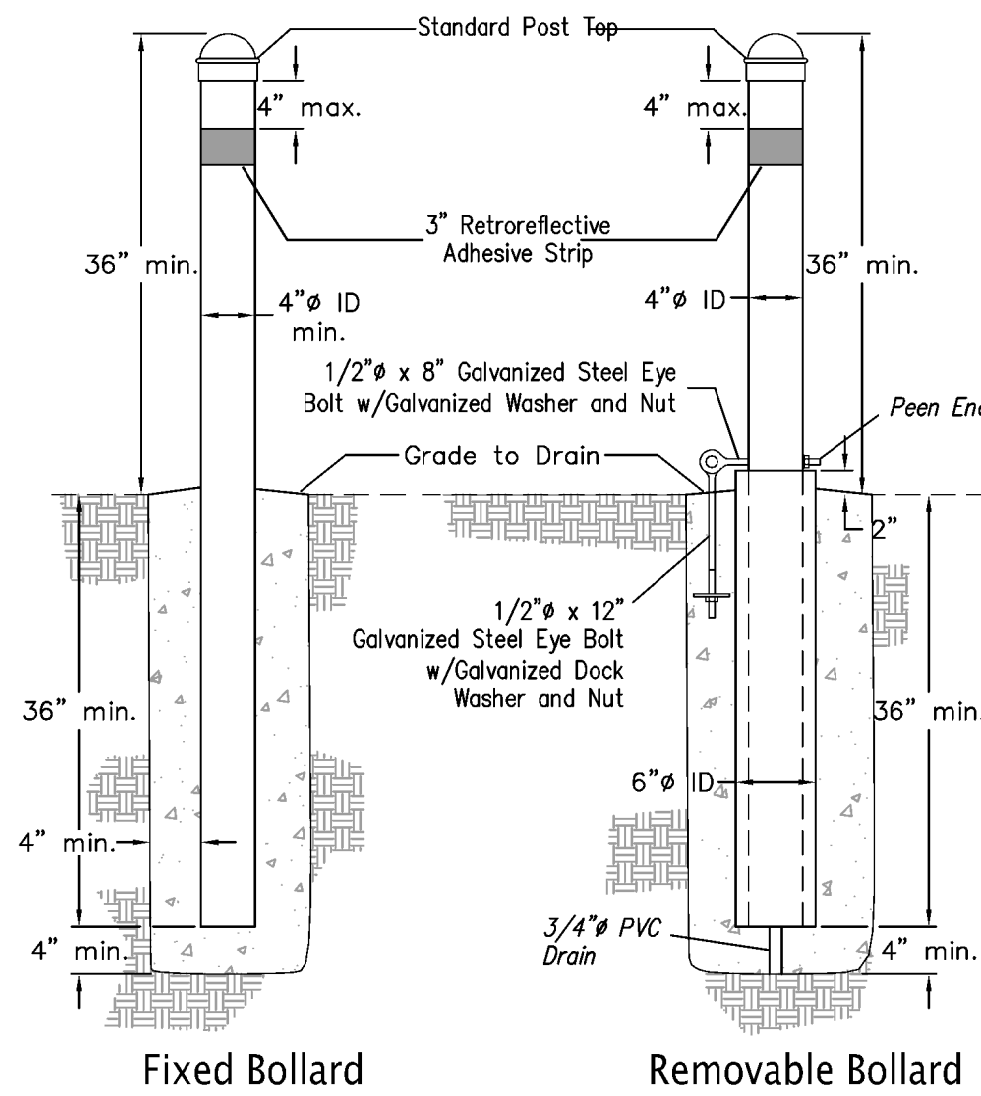
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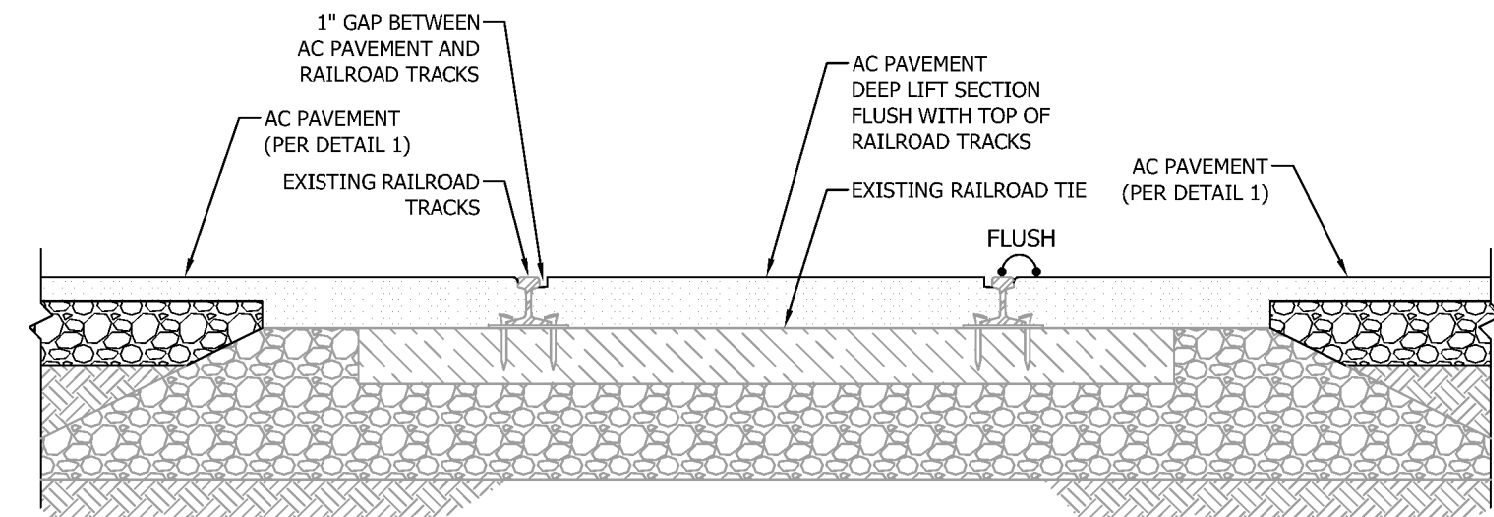
REDWOOD HEADER - EDGE OF PAVEMENT

Scale: NTS



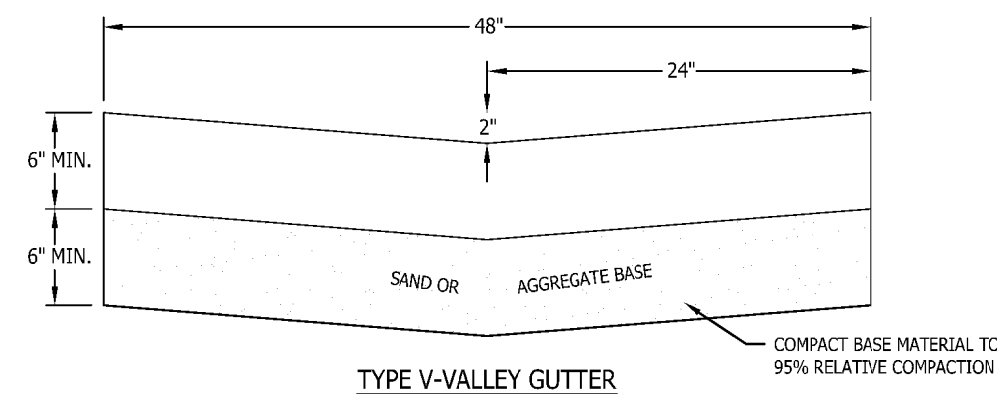
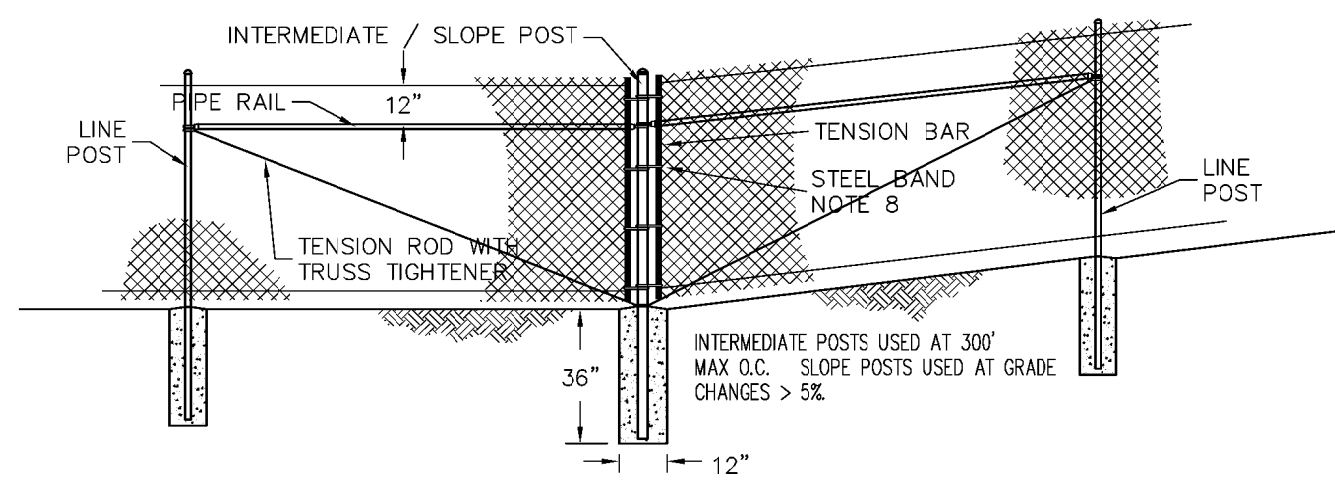
FIXED AND REMOVABLE BOLLARDS

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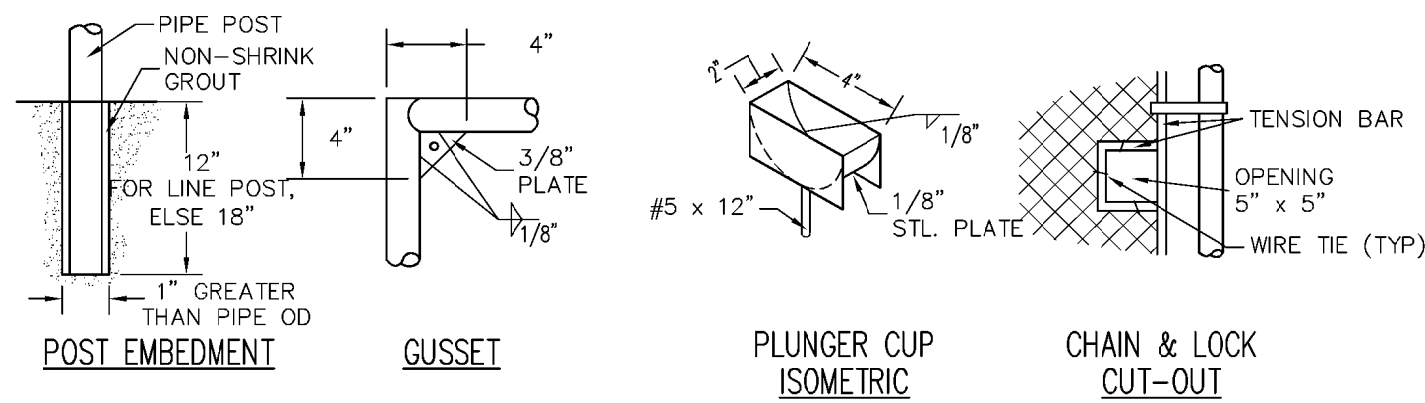
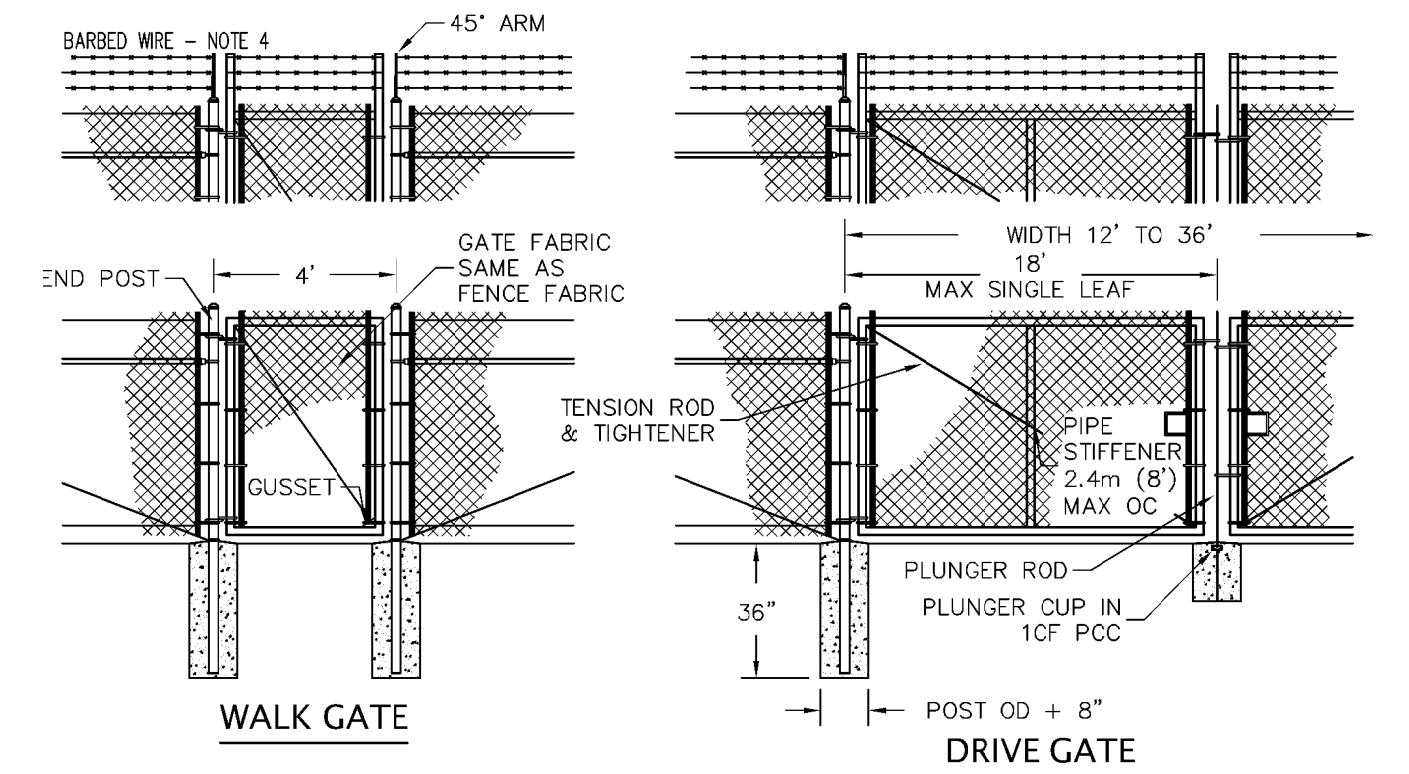
RAILROAD GRADE CROSSING SECTION

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CONCRETE VALLEY GUTTER

Scale: NTS

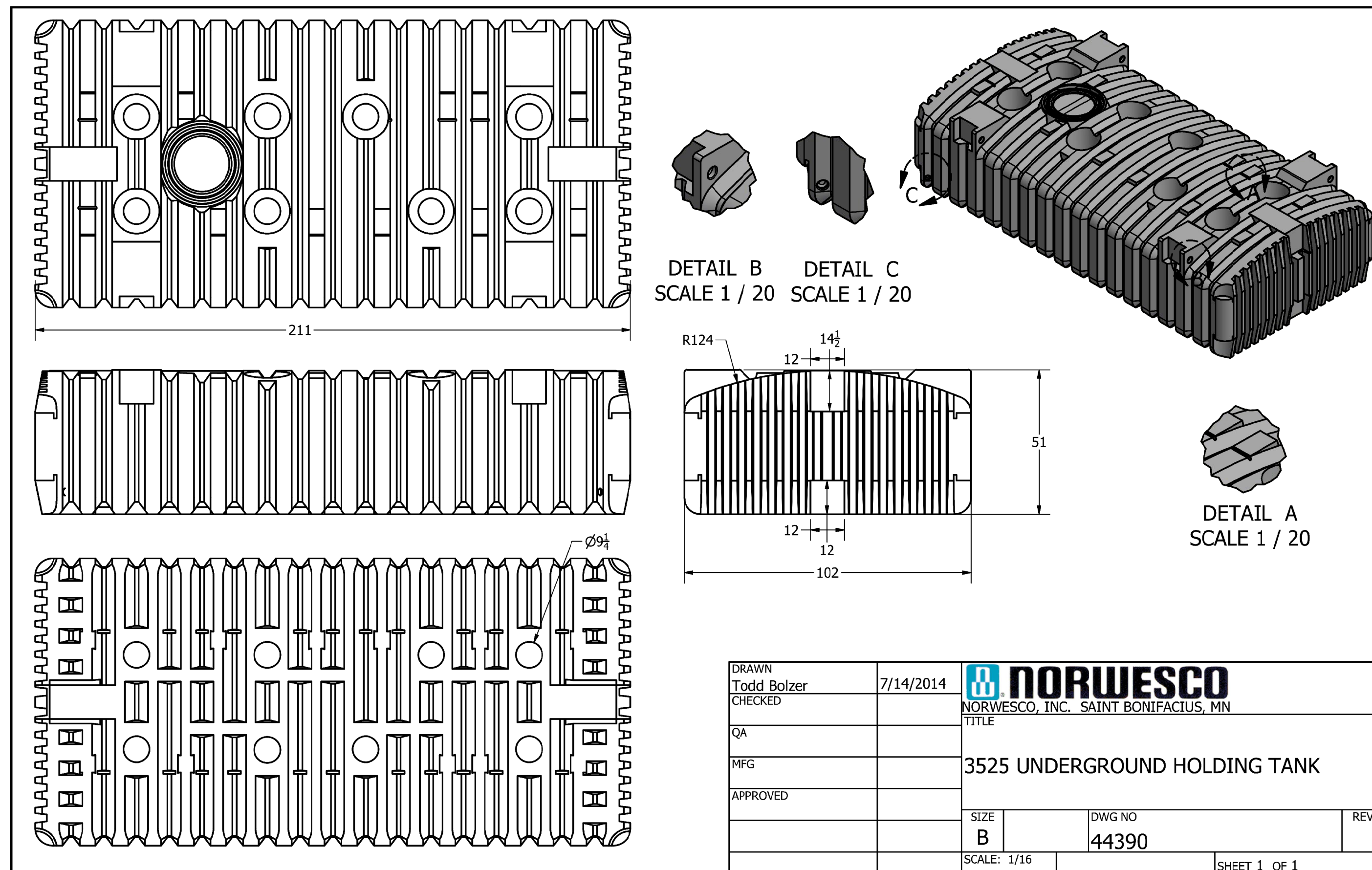


NOTES:


1. SECURE DRIVE-FIT GALVANIZED CAP TO POST WITH 1/4" ROUND-HEAD RIVET.
2. H DENOTES FABRIC WIDTH AND NOMINAL FENCE HEIGHT = H" S UNLESS OTHERWISE SPECIFIED.
3. IF FENCING WITH TOP RAIL IS SPECIFIED, DELETE STEEL TENSION WIRE AT TOP, AND PIPE RAILS AT INTERMEDIATE, SLOPE, END AND CORNER POSITIONS. EXTENSION TENSION RAIL TO TOP RAIL.
4. BARBED WIRE SHALL BE USED ONLY WHEN SPECIFIED.
5. POST SPACING IS MAXIMUM 10'.
6. RAIL CLEAR OPENINGS GREATER THAN 18" x 36" WITH FABRIC FOR OPENINGS LESS THAN 18", THE FABRIC TO POSTS.
7. USE ONE POST FOR COMBINED SLOPE AND CORNER POST IF IF OF CHANNEL WALL IS CONSTRUCTED AS SHOWN FOR "ALTERNATE".
8. STEEL BANDS AT TENSION BARS SHALL BE 1/8" x 3", MINIMUM, SPACED AT MAXIMUM 16'.

CHAIN LINK FENCE

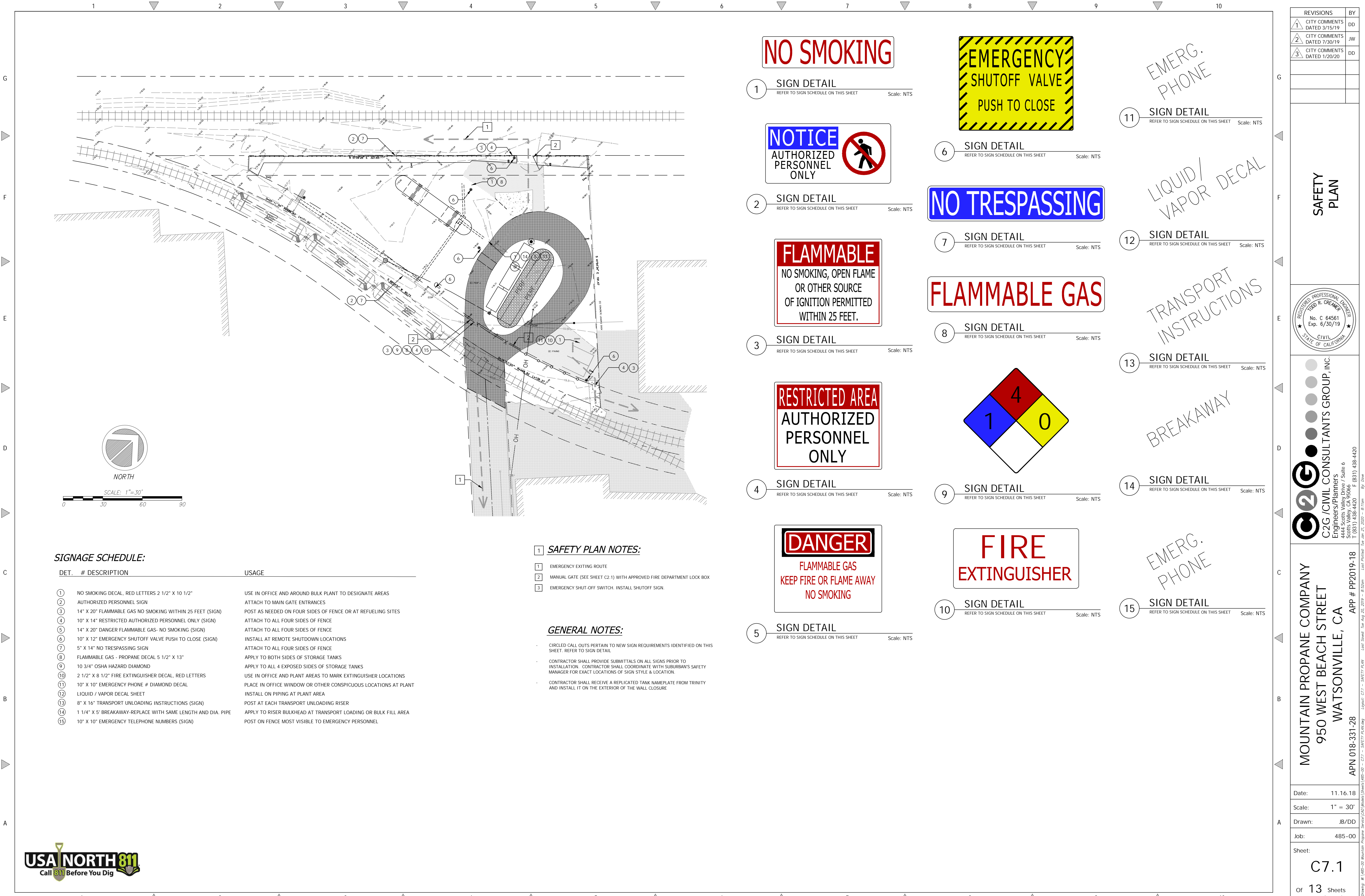
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DETAIL A
SCALE 1 / 20

DRAWN Todd Bolzer	7/14/2014	 NORWESCO NORWESCO, INC. SAINT BONIFACIUS, MN			
CHECKED		TITLE			
QA		3525 UNDERGROUND HOLDING TANK			
MFG					
APPROVED					
		SIZE B	DWG NO 44390	REV	
		SCALE: 1/16		SHEET 1 OF 1	

[illegible][illegible]



REVISIONS

1	CITY COMMENTS DATED 3/15/19	DD
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SAFETY PLAN

REGISTERED PROFESSIONAL ENGINEER

TODD R. CREMER

No. C. 64561

Exp. 6/30/19

CIVIL

STATE OF CALIFORNIA

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MOUNTAIN PROPANE COMPANY

950 WEST BEACH STREET

WATSONVILLE, CA

APN 018-331-28

APP # PP2019-18

Date: 11.16.18

Scale: 1" = 30'

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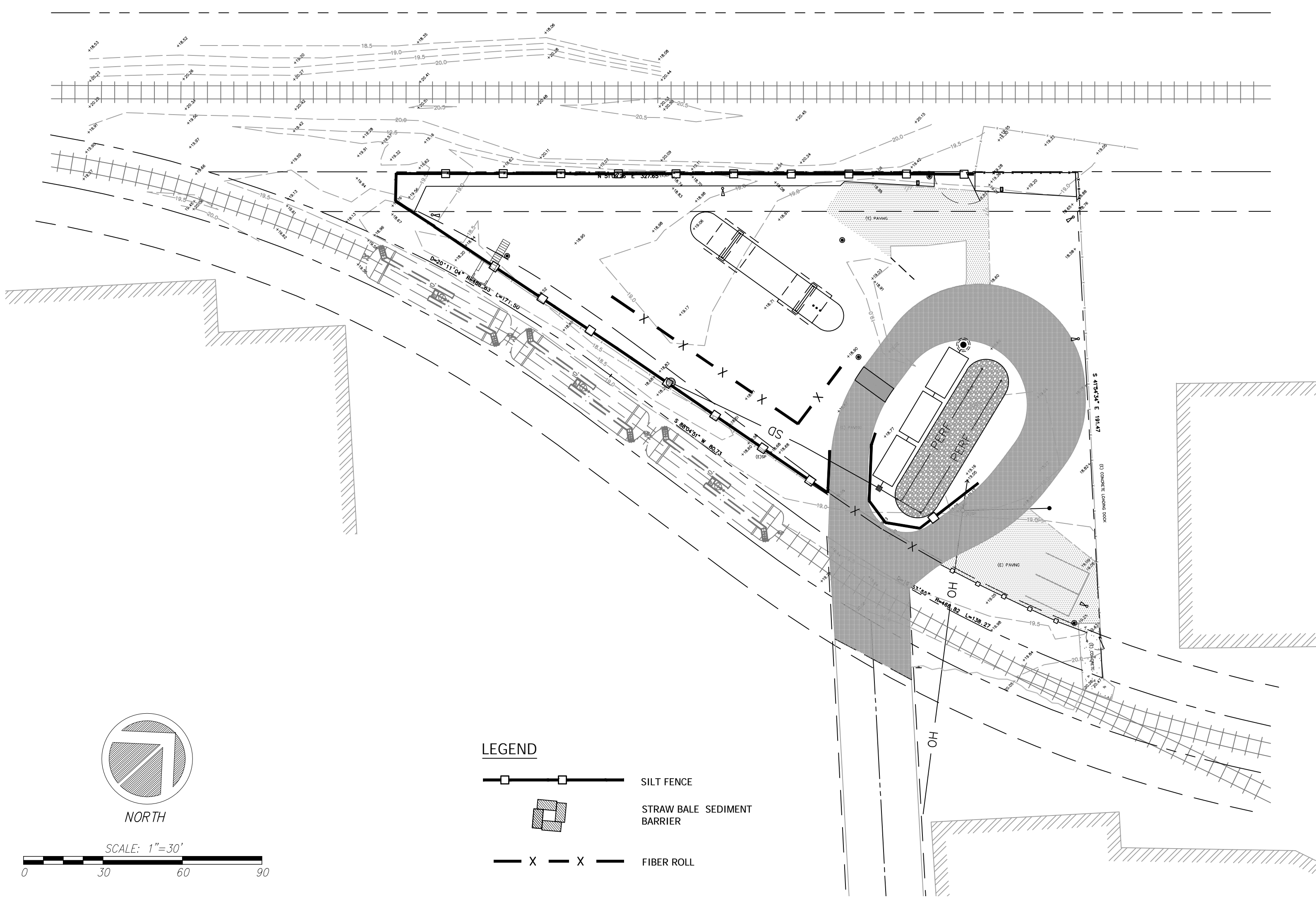
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Attachment 3

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CONSTRUCTION SPECIFICATIONS

THE HEIGHT OF A SILT FENCE SHALL NOT EXCEED 36 INCHES. STORAGE HEIGHT SHALL NEVER EXCEED 18". THE FENCE LINE SHALL FOLLOW THE CONTOUR AS CLOSELY AS POSSIBLE.

IF POSSIBLE, THE FILTER FABRIC SHALL BE CUT FROM A CONTINUOUS ROLL TO AVOID THE USE OF JOINTS. WHEN JOINTS ARE NECESSARY, FILTER CLOTH SHALL BE SPLICED ONLY AT A SUPPORT POST, WITH A MINIMUM 6-INCH OVERLAP AND BOTH ENDS SECURELY FASTENED TO THE POST.

POSTS SHALL BE SPACED A MAXIMUM OF 10 FEET APART AND DRIVEN SECURELY INTO THE GROUND (MINIMUM OF 12 INCHES). WHEN EXTRA STRENGTH FABRIC IS USED WITHOUT THE WIRE SUPPORT FENCE, POST SPACING SHALL NOT EXCEED 6 FEET. TURN THE ENDS OF THE FENCE UPHILL.

A TRENCH SHALL BE EXCAVATED APPROXIMATELY 4 INCHES WIDE AND 6 INCHES DEEP ALONG THE LINE OF POSTS AND UPSLOPE FROM THE BARRIER.

WHEN STANDARD-STRENGTH FILTER FABRIC IS USED, A WIRE MESH SUPPORT FENCE SHALL BE FASTENED SECURELY TO THE UPSLOPE SIDE OF THE POSTS USING HEAVY DUTY WIRE STAPLES AT LEAST 1 INCH LONG, TIE WIRES OR HOG RINGS. THE WIRE SHALL EXTEND INTO THE TRENCH A MINIMUM OF 2 INCHES AND SHALL NOT EXTEND MORE THAN 36 INCHES ABOVE THE ORIGINAL GROUND SURFACE.

THE STANDARD-STRENGTH FILTER FABRIC SHALL BE STAPLED OR WIRED TO THE FENCE, AND 6 INCHES OF THE FABRIC SHALL EXTEND INTO THE TRENCH. THE FABRIC SHALL NOT EXTEND MORE THAN 36 INCHES ABOVE THE ORIGINAL GROUND SURFACE. FILTER FABRIC SHALL NOT BE STAPLED TO EXISTING TREES.

WHEN EXTRA-STRENGTH FILTER FABRIC AND CLOSER POST SPACING ARE USED, THE WIRE MESH SUPPORT FENCE MAY BE ELIMINATED. IN SUCH A CASE, THE FILTER FABRIC IS STAPLED OR WIRED DIRECTLY TO THE POSTS.

THE TRENCH SHALL BE BACKFILLED AND THE SOIL COMPACTED OVER THE TOE OF THE FILTER FABRIC.

SILT FENCES PLACED AT THE TOE OF A SLOPE SHALL BE SET AT LEAST 6 FEET FROM THE TOE IN ORDER TO INCREASE PONDING VOLUME.

SILT FENCES SHALL BE REMOVED WHEN THEY HAVE SERVED THEIR USEFUL PURPOSE, BUT NOT BEFORE THE UPSLOPE AREA HAS BEEN PERMANENTLY STABILIZED, AND ANY SEDIMENT STORED BEHIND THE SILT FENCE HAS BEEN REMOVED.

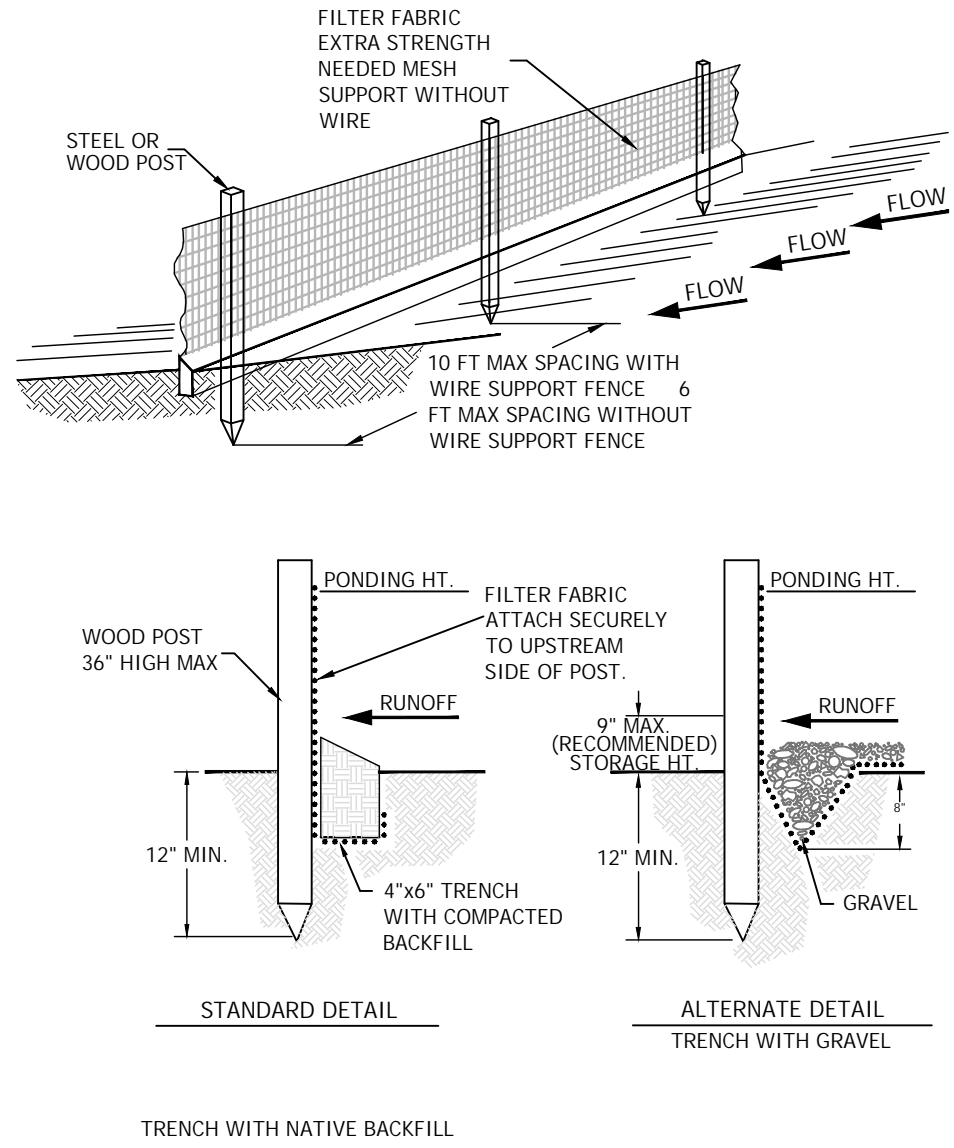
INSPECTION AND MAINTENANCE

SILT FENCES AND FILTER BARRIERS SHALL BE INSPECTED WEEKLY AND AFTER EACH SIGNIFICANT STORM (1" IN 24 HR.). ANY REQUIRED REPAIRS SHALL BE MADE IMMEDIATELY. SEDIMENT SHALL BE REMOVED WHEN IT REACHES 1/3 HEIGHT OF THE FENCE OR 9 INCHES MAXIMUM.

THE REMOVED SEDIMENT SHALL VEGETATE OR OTHERWISE STABILIZED.

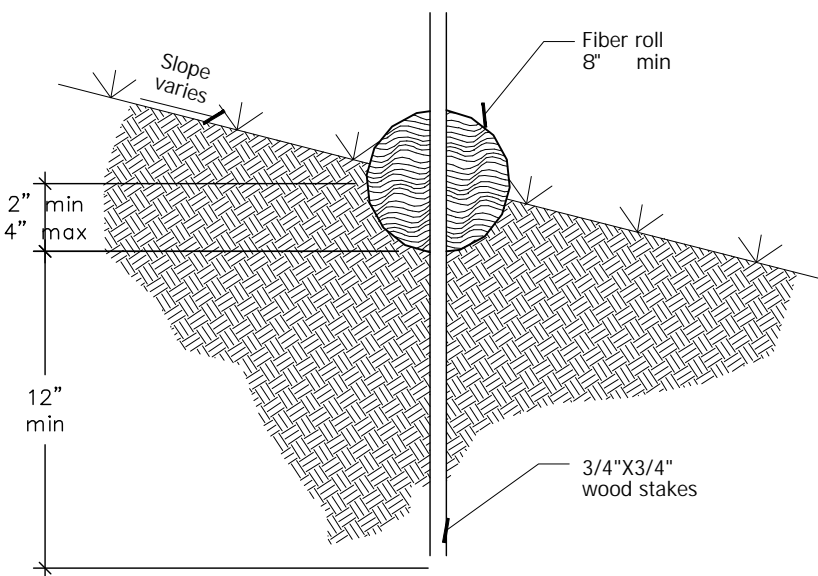
NOTE:

1. INSPECT AND REPAIR FENCE AFTER EACH STORM EVENT AND REMOVE SEDIMENT WHEN NECESSARY.
2. REMOVED SEDIMENT SHALL BE DEPOSITED AT AN AREA THAT WILL NOT CONTRIBUTE SEDIMENT OFF-SITE AND CAN BE PERMANENTLY STABILIZED.
3. SILT FENCE SHALL BE REPLACED ON SLOPE CONTOURS TO MAXIMIZE PONDING EFFICIENCY.



2 SILT FENCE

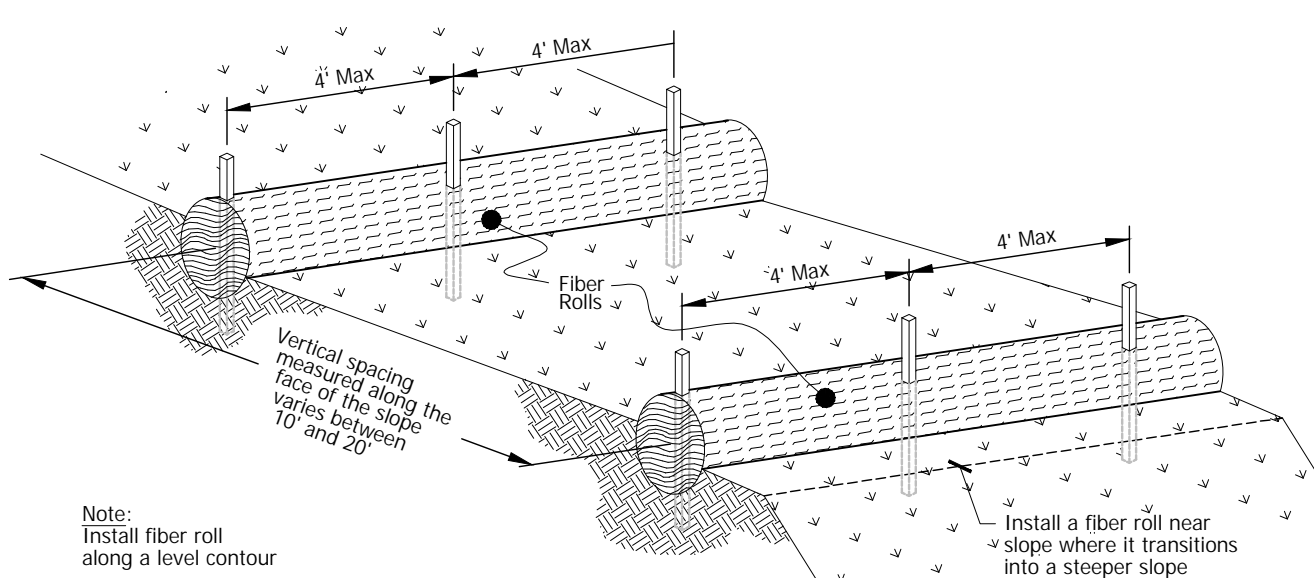
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CONSTRUCTION SPECIFICATIONS

LOCATE FIBER ROLLS ON LEVEL CONTOURS SPACED AS FOLLOWS:

- SLOPE INCLINATION OF 4 :1 (H:V) OR FLATTER: FIBER ROLLS SHOULD BE PLACED AT A MAXIMUM INTERVAL OF 20 FT.
- SLOPE INCLINATION BETWEEN 4:1 AND 2:1 (H:V) FIBER ROLLS SHOULD BE PLACED AT A MAXIMUM INTERVAL OF 15 FT. (A CLOSER SPACING IS MORE EFFECTIVE).
- SLOPE INCLINATION OF 2:1 (H:V) OR GREATER: FIBER ROLLS SHOULD BE PLACED AT A MAXIMUM INTERVAL OF 10 FT. (A CLOSER SPACING IS MORE EFFECTIVE).
- TURN THE ENDS OF THE FIBER ROLL UP SLOPE TO PREVENT RUNOFF FROM GOING AROUND THE ROLL. STAKE FIBER ROLLS INTO A 2 TO 4 IN. DEEP TRENCH WITH A WIDTH EQUAL TO THE DIAMETER OF THE FIBER ROLL.
- DRIVE STAKES AT THE END OF EACH FIBER ROLL AND SPACED 4 FT MAXIMUM ON CENTER.
- USE WOOD STAKES WITH A NOMINAL CLASSIFICATION OF 0.75 BY 0.75 IN. AND A MINIMUM LENGTH OF 24 IN.
- IF MORE THAN ONE FIBER ROLL IS PLACED IN A ROW, THE ROLLS SHOULD BE OVERLAPPED, NOT ABUTTED. REPAIR OR REPLACE SPLIT, TORN, UNRAVELING OR SLUMPING FIBER ROLLS.



IF THE FIBER ROLL IS USED AS A SEDIMENT CAPTURE DEVICE, OR AS AN EROSION CONTROL DEVICE TO MAINTAIN SHEET FLOWS, SEDIMENT THAT ACCUMULATES IN THE BMP MUST BE PERIODICALLY REMOVED IN ORDER TO MAINTAIN BMP EFFECTIVENESS. SEDIMENT SHOULD BE REMOVED WHEN SEDIMENT ACCUMULATION REACHES ONE-HALF THE DESIGNATED SEDIMENT STORAGE DEPTH, USUALLY ONE-HALF THE DISTANCE BETWEEN THE TOP OF THE FIBER ROLL AND THE ADJACENT GROUND SURFACE. SEDIMENT REMOVED DURING THE MAINTENANCE MAY BE INCORPORATED INTO EARTHWORK ON THE SITE OR DISPOSED AT AN APPROPRIATE LOCATION.

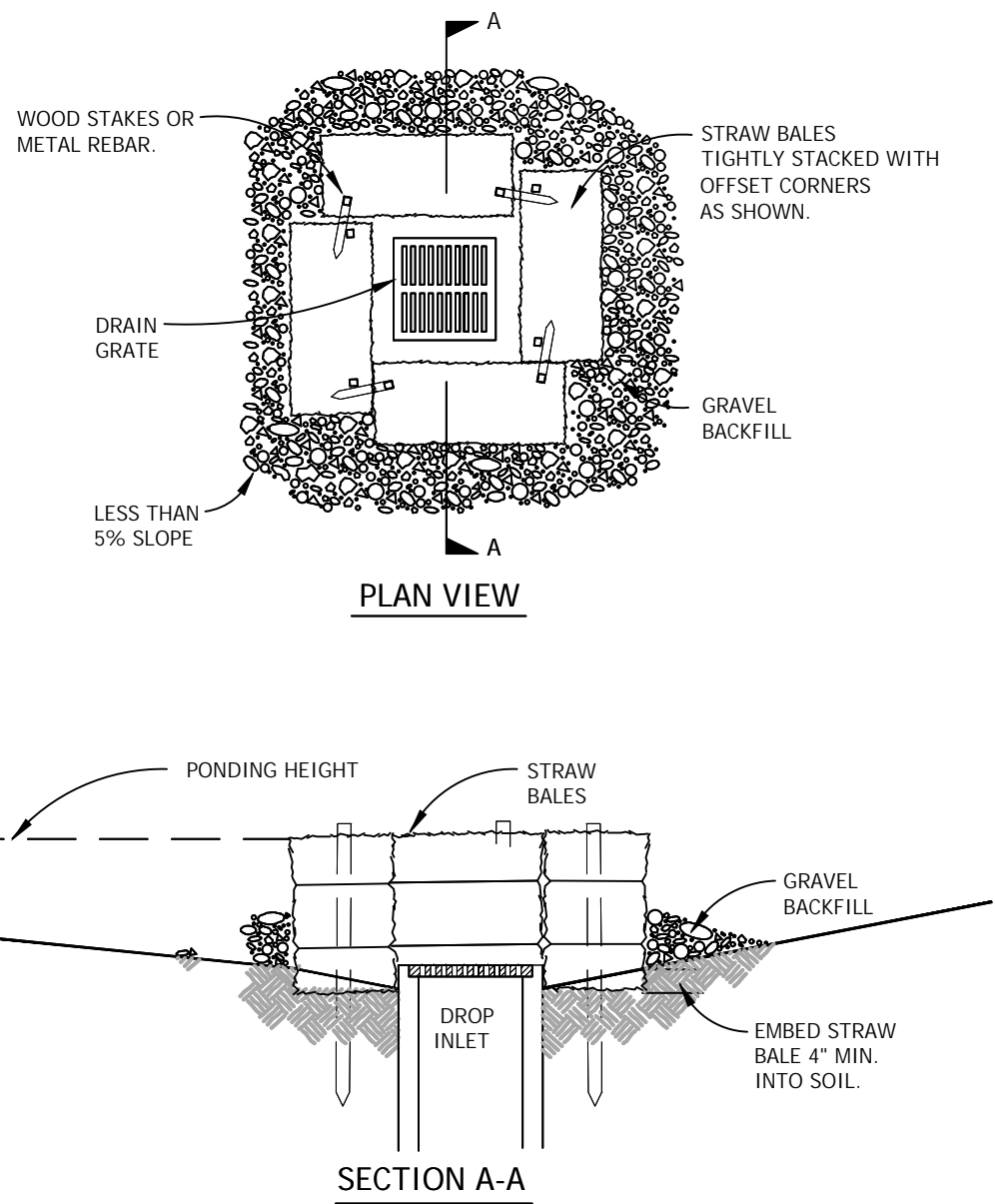
1 FIBER ROLLS

Scale: NTS

EROSION CONTROL NOTES

1. BETWEEN OCTOBER 15 AND APRIL 15, EXPOSED SOIL SHALL BE PROTECTED FROM EROSION AT ALL TIMES. HAY BALES, FILTER BERMS, OR OTHER MEANS SHALL BE EMPLOYED TO PREVENT TURBID RUNOFF TO ADJOINING PROPERTIES.
2. ALL AREA ON AND OFF SITE, EXPOSED DURING CONSTRUCTION, IF NOT PERMANENTLY LANDSCAPED PER PLANS, SHALL BE PROTECTED BY MULCHING AND/OR PLANTING OF THE FOLLOWING APPROVED EROSION CONTROL MIX, AT A RATE OF 35 POUNDS PER ACRE:

BLANDO BROME	50%
ROSE CLOVER (PELLET INOCULATED)	35%
CREeping RED RESCUE	15%
ZORRO ANNUAL FESCUE	TRACE
WILDFLOWERS	TRACE
3. UNNECESSARY GRADING AND DISTURBING OR SOIL SHALL BE AVOIDED.
4. ANY EXCESS MATERIAL SHALL BE DISPOSED OF OFF-SITE OR STOCKPILED IN A MANNER TO AVOID RUNOFF ONTO ADJOINING PROPERTIES.
5. UPON COMPLETION OF CONSTRUCTION, ALL REMAINING EXPOSED AREAS SHALL BE PERMANENTLY REVEGETATED PER LANDSCAPE PLANS.
6. ANY MATERIAL STOCKPILED DURING CONSTRUCTION SHALL BE COVERED WITH PLASTIC.
7. DURING CONSTRUCTION, NO TURBID SITE WATER SHALL BE PERMITTED TO ENTER STORM DRAIN SYSTEM. USE OF SILT AND GREASE TRAPS, FILTER BERMS, OR HAY BALES MAY BE USED TO PREVENT SUCH DISCHARGE.
8. CONTRACTOR SHALL NOTIFY COUNTY 48 HOURS BEFORE ANY EARTHWORK IS BEGUN.
9. ALL CONSTRUCTION SHALL CONFORM "EXCAVATION, GRADING, EROSION AND SEDIMENT CONTROL REGULATIONS" PER DSA. NO CLEARING, GRADING, OR EXCAVATION SHALL TAKE PLACE BETWEEN OCTOBER 15, AND APRIL 15 UNLESS THERE IS AN APPROVED WINTER EROSION CONTROL PLAN. ALL DISTURBED SOUL SHALL BE SEEDED, MULCHED, OR OTHERWISE PROTECTED BY OCTOBER 15.



3 INLET PROTECTION

Scale: NTS

DROP INLET SEDIMENT BARRIERS

CONSTRUCTION SPECIFICATIONS

STRAW BALE BARRIER

EXCAVATE A 4-INCH DEEP TRENCH AROUND THE INLET AND MAKE THE TRENCH AS WIDE AS A STRAW BALE IN ORDER TO EMBED THE BALES PROPERLY. ORIENT THE STRAW BALES WITH THE BINDINGS AROUND THE SIDES OF THE BALES SO THE WIRE DOES NOT COME IN CONTACT WITH THE SOIL.

PLACE BALES LENGTHWISE AROUND THE INLET AND PRESS THE ENDS OF ADJACENT BALES TOGETHER AS SHOWN.

DRIVE TWO 2-BY 2-INCH STAKES THROUGH EACH BALE TO ANCHOR THE BALE SECURELY IN PLACE.

UTILIZE 3/4 INCH TO 2 INCH GRAVEL TO FILL THE VOID SPACES BETWEEN THE BALES IF NECESSARY TO DEWATER THE PONDING AREA MORE RAPIDLY.

INSPECTION AND MAINTENANCE

INSPECT THE BARRIER AFTER EACH RAIN AND PROMPTLY MAKE REPAIRS AS NEEDED.

SEDIMENT SHALL BE REMOVED AFTER EACH SIGNIFICANT STORM (1" IN 24 HOURS) TO PROVIDE ADEQUATE STORAGE VOLUME FOR THE NEXT RAIN.

THE REMOVED SEDIMENT SHALL BE DEPOSITED IN AN AREA THAT WILL NOT CONTRIBUTE SEDIMENT OFF-SITE AND CAN BE PERMANENTLY DISTRIBUTED ON-SITE.

FOR GRAVEL FILTERS: IF THE GRAVEL BECOMES CLOGGED WITH SEDIMENT IT MUST BE CAREFULLY REMOVED FROM THE INLET AND EITHER CLEANED OR REPLACED.

NOTES:

1. EMBED THE BALES 4" INTO THE SOIL AND OFFSET CORNERS OR PLACE BALES WITH ENDS TIGHTLY ABUTTING. GRAVEL BACKFILL WILL PREVENT EROSION OR FLOW AROUND THE BALES.
2. THE TOP OF THE STRUCTURE (PONDING HEIGHT) MUST BE WELL BELOW THE GROUND ELEVATION DOWNSLOPE TO PREVENT RUNOFF FROM BY-PASSING THE INLET. EXCAVATION OF A BASIN ADJACENT TO THE DROP INLET OR A TEMP-ORARY DIKE ON THE DOWNSLOPE OF THE STRUCTURE MAY BE NECESSARY.



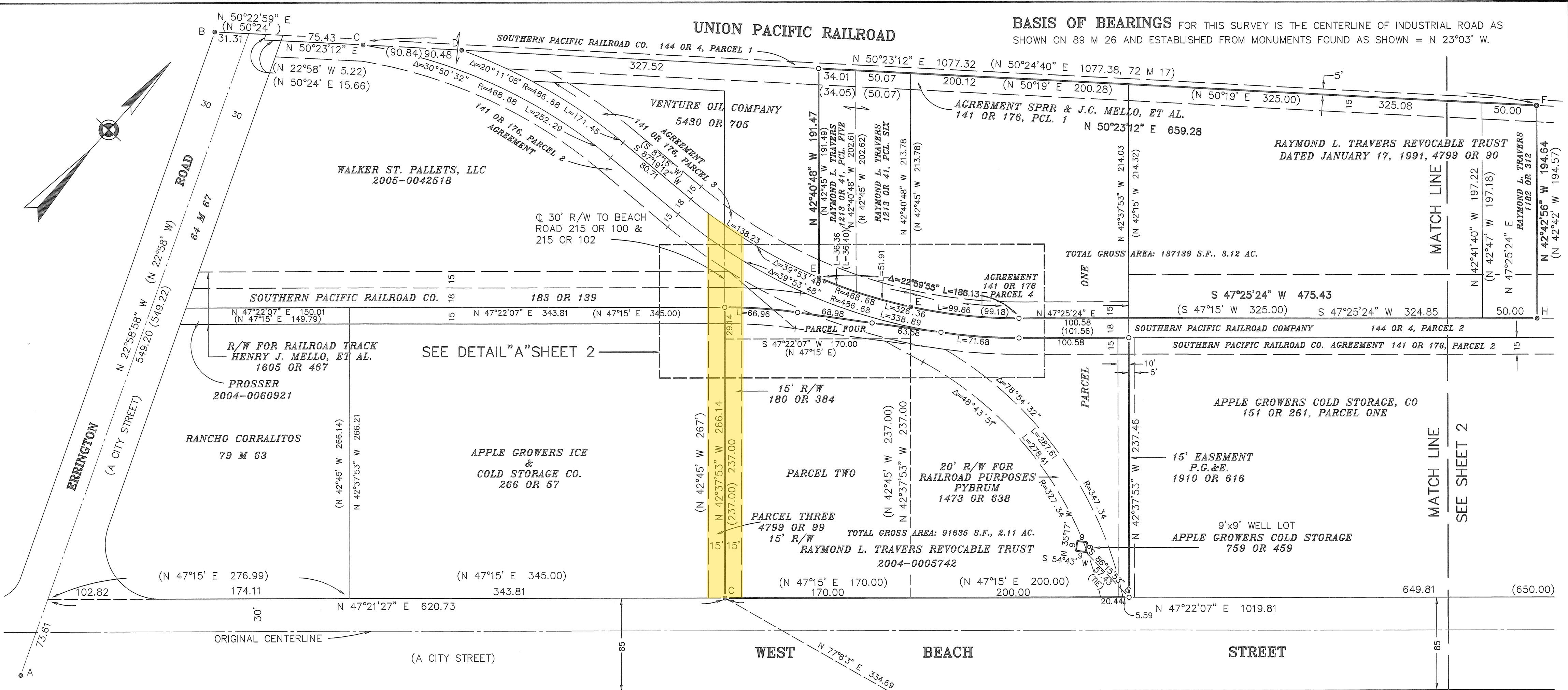
REVISIONS	BY
1 CITY COMMENTS DATED 3/15/19	DD
2 CITY COMMENTS DATED 7/30/19	JW
3 CITY COMMENTS DATED 1/20/20	DD

EROSION CONTROL PLAN

MOUNTAIN PROPANE COMPANY
950 WEST BEACH STREET
WATSONVILLE, CA
APN 018-331-28
APP # PP2019-18

Date: 11.16.18
Scale: 1" = 30'
Drawn: JB/DD
Job: 485-00
Sheet: C8.1
or 13 Sheets

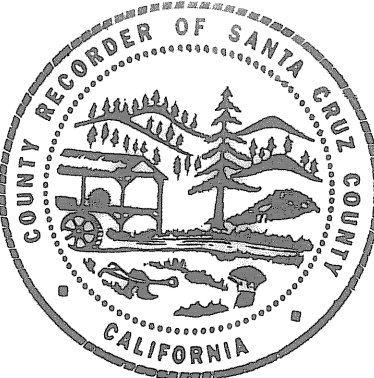
USA NORTH 811
Call 811 Before You Dig



RECORDER'S STATEMENT

FILED THIS 21ST DAY OF NOVEMBER, 20 05
AT 10:11 A.M. IN BOOK 108 OF MAPS AT PAGE 8
AT THE REQUEST OF RAYMOND L. TRAVERS
2005-0081452

(SIGNED) GARY E. HAZELTON
COUNTY RECORDER
BY: JONE PALESTRA
DEPUTY



LEGEND

- SET 1/2" PIPE, TAGGED L.S. 3233
 - FOUND MONUMENT INDICATED AS FOLLOWS:
 - A PLUG & TAG IN AC DIKE, TAGGED L.S. 2265
 - B 1" PIPE, TAGGED L.S. 2265
 - C AXLE, NO TAG AS PER 72 M 17
 - D 1/2" PIPE, NO TAG
 - E 1/2" PIPE, TAGGED L.S. 2362
 - F 1/2" PIPE, L.S. 3233
 - G RAILROAD SPIKE
 - H 1-1/4" PIPE, NO TAG
 - () RECORD DATA
- DISTANCES ARE IN FEET AND DECIMALS THEREOF

SURVEYOR'S STATEMENT

THIS MAP CORRECTLY REPRESENTS A SURVEY MADE BY ME OR UNDER MY DIRECTION IN CONFORMANCE WITH THE REQUIREMENTS OF THE LAND SURVEYORS' ACT AT THE REQUEST OF RAYMOND L. TRAVERS IN AUGUST, 2005



Stanley O. Nielsen
STANLEY O. NIELSEN P.L.S. 3233
LICENSE RENEWAL DATE: 6-30-06

DATED: 11-03-05

COUNTY SURVEYOR'S STATEMENT

THIS MAP HAS BEEN EXAMINED IN ACCORDANCE WITH SECTION 8766 OF THE LAND SURVEYORS' ACT THIS 9TH DAY OF November, 20 05



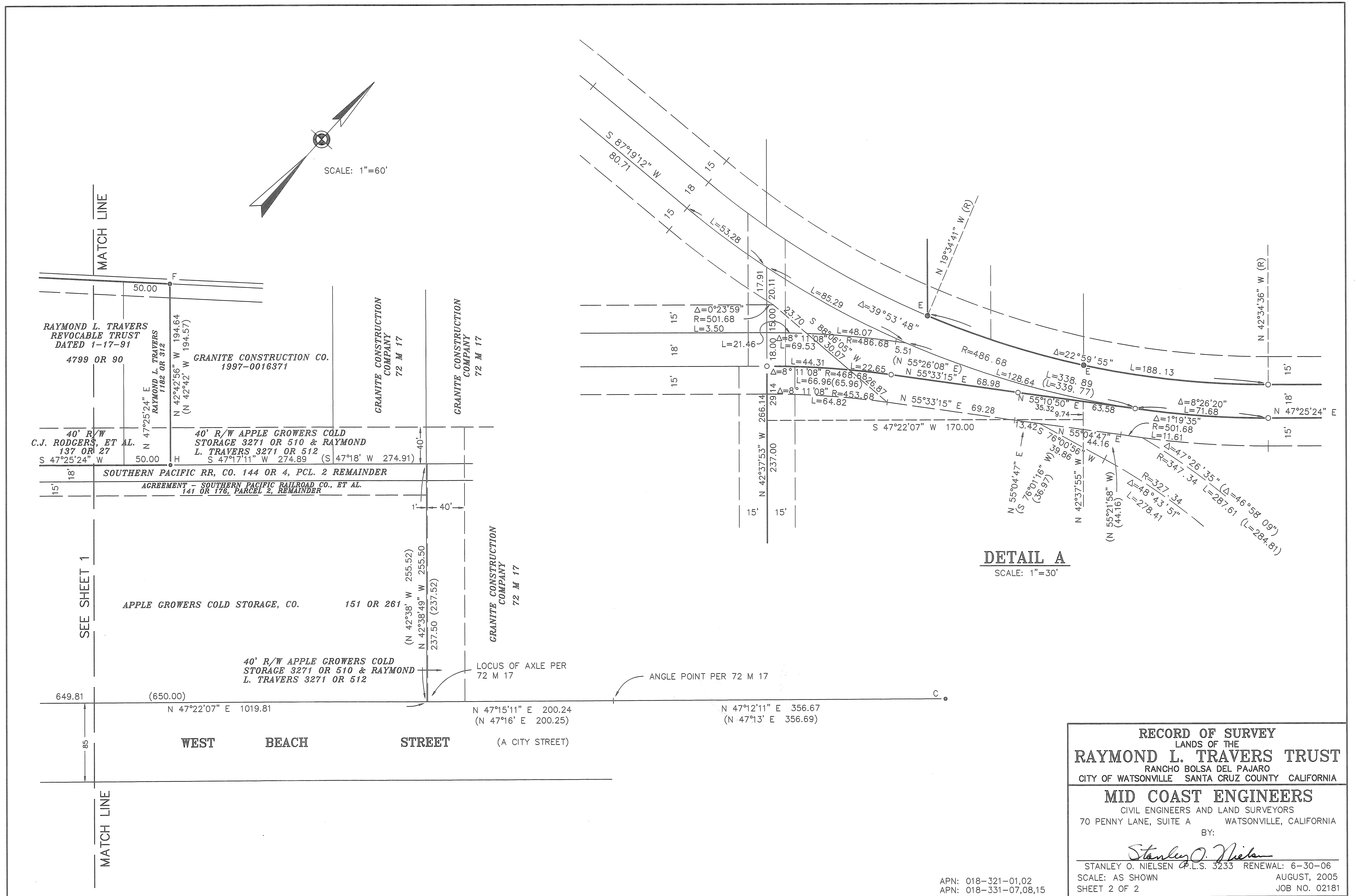
(SIGNED AND SEALED)
THOMAS L. BOLICH, COUNTY SURVEYOR
R.C.E. NO. 26862
LICENSE RENEWAL: 3-31-2007

RECORD OF SURVEY
LANDS OF THE
RAYMOND L. TRAVERS TRUST
RANCHO BOLSA DEL PAJARO
CITY OF WATSONVILLE SANTA CRUZ COUNTY CALIFORNIA

MID COAST ENGINEERS
CIVIL ENGINEERS AND LAND SURVEYORS
70 PENNY LANE, SUITE A WATSONVILLE, CALIFORNIA

BY: Stanley O. Nielsen
STANLEY O. NIELSEN P.L.S. 3233 RENEWAL: 6-30-06
SCALE: 1"=60'
SHEET 1 OF 2
AUGUST, 2005
JOB NO. 02181

APN: 018-321-01,02
APN: 018-331-07,08,15



STATE OF CALIFORNIA, }
COUNTY OF SANTA CRUZ, } ss.

On this 31st day of March, in the year one thousand nine hundred and thirty before me, C. R. TAYLOR a Notary Public in and for the said County of Santa Cruz, personally appeared FLORENCE E. PECK, personally known to me to be the person whose name is subscribed to the within instrument, and she acknowledged to me that she executed the same, individually and as Trustee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal, at my office in the said County of Santa Cruz, the day and year in this certificate first above written.

C. R. Taylor,

(SEAL)

Notary Public in and for the County
of Santa Cruz, State of California.

My commission expires
January 3rd, 1932.

STATE OF CALIFORNIA, }
COUNTY OF SANTA CRUZ, } ss

On this 28th day of June, in the year one thousand nine hundred and thirty before me, C. R. TAYLOR a Notary Public in and for the said County of Santa Cruz, personally appeared A. FAUSTINO and MARIAN M. FAUSTINO, his wife, personally known to me to be the persons whose names are subscribed to the within instrument, and they each acknowledged to me that they executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal, at my office in the said County of Santa Cruz, the day and year in this certificate first above written.

C. R. Taylor,

(SEAL)

Notary Public in and for the County
of Santa Cruz, State of California.

My commission expires
January 3rd, 1932.

Recorded at request of C. R. Taylor Jul 9-1930 at 31 min. past 8 A. M.

Belle Lindsay

County Recorder.

4723

Typist Dorcas Jones

--000--

KNOW ALL MEN BY THESE PRESENTS:

That the undersigned hereby GRANT to JOHN C. MELLO, his heirs and assigns, a right of way, freely to pass and repass, on foot and with all manner of vehicles and with livestock, along, over and upon that certain strip of land, 15 feet in width throughout, situate in the County of Santa Cruz, State of California, and having as its western boundary a line described as follows:

BEGINNING at a point in the center of the Beach Road, from which point of beginning the southwestern corner of a tract of land conveyed to said Mello by Elizabeth W. Clow, et al., by deed dated December 31, 1926, and of record in Volume 85 of Official Records, page 50, in the office of the County Recorder of said County, bears South 47° 15' West, along the center-line of said road, 616.74 feet distant; and running thence North 42° 45' West 296.14 feet, more or less, to an 18 foot strip of land recently conveyed by John C. Mello, et ux, et al, to Southern Pacific Company.

Said right of way is forever to be appurtenant to all lands of said John C. Mello, conveyed to him by the said Clow deed, and is to be free, open and unobstructed.

IN WITNESS WHEREOF, we have hereunto set our hands this 9th day of June, 1930.

Manuel A. Travers

Florence Travers

STATE OF CALIFORNIA, }
COUNTY OF SANTA CRUZ, } ss.

On this 28th day of June in the year one thousand nine hundred and thirty

RECORDING REQUESTED BY

AND WHEN RECORDED MAIL TO

NAME WYCKOFF, RICHARDSON, SANSON,
ALLEN, LOCKE-PADDON, WELDON
& JOHNSON

ADDRESS P.O. Box 960

CITY & STATE Watsonville, CA 95077-0960

R & T 11911

DOCUMENTARY TRANSFER TAX \$-0- NONE

☐ COMPUTED ON FULL VALUE OF PROPERTY CONVEYED, OR
☐ COMPUTED ON FULL VALUE LESS LIENS & ENCUMBRANCES
REMAINING THEREON AT TIME OF SALE.

Richard H. Allen
RICHARD H. ALLEN

VOL. 4799 PAGE 99

011985

11985

RE 5
MI 3
SF 3
SM 10
LN
CP

RECORDED

'91 MAR 1 AM 8 22

SANTA CRUZ

RECORDED COUNTY RECORDER

GRANT DEED

Signature of declarant or agent determining tax - first name

Grantor(s):

RAYMOND L. TRAVERS, as his sole and separate property

Grant(s) to Grantee(s):

RAYMOND L. TRAVERS, Trustee of the RAYMOND L. TRAVERS REVOCABLE TRUST
dated 1-1-7, 1991

all that real property situated in the

County

of Santa Cruz

State of California and bounded and described as follows:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

018-331-15 & 08

Assessor's Parcel No.

Executed January 17, 1991

Raymond L. Travers
RAYMOND L. TRAVERS

STATE OF CALIFORNIA County of Santa Cruz ss.

On January 17, 1991 before the undersigned Notary Public, in and for said

County and State, personally appeared RAYMOND L. TRAVERS

proved to me on the basis of satisfactory evidence or personally

known to me to be the person(s) whose name is subscribed to the within instrument, and acknowledged
to me that he executed the same.

Claire E. Sweetland
Notary Public

MAIL TAX STATEMENTS TO:

Raymond L. Travers
P.O. Box 908
Watsonville, CA 95077

N
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C



OFFICIAL SEAL
CLAIRE E. SWEETLAND
Notary Public - California
SANTA CRUZ COUNTY
My Comm. Exp. Feb. 4, 1991

S
E
A
L

EXHIBIT A

SITUATE IN the County of Santa Cruz, State of California bounded and more particularly described as follows, to wit:

PARCEL ONE: A tract of land described as being a part of the Rancho Bolsa del Pajaro, and beginning in the middle of the Beach Road at a station from which the most Southern corner of lands conveyed by John C. Mello, et ux., to Granite Construction Company, by Deed dated November 28, 1927, and recorded in Vol. 122 at Page 54, Official Records, in the Office of the County Recorder of said Santa Cruz County, bears North 47° 15' East 849.50 feet distant and a Ford Axle driven in the ground bears North 42° 45' West 30 feet distant; and running thence from said point of beginning along the centerline of said Beach Road South 47° 15' West 200 feet; thence leaving said Beach Road North 42° 45' West 510.03 feet to the Southeastern line of the lot of land "2nd" described in a Deed from John C. Mello, et ux., to C. J. Rodgers, L. N. Kusalich, Jasper Simunovich, Mitchell Resetar and M. A. Travers, dated June 27, 1928; thence along said last named lands North 50° 19' East 200.28 feet; thence leaving said last named lands South 42° 45' East 499.32 feet to the place of beginning, and containing 2.317 acres of land.

SAVING AND EXCEPTING therefrom that portion thereof lying within the boundaries of the 18 foot strip of land "3rd" described in said Deed from John C. Mello, et ux., to C. J. Rodgers, et al., (but with the right of way to cross the said strip at one point within the boundaries of the land "1st" above described, as reserved in said Deed).

PARCEL TWO: Being a part of the Rancho Bolsa del Pajaro and beginning in the middle of the Beach Road and at the most Southern corner of lands conveyed by John C. Mello, et ux., to M. A. Travers by Deed dated June 28, 1928; and recorded in Volume 137 at Page 30, Official Records of Santa Cruz County; and running thence from said point of beginning along the centerline of said Beach Road South 47° 15' West 170 feet; thence leaving road North 42° 45' West 267 feet; thence North 47° 15' East 170 feet to the aforesaid lands conveyed by Mello to Travers as aforesaid and thence along the Southwestern boundary of said last named lands South 42° 45' East 267 feet to the place of beginning, and containing 1.04 acres of land.

PARCEL THREE: A right of way freely to pass and repass, along, over and upon a strip of land, 15 feet in width throughout and having as its Eastern boundary a line described as follows:

BEGINNING at a point in the center of the Beach Road, from which point of beginning the Southwestern corner of a tract of land conveyed to John C. Mello by Elizabeth W. Clow, et al., by Deed dated December 31, 1926, and of record in Volume 85 of Official Records, Page 50, in the Office of the County Recorder of said County, bears South 47° 15' West, along the centerline of said road, 616.74 feet distant; and running thence North 42° 45' West 296.14 feet, more or less, to an 18 foot strip of land

EXHIBIT A

conveyed by John C. Mello, et ux., et al., to Southern Pacific Company. Said right of way being appurtenant to lands of said Travers, heretofore conveyed to him by said Mello and being portions of the said tract of land so conveyed by Clow to Mello, and to be free, open and unobstructed.

PARCEL FOUR: Being a part of the Rancho Bolsa Del Pajaro and beginning at the most Western corner of lands conveyed by John C. Mello, et ux., to Manuel A. Travers by Deed dated June 11th, 1929, and recorded in Vol. 160 at Page 320 Official Records of Santa Cruz County, and running thence from said point of beginning North 42° 45' West 29.14 feet to lands of the Southern Pacific Company, thence along the boundary of said last named lands on a curve to the right having a radius of 468.68 feet an arc distance of 65.958 feet; thence North 55° 26' 08" East 68.984 feet and thence North 55° 21' 27" East 36.516 feet to lands conveyed by John C. Mello, et ux., to Manuel A. Travers by Deed dated June 28th, 1928 and recorded in Vol. 137 at Page 30 Official Records of Santa Cruz County; thence along the boundary of said last named lands South 42° 45' East 9.42 feet to the first mentioned lands conveyed by said John C. Mello, et ux., to Manuel A. Travers and thence along the Northwestern boundary of said lands South 47° 15' West 170.00 feet to the place of beginning.

SAVING AND EXCEPTING therefrom the rights of way over a portion of said land heretofore granted by John C. Mello, et ux., as shown by the Official Records of said County, and also excepting a right of way freely to pass and repass, along, over and upon the southwestern 15 feet of said land, which right of way is to be appurtenant to all lands of said John C. Mello lying Northwesterly thereof.

Assessor's Parcel Number: 018-331-15, 08

Common Address: 890 & 880 West Beach Street, Watsonville

PCR Tier	Requirements
Tier 1	Performance Requirement 1 – Site Design & Runoff Reduction
Projects that create or replace 2,500 sq. ft. or more of impervious surface, including detached single-family home projects.	Implement site design and runoff reduction measures: <ul style="list-style-type: none"> • Limit disturbance of creeks and natural drainage features. • Minimize compaction of highly permeable soils. • Limit clearing and grading of native vegetation to the minimum area necessary. • Minimize impervious surfaces. • Minimize runoff by incorporating permeable surfaces and directing runoff toward permeable areas or to rain barrels for reuse.
Tier 2	Performance Requirement 2 – Water Quality Treatment
Projects, except detached single-family homes, with 5,000 sq. ft. or more of net impervious surface*. (Detached single-family home projects with 15,000 sq. ft. or more of net impervious surface*.)	Tier 1 performance requirements, plus: <ul style="list-style-type: none"> • Treat stormwater runoff using one or more onsite systems, including low impact development treatment systems, biofiltration treatment systems, and non-retention based treatment systems. • Project applicant must submit a Stormwater Control Plan to the City that sufficiently demonstrates that the project design meets performance requires of PCR Tier 2.
Tier 3	Performance Requirement 3 – Runoff Retention
Projects, except detached single-family homes, that create or replace 15,000 sq. ft. or more of impervious surface. (Detached single-family home projects with 15,000 sq. ft. or more of net impervious surface*.)	Tier 2 performance requirements, plus: <ul style="list-style-type: none"> • Use low impact development standards to prevent offsite discharge of runoff from events up to the 95th percentile rainfall event. • Where technical infeasibility prevents full onsite retention requirements, retention-based stormwater control measures shall be provided for no less than 10 percent of the project's impervious surface area. • Project applicant must submit a Stormwater Control Plan to the City that sufficiently demonstrates that the project design meets performance requires of PCR Tier 3.
Tier 4	Performance Requirement 4 – Peak Management
Projects that create and/or replace 22,500 sq. ft. or more of impervious surface in Watershed Management Zone 1.	Tier 3 performance requirements, plus: <ul style="list-style-type: none"> • Control peak flows to not exceed pre-project flows for the 2-year through 10-year storm event. • Project applicant must submit a Stormwater Control Plan to the City that sufficiently demonstrates that the project design meets performance requires of PCR Tier 4. • Submit an Operations and Maintenance Plan for structural stormwater control measures to the City of Watsonville for review and approval prior to final construction sign-off.

* Net impervious area equals new and replaced impervious area minus the total pre-project-to-post-project reduction in impervious area.

Source: Ordinance No. 1299-14 (CM).



June 4, 2020

Justin Meek, AICP
Principal Planner
City of Watsonville
Watsonville, California

Mountain Propane Environmental Guidance Memorandum

Dear Mr. Meek:

The purpose of this memorandum prepared by Harris & Associates (Harris) is to support the City of Watsonville (City) in determining the appropriate California Environmental Quality Act (CEQA) documentation for the Mountain Propane Tank Relocation and Filling Station (project), proposed by project applicant Mountain Propane.

Harris' determination that a Common Sense Exemption is the appropriate documentation (instead of an Initial Study/Mitigated Negative Declaration) is based on the potential environmental impacts of the project, as identified in several technical studies prepared, and guidance on the potential use of the "common sense" exemption found in CEQA Guidelines Section 15061(b)(3).

Project Description

The Mountain Propane Tank Relocation and Filling Station Project (project) site is located at 950 West Beach Street in the City of Watsonville (**Figure 1**). The 0.69-acre project site is zoned General Industrial (IG) and is a previously developed industrial site, owned by Mountain Propane and previously owned by Venture Oil Company and used for propane storage. Currently, the project site is comprised of impervious pavement and concrete surfaces, heavily disturbed unpaved areas, and a 50,000-gallon propane storage tank that is not currently in use.

The applicant is proposing to relocate the existing 50,000-gallon propane storage tank westward to the middle of the site and to install four new 30,000-gallon propane storage tanks in the approximately 1,750 square foot area currently occupied by the existing tank, resulting in a total of 170,000 gallons of propane storage at the project site.

Additional site improvements include asphalt paving, bollard installation, foundation construction for the propane tanks, tank unloading stations, irrigation and landscaping, gate and fencing installation, liquefied petroleum gas (LPG) piping and appurtenance installation, mini mobile office, and private fire hydrant installation.

The propane storage tanks and LPG piping and appurtenance equipment would be installed and maintained in accordance with California Code of Regulations, Title 8, Article 7, Section 536ⁱ. The tanks and LPG piping would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keeps errant propane from being released. The site would be under video monitoring when company personnel is not onsite and throughout the evening.

The applicant would utilize the adjacent rail line for the delivery of the propane, which would then be transferred to a truck and then to the on-site propane storage tanks, and would fill bobtail delivery trucks at the site and deliver propane to customers. The transport rail and truck facilities would be operated and maintained in accordance with Federal Code of Regulations, Title 49, Part 174 (Carriage by Rail)ⁱⁱ and CHP Form 800C (Vehicles Transporting Hazardous Materials)ⁱⁱⁱ.

The project would be implemented in two phases. Phase 1 involves rotating and relocating the existing 50,000-gallon storage tank to allow easier access for filling and distribution and would be implemented this year (2020).



Phase 2 involves adding 120,000 gallons of storage (in four new 30,000-gallon storage tanks) and would be implemented within 2-3 years, contingent on demand and development of business services.

Following construction, it is estimated that the project would generate approximately 10 roundtrips for bobtail trucks, four daily roundtrips for passenger vehicles, and up to one heavy-duty truck trip daily at buildout, after both Phase 1 and 2 are constructed.

CEQA Compliance and Documentation

Because the project requires discretionary approval, it is considered a project subject CEQA. As a project under CEQA, the lead agency (City of Watsonville) is required to determine if the project is exempt from CEQA or requires further analysis. CEQA Guidelines Section 15061(b) states that a project is exempt from CEQA if:

1. The project is exempt by statute (Article 18);
2. The project is exempt pursuant to a categorical exemption (Article 19);
3. The activity is covered by the common sense exemption that CEQA applies only to projects that have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA;
4. The project will be rejected or disapproved by the public agency; or
5. The project is exempt pursuant to the provisions of Article 12.5 (Agricultural Housing, Affordable Housing, and Residential Infill Projects).

To determine if the “common sense” exemption applies (as described in #3), Harris conducted a review of the following five environmental topics based on the questions outlined in CEQA Guidelines Appendix G, Environmental Checklist Form, and documented the results in technical memoranda (attached).

- Air Quality/Greenhouse Gases
- Archeological/Cultural Resources
- Biological Resources
- Hazardous Materials
- Traffic/Transportation

Conclusion

The analyses all conclude that the proposed project would have either “no impact” or a “less than significant impact” on the environment. No mitigation measures are recommended or required to reduce potential impacts to a less than significant level for any of the environmental topics analyzed. Best Management Practices (BMPs) are recommended were applicable.

Therefore, it is clear, based on the evidence on the record, that the proposed project can be considered exempt from CEQA under Section 15061(b)(3), the “common sense” exemption, as it can be seen with certainty that there is no possibility that the activity (project) in question would have a significant effect on the environment. Refer to the five attached technical memoranda for documentation and evidence on the record.

Sincerely,

David J. R. Mack, AICP
Senior Planner/Project Manager



Attachments:

1. Air Quality/Greenhouse Gases Technical Memorandum
2. Archaeological/Cultural Resources Technical Memorandum
3. Biological Resources Technical Memorandum
4. Hazardous Materials Technical Memorandum
5. Traffic/Transportation Technical Memorandum

ⁱ California Code of Regulations, Title 8, Section 536, printed May 7, 2020

ⁱⁱ Code of Federal Regulations, Title 49, Part 174.304, printed May 7, 2020

ⁱⁱⁱ California Highway Patrol Form 800C, printed May 7, 2020.

CITY OF WATSONVILLE



Source: County of Santa Cruz Imagery 2016.



Harris & Associates



0 300 600
Feet



TECHNICAL MEMORANDUM

To: Justin Meek, AICP, Principal Planner, City of Watsonville
From: Sharon Toland, Project Manager and Air Quality/GHG Specialist, Harris & Associates
Subject: Mountain Propane Project - Air Quality and Greenhouse Gas Emissions
Date: June 4, 2020
CC: David Mack, Project Manager/Senior Planner, Harris & Associates
Att: 1, Model Outputs

Introduction

The purpose of this technical memorandum is to determine potential air quality and greenhouse gas (GHG) emissions impacts of the proposed Mountain Propane Tank Relocation and Filling Station Project, as they relate to compliance with the California Environmental Quality Act (CEQA) and the Monterey Air Resources Board's guidelines. Accordingly, the methodology used is to address the questions related to Air Quality and GHG in the CEQA Guidelines Appendix G, Environmental Checklist Form.

The information in this memorandum is based on project description information provided by the applicant¹, field survey, and research conducted by Harris & Associates staff.

Project Description

The Mountain Propane Tank Relocation and Filling Station Project (project) site is located at 950 West Beach Street in the City of Watsonville (**Figure 1**). The 0.69-acre project site is zoned General Industrial (IG) and is a previously developed industrial site, owned by Mountain Propane and previously owned by Venture Oil Company and used for propane storage. Currently, the project site is comprised of impervious pavement and concrete surfaces, heavily disturbed unpaved areas, and a 50,000-gallon propane storage tank that is not currently in use.

The applicant is proposing to relocate the existing 50,000-gallon propane storage tank westward to the middle of the site and to install four new 30,000-gallon propane storage tanks in the approximately 1,750 square foot area currently occupied by the existing tank, resulting in a total of 170,000 gallons of propane storage at the project site.

Additional site improvements include asphalt paving, bollard installation, foundation construction for the propane tanks, tank unloading stations, irrigation and landscaping, gate and fencing installation, liquefied petroleum gas (LPG) piping and appurtenance installation, mini mobile office, and private fire hydrant installation.

The propane storage tanks and LPG piping and appurtenance equipment would be installed and maintained in accordance with California Code of Regulations, Title 8, Article 7, Section 536¹. The tanks and LPG piping would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keeps errant propane from being released. The site would be under video monitoring when company personnel is not onsite and throughout the evening.

The applicant would utilize the adjacent rail line for the delivery of the propane, which would then be transferred to a truck and then to the on-site propane storage tanks, and would fill bobtail delivery trucks at the site and

¹ Project application documents and background studies were provided by Justin Meek, AICP, Principal Planner, City of Watsonville, on January 24, 2020. Additional information related to project construction and operation was provided by the applicant's engineer C2G Engineering via David Dauphin, in a March 22, 2020 email and Richard Kojak in a March 23, 2020 email.



deliver propane to customers. The transport rail and truck facilities would be operated and maintained in accordance with Federal Code of Regulations, Title 49, Part 174 (Carriage by Rail)ⁱⁱ and CHP Form 800C (Vehicles Transporting Hazardous Materials)ⁱⁱⁱ.

The project would be implemented in two phases. Phase 1 involves rotating and relocating the existing 50,000-gallon storage tank to allow easier access for filling and distribution and would be implemented this year (2020). Phase 2 involves adding 120,000 gallons of storage (in four new 30,000-gallon storage tanks) and would be implemented within 2-3 years, contingent on demand and development of business services.

Following construction, it is estimated that the project would generate approximately 10 roundtrips for bobtail trucks, four daily roundtrips for passenger vehicles, and up to one heavy-duty truck trip daily at buildout, after both Phase 1 and 2 are constructed.

Emissions of Concern

Air Quality

Historically, air quality laws and regulations have divided air pollutants into two broad categories: criteria air pollutants and non-criteria pollutants, or toxic air contaminants (TACs). Criteria air pollutants are a group of common air pollutants regulated by the federal and state governments by means of ambient standards based on criteria regarding health and environmental effects of pollution (USEPA 2018a). TACs are pollutants with the potential to cause significant adverse health effects. Unlike the air quality standards for criteria pollutants to protect health and the environment, in California, the California Air Resources Board (CARB) identifies exposure thresholds for TACs that indicate levels below which no significant adverse health effects are anticipated from exposure to the identified substance. However, no thresholds are specified for TACs that have been found to have no safe exposure level or where insufficient data are available to identify an exposure threshold (CARB 2020a).

The criteria air pollutants pertinent to the analysis in this report are carbon monoxide, nitrogen oxides, ozone, particulate matter, and sulfur dioxide. The following describes the health effects for each of these criteria air pollutants.

Carbon Monoxide (CO)

CO is a colorless, odorless, poisonous gas produced by combustion processes, primarily mobile sources. When CO gets into the body, it combines with chemicals in the blood and prevents blood from providing oxygen to cells, tissues, and organs. Because the body requires oxygen for energy, high-level exposure to CO can cause serious health effects, including death (USEPA 2016a).

Nitrogen Oxides (NO_x)

NO_x is a general term pertaining to compounds including nitric oxide (NO), nitrogen dioxide (NO₂), and other oxides of nitrogen. NO_x is produced from burning fuels, including gasoline, diesel, and coal. NO_x reacts with VOCs to form ground-level O₃ (smog). NO_x is linked to a number of adverse respiratory systems effects (USEPA 2016b).

Ozone (O₃)

Ground level O₃ is not emitted directly into the air but is formed by chemical reactions of “precursor” pollutants (NO_x and VOCs) in the presence of sunlight. Major emissions sources include NO_x and VOC emissions from industrial facilities and electric utilities, motor vehicle exhaust, gasoline vapors, and chemical solvents. Propane is a volatile organic compound and O₃ precursor (CARB 2014). O₃ can trigger a variety of health problems, particularly for sensitive receptors, including children, the elderly, and people of all ages who have lung diseases, such as asthma (USEPA 2018b).

Particulate Matter (PM₁₀ and PM_{2.5})

Particulate matter includes dust, metals, organic compounds, and other tiny particles of solid materials that are released into and move around in the air. Particulates are produced by many sources, including the burning of diesel fuels by trucks and buses, industrial processes, and fires. Particulate pollution can cause nose and throat irritation and heart and lung problems. Particulate matter is measured in microns, which are 1 millionth of a meter in length (or 1



thousandth of a millimeter). PM₁₀ is small (i.e., respirable) particulate matter measuring no more than 10 microns in diameter, while PM_{2.5} is fine particulate matter measuring no more than 2.5 microns in diameter (CARB 2020b).

Sulfur Dioxide (SO₂)

SO₂ is formed primarily by the combustion of sulfur-containing fossil fuels, especially at power plants and industrial facilities. SO₂ is linked to a number of adverse effects on the respiratory system (USEPA 2019a).

Toxic Air Contaminants

TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. The two primary emissions of concern regarding health effects for land development projects are CO and diesel particulate matter (DPM). The health effects of CO are described previously. DPM is a mixture of many exhaust particles and gases that is produced when an engine burns diesel fuel. Compounds found in diesel exhaust are carcinogenic. Some short-term (acute) effects of diesel exhaust exposure include eye, nose, throat, and lung irritation and headaches and dizziness. Long-term exposure is linked to increased risk of cardiovascular, cardiopulmonary, and respiratory disease and lung cancer (OSHA 2013).

Greenhouse Gas Emissions

The primary GHG emitted by human activities is carbon dioxide (CO₂). CO₂ enters the atmosphere through the burning of fossil fuels, solid waste, trees, and wood products and because of other chemical reactions, such as those produced through the manufacturing of cement. Globally, the largest source of CO₂ emissions is the combustion of fossil fuels in power plants, automobiles, industrial facilities, and other similar sources (USEPA 2020). Methane (CH₄) is emitted from natural and human-related sources, including fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management (USEPA 2020). Nitrous oxide (N₂O) is emitted during agricultural and industrial activities and combustion of fossil fuels and solid waste (USEPA 2020). Hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride are synthetic, powerful GHGs that are emitted from a variety of industrial processes and the production of chlorodifluoromethane. Construction or operation of the proposed project would not include any industrial processes other than propane storage, and chlorodifluoromethane has been mostly phased out of use in the United States, with the exception of feedstock production (USEPA 2020); therefore, these GHGs are not discussed further in this report.

Individual GHGs have varying heat-trapping properties and atmospheric lifetimes. **Table 1** identifies the CO₂ equivalent (CO₂e) and atmospheric lifetimes of basic GHGs. The CO₂e is a consistent method for comparing GHG emissions because it normalizes various GHG emissions to a consistent measure. Each GHG is compared to CO₂ with respect to its ability to trap infrared radiation, its atmospheric lifetime, and its chemical structure. For example, CH₄ is a GHG that is 25 times more potent than CO₂; therefore, 1 metric ton (MT) of CH₄ is equal to 25 metric tons of carbon dioxide equivalent (MTCO₂e).

Table 1. Global Warming Potentials and Atmospheric Lifetimes of Common Greenhouse Gases

GHG	Formula	100-Year Global Warming Potential (1)	Atmospheric Lifetime
Carbon dioxide	CO ₂	1	~100
Methane	CH ₄	25	12
Nitrous oxide	N ₂ O	298	121

Source: CAPCOA 2017. Consistent with CalEEMod, Version 2016.3.2.

Definitions: CH₄ = methane; CO₂ = carbon dioxide; GHG = greenhouse gas; N₂O = nitrous oxide

(1) The warming effects over a 100-year period relative to other GHGs.

Regulatory Setting

The project site is located within Watsonville, which is within the North Central Coast Air Basin (NCCAB), comprised of Monterey, Santa Cruz, and San Benito Counties. The Monterey Bay Air Resources District (MBARD) consists of all three counties within the NCCAB; therefore, MBARD is responsible for air monitoring, permitting, enforcement, long-range air

quality planning, regulatory development, education, and public information activities related to air pollution, as required by the California Clean Air Act (CCAA) and Amendments, and the Federal Clean Air Act (CAA) and Amendments.

The CAA of 1970 required the U.S. Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) with states retaining the option to adopt standards that are more stringent or to include other specific pollutants. The 1990 CAA Amendments require that each state have an air pollution control plan called the State Implementation Plan (SIP). The SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The CAA Amendments dictate that states containing areas violating the NAAQS revise their SIPs to include extra control measures to reduce air pollution. The USEPA reviews the SIPs to determine whether the plans would conform to the 1990 CAA Amendments and achieve the air quality goals.

The USEPA has classified air basins (or portions thereof) as being in “attainment,” “nonattainment,” or “unclassified” for each criteria air pollutant, based on whether or not the NAAQS have been achieved. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designation. **Table 2** lists the attainment status of the North Central Coast Air Basin (NCCAB) for the applicable criteria pollutants. The USEPA classifies the NCCAB as in attainment or unclassified for all pollutants with respect to federal air quality standards. The NCCAB is not in nonattainment status for any pollutant under federal standards. On April 2, 2007, the U.S. Supreme Court ruled in *Massachusetts v. USEPA* that CO₂ is an air pollutant, as defined under the federal Clean Air Act, and that the USEPA has the authority to regulate emissions of GHGs. However, a NAAQS or equivalent standard has not been established for GHG emissions.

The state of California, under the California Clean Air Act (CCAA), has established standards for criteria pollutants that are generally stricter than federal standards. As shown in **Table 2**, the NCCAB is currently in nonattainment status for respirable particulate matter (PM₁₀), and transitional nonattainment status for ozone. An area is designated transitional nonattainment if, during a single calendar year, the state standard is not exceeded more than three times at any monitoring location within the district.

Table 2. North Central Coast Air Basin Attainment Status

Pollutant	Averaging Time	California Standards	Federal Standards
Ozone (O3)	1 Hour	Nonattainment – Transitional	No Federal Standard
	8 Hour		Attainment
Respirable Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	Nonattainment	No Federal Standard
	24 Hour		Unclassified (1)
Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	Attainment	Attainment
	24 Hour	No State Standard	
Carbon Monoxide (CO)	8 Hour	Unclassified	Unclassified/Attainment
	1 Hour		
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	No State Standard	Attainment
	1 Hour	Attainment	No Federal Standard
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	No State Standard	Attainment
	24 Hour	Attainment	Attainment
	1 Hour	Attainment	No Federal Standard

Source: CARB 2018, USEPA 2017b.

Unclassified; indicates data are not sufficient for determining



In September 2006, the California Legislature adopted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing GHG emissions in California. AB 32 identifies a statewide goal of reducing the statewide level of GHG emissions to 1990 levels by 2020. Effective January 1, 2017, Senate Bill (SB) 32 requires California to reduce its statewide GHG emissions by the year 2030 so that emissions are 40 percent below those that occurred in 1990. Additionally, in 2005, California Governor Arnold Schwarzenegger announced, through EO S-3-05, a statewide GHG emission reduction target of reducing GHG emissions to 80 percent below 1990 levels by 2050.

The 2017 Climate Change Scoping Plan (2017 Scoping Plan) was finalized in November 2017 and adopted in December 2017. This plan outlines the framework for achieving the statewide emissions reduction goals. The 2017 Scoping Plan identifies GHG reductions by emissions sector to achieve a statewide emissions level that is 40 percent below 1990 levels by 2030. CARB recommends statewide targets of no more than 6 MTCO₂e per capita by 2030 and no more than 2 MTCO₂e per capita by 2050. However, CARB specifically states that these goals are appropriate for the plan level (city, county, subregional, or regional level) but not for specific individual projects because the goals include all emissions sectors in the state (CARB 2017).

In 2015, Watsonville adopted a Climate Action Plan (CAP) to assist Watsonville in preparing for the potential impacts of climate change and protect public health, safety and critical infrastructure. The CAP identifies and prioritizes policies and programs that both reduce GHG emissions and increase the ability of the city to adapt to future climate impacts. Based on state guidance, the CAP establishes the goals of reducing GHG emissions by 15 percent from 2005 levels to meet the AB 32 target and 25 percent below 2005 emissions by 2030 to continue on the trajectory to reach the 2050 reduction target. The CAP includes a list of actions for the City to implement to reduce GHG emissions, including improvements for bicycle and pedestrian infrastructure and incentive programs to promote reduction in vehicles miles travelled and utility use. The CAP does not include specific requirements or emissions reduction targets for individual projects.

Potential Impacts

Methodology

Project criteria pollutant and GHG emissions were estimated using the CalEEMod Model, version 2016.3.2, based on construction information provided by the applicant and City of Watsonville. Detailed assumptions and modeling data sheets are provided in **Attachment 1**.

Construction of Phase 1 of the project would result in the disturbance of a total of 21,000 square feet. Construction would take place over a total of 4.5 months, and construction activities would potentially overlap. Construction would generally include demolition of existing material on-site (10 working days), grading (20 working days), paving (10 working days), and construction of the pad and installation of the permanent propane tank (67 working days). Construction and installation would consist of construction of concrete piers (3 weeks), installation of storm water and irrigation utilities (3 weeks), relocation of tank (2 days), installation of propane piping (3 weeks), lighting and electrical installation (2 weeks), and planting (1 week). The entire disturbance area of 21,000 square feet is assumed for demolition material. Grading is anticipated to require import of 156 cubic yards of material. CalEEMod default assumptions are assumed for anticipated construction fleet, hours of operation of construction equipment, and worker vehicle and truck trips. Phase 2 of the project would potentially add 120,000 gallons of storage (in four new 30,000-gallon storage tanks); however, earthwork and pad construction for this phase would be completed in Phase 1. Therefore, Phase 1 represents the worst-case construction emission that would occur from the project.

Following construction, the project would generate approximately 10 daily roundtrips for bobtail trucks at buildout. Additionally, four roundtrips for passenger vehicles are anticipated daily. Up to one heavy-duty truck trip is anticipated per week. Modeling conservatively assumes a daily heavy-duty truck trip. Most propane would be delivered by rail. The project site is currently served by rail, and the proposed project would not result in a change to existing rail operations. Emissions from rail are not included in this analysis. No permanent facilities for drivers would be provided on the site. Therefore, it is assumed that the proposed project would not generate



demand for water, natural gas, or solid waste onsite. The project would result in electricity demand for lighting. It is assumed that electricity service would be carbon-free electricity provided by Monterey Bay Community Power (MBCP). Therefore, no GHG emissions are calculated for electricity use.

The project site would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keeps errant propane from being released. However, VOC emissions from propane storage and loading operations are estimated based on calculations performed for the Watkins Glen Storage Facility in Schuyler County, New York, and the Marathon Petroleum Company LP Refinery in Detroit, Michigan, as part of the permitting processes for these facilities.

Watkins Glen Storage Facility proposed 150,000 gallons of propane storage for truck and rail delivery (Trinity Consultants 2010). The 2010 permit application for this facility estimated annual VOC emissions of 6.81 tons per year from loading and unloading activities and 0.07 tons per year from fugitive releases. However, calculations projected loading and unloading activities for 98,112 trucks per year, compared to approximately 2,500 per year for the proposed project at buildout. Therefore, loading emissions for the proposed project would be approximately three percent of this facility, or 0.17 tons (340 pounds) per year. Likewise, potential VOC emissions from fugitive releases would be approximately 0.08 tons (160 pounds) per year for the proposed project based on the relatively larger storage capacity. Thus, the estimated total daily VOC emissions for the proposed project would be approximately 0.25 tons (500 pounds) per year, or 1.4 pounds per day.

More recently, in 2015 the study for Marathon Petroleum Company LP Refinery calculated potential VOC emissions from LPG storage, including propane, and operations, including both truck and railcar loading (Horizon Environmental 2015). The study calculated total potential fugitive VOC emissions due to leaking components associated with the proposed storage and transfer operations using emission factors for individual storage and transfer components. The study calculated that the project's upgraded facilities would result an estimated 5,164 pounds per year of VOCs, or approximately 14 pounds per day. The Marathon Petroleum Company storage facilities would have a capacity of 59,100 barrels (approximately 2.48 million gallons). Based on the calculations for the Marathon Petroleum Company storage facilities, an emissions factor of approximately 0.002 pounds per year (0.000006 pounds per day) per gallon of propane storage. Based on this emissions factor, the potential storage capacity of 170,000 gallons of propane at the project site would result in emissions of approximately 0.17 tons (340 pounds) per year, or 0.9 pounds per day.

Detailed specifications of project equipment are unknown at this time; therefore, because the results of these permit applications from the aforementioned facilities result in similar emissions estimates for the proposed project, the conservative VOC estimate of 1.4 pounds per day is assumed to represent potential VOC emissions from propane release for buildout of the proposed project.

Air Quality

The following sections address the potential for the proposed project to result in a significant impact based on the questions outlined in Appendix G of the CEQA Guidelines related to air quality.

1. Would the project conflict with or obstruct implementation of the applicable air quality plan?

In accordance with the CCAA, MBARD has developed the 2012-2015 Air Quality Management Plan (AQMP) for the Monterey Bay Region (MBARD 2017). The focus of the plan is achieving the 8-hour ozone standard in the region. The plan includes an updated air quality trends analysis; emissions inventory that includes the latest information on stationary, area, and mobile emission sources; and mobile source programs. Projects that are inconsistent with the AQMP would result in a significant cumulative impact related to ozone emissions. A project is consistent with the AQMP if it is consistent with the growth assumptions in the AQMP and, therefore, accommodated in the emissions inventories.

According to MBARD Guidelines, a project would conflict with or obstruct implementation of the AQMP for the NCCAB if it is inconsistent with the growth assumptions included in the AQMP, in terms of population,



employment, or regional growth in vehicle miles traveled (VMT) (MBARD 2008). The proposed project does not contain a residential component and would therefore not increase the residential population. The commercial component replaces an existing temporary propane tank and would not provide a new employment center. The proposed project is consistent with existing zoning and is consistent with the growth assumptions in the AQMP. Construction of the proposed project would generate temporary employment opportunities, but jobs created by this construction activity would likely be filled by the existing workforce in Watsonville or immediately surrounding areas. No direct growth inducement is expected to result from proposed project implementation.

No stationary sources would be constructed that would be long-term permanent sources of emissions. Permanent propane storage would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keeps errant propane from being released. As further discussed below, the project would not result in an exceedance of numeric thresholds established by MBARD during construction or operation. Additionally, the proposed project would involve typical construction practices and general construction activity related emissions (i.e., temporary sources). According to Section 5.3 of the MBARD CEQA Air Quality Guidelines (2008), Criteria for Determining Construction Impacts, typical construction practices are accounted for in the emission inventories included in the air quality plans. Therefore, impacts to air quality plan objectives would be less than significant. Implementation of the project would not conflict with or obstruct any long-range air quality plans of the MBARD.

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

Construction

Construction activities associated with the project would result in temporary increases in air pollutant emissions. According to MBARD, construction activities (e.g., excavation, grading, on-site vehicles) which directly generate 82 pounds per day or more of PM₁₀ would have a significant impact on local air quality. The screening level for construction with the potential to exceed this threshold is disturbance of 2.2 acres or more per day. The project site is less than one acre; therefore, the proposed project would not exceed the screening level for potential PM₁₀ impacts. However, potential construction emissions from the project have been quantified and are presented in **Table 3**. As shown in **Table 3**, the project is not estimated to generate PM₁₀ levels in exceedance of this threshold during any phase or simultaneous phase of construction.

MBARD does not identify quantitative thresholds for other criteria pollutants during construction. Construction projects using typical construction equipment such as dump trucks, scrapers, bulldozers, compactors and front-end loaders that temporarily emit precursors of ozone (i.e., VOC or NOx), are accommodated in the emission inventories of state- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone AAQS. However, a project that would use non-typical equipment would have the potential to result in a significant impact related to emissions of VOCs or NOx. The proposed project would employ typical construction equipment. It would not require any non-typical construction equipment or techniques that have not been accounted for in the NCCAB emissions inventories. Thus, the proposed project would not result in a significant impact related to emissions of VOCs or NOx.

The proposed project would result in a less than significant impact related to maximum daily criteria pollutant emissions during construction. Because the emissions would be below the applicable health-based significance thresholds, no adverse health effects would occur. The project would not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, construction emissions would be less than significant.

**Table 3. Estimated Construction Daily Maximum Air Pollutant Emissions (lbs. /day)**

Construction Phase	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Demolition	1	10	8	<1	3	1
Grading	1	10	8	<1	1	1
Paving	1	7	8	<1	<1	<1
Pad Construction, Utility Installation, and Tank Relocation	1	8	8	<1	1	<1
Maximum Simultaneous Daily Emissions	2	20	16	<1	4	2
MBARD Threshold	–	–	–	–	82	–
Significant Impact?	–	–	–	–	No	–

Source: CalEEMod Version 2016.3.2. Model output provided in Attachment 1.

Definitions: VOC = Volatile Organic Compounds. NOx = Oxides of Nitrogen. CO = Carbon Monoxide. SOx. = Sulfur oxides. PM10 = Particulate matter 10 micrometers or less in diameter. PM2.5 = Particulate matter 2.5 micrometers or less in diameter.

Operation

Following construction, the project would generate criteria pollutant emissions from truck delivery and personal vehicle trips. Minimal VOC emissions from propane leaks are anticipated. Emissions from operation of the project are provided in **Table 4**. The proposed project would not exceed MBARD thresholds for maximum daily criteria pollutant emissions for any pollutant during operation. Because the emissions would be below the applicable health-based significance thresholds, no adverse health effects would occur. The project would not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, cumulative operational impacts related to emissions of criteria pollutants would be less than significant.

Table 4. Estimated Operation Daily Maximum Air Pollutant Emissions (lbs. /day)

Construction Phase	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Mobile Emissions	<1	2	1	<1	<1	<1
Propane Release	1.4	--	--	--	--	--
MBARD Threshold	137	137	550	150	82	–
Significant Impact?	No	No	No	No	No	–

Source: CalEEMod Version 2016.3.2 (mobile emissions). Model output provided in Attachment 1. Horizon Environmental 2015 (propane release).

Definitions: VOC = Volatile Organic Compounds. NOx = Oxides of Nitrogen. CO = Carbon Monoxide. SOx. = Sulfur oxides. PM10 = Particulate matter 10 micrometers or less in diameter. PM2.5 = Particulate matter 2.5 micrometers or less in diameter.

3. Would the project expose sensitive receptors to substantial pollutant concentrations?

MBARD defines sensitive receptors for CEQA purposes as any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. Sensitive receptors also include long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing.

The project site is located on lands used for industrial uses. The nearest sensitive receptors are residences located approximately 700 feet northwest of the project site. As shown in **Table 3**, construction emissions from the project would be minimal. Additionally, construction would only occur over a 4.5-month period. Therefore, because project construction activities, such as the operation of heavy equipment, would be minimal and would occur relatively far away from sensitive receptors, the proposed project is not anticipated to expose these receptors to short-term criteria pollutant emissions.

Following construction, the proposed project would result in new truck trips and permanently locate propane storage on the project site. New truck trips are a potential source of DPM. A maximum of 11 daily roundtrip truck trips are anticipated for the site. As shown in **Table 4**, these trips would result in emissions that would be minimal relative to MBARD thresholds. Particulate matter emissions would be less than one pound per day. Additionally,



a total of 15 roundtrips, including passenger vehicles, occurring throughout the workday, would not contribute to congestion that would result in a potential carbon monoxide hotspot. Propane is a VOC and ozone precursor; however, propane storage is not a use listed by CARB as potentially requiring a health risk assessment (CARB 2005). The project site would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keep errant propane from being released. As shown in **Table 4**, emissions are anticipated to be minimal. Therefore, due to distance and minimal emissions anticipated for the project, impacts to sensitive receptors from project operation would be less than significant.

4. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Construction associated with the proposed project could result in minor amounts of odor compounds associated with diesel-heavy equipment exhaust. However, diesel equipment would not be operating together at one time, and construction near existing receptors, including employees at adjacent industrial land uses, would be temporary. Additionally, SO_x is the only criteria air pollutant with a strong, pungent odor (ATSDR 2015). As shown in **Table 3**, maximum construction emissions of SO_x would be less than 1 pound per day, which is well below the MBARD long-term threshold of 150 pounds per day. Therefore, impacts associated with odors during construction would not result in nuisance odors that would result in a significant impact.

CARB's Air Quality and Land Use Handbook (CARB 2005) includes a list of the most common sources of odor complaints received by local air districts. Typical sources of odor complaints include facilities such as sewage treatment plants, landfills, recycling facilities, petroleum refineries, and livestock operations. The proposed project does not propose any new uses that would be associated with new objectionable odors. The project site would also be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keep errant propane from being released. As shown in **Table 4**, emissions are anticipated to be minimal. Odor emissions from the proposed project would be limited to odors associated with vehicle and engine exhaust and idling from cars entering, parking, and exiting the facility. A maximum of 11 trucks are anticipated for the site per day and would be dispersed throughout the day. Idling would be limited to five minutes or less in accordance with California Code of Regulations, Title 13, sections 2449(d)(3) and 2485. Therefore, the project does not include any known sources of objectionable odors associated with the long-term operations phase.

The project would not create objectionable odors affecting a substantial number of people; therefore, the project would result in a less than significant impact related to objectionable odors during construction or operation.

Greenhouse Gas Emissions

The following sections address the potential for the proposed project to result in a significant impact based on the questions outlined in Appendix G of the CEQA Guidelines related to GHG emissions.

1. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Implementation of the project would generate greenhouse gas (GHG) emissions by usage of fossil fuels during construction activities and vehicle trips during operation. The 4.5-month construction period for Phase 1 would result in one-time total GHG emissions of 72 MTCO₂e, based on the conservative assumptions for analysis. Placement of tanks during Phase 2 would result in some additional GHG emissions for tank transport and placement. However, major construction activities, such as earthwork and pad construction, would be completed during Phase 1. Phase 2 construction emissions would not exceed the worst-case annual emissions of 72 MTCO₂e estimated for Phase 1. Following construction, the proposed project would result in annual GHG emissions of approximately 66 MTCO₂e from truck and passenger vehicle trips at buildout. This estimate is conservative and assumes one daily heavy-duty truck trip in addition to regular bobtail truck trips. **Attachment 1** provides detailed model output for project emissions.



Neither Watsonville nor MBARD have established a numeric threshold for screening impacts related to GHG emissions. Additionally, the Watsonville CAP is not a qualified CAP according to CEQA Guidelines Section 15183.5. However, a threshold of 900 MTCO₂e (annual operational emissions) is recommended by the California Air Pollution Control Officers Association (CAPCOA) (CAPCOA 2008), and a threshold of 1,100 MTCO₂e (annual operational emissions) was adopted by neighboring air districts, including the Sacramento Metropolitan Air Quality Management District, as referenced in the 2017 Scoping Plan (CARB 2017), and the Bay Area Air Quality Management District (BBAQMD 2017). These bright-line thresholds address the state's long-term emissions reduction goals by determining a screening level under which a project would not be considered to hinder the state's ability to meet long-term goals. Bright-line thresholds are typically intended to screen out smaller projects with relatively minimal emissions so that the vast majority (typically 90 percent) of total future development would be subject to mitigation or project features that would reduce GHG emissions compared to business-as-usual emissions, and consistent with GHG reduction goals (CAPCOA 2008). Although these thresholds do not specifically address the contribution of emissions in Watsonville to the statewide goals or the goals of the CAS, these screening levels provide a reasonable proxy for screening project impacts related to statewide GHG reduction goals.

The proposed project would be responsible for a temporary increase in GHG emissions during construction and minimal on-going annual GHG emissions following construction. However, emissions would not exceed annual emissions thresholds recommended by CAPCOA or neighboring air districts for on-going operational impacts. Emissions would be less than 10 percent of the bright-line emissions thresholds adopted by neighboring agencies to screen out smaller projects whose emissions would be considered relatively minimal. Therefore, the project would not result in a significant on-going increase in annual GHG emissions. This impact would be less than significant.

2. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Watsonville CAP and statewide emissions reduction goals are the applicable plans and regulations adopted for the purpose of reducing GHG emissions. As discussed above, the project would result in relatively minimal GHG emissions that would not be anticipated to conflict with the ability of the City or the state to meet emissions reduction goals (AB 32, S-3-05, and SB 32). As a propane storage facility that does not include permanent services for drivers, the project does not propose any structures that would be subject to programs outlined in the CAP to reduce utility use. The project would accommodate only those truck trips that could be served by propane tank capacity, and truck trips are required for this kind of activity. As such, CAP measures related to reduction in vehicle miles travelled, primarily by increasing non-motorized travel, do not apply to the project. The proposed project would not conflict with the CAP or statewide emissions reduction goals. This impact would be less than significant.

Summary

The proposed project would not result in air quality or GHG emissions that would exceed applicable thresholds. All impacts would be less than significant with no mitigation required.

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ⁱ California Code of Regulations, Title 8, Section 536, printed May 7, 2020

ⁱⁱ Code of Federal Regulations, Title 49, Part 174.304, printed May 7, 2020

ⁱⁱⁱ California Highway Patrol Form 800C, printed May 7, 2020.

CITY OF WATSONVILLE



Source: County of Santa Cruz Imagery 2016.



Harris & Associates



0 300 600
Feet

Attachment 1. Model Outputs

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950 W Beach St - North Central Coast Air Basin, Winter

950 W Beach St
North Central Coast Air Basin, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-Rail	3.50	1000sqft	0.08	3,500.00	0
Parking Lot	17.50	1000sqft	0.40	17,500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.8	Precipitation Freq (Days)	53
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MW hr)	641.35	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

950 W Beach St - North Central Coast Air Basin, Winter

Project Characteristics -

Land Use -

Construction Phase - Based on information from applicant

Grading -

Demolition -

Vehicle Trips - Based on estimate of up to 11 trucks and 4 passenger vehicles per day

Fleet Mix - Assumes 10 out of 15 vehicles would be MDT, 1 out of 15 HDT, and 4 out of 15 would be personal vehicles

Energy Use - No natural gas use.

Water And Wastewater - No water use

Solid Waste - No solid waste facilities

950 W Beach St - North Central Coast Air Basin, Winter

Table Name	Column Name	Default Value	New Value
tblEnergyUse	NT24NG	0.21	0.00
tblEnergyUse	T24NG	1.18	0.00
tblFleetMix	HHD	0.04	0.06
tblFleetMix	LDA	0.54	0.09
tblFleetMix	LDT1	0.03	0.09
tblFleetMix	LDT2	0.20	0.09
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.3010e-003	0.00
tblFleetMix	MCY	7.0280e-003	0.00
tblFleetMix	MDV	0.13	0.00
tblFleetMix	MH	8.9700e-004	0.00
tblFleetMix	MHD	0.02	0.67
tblFleetMix	OBUS	3.0720e-003	0.00
tblFleetMix	SBUS	1.0980e-003	0.00
tblFleetMix	UBUS	2.5650e-003	0.00
tblGrading	MaterialImported	0.00	156.00
tblSolidWaste	SolidWasteGenerationRate	3.29	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	WD_TR	1.68	8.57
tblWater	IndoorWaterUseRate	809,375.00	0.00

2.0 Emissions Summary

950 W Beach St - North Central Coast Air Basin, Winter

2.1 Overall Construction (Maximum Daily Emission)**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	1.0190	9.9840	8.4619	0.0208	2.3676	0.4493	2.7855	0.4883	0.4134	0.8874	0.0000	2,068.668 8	2,068.668 8	0.3649	0.0000	2,074.995 6
Maximum	1.0190	9.9840	8.4619	0.0208	2.3676	0.4493	2.7855	0.4883	0.4134	0.8874	0.0000	2,068.668 8	2,068.668 8	0.3649	0.0000	2,074.995 6

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	1.0190	9.9840	8.4619	0.0208	2.3676	0.4493	2.7855	0.4883	0.4134	0.8874	0.0000	2,068.668 7	2,068.668 7	0.3649	0.0000	2,074.995 6
Maximum	1.0190	9.9840	8.4619	0.0208	2.3676	0.4493	2.7855	0.4883	0.4134	0.8874	0.0000	2,068.668 7	2,068.668 7	0.3649	0.0000	2,074.995 6

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

950 W Beach St - North Central Coast Air Basin, Winter

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0966	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0750	1.6443	0.8293	5.3800e-003	0.2191	6.3200e-003	0.2254	0.0636	6.0200e-003	0.0696		558.1795	558.1795	0.0143		558.5357
Total	0.1717	1.6443	0.8314	5.3800e-003	0.2191	6.3300e-003	0.2254	0.0636	6.0300e-003	0.0696		558.1841	558.1841	0.0143	0.0000	558.5406

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0966	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0750	1.6443	0.8293	5.3800e-003	0.2191	6.3200e-003	0.2254	0.0636	6.0200e-003	0.0696		558.1795	558.1795	0.0143		558.5357
Total	0.1717	1.6443	0.8314	5.3800e-003	0.2191	6.3300e-003	0.2254	0.0636	6.0300e-003	0.0696		558.1841	558.1841	0.0143	0.0000	558.5406

950 W Beach St - North Central Coast Air Basin, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/4/2021	1/15/2021	5	10	
2	Grading	Grading	1/16/2021	1/19/2021	5	2	
3	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100	
4	Paving	Paving	6/9/2021	6/15/2021	5	5	

Acres of Grading (Site Preparation Phase): 0**Acres of Grading (Grading Phase): 0****Acres of Paving: 0.4****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

950 W Beach St - North Central Coast Air Basin, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	96.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	20.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	9.00	3.00	0.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

950 W Beach St - North Central Coast Air Basin, Winter

3.2 Demolition - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.1063	0.0000	2.1063	0.3190	0.0000	0.3190			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886		1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	2.1063	0.4073	2.5136	0.3190	0.3886	0.7076		1,147.4338	1,147.4338	0.2138		1,152.7797

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0762	2.5799	0.4992	7.5700e-003	0.1678	9.7700e-003	0.1776	0.0460	9.3500e-003	0.0553		798.8442	798.8442	0.0344		799.7038
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0489	0.0436	0.3728	9.0000e-004	0.0935	7.5000e-004	0.0943	0.0248	6.9000e-004	0.0255		89.1056	89.1056	3.4200e-003		89.1910
Total	0.1251	2.6235	0.8719	8.4700e-003	0.2613	0.0105	0.2719	0.0708	0.0100	0.0808		887.9498	887.9498	0.0378		888.8948

950 W Beach St - North Central Coast Air Basin, Winter

3.2 Demolition - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.1063	0.0000	2.1063	0.3190	0.0000	0.3190			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	2.1063	0.4073	2.5136	0.3190	0.3886	0.7076	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0762	2.5799	0.4992	7.5700e-003	0.1678	9.7700e-003	0.1776	0.0460	9.3500e-003	0.0553		798.8442	798.8442	0.0344		799.7038
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0489	0.0436	0.3728	9.0000e-004	0.0935	7.5000e-004	0.0943	0.0248	6.9000e-004	0.0255		89.1056	89.1056	3.4200e-003		89.1910
Total	0.1251	2.6235	0.8719	8.4700e-003	0.2613	0.0105	0.2719	0.0708	0.0100	0.0808		887.9498	887.9498	0.0378		888.8948

950 W Beach St - North Central Coast Air Basin, Winter

3.3 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7648	0.0000	0.7648	0.4156	0.0000	0.4156			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886		1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.7648	0.4073	1.1722	0.4156	0.3886	0.8042		1,147.4338	1,147.4338	0.2138		1,152.7797

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0794	2.6874	0.5200	7.8800e-003	0.1748	0.0102	0.1850	0.0479	9.7400e-003	0.0576		832.1294	832.1294	0.0358		833.0248
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0489	0.0436	0.3728	9.0000e-004	0.0935	7.5000e-004	0.0943	0.0248	6.9000e-004	0.0255		89.1056	89.1056	3.4200e-003		89.1910
Total	0.1282	2.7310	0.8927	8.7800e-003	0.2683	0.0109	0.2793	0.0727	0.0104	0.0831		921.2350	921.2350	0.0392		922.2158

950 W Beach St - North Central Coast Air Basin, Winter

3.3 Grading - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7648	0.0000	0.7648	0.4156	0.0000	0.4156			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.7648	0.4073	1.1722	0.4156	0.3886	0.8042	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0794	2.6874	0.5200	7.8800e-003	0.1748	0.0102	0.1850	0.0479	9.7400e-003	0.0576		832.1294	832.1294	0.0358		833.0248
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0489	0.0436	0.3728	9.0000e-004	0.0935	7.5000e-004	0.0943	0.0248	6.9000e-004	0.0255		89.1056	89.1056	3.4200e-003		89.1910
Total	0.1282	2.7310	0.8927	8.7800e-003	0.2683	0.0109	0.2793	0.0727	0.0104	0.0831		921.2350	921.2350	0.0392		922.2158

950 W Beach St - North Central Coast Air Basin, Winter

3.4 Building Construction - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0115	0.3408	0.0904	8.4000e-004	0.0203	1.0700e-003	0.0214	5.8500e-003	1.0200e-003	6.8700e-003		87.9124	87.9124	5.0100e-003		88.0376
Worker	0.0440	0.0392	0.3355	8.1000e-004	0.0842	6.7000e-004	0.0849	0.0223	6.2000e-004	0.0230		80.1950	80.1950	3.0800e-003		80.2719
Total	0.0555	0.3800	0.4259	1.6500e-003	0.1045	1.7400e-003	0.1062	0.0282	1.6400e-003	0.0298		168.1074	168.1074	8.0900e-003		168.3095

950 W Beach St - North Central Coast Air Basin, Winter

3.4 Building Construction - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0115	0.3408	0.0904	8.4000e-004	0.0203	1.0700e-003	0.0214	5.8500e-003	1.0200e-003	6.8700e-003		87.9124	87.9124	5.0100e-003		88.0376
Worker	0.0440	0.0392	0.3355	8.1000e-004	0.0842	6.7000e-004	0.0849	0.0223	6.2000e-004	0.0230		80.1950	80.1950	3.0800e-003		80.2719
Total	0.0555	0.3800	0.4259	1.6500e-003	0.1045	1.7400e-003	0.1062	0.0282	1.6400e-003	0.0298		168.1074	168.1074	8.0900e-003		168.3095

950 W Beach St - North Central Coast Air Basin, Winter

3.5 Paving - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7214	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286		1,035.3425	1,035.3425	0.3016		1,042.8818
Paving	0.2096					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.9310	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286		1,035.3425	1,035.3425	0.3016		1,042.8818

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0880	0.0785	0.6710	1.6100e-003	0.1684	1.3400e-003	0.1697	0.0447	1.2400e-003	0.0459		160.3900	160.3900	6.1500e-003		160.5439
Total	0.0880	0.0785	0.6710	1.6100e-003	0.1684	1.3400e-003	0.1697	0.0447	1.2400e-003	0.0459		160.3900	160.3900	6.1500e-003		160.5439

950 W Beach St - North Central Coast Air Basin, Winter

3.5 Paving - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7214	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286	0.0000	1,035.3425	1,035.3425	0.3016		1,042.8818
Paving	0.2096					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.9310	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286	0.0000	1,035.3425	1,035.3425	0.3016		1,042.8818

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0880	0.0785	0.6710	1.6100e-003	0.1684	1.3400e-003	0.1697	0.0447	1.2400e-003	0.0459		160.3900	160.3900	6.1500e-003		160.5439
Total	0.0880	0.0785	0.6710	1.6100e-003	0.1684	1.3400e-003	0.1697	0.0447	1.2400e-003	0.0459		160.3900	160.3900	6.1500e-003		160.5439

4.0 Operational Detail - Mobile

950 W Beach St - North Central Coast Air Basin, Winter

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0750	1.6443	0.8293	5.3800e-003	0.2191	6.3200e-003	0.2254	0.0636	6.0200e-003	0.0696		558.1795	558.1795	0.0143		558.5357
Unmitigated	0.0750	1.6443	0.8293	5.3800e-003	0.2191	6.3200e-003	0.2254	0.0636	6.0200e-003	0.0696		558.1795	558.1795	0.0143		558.5357

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-Rail	30.00	0.00	0.00	62,551	62,551
Total	30.00	0.00	0.00	62,551	62,551

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-Rail	9.50	7.30	7.30	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.543525	0.028472	0.201539	0.126188	0.021864	0.005301	0.018669	0.039782	0.003072	0.002565	0.007028	0.001098	0.000897
Unrefrigerated Warehouse-Rail	0.090000	0.090000	0.090000	0.000000	0.000000	0.000000	0.670000	0.060000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

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5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail**6.1 Mitigation Measures Area**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0966	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003
Unmitigated	0.0966	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0153					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0811					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.0000e-004	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003
Total	0.0966	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003

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6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0153					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0811					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.0000e-004	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003
Total	0.0966	2.0000e-005	2.1500e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.6000e-003	4.6000e-003	1.0000e-005		4.9000e-003

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

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Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-Rail	3.50	1000sqft	0.08	3,500.00	0
Parking Lot	17.50	1000sqft	0.40	17,500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.8	Precipitation Freq (Days)	53
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MW hr)	641.35	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics -

Land Use -

Construction Phase - Based on information from applicant

Grading -

Demolition -

Vehicle Trips - Based on estimate of up to 11 trucks and 4 passenger vehicles per day

Fleet Mix - Assumes 10 out of 15 vehicles would be MDT, 1 out of 15 HDT, and 4 out of 15 would be personal vehicles

Energy Use - No natural gas use.

Water And Wastewater - No water use

Solid Waste - No solid waste facilities

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Table Name	Column Name	Default Value	New Value
tblEnergyUse	NT24NG	0.21	0.00
tblEnergyUse	T24NG	1.18	0.00
tblFleetMix	HHD	0.04	0.06
tblFleetMix	LDA	0.54	0.09
tblFleetMix	LDT1	0.03	0.09
tblFleetMix	LDT2	0.20	0.09
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.3010e-003	0.00
tblFleetMix	MCY	7.0280e-003	0.00
tblFleetMix	MDV	0.13	0.00
tblFleetMix	MH	8.9700e-004	0.00
tblFleetMix	MHD	0.02	0.67
tblFleetMix	OBUS	3.0720e-003	0.00
tblFleetMix	SBUS	1.0980e-003	0.00
tblFleetMix	UBUS	2.5650e-003	0.00
tblGrading	MaterialImported	0.00	156.00
tblSolidWaste	SolidWasteGenerationRate	3.29	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	WD_TR	1.68	8.57
tblWater	IndoorWaterUseRate	809,375.00	0.00

2.0 Emissions Summary

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2.1 Overall Construction**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.0493	0.4945	0.4533	8.1000e-004	0.0183	0.0259	0.0442	3.9000e-003	0.0239	0.0278	0.0000	71.6397	71.6397	0.0186	0.0000	72.1047
Maximum	0.0493	0.4945	0.4533	8.1000e-004	0.0183	0.0259	0.0442	3.9000e-003	0.0239	0.0278	0.0000	71.6397	71.6397	0.0186	0.0000	72.1047

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.0493	0.4945	0.4533	8.1000e-004	0.0183	0.0259	0.0442	3.9000e-003	0.0239	0.0278	0.0000	71.6397	71.6397	0.0186	0.0000	72.1046
Maximum	0.0493	0.4945	0.4533	8.1000e-004	0.0183	0.0259	0.0442	3.9000e-003	0.0239	0.0278	0.0000	71.6397	71.6397	0.0186	0.0000	72.1046

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-4-2021	4-3-2021	0.3049	0.3049
2	4-4-2021	7-3-2021	0.2359	0.2359
		Highest	0.3049	0.3049

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0176	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.6408	5.6408	2.6000e-004	5.0000e-005	5.6629
Mobile	9.5700e-003	0.2120	0.1018	7.0000e-004	0.0277	8.1000e-004	0.0285	8.0800e-003	7.7000e-004	8.8600e-003	0.0000	66.0737	66.0737	1.6200e-003	0.0000	66.1141
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0272	0.2120	0.1019	7.0000e-004	0.0277	8.1000e-004	0.0285	8.0800e-003	7.7000e-004	8.8600e-003	0.0000	71.7149	71.7149	1.8800e-003	5.0000e-005	71.7774

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2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0176	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.6408	5.6408	2.6000e-004	5.0000e-005	5.6629
Mobile	9.5700e-003	0.2120	0.1018	7.0000e-004	0.0277	8.1000e-004	0.0285	8.0800e-003	7.7000e-004	8.8600e-003	0.0000	66.0737	66.0737	1.6200e-003	0.0000	66.1141
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0272	0.2120	0.1019	7.0000e-004	0.0277	8.1000e-004	0.0285	8.0800e-003	7.7000e-004	8.8600e-003	0.0000	71.7149	71.7149	1.8800e-003	5.0000e-005	71.7774

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/4/2021	1/15/2021	5	10	
2	Grading	Grading	1/16/2021	1/19/2021	5	2	
3	Building Construction	Building Construction	1/20/2021	6/8/2021	5	100	
4	Paving	Paving	6/9/2021	6/15/2021	5	5	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0.4

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	96.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	20.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	9.00	3.00	0.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	12.30	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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3.2 Demolition - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0105	0.0000	0.0105	1.5900e-003	0.0000	1.5900e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.9800e-003	0.0363	0.0379	6.0000e-005		2.0400e-003	2.0400e-003		1.9400e-003	1.9400e-003	0.0000	5.2047	5.2047	9.7000e-004	0.0000	5.2289
Total	3.9800e-003	0.0363	0.0379	6.0000e-005	0.0105	2.0400e-003	0.0126	1.5900e-003	1.9400e-003	3.5300e-003	0.0000	5.2047	5.2047	9.7000e-004	0.0000	5.2289

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.7000e-004	0.0129	2.3500e-003	4.0000e-005	8.2000e-004	5.0000e-005	8.6000e-004	2.2000e-004	5.0000e-005	2.7000e-004	0.0000	3.6702	3.6702	1.5000e-004	0.0000	3.6739
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.2000e-004	2.0000e-004	1.8000e-003	0.0000	4.5000e-004	0.0000	4.6000e-004	1.2000e-004	0.0000	1.2000e-004	0.0000	0.4061	0.4061	2.0000e-005	0.0000	0.4065
Total	5.9000e-004	0.0131	4.1500e-003	4.0000e-005	1.2700e-003	5.0000e-005	1.3200e-003	3.4000e-004	5.0000e-005	3.9000e-004	0.0000	4.0763	4.0763	1.7000e-004	0.0000	4.0804

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3.2 Demolition - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0105	0.0000	0.0105	1.5900e-003	0.0000	1.5900e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.9800e-003	0.0363	0.0379	6.0000e-005		2.0400e-003	2.0400e-003		1.9400e-003	1.9400e-003	0.0000	5.2047	5.2047	9.7000e-004	0.0000	5.2289
Total	3.9800e-003	0.0363	0.0379	6.0000e-005	0.0105	2.0400e-003	0.0126	1.5900e-003	1.9400e-003	3.5300e-003	0.0000	5.2047	5.2047	9.7000e-004	0.0000	5.2289

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.7000e-004	0.0129	2.3500e-003	4.0000e-005	8.2000e-004	5.0000e-005	8.6000e-004	2.2000e-004	5.0000e-005	2.7000e-004	0.0000	3.6702	3.6702	1.5000e-004	0.0000	3.6739
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.2000e-004	2.0000e-004	1.8000e-003	0.0000	4.5000e-004	0.0000	4.6000e-004	1.2000e-004	0.0000	1.2000e-004	0.0000	0.4061	0.4061	2.0000e-005	0.0000	0.4065
Total	5.9000e-004	0.0131	4.1500e-003	4.0000e-005	1.2700e-003	5.0000e-005	1.3200e-003	3.4000e-004	5.0000e-005	3.9000e-004	0.0000	4.0763	4.0763	1.7000e-004	0.0000	4.0804

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3.3 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.6000e-004	0.0000	7.6000e-004	4.2000e-004	0.0000	4.2000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.0000e-004	7.2500e-003	7.5700e-003	1.0000e-005		4.1000e-004	4.1000e-004		3.9000e-004	3.9000e-004	0.0000	1.0409	1.0409	1.9000e-004	0.0000	1.0458
Total	8.0000e-004	7.2500e-003	7.5700e-003	1.0000e-005	7.6000e-004	4.1000e-004	1.1700e-003	4.2000e-004	3.9000e-004	8.1000e-004	0.0000	1.0409	1.0409	1.9000e-004	0.0000	1.0458

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.0000e-005	2.6900e-003	4.9000e-004	1.0000e-005	1.7000e-004	1.0000e-005	1.8000e-004	5.0000e-005	1.0000e-005	6.0000e-005	0.0000	0.7646	0.7646	3.0000e-005	0.0000	0.7654
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	4.0000e-005	3.6000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0812	0.0812	0.0000	0.0000	0.0813
Total	1.2000e-004	2.7300e-003	8.5000e-004	1.0000e-005	2.6000e-004	1.0000e-005	2.7000e-004	7.0000e-005	1.0000e-005	8.0000e-005	0.0000	0.8459	0.8459	3.0000e-005	0.0000	0.8467

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3.3 Grading - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.6000e-004	0.0000	7.6000e-004	4.2000e-004	0.0000	4.2000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.0000e-004	7.2500e-003	7.5700e-003	1.0000e-005		4.1000e-004	4.1000e-004		3.9000e-004	3.9000e-004	0.0000	1.0409	1.0409	1.9000e-004	0.0000	1.0458
Total	8.0000e-004	7.2500e-003	7.5700e-003	1.0000e-005	7.6000e-004	4.1000e-004	1.1700e-003	4.2000e-004	3.9000e-004	8.1000e-004	0.0000	1.0409	1.0409	1.9000e-004	0.0000	1.0458

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.0000e-005	2.6900e-003	4.9000e-004	1.0000e-005	1.7000e-004	1.0000e-005	1.8000e-004	5.0000e-005	1.0000e-005	6.0000e-005	0.0000	0.7646	0.7646	3.0000e-005	0.0000	0.7654
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	4.0000e-005	3.6000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0812	0.0812	0.0000	0.0000	0.0813
Total	1.2000e-004	2.7300e-003	8.5000e-004	1.0000e-005	2.6000e-004	1.0000e-005	2.7000e-004	7.0000e-005	1.0000e-005	8.0000e-005	0.0000	0.8459	0.8459	3.0000e-005	0.0000	0.8467

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3.4 Building Construction - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0388	0.3993	0.3632	5.7000e-004		0.0224	0.0224		0.0206	0.0206	0.0000	50.0410	50.0410	0.0162	0.0000	50.4456
Total	0.0388	0.3993	0.3632	5.7000e-004		0.0224	0.0224		0.0206	0.0206	0.0000	50.0410	50.0410	0.0162	0.0000	50.4456

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5000e-004	0.0171	4.1600e-003	4.0000e-005	9.9000e-004	5.0000e-005	1.0400e-003	2.9000e-004	5.0000e-005	3.4000e-004	0.0000	4.0626	4.0626	2.1000e-004	0.0000	4.0680
Worker	1.9900e-003	1.7800e-003	0.0162	4.0000e-005	4.0800e-003	3.0000e-005	4.1100e-003	1.0800e-003	3.0000e-005	1.1100e-003	0.0000	3.6547	3.6547	1.4000e-004	0.0000	3.6582
Total	2.5400e-003	0.0189	0.0203	8.0000e-005	5.0700e-003	8.0000e-005	5.1500e-003	1.3700e-003	8.0000e-005	1.4500e-003	0.0000	7.7174	7.7174	3.5000e-004	0.0000	7.7262

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3.4 Building Construction - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0388	0.3993	0.3632	5.7000e-004		0.0224	0.0224		0.0206	0.0206	0.0000	50.0410	50.0410	0.0162	0.0000	50.4456
Total	0.0388	0.3993	0.3632	5.7000e-004		0.0224	0.0224		0.0206	0.0206	0.0000	50.0410	50.0410	0.0162	0.0000	50.4456

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5000e-004	0.0171	4.1600e-003	4.0000e-005	9.9000e-004	5.0000e-005	1.0400e-003	2.9000e-004	5.0000e-005	3.4000e-004	0.0000	4.0626	4.0626	2.1000e-004	0.0000	4.0680
Worker	1.9900e-003	1.7800e-003	0.0162	4.0000e-005	4.0800e-003	3.0000e-005	4.1100e-003	1.0800e-003	3.0000e-005	1.1100e-003	0.0000	3.6547	3.6547	1.4000e-004	0.0000	3.6582
Total	2.5400e-003	0.0189	0.0203	8.0000e-005	5.0700e-003	8.0000e-005	5.1500e-003	1.3700e-003	8.0000e-005	1.4500e-003	0.0000	7.7174	7.7174	3.5000e-004	0.0000	7.7262

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3.5 Paving - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.8000e-003	0.0168	0.0177	3.0000e-005		8.8000e-004	8.8000e-004		8.2000e-004	8.2000e-004	0.0000	2.3481	2.3481	6.8000e-004	0.0000	2.3652
Paving	5.2000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	2.3200e-003	0.0168	0.0177	3.0000e-005		8.8000e-004	8.8000e-004		8.2000e-004	8.2000e-004	0.0000	2.3481	2.3481	6.8000e-004	0.0000	2.3652

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.0000e-004	1.8000e-004	1.6200e-003	0.0000	4.1000e-004	0.0000	4.1000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3655	0.3655	1.0000e-005	0.0000	0.3658
Total	2.0000e-004	1.8000e-004	1.6200e-003	0.0000	4.1000e-004	0.0000	4.1000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3655	0.3655	1.0000e-005	0.0000	0.3658

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3.5 Paving - 2021**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.8000e-003	0.0168	0.0177	3.0000e-005		8.8000e-004	8.8000e-004		8.2000e-004	8.2000e-004	0.0000	2.3481	2.3481	6.8000e-004	0.0000	2.3652
Paving	5.2000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	2.3200e-003	0.0168	0.0177	3.0000e-005		8.8000e-004	8.8000e-004		8.2000e-004	8.2000e-004	0.0000	2.3481	2.3481	6.8000e-004	0.0000	2.3652

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.0000e-004	1.8000e-004	1.6200e-003	0.0000	4.1000e-004	0.0000	4.1000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3655	0.3655	1.0000e-005	0.0000	0.3658
Total	2.0000e-004	1.8000e-004	1.6200e-003	0.0000	4.1000e-004	0.0000	4.1000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3655	0.3655	1.0000e-005	0.0000	0.3658

4.0 Operational Detail - Mobile

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4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	9.5700e-003	0.2120	0.1018	7.0000e-004	0.0277	8.1000e-004	0.0285	8.0800e-003	7.7000e-004	8.8600e-003	0.0000	66.0737	66.0737	1.6200e-003	0.0000	66.1141
Unmitigated	9.5700e-003	0.2120	0.1018	7.0000e-004	0.0277	8.1000e-004	0.0285	8.0800e-003	7.7000e-004	8.8600e-003	0.0000	66.0737	66.0737	1.6200e-003	0.0000	66.1141

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-Rail	30.00	0.00	0.00	62,551	62,551
Total	30.00	0.00	0.00	62,551	62,551

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-Rail	9.50	7.30	7.30	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.543525	0.028472	0.201539	0.126188	0.021864	0.005301	0.018669	0.039782	0.003072	0.002565	0.007028	0.001098	0.000897
Unrefrigerated Warehouse-Rail	0.090000	0.090000	0.090000	0.000000	0.000000	0.000000	0.670000	0.060000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	5.6408	5.6408	2.6000e-004	5.0000e-005	5.6629
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	5.6408	5.6408	2.6000e-004	5.0000e-005	5.6629
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

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5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

950 W Beach St - North Central Coast Air Basin, Annual

5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	6125	1.7818	8.0000e-005	2.0000e-005	1.7888
Unrefrigerated Warehouse-Rail	13265	3.8589	1.7000e-004	4.0000e-005	3.8741
Total		5.6408	2.5000e-004	6.0000e-005	5.6629

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	6125	1.7818	8.0000e-005	2.0000e-005	1.7888
Unrefrigerated Warehouse-Rail	13265	3.8589	1.7000e-004	4.0000e-005	3.8741
Total		5.6408	2.5000e-004	6.0000e-005	5.6629

6.0 Area Detail**6.1 Mitigation Measures Area**

950 W Beach St - North Central Coast Air Basin, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0176	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004
Unmitigated	0.0176	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	2.8000e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0148					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004
Total	0.0176	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004

950 W Beach St - North Central Coast Air Basin, Annual

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	2.8000e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0148					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004
Total	0.0176	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.8000e-004	3.8000e-004	0.0000	0.0000	4.0000e-004

7.0 Water Detail**7.1 Mitigation Measures Water**

950 W Beach St - North Central Coast Air Basin, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

950 W Beach St - North Central Coast Air Basin, Annual

7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

950 W Beach St - North Central Coast Air Basin, Annual

8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-Rail	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

950 W Beach St - North Central Coast Air Basin, Annual

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

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Phase I Archaeological Investigations for 950 West Beach Street, Watsonville, California

Prepared for Harris & Associates



ALBION
MAY 2020

Phase I Archaeological Investigations for 950 West Beach Street, Watsonville, California

May 2020
J2020-007.04
Photo Credit: Matt Manigault

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Executive Summary

In 2020, Harris & Associates contracted with Albion Environmental, Inc. (Albion) to conduct Phase I archaeological investigations for a proposed project at 950 West Beach Street in Watsonville, California. Mountain Propane, which currently owns the approximately 0.69 acre triangular lot, is proposing to improve the parcel to transfer propane from the adjacent Santa Cruz Regional Transportation Commission railroad for distribution purposes. Proposed site improvements include asphalt paving, bollards, a foundation for the propane tank, irrigation, gates and fencing, LPG piping, mobile storage containers, a private fire hydrant, and planting. Mechanical grading will be undertaken to raise the grade where existing and future propane tanks will be placed. Portions of the existing concrete and asphalt paving will be removed to mitigate for storm water detention requirements.

As the proposed Project requires permits from the City of Watsonville, it must comply with the California Environmental Quality Act (CEQA) and Policy 9H of the Watsonville General Plan. As such, it is necessary for the Project to determine if it will have an effect on historical resources under CEQA, which includes archaeological resources.

In order to comply with CEQA requirements, Albion completed the following tasks: 1) background historical research, including archival maps and photos and a records search at the Northwest Information Center (NWIC), extending to a quarter-mile beyond the Project APE; 2) pedestrian field survey of the entire APE to identify any previously unidentified archaeological resources; 3) cultural resources report documenting the methods and results of each task, including identifying and determining potential effects on archaeological resources within the APE and making recommendations on how to address these effects.

A search of records at NWIC revealed one known cultural resources within the APE and two within a quarter-mile radius. The cultural resource documented as extending within the APE is a portion of the Santa Cruz Branch of the Southern Pacific Railroad (SPRR, P-44-000377). The two cultural resources recorded within a quarter-mile of the APE include a standard gauge spur of the SPRR (P-44-001157) and a possible site of unknown date or character (387A-004).

Background historical research revealed that the APE was once part of the Mexican Period Rancho Bolsa del Pajaro. Historic maps show that by the 1880s the Project vicinity had been divided into private parcels and that over the next several decades the parcel in which the APE is located passed through a series of private owners. The narrow gauge Santa Cruz Branch Railroad was constructed just north of the APE in 1876, converted to standard gauge in 1883 after it was acquired by the SPRR, and expanded with a railroad spur on the south side of the APE leading to a warehouse complex by the 1930s. Between the 1930s and 1960s, aerial photographs show a series of unidentified objects within the APE, probably parked vehicles or portable equipment associated with the adjacent railroad or warehouse complex.

The results of Albion's pedestrian survey turned up no evidence of precontact Native American or historic period cultural resources within the Project APE that would qualify as historical resources under CEQA. Our survey shows that, despite records search results indicating that the SPRR (P-44-000377) overlaps with the APE, this resource is actually located well outside the APE and will not be subject to Project impacts.

Based on results of this study, including the lack of known or newly identified cultural resources within the Project APE, Albion concludes that no historical resources will be affected by the Project and recommends no further archaeological measures prior to or during construction.

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Introduction

1

PROJECT DESCRIPTION

In 2020, Harris & Associates contracted with Albion Environmental, Inc. (Albion) to conduct Phase I archaeological investigations for a proposed project at 950 West Beach Street in Watsonville, California (Figure 1). Mountain Propane, which currently owns the approximately 0.69 acre triangular lot, is proposing to improve the parcel to transfer propane from the adjacent Santa Cruz Regional Transportation Commission railroad for distribution purposes. Transfer would occur from rail cars to onsite tanks, then from the tanks to trucks for transport to customers. The Project will include installation of a pneumatic shut-off system for fail-safe redundancy, along with low-emission appurtenances for transferring liquid propane. It is anticipated that trucks will be parked on site overnight and empty propane tanks stored temporarily for maintenance.

The applicant is proposing to relocate the existing 50,000-gallon propane storage tank westward to the middle of the site and to install four new 30,000-gallon propane storage tanks in phases, resulting in a total of 170,000 gallons of propane storage at the project site. The four new tanks would be approximately 15 feet in height and would occupy approximately 1,750 square feet in the area currently occupied by the 50,000-gallon tank, which is approximately 15-feet in height.

The Project parcel is currently surrounded by chain link perimeter fencing and contains an existing light pole, partial asphalt and concrete paving, and an empty 50,000 gallon propane tank. Proposed site improvements include asphalt paving, bollards, foundations for the propane tanks, irrigation, gates and fencing, LPG piping, mobile storage containers, a private fire hydrant, and planting. Mechanical grading will be undertaken to raise the grade where existing and future propane tanks will be placed. Portions of the existing concrete and asphalt paving will be removed to mitigate for storm water detention requirements.

REGULATORY CONTEXT

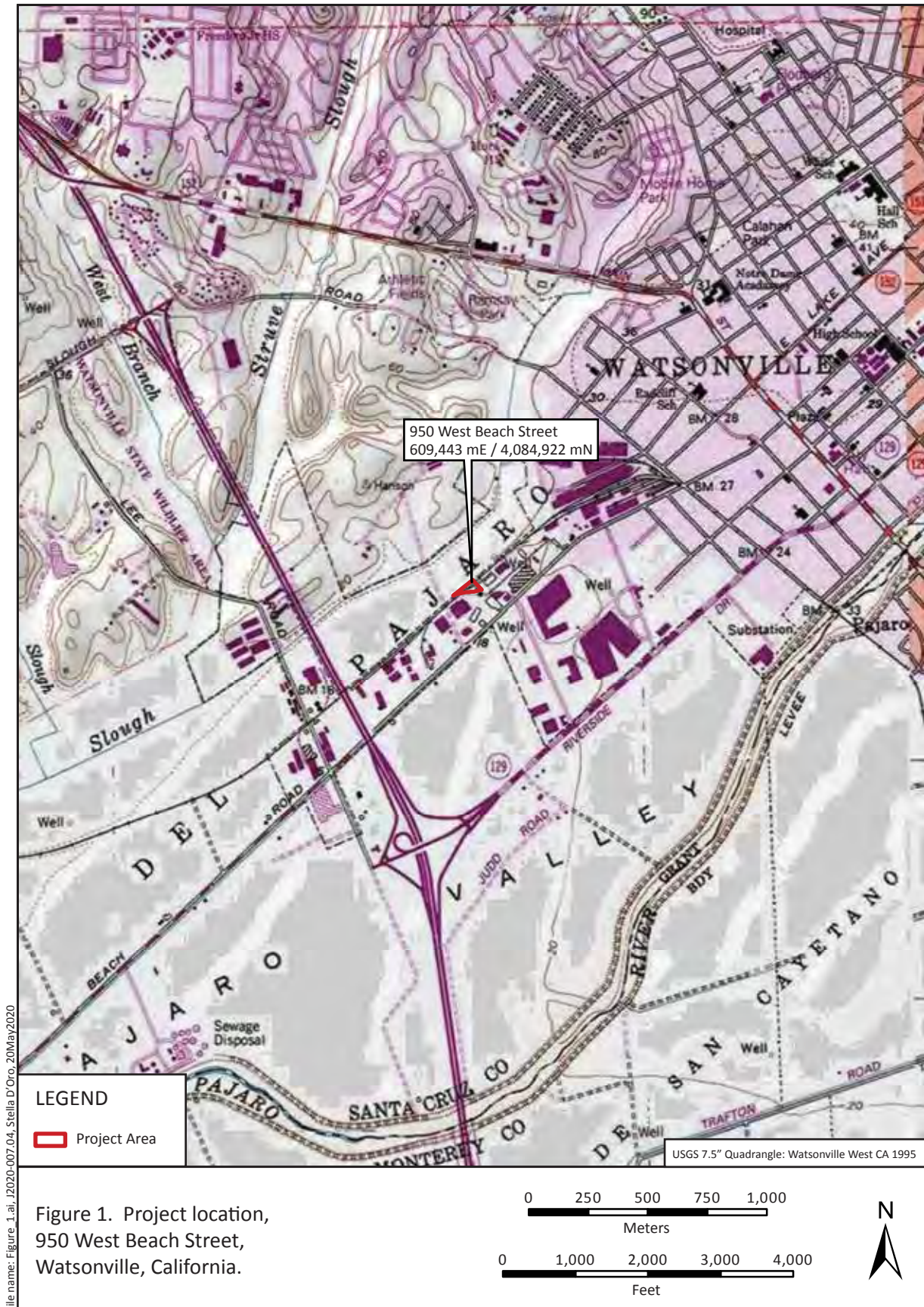
As the proposed Project requires permits from the City of Watsonville, it must comply with the California Environmental Quality Act (CEQA) and Policy 9H of the Watsonville General Plan. As such, it is necessary for the Project to determine if it will have an effect on historical resources under CEQA, which includes archaeological resources.

The proposed Area of Potential Effect (APE) for this Project includes all areas that may experience ground disturbance as a result of project activities, including staging of vehicles, equipment, and construction materials. As described above, this area comprises the entire Project parcel.

In order to comply with CEQA requirements, Albion completed the following tasks:

- 1) Background historical research, including archival maps and photos and a records search at the Northwest Information Center (NWIC), extending to a quarter-mile beyond the Project APE. The goal was to identify any known or potential archaeological resources in or near the APE.
- 2) Pedestrian field survey of the entire APE to identify any previously unidentified archaeological resources.
- 3) Cultural resources report documenting the methods and results of each task, including identifying and determining potential effects on archaeological resources within the APE and making recommendations on how to address these effects.

The Albion team conducted investigations per standards and guidelines outlined in CEQA regulations and the Secretary of the Interior's Standards for Archaeological Documentation. These investigations were completed under the supervision of Douglas Ross, PhD, who has been a professional archaeologist for over twenty years and exceeds the Secretary of the Interior's Professional Qualifications Standards.



File name: Figure 1.ai, J2020-007.04, Stella D'Oro, 20May2020

Sources Consulted

2

To determine if cultural resources are recorded within or near the Project APE, Albion consulted the following sources as part of the NWIC records search (Appendix B):

CALIFORNIA INVENTORY OF HISTORIC RESOURCES

The California Inventory of Historic Resources, managed by the State of California Department of Parks and Recreation (1976), lists no cultural resources in or within proximity to the Project APE.

BUILT ENVIRONMENT RESOURCES DIRECTORY

The Built Environment Resources Directory (BERD) for Watsonville, managed by the State Office of Historic Preservation (including the California Register of Historical Resources, California Historic Landmarks, and California Points of Historical Interest), lists no resources within the Project APE or within a quarter mile of the APE.

STUDIES AND RESOURCES

A search of records at NWIC indicates that one cultural resource has been previously recorded within the Project APE and two cultural resources have been identified within a quarter-mile of the APE. Additionally, nine archaeological studies have been conducted within a quarter-mile radius, though none within the APE itself (Tables 2 and 3).

The nine cultural resource studies within a quarter-mile of the APE were conducted in conjunction with a food processing plant, wastewater treatment system, an industrial park, a fiber optic cable, a wetland restoration, and several public and private parcels.

The single documented resource that overlaps with the Project APE is a portion of the Santa Cruz Branch of the Southern Pacific Railroad (SPRR, P-44-000377). This line, eventually extending from Davenport to Watsonville, was constructed in segments between 1876 and 1905. The two known cultural resources recorded within a quarter-mile of the Project APE include a standard gauge spur of the SPRR (P-44-001157) and a possible site of unknown date or character (387A-004).

In sum, results of the records search identified one previously documented cultural resource within the Project APE and two cultural resource within a half-mile of the APE.

Table 1. Archaeological Studies Conducted Within a Quarter-Mile of the Project APE.

Study No.	Title	Author	Year
S-3852	Preliminary Field Reconnaissance of the Proposed Frozen Food Processing Plant, Industrial Road and Riverside Drive, City of Watsonville, Santa Cruz County	Jean Stafford	1974
S-3964	Santa Cruz Regional Wastewater Treatment System Project, Santa Cruz County, California	Ann S. Peak & Associates	1977
S-4036	Report of an Archaeological Reconnaissance of the Westside Annexation Properties	Archaeological Consulting and Research Services, Inc.	1976
S-6722	Cultural Resource Evaluation of the Landmark Industrial Park off Harkins Slough Road in the City of Watsonville, County of Santa Cruz [and related report]	Robert Cartier	1984
S-21986	Peer Review of Previous Archaeological Reconnaissance & Additional Archaeological Reconnaissance of Assessor's Parcel Number 018-372-02, Watsonville, Santa Cruz County, California [and related reports]	Mary Doane and Gary S. Breschini	1999
S-22657	Phase 1 Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project [and related report]	Izaak Sawyer, Laurie Pfeiffer, Karen Rasmussen, and Judy Berryman	2000
S-25267	A Report of Findings from an Archaeological Field Inspection and Historical Building Evaluation of the Sea View Ranch Project Area, Watsonville, Santa Cruz County, California	Miley Paul Holman and Randall Dean	2000
S-26671	Bay Breeze Project, AC 2788B (letter report)	Mary Doane	2002
S-31355	Archaeological Survey Report for the Manabe Property Wetland Restoration Project, City of Watsonville, Santa Cruz County, California	Kevin Bartoy	2006

Table 2. Cultural Resources In and Within a Quarter-Mile of the Project APE.

Resource No.	Resource Name	Last Recorded
P-44-000377	Southern Pacific Railroad (SPRR)	Haas and Treffers 2018
P-44-001157	Standard Gauge Railroad Spur of the SPRR	Ehringer and Curry 2018
387A-004	Possible site (informal resource)	Riner 2019 (NWIC Staff)

Background

3

ENVIRONMENT

The Project APE is located in Township 12 South, Range 2 East within the City of Watsonville, California. It is approximately 0.1 miles southeast of Watsonville Slough and 3.5 miles east of Monterey Bay at an elevation of 19 feet above sea level. The parcel is on the edge of an industrial park at the south end of the city, bounded on the north by the Southern Pacific Railroad and to the south by an associated railroad spur. Native soils consist of Conejo Clay Loam, very deep, well drained soils that form on alluvial fans and stream terraces from igneous or sedimentary rock on slopes ranging from zero to nine percent (United States Department of Agriculture 2019). These soils are used for irrigated row crops, orchards, pasture, and grains.

PRECONTACT HISTORIC CONTEXT

In recent years, many contemporary archaeologists working along the central coast have adopted the chronological sequence proposed by Jones et al. (1996). This sequence recognizes six major prehistoric periods of cultural adaptation extending beyond the last 10,000 years of human occupancy. The proposed temporal periods emphasize changes in human adaptation over time and focus largely on the shifting significance of coastal vs. terrestrial habitats and the associated artifact assemblages. Jones et al. (2007) present a more recent application of this framework along with a regional overview.

The initial period in this sequence, termed the Paleoindian, originates in the late Pleistocene and continues until approximately 10,000 B.P. This is followed by the Millingstone Period (10,000–5,500 B.P.), and is recognized by increasingly abundant milling equipment (manos and metates) in the archaeological record when populations apparently followed a generalized subsistence pattern that placed an importance on coastal resources, namely shellfish. The ensuing Early Period (5,500–2,600 B.P.) was a time of new subsistence emphases that include a greater reliance on hunting and the initial exploitation of acorns. The Middle Period (2,600–1,000 B.P.) was marked by the intensification of subsistence practices, especially a greater reliance on marine and littoral foods where fish played an important role in the diet. During the Middle/Late Transition (1,000–750 B.P.), populations in central California experienced deteriorating environmental conditions, and apparently underwent major adaptive shifts in both subsistence and settlement. Finally, the Late Period (750 B.P.-Historic) marks the initial appearance of numerous projectile points, including small side-notched (Desert side-notched), triangular (Cottonwood), and leaf-shaped points, representing the introduction of the bow and arrow. There is an apparent shift in settlements to interior settings while the immediate coastal environments appear to have been used for more short term gathering and processing activities.

Indications of prehistoric inhabitation of the central California coast dating to the terminal Pleistocene/early Holocene is limited. The dearth of sites dating to this antiquity may, in part, be related to progressively rising sea levels that accompanied the end of the Pleistocene and the early Holocene (Masters and Aiello 2007). Between ca. 10,000 and 8,000 B.P., the Elkhorn Valley was inundated by saltwater and transformed into a high energy tidal channel (Jones et al. 1996:6). At 8,000 years ago, sea level was about 15 m below its present level at Elkhorn Slough (Masters and Aiello 2007:49). Bickle (1978:8) estimates that sea level rise has submerged 20,000 km² of land along the California coast. Sea level transgression slowed after about 7,000 years ago, prompting fluvial sedimentation and tectonic uplift. Consequently, coastal sites earlier than 7,000 B.P. may have been inundated by rising waters.

In general, researchers normally divide this early time span into two divisions: the Paleoindian (pre-10,000 B.P.) and the Millingstone (10,000–5,500 B.P.). A coastal focused alternative to the large game focused Paleoindian model, the Paleo-Coastal Tradition, was first proposed by Davis et al. (1969) and later expanded upon by Moratto (1984). Although few sites or site components dating from this time period have been investigated and its presence is largely conjectural, some researchers have posited that Paleo-Coastal peoples established residences along estuaries and bay shores. Associated toolkits are suggested to be scrapers, scraper-planes, bifaces, and lack milling equipment. Jones et al. (1996:39) note that “the extent to which these assemblages are constituted to some unknown degree by materials mixed from more recent contexts is indicated by the occurrence of obsidian among strata assigned to these phases since none of the obsidian hydration results equate with a time depth greater than 7000 B.C.” As a result, the Paleo-Coastal tradition is not readily described in the Monterey Bay area.

Coastal sites attributed to the Millingstone Period (10,000–5,500 B.P.) are best characterized by high density shell middens—composed primarily of mussel (*Mytilus* spp.)—located adjacent to extant estuaries or near areas where paleo-estuaries once existed as a result of early Holocene sea level rise. As the name for this period implies, site assemblages generally contain abundant milling stones and hand stones (Erlandson 1991, 1994; Fitzgerald and Jones 1999), although this is not always the case (Jones et al. 2004; Jones et al. 1996).

In addition to milling equipment, Millingstone Period sites are typified by eccentric crescents, long-stemmed projectile points, and cobble/core tools. In general, there is a low incidence of projectile points and other flaked stone. Shell beads from this time period are characterized as thick rectangular (L-series) *Olivella* beads (Glassow 1996). Erlandson (1991, 1994) has suggested that Millingstone Period groups were semi-sedentary, their diets emphasizing shellfish and small seeds. The hunting of large terrestrial game and marine mammals as well as the exploitation of fishes was apparently of minor importance. Other researchers, however, have argued that both coastal and interior habitats were exploited by early Holocene populations targeting small fauna, and a variety of grass seeds, nuts, and other inland plant taxa as well as shellfish (Jones and Richman 1995; McGuire and Hildebrandt 1994; Mikkelsen et al. 1998; Milliken et al. 1999). Jones (2003:218) argues for a more mobile settlement pattern during this time that included the exploitation of marine mammals.

The next few thousand years (between 5,500 and 2,600 B.P.) are referred to as the Early Period throughout southern and central California. Most notable about prehistoric adaptations at this time are innovations in subsistence technology, especially the initial appearance of mortars and pestles (perhaps signaling acorn use) and an increase in the frequency of large side-notched and

contracting-stem projectile points along with flaked stone debris. Shell beads common during this time period include thick rectangular (L-series), end-ground (B-series), and split (C-series) *Olivella* beads. The appearance of eastern California obsidian (mainly Casa Diablo) in Early Period assemblages also implies that long-distance trade and exchange relations developed during this period (Jones 1995). Jones (1995) and Jones and Waugh (1997) posit a decrease in residential mobility, which they attribute to the advent of mortar and pestle use and a clearer delineation of gender roles that accompanied a trend toward greater population circumscription. Jones and Waugh (1997) also contend that Early Period sites, in contrast to Millingstone Period sites, are found in more diverse settings, including interior, estuary, and outer coast contexts.

In terms of subsistence, mammals and fish increased in importance relative to shellfish. These resources, coupled with the addition of acorns, signified a broadening of the diet breadth. Glassow (1996:134) has pointed out that this expansion of the diet breadth was accompanied by a significant increase in labor devoted to food processing. Before acorns can be made palatable, the toxic tannic acid must be leached out of the meal, a process not required by hard seeds. Glassow (1996:134) stated, "it is likely, therefore, that people would consume acorns no more than necessary, as insurance against normal fluctuations in food resource productivity from one year to the next." While the introduction of acorns has implications for labor organization and settlement, the peripheral role played by the resource base at this time in prehistory may relate to more of a process of "extensification" (*sensu* Beaton 1991) where new foods are introduced to the diet, rather than "intensification" where greater amounts of labor are focused on the processing of a particular resource, as is more characteristic of later prehistoric times. Acorn macrofossils are recovered in lesser amounts in these early assemblages than in later ones.

The change that occurred from the Millingstone to the Early Period has traditionally been interpreted as an adaptive shift accompanying the arrival of Rogers's (1929) "Hunting Culture." In his original conception, Rogers described Hunting Culture people as a separate ethnic population more reliant upon use of the acorn and on both terrestrial and marine mammals. These Hunting peoples, he hypothesized, entered the central coast and gradually displaced the earlier populations of Millingstone-adapted peoples. This premise, however, has more recently been discounted largely in favor of the idea that observed differences in artifact assemblages are probably more indicative of seasonal or functional variability in site occupations (Erlandson 1997; Glassow 1997). Jones, moreover, views the transition from Millingstone to Hunting technologies largely as the result of population circumscription and economic intensification, an *in situ* development that reflected the shift from an earlier, mobile, more selective adaptive strategy to one emphasizing limited mobility and decreased subsistence efficiency.

Cultural changes marking the transition from the Early to Middle Period (2,600-1,000 B.P.) were much less pronounced than during the Millingstone/Early Period transition. Instead, many of the adaptive traits initiated during the Early Period continued and grew in relative importance. The use of mortars and pestles increased, as did reliance on small schooling fishes (e.g. anchovies, herring, smelt). The use of shellfish, however, appears to have steadily declined. Middle Period populations also began to focus more on the exploitation of smaller, more elusive game; sea otters and rabbits, for instance, were more important than they had been previously. Glassow (1996) and Lambert (1993) place a slightly stronger emphasis on the importance of increasingly maritime adaptations during this time, arguing that fishing and sea mammal hunting were important subsistence pursuits. Artifact assemblages are typified by large-stemmed points, mortars, pestles, handstones, and milling slabs. Shell beads include *Olivella* saucer (G-series) and saddle (F-series) types. Perhaps the most

significant change in the artifact assemblage was the introduction of the circular shell fishhook. This artifact class is recovered more commonly on rocky coasts than in protected slough habitats where schooling fishes were likely captured through other means such as baskets, nets, or other trapping methods (Jones et al. 1996:193; Strudwick 1986). Circular shell fishhooks no doubt facilitated an increase in the exploitation of fishes, but, at the same time, may have resulted in a decrease in dietary efficiency (Glassow 1990:89; Jones 2003:226), a pattern that continues throughout the Holocene. Trans-Sierran trade, especially in obsidian, appears to increase during the Middle Period. Casa Diablo obsidian, a source whose origin is east of the Sierra Nevada Mountains was the chief import in the vicinity Monterey Bay, whereas Coso obsidian is more common to the south (Jones et al. 1996:197, 199). Jones (2003:226) also notes a high frequency of sea otter (*Enhydra lutris*) bones at Middle Period sites, which he interprets as evidence of exchange in otter pelts.

It was also during the Middle Period that a few researchers (Breschini 1983; Moratto 1984; Whistler 1977, 1980) have suggested a major shift in population occurred in the Bay Area. This shift is usually viewed within an ethnolinguistic framework, whereby an indigenous Hokan-speaking population merged with or was displaced by a later Penutian-speaking population. Specifically, Breschini (1983) and Breschini and Haversat (1980) contend that ca. 2,500 B.P. a distinct ethnic population speaking a Penutian language expanded into the Monterey Bay area. These new peoples were the precursors of the ethnohistoric Ohlone, or Costanoans. Their settlement-subsistence pattern was characterized by low mobility, logistical organization, and a more specialized subsistence regime based primarily on the exploitation of the acorn. Breschini (1983) dubbed this the "Monterey Pattern," and stated that it was akin to a "collector" pattern. The prior language group, which Breschini argued had characterized the area since approximately 4,000 years B.P., was organized more around a "forager" pattern. Breschini called this the "Sur Pattern" and argued that it was typified by high mobility and a generalized adaptive pattern geared toward the exploitation of a wide range of resources and environments.

The Middle/Late Transition (1,000-750 B.P.) is a short period of time when there appears to have been a time of rapid change in settlement organization. It is represented along the central California coast by Contracting-stemmed and double Side-notched projectile points. Small leaf-shaped points also occur alongside these larger points, though their numbers are few (Jones 2003:221). Several types of *Olivella* shell beads, including split punched (D-series), are also found. Hopper mortars make their first appearance in the archaeological record and are found in tandem with bowl mortars and pestles, as well as handstones and milling slabs. Subsistence regimes during this time demonstrate substantial differences from the previous period. Marine resources, such as fish and marine mammals, appear to have been largely dropped from native diets. Instead, populations emphasized terrestrial resources, especially small mammals and acorns. This stands in marked contrast to developments along the Santa Barbara Channel where prehistoric populations underwent increasingly progressive maritime adaptations, and fishing was a major subsistence pursuit.

As originally perceived, these changes were largely considered to have resulted from an overexploitation of coastal resources accompanying the increased demographic pressures that were initiated during the Middle Period. However, more recent evidence suggests that other factors, especially environmental degradation, played a more significant role. Coinciding with the Middle/Late Transition (1,000-750 B.P.), California and parts of western North America underwent a dramatic warming trend, known as the "Medieval Climatic Anomaly" (Graumlich 1993; Jones and Kennett 1999; Stine 1990, 1994). Researchers have identified three major environmental trends

during this period: (1) changing sea temperatures (Arnold 1992; Kennett 1998; Kennett and Kennett 2000; Pisias 1978); (2) warmer summer temperatures (Graumlich 1993); and (3) decreased precipitation (Stine 1990, 1994). According to Jones (1995:223), this latter trend had especially serious consequences for prehistoric coastal populations.

Serious drought after A.D. 1000 (950 B.P.) caused such rapid, severe deterioration of the resource base that major subsistence problems developed, causing widespread settlement shifts and resource competition. Unlike the environmental changes of the early and Mid-Holocene, technological innovations could not mitigate the environmental problems, because they developed rapidly and were severe. Jones and Ferneau (2002) posit the argument that central coast populations during this time underwent a process of “deintensification.” Population growth declined, diet breadth contracted, and interregional exchange systems collapsed. In Monterey County, for example, numerous coastal sites were abandoned and populations relocated to more interior settings (Jones 1995:215). Populations also apparently declined, perhaps as a result of resources stress, and systems of trade and exchange collapsed. Obsidian, for instance, virtually disappears from the archaeological record.

Late Period (750 B.P.-Historic) populations on the central coast apparently rebounded from the environmental stresses that characterized the previous period. Their subsistence practices continued to demonstrate a terrestrial focus. Jones (1995:221), for example, indicates that the consumption of fish and other marine resources was less intensive and the extraction of mussels perhaps more selective than during the previous interval. From his analysis of several sites in Big Sur, Jones (1995:206) suggests that Late Period populations focused their subsistence activities on black-tailed deer (*Odocoileus hemionus*). This view has recently been challenged by the findings from CA-MNT-1942 (Wohlgemuth et al. 2002), where fish, including several species of clupeidae (such as anchovies and herrings), constitute significant portions of the overall faunal assemblage.

Nevertheless, it appears that Late Period habitation on the central coast shifted to inland localities (Jones and Ferneau 2002:230), and many coastal sites occupied during the Middle Period were no longer used in the Late Period, or see less intensive use (Jones et al. 1996:196; Milliken et al. 1999:153). Late period midden sites on the interior are often associated with bedrock mortars (Jones et al. 2007:140), and on the coast are more often shellfish processing sites (Jones et al. 1996:41). Population circumscription is suggested by a drop off in the diversity of obsidian sources and its use as a raw material. In fact, a decrease in the presence of Franciscan chert relative to the more locally available Monterey chert has been identified in Late Period contexts, suggesting more restricted mobility (Hylkema 1991; Jones et al. 2007:143).

Jones (1995, 2003) suggests that central coast sites dating to this time period, excluding habitation sites along productive estuaries, probably represent specialized forays made from large interior settlements. During this time, populations did not undergo transformational changes in social and political organization that led to greater complexity. Instead, human populations in these areas maintained a tribelet system of socio-political organization (Jones 1995:223). Artifact assemblages from this time are marked by contracting-stem, leaf-shaped, and small, triangular-shaped and side-notched projectile points, mortars and pestles, and a variety of late prehistoric bead types, including *Olivella* lipped (E-series) and callus (K-series). Clam shell disk beads and talc schist disk beads are also common during this time. Bifacial bead drills and detritus from *Olivella* bead manufacture are also common at well sampled late period sites, suggesting bead manufacture was common and widespread, though not intensive (Jones et al. 2007:140).

ETHNOGRAPHIC CONTEXT

Native American populations living in the Project area at the time of European contact are attributed to the Ohlone. The Ohlone occupied lands from the Monterey peninsula inland to San Juan Bautista, and north to Santa Cruz, the Santa Clara Valley, the Delta, San Francisco Peninsula and the East Bay (Levy 1978). Organized as tribelets, the Ohlone were noted to have lived in approximately 50 autonomous villages (Kroeber 1925). During the course of the year it is likely that families came and went from a particular village depending on the season and important resources available, though winter was a time when families often coalesced and made use of food stores as well as to partake in ceremonial activities (Broadbent 1972; Margolin 1978). From the time of European contact and missionization, the Ohlone populations experienced a rapid decline from the 1770s to the mid-1800s (Cook 1943). Though the population suffered much from disease and discrimination, important information regarding language, folkways and material culture has been preserved among the few survivors. Likewise other pieces of information have been able to piece together a generalized picture of pre-contact Ohlone culture (Bean 1994; Broadbent 1972; Kroeber 1925; Levy 1978; Milliken 1995).

As the Ohlone inhabited varied coastal and interior environments, their subsistence practices varied depending on where they were. They were hunter-gatherers who supported themselves through the hunting and harvesting of plants and animal. They were noted to rely on acorn as a staple food, though other seeds, berries and roots, as well as kelp were regularly partaken of. Important terrestrial animals included deer, pronghorn and tule elk, though small game including squirrel, woodrats, and mice were also taken (Baumhoff 1963:17; Levy 1978:491).

Shellmounds common to the Bay Area attest to the importance of shellfish to the Ohlone diet. Mussels, abalone, clam and oyster were among important shellfish species eaten. These, in addition to sea lions, seals and sea otters were important coastal resources, along with fish and waterfowl in both coastal and inland contexts (Baumhoff 1963; Levy 1978).

While the Ohlone reportedly inhabited the coastal area is located, further south in the Carmel River Valley were the Esselen, their neighbors to the south. Little is known of the Esselen, likely due to their territory being largely comprised of thickly wooded mountainous habitats in the Carmel Valley down to Point Lopez (Hester 1978). It is likely that the two groups interacted, and that socio-political boundaries may have shifted at different points in prehistory.

POSTCONTACT HISTORIC CONTEXT

SPANISH AND MEXICAN PERIODS

Sebastian Vizcaino's landing at present day Monterey in 1602 is one of the earliest documented contact with Native Americans in the area. Following Vizcaino's landing, other Spanish ships may have stopped at Monterey, but contact was minimal until the initial overland exploration of the area by Gaspar de Portolá in 1769 (Hoover et al. 1990). Subsequent exploration of the region included Pedro Fages in 1770 and 1772, Fernando Javier de Rivera in 1774, and Juan Bautista de Anza in 1776 (Beck and Haase 1974).

In late September of 1769, Portolá's expedition encountered a small band of Indians engaged in collecting pine nuts. Miguel Costansó, one of the expedition's main chroniclers, called the natives

“wandering people without either house or home.” A few days later, they came upon a village, which Costansó described as “very poor” and its inhabitants as “friendly and obsequious.” Finally, on the 26th of September, they encountered another, larger band of Indians who were also engaged in pine nut collecting. Costansó wrote:

At the foot of the slope was a band of wandering Indians, which must have numbered more than two hundred souls. They had no houses, and lived in the open near a fallen oak tree. For this reason the place was named *Ranchería del Palo Caído*. These natives offered us a quantity of pine nuts and seeds. We remained a short time among them, and then passed on in order to make camp on the bank of a river... (Costansó 1992:81).

Portolá’s expedition, though at the time producing little lasting and substantive contact, was a harbinger of later developments. As a direct result of the expedition, the Spanish established a system of fully functioning Franciscan missions over the length of Alta California, from San Diego to the northern San Francisco Bay. Missions in the area included Mission San Antonio de Padua (1771), Mission Soledad (1791), Mission Santa Cruz (1791), Mission San Juan Bautista (1797), and Mission San Miguel (1797).

In 1821, Mexico achieved her independence from Spain, and word of this event reached Alta California the following year. In California history, this era is known as the Mexican Period (ca. 1821–1848). The colonial policies of the republic were to be quite different from those of the Spanish monarchy. Not only were Californians allowed to trade with foreigners, but foreigners could also now hold land in the province once they had been naturalized and converted to Catholicism. Under Spain, land grants to individuals were few in number, and title to these lands remained in the hands of the crown. Under Mexican rule, however, governors were encouraged to make more grants for individual ranchos, and these grants were to be outright. Most importantly, the new Mexican republic was determined to move to “secularize” the missions, to remove the natives and the mission property from the control of the Franciscan missionaries.

Secularization was set in motion by the Mexican Governor Echeandia in 1826, but was not carried out in earnest until 1834 when Governor José Figueroa issued an official proclamation ordering the secularization of the California missions. His proclamation turned the mission properties over to Mexican civil authorities, allowed for the dispersement of mission property, opened mission land for settlement by petitioners, and created a series of pueblos. Indian neophytes were freed from their role as personal servants to the padres; however, in reality, the effects of secularization throughout California were to deprive a large percentage of the remaining mission Indians of their property. This resulted in the creation of a relatively large population of landless Indian tenants, many of whom sought work in the newly created *rancherías*.

The new ranchos that sprang up as a result of secularization created a wholly new culture in California, one that was centered on the raising and maintaining of vast herds of cattle. These ranchos were usually owned by individual families who supervised a veritable army of Indian laborers and vaqueros. The ranch owners owed their livelihood to the sale and trade of the products, primarily hide and tallow, derived from their cattle. A flourishing trade with foreign Marchants, mostly Americans, kept the Mexican ranchos afloat; hides and tallow were traded to American Marchants for everything from food staples and clothing to furniture and luxury goods.

AMERICAN PERIOD

The end of the Mexican-American War and the signing of the Treaty of Guadalupe Hidalgo in 1848 marked the beginning of the American Period (ca. 1848–Present) in California history. The onset of

this period, however, did nothing to change the economic condition of the Native American populations working on the ranchos.

The town of Watsonville was first established in 1852 on a small portion of Rancho Bolsa del Pajaro obtained from the Rodriguez family, originally granted to them in 1837 by the Mexican government. The nearby town of Freedom was settled around the same time on a portion of the former Rancho Los Corralitos, but until 1877 was known as Whiskey Hill. Watsonville became an incorporated municipality in 1868, with a population of almost 2,000 people (Archives and Architecture 2013). Residential and commercial development increased over the next three decades, including annexation of nearby residential lots between 1907 and 1925. Between 1940 and 1960, the city nearly doubled in size.

After 1940, the population of Watsonville changed significantly, with arrival of people from other parts of the United States and foreign immigrants (Archives and Architecture, LLC. 2013):

The influx Americans from the Midwest continued to populate Watsonville Interwar period, and foreign immigrants including Chinese, Japanese, and Filipinos already in the Pajaro Valley were experiencing increased resentment from local whites. Hostilities because of union formation and increased demands by workers for better working conditions, combined with a general anti-immigrant (especially anti-Asian) sentiment were further strained by the plunge in economic vitality. By the time the United States entered into World War II against Germany and Japan, overt racism and discrimination was common in a location that had always been ethnically mixed and relatively tolerant compared to the rest of the country. The signing of Executive Order 9066 by President Roosevelt, which called for the systematic removal the Japanese population from all coastal areas, including those who resided in parts of Watsonville was the culmination of this period.

A shift in local population began after the war. Many Japanese who were interned during World War II returned to the area and faced new competition from the large numbers of Mexican workers brought in through the Bracero Program. Some Japanese families stayed and rebuilt their lives, others left. As a whole, they did not return to agriculture in the same numbers as before the war. Their places, at least in the fields, were now filled by Mexicans, starting the trend that continues today. Growth in the community during the 1950s also marked the growth of Watsonville High across from the subject properties, with school expansion necessitating the construction of classrooms, music halls and shop buildings between 1956 and 1958.)

HISTORY OF THE PROJECT AREA

The 1867 Plat Map of Township 12 South, Range 2 East shows the Project APE within the former Mexican land grant known as Rancho Bolsa del Pajaro, granted to Sebastian Rodriguez by Mexican Governor Juan Alvarado in 1837 (Figure 2). Its name refers to its location on the north side of the Pajaro River and surrounded by sloughs (Hoffman 1862). No buildings or other improvements are depicted on the map in this location.

The 1880-1881 Map of Santa Cruz County shows that by then the APE was within a large 62.38 acre parcel owned by Charles Ford, with a note indicating that this includes railroad land, though the railroad itself is not shown on the map (Figure 3). The narrow gauge Santa Cruz Railroad was completed between Santa Cruz and Watsonville in 1876; in 1883 it became the standard gauge Santa Cruz Branch of the Southern Pacific Railroad (SPRR). As with the previous map, no improvements of any kind are shown within this parcel.

The 1906 Map of Santa Cruz County indicates that Ford's property had been acquired by Edward Kenhaugh. The SPRR is shown as passing through the northern portion of this property on the north

side of the APE just south of Watsonville Slough, but there are no structures or other signs of development within the APE itself (Figure 4). Likewise, the 1929 Map of Santa Cruz County shows no improvements within the APE but indicates that it was now part of a 20.77 acre parcel owned by John C. Mello (Figure 5).

A 1931 aerial photograph reveals that by the early 1930s a spur of the SPRR branched off to the south just outside the southern boundary of the Project APE toward a large warehouse complex, a spur which remains in place to this day (Figure 6). Within the APE is what appears to be a small cluster of objects between the SPRR and the spur with a gravel road leading to them, probably vehicles or other stored equipment. Similarly, aerial photos from 1939 and 1963 show distinct objects within the APE, again probably parked vehicles or other portable equipment associated with the adjacent railroad or industrial warehouse complex, rather than buildings or other structures (Figures 7 and 8). In the 1963 aerial photo the surface on which these objects are parked is very light in color, suggesting concrete paving, and this area was probably a small parking lot.

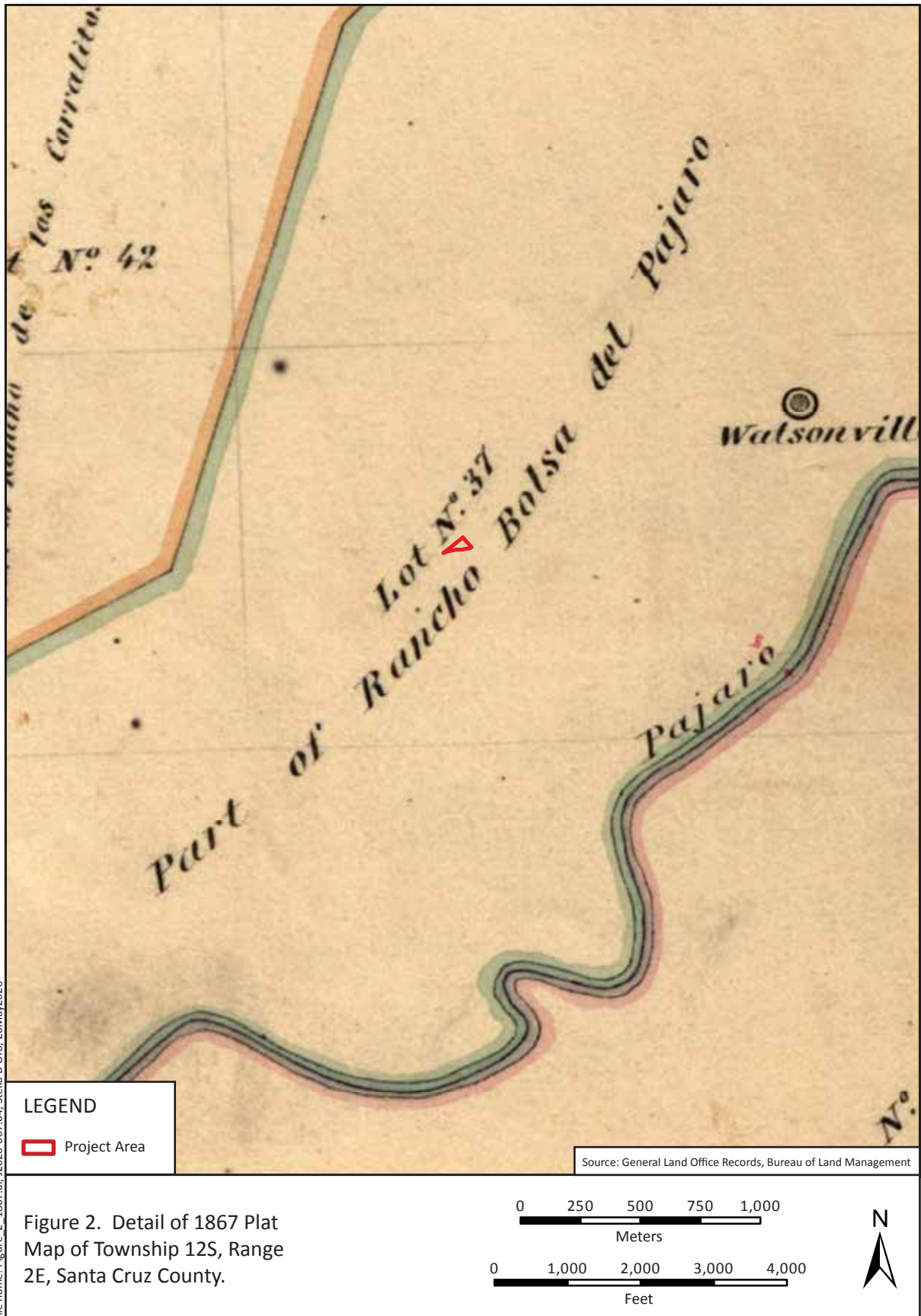
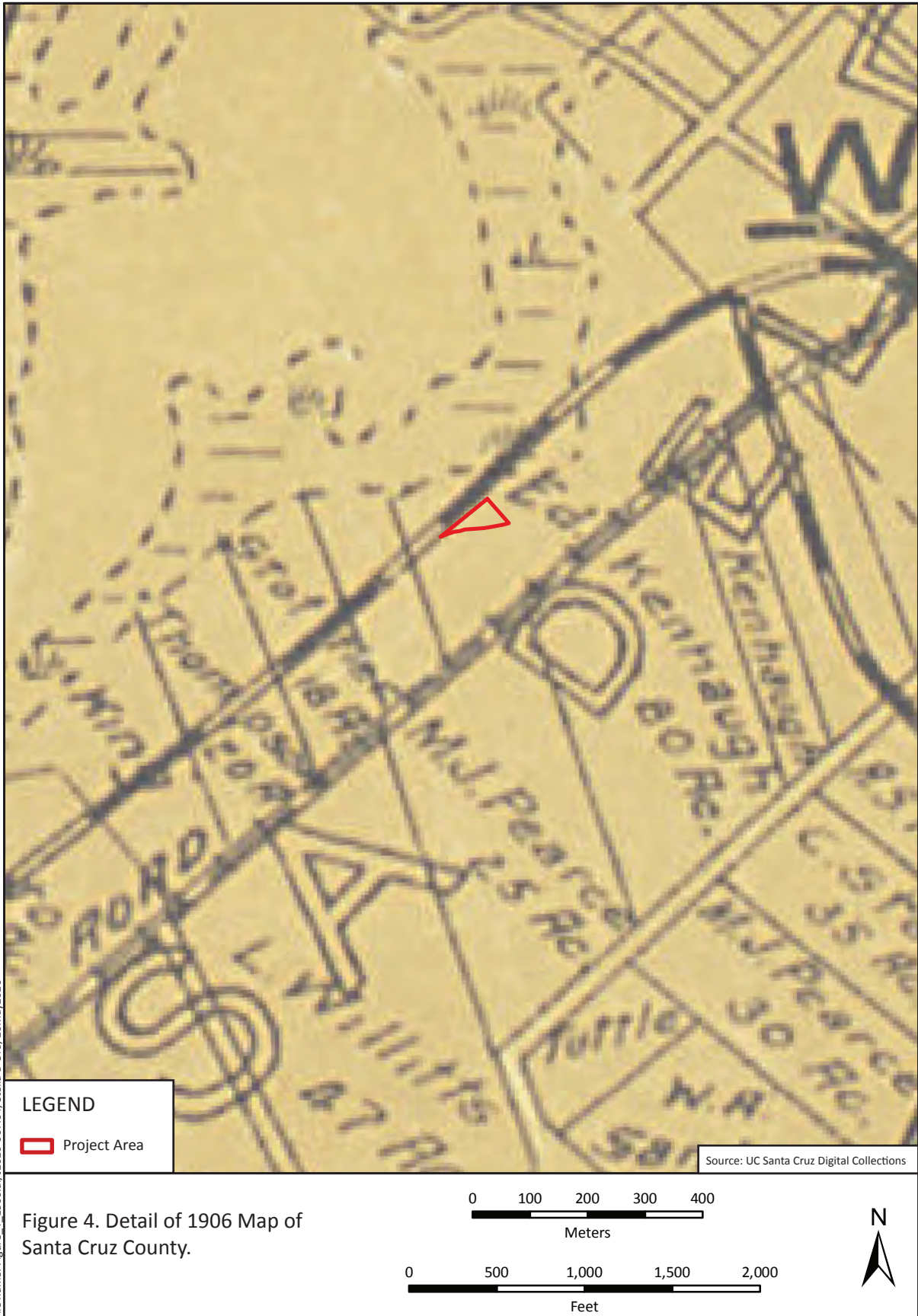
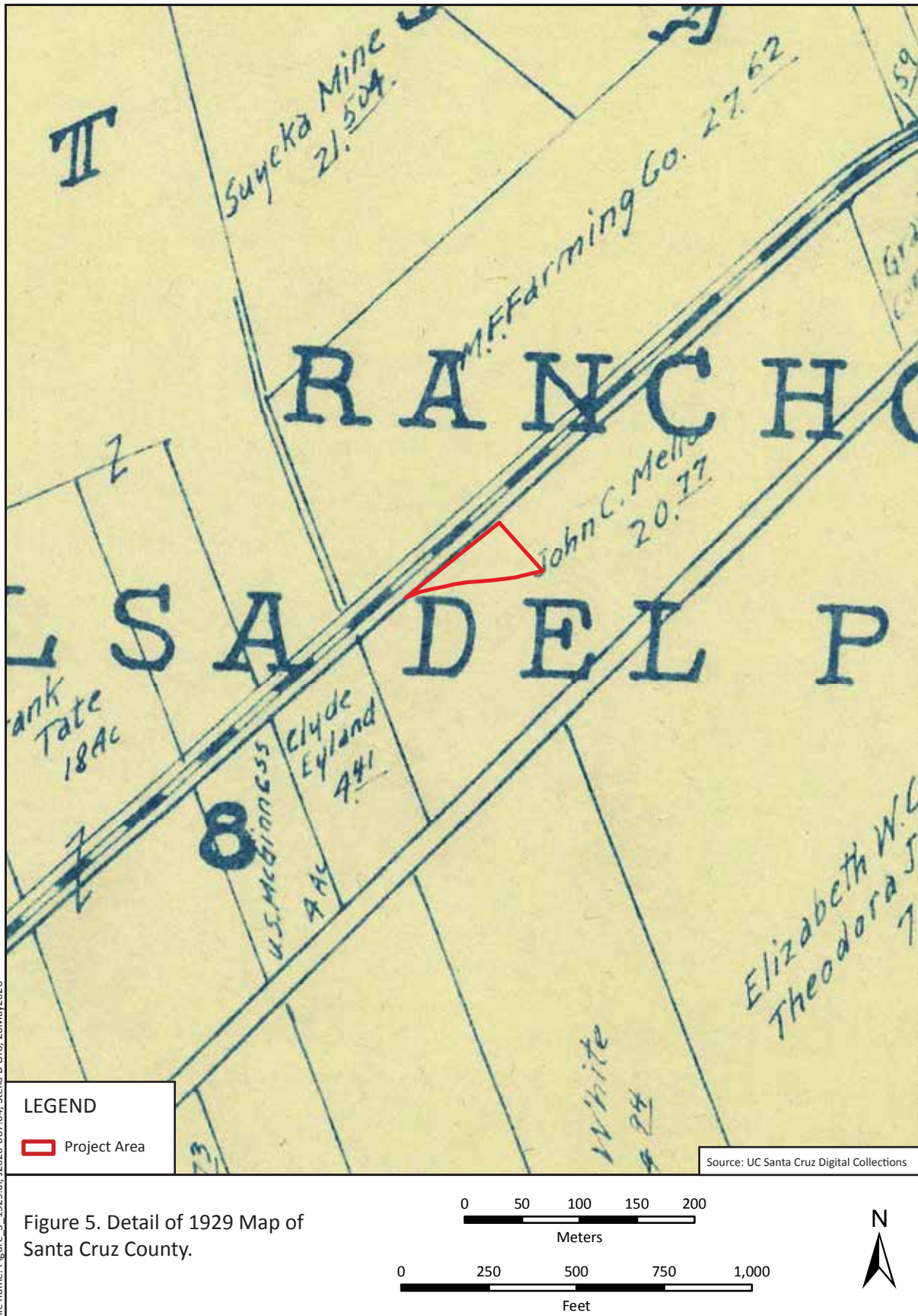


Figure 2. Detail of 1867 Plat Map of Township 12S, Range 2E, Santa Cruz County.







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Figure 7. Detail of 1939 Aerial Photograph, Flight C-5750, Frame 298-12.

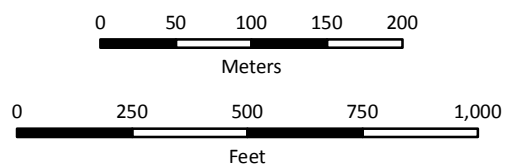
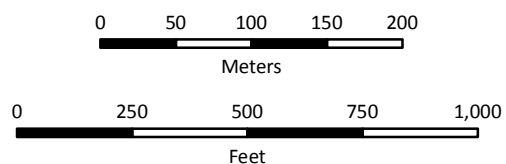




Figure 8. Detail of 1963 Aerial Photograph, Flight CA-SCR, Frame 2-25.



Field Methods and Results

4

FIELD METHODS

On May 8, 2020, Albion archaeologist Matt Manigault conducted a pedestrian surface survey of the Project APE (Figure 9). The survey involved a walkover of the entire APE and an intensive surface inspection of all areas of exposed ground for evidence of archaeological materials, documented by written notes and photos. Field notes documented details on disturbances, slope, ground cover, soil visibility, vegetation, the built environment, and any cultural material observed. Albion conducted no subsurface testing as part of this study. Upon completion of the fieldwork, all notes, maps, and photos were returned to Albion for processing.

FIELD RESULTS

The Project APE consists of a small triangular parcel bordered on the north by the SPRR and on the south by an SPRR railroad spur, two of the same resources identified in the records search (P-44-000377 and P-44-001157). These rail lines are located well outside the parcel, with the spur no longer active, having been partially paved over. There is a vacant grassy lot to the north and active warehouses belonging to other property owners on the remaining sides.

The parcel itself is surrounded by a chain link fence topped with barbed wire and is partially paved with asphalt and concrete, with dense grass, weeds, and shrubs surrounding the perimeter and filling in unpaved areas. The asphalt and concrete paving is patchy and in poor condition and there is a small pile of asphalt debris in the eastern portion of the parcel. Next to this pile is a power pole supporting an active line linking adjacent buildings, and there is a second inactive pole along the south fence line. Midway along the north side of the parcel is another wooden pole supporting a floodlight. Attached to the northern portion of the fence is a large piece of plywood supporting a series of disconnected former electrical utilities. Next to the plywood is a substantial tear in the fence.

In the middle of the parcel is a large cylindrical white steel fuel tank propped up on railroad ties and sitting on a section of intact concrete paving. A Simon MP110 aerial lift is parked between the tank and the power pole. The western portion of the parcel, west of the tank, is largely unpaved and is the most overgrown with grass and shrubs. Within this overgrown area is at least one large mound of soil. White and orange A-frame barricades are scattered across the parcel, with a cluster of them surrounding a shallow irregular hole 3-6 ft. in diameter dug into the surface sometime in the recent past.



File name: Figure 9 - Current.ai, 12020-007.04, Stella D'Oro, 20May2020

The profile of this hole shows that soils in this location consist of a few inches of sandy loam, followed by loose dry sand. No cultural materials were observed in these exposed deposits.

No archaeological artifacts, features, or deposits were observed anywhere within the APE that have the potential to be considered historical resources under CEQA. The fencing, fuel tank, aerial lift, power poles, and other objects and utilities are all less than fifty years old and otherwise lack the potential to qualify as eligible for the California Register of Historical Resources (CRHR). Based on the 1963 aerial photograph, some of the concrete paving within the parcel may be older than fifty years, but, as discussed in the following section, also lacks potential CRHR eligibility.

Study Findings and Recommendations 5

STUDY FINDINGS

Albion's Phase I archaeological investigations for the proposed 950 West Beach Street Project comprised an NWIC records search, background research, and a pedestrian survey of the entire Project APE. The records search revealed one known cultural resources within the APE and two within a quarter-mile radius. The cultural resource documented as extending within the APE is a portion of the Santa Cruz Branch of the Southern Pacific Railroad (SPRR, P-44-000377). The two cultural resources recorded within a quarter-mile of the APE include a standard gauge spur of the SPRR (P-44-001157) and a possible site of unknown date or character (387A-004).

Background historical research revealed that the APE was once part of the Mexican Period Rancho Bolsa del Pajaro, but no structures or other landscape features from this rancho overlap with the APE itself. Historic maps show that by the 1880s the Project vicinity had been divided into private parcels and that over the next several decades the parcel in which the APE is located passed through a series of private owners. The narrow gauge Santa Cruz Branch Railroad was constructed just north of the APE in 1876, converted to standard gauge in 1883 after it was acquired by the SPRR, and expanded with a railroad spur on the south side of the APE leading to a warehouse complex by the 1930s. Between the 1930s and 1960s, aerial photographs show a series of unidentified objects within the APE, probably vehicles or portable equipment associated with the adjacent railroad or warehouse complex. Evidence from the 1963 aerial photo suggests the APE may have been paved by that time, and that this was likely a small parking area.

The results of Albion's pedestrian survey turned up no evidence of precontact Native American or historic period cultural resources within the Project APE that would qualify as historical resources under CEQA. Our survey shows that, despite records search results indicating that the SPRR (P-44-000377) overlaps with the APE, this resource is actually located well outside the APE and will not be subject to Project impacts. The concrete and asphalt paving within the Project parcel is probably older than fifty years, and therefore has the potential to qualify as a historical resource under CEQA. However, it is in very poor condition, is peripheral to the core functioning of both the adjacent railroad and warehouse complex, and has no potential to contribute to research questions that cannot be addressed using historical sources. Consequently, it is Albion's opinion that the paving should not be considered a historical resource under CEQA.

RECOMMENDATIONS

Based on results of this study, including the lack of known or newly identified cultural resources within the Project APE, Albion concludes that no historical resources will be affected by the Project and recommends no further archaeological measures prior to or during construction.

If the Project scope changes in ways that affect the boundaries of the APE, additional archaeological survey and testing may be required to assess these potential effects and recommend appropriate mitigation measures.

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Appendix A

Fieldwork Photographs



Photograph 1. View toward Project parcel from the west, facing east.



Photograph 2. View toward Project parcel from the north, facing southeast.



Photograph 3. View of southern exterior of Project parcel facing east.



Photograph 4. View toward southeastern portion of Project parcel, facing northwest.



Photograph 5. View from east corner of Project parcel, facing west.



Photograph 6. View from east corner of Project parcel, facing northwest.

Figure A-1. Fieldwork photographs.

File name: Figure A1_Photos.ai; 12020-007.04, Stella D'Oro, 20May2020



Photograph 7. Fuel tank, power pole, and aerial lift in eastern portion of Project parcel, facing northwest.



Photograph 8. View of southeastern portion of Project parcel, facing east.



Photograph 9. View of Project parcel west of fuel tank, facing north.



Photograph 10. View of western portion of Project parcel, facing west toward hole.



Photograph 11. Close-up of shallow hole, facing east.



Photograph 12. Vegetated earthen mound in western corner of Project parcel, facing east.

Figure A-2. Fieldwork photographs.

File name: Figure A2_Photos.ai; 12020-007.04, Stella D'Oro, 20May2020



Photograph 13. View toward fuel tank from east side of earthen mound, facing east.



Photograph 14. View of western portion of Project parcel just east of mound, facing south.



Photograph 15. View of northern portion of Project parcel, facing northeast.



Photograph 16. View of northern portion of Project parcel, facing southwest.



Photograph 17. Electrical panel along northern fence line, facing northwest.



Photograph 18. View of eastern portion of Project parcel, facing southeast.

Figure A-3. Fieldwork photographs.

File name: Figure A3_Photos.ai; 12020-007.04, Stella D'Oro, 20 May 2020

Appendix B

Records Search Summary Letter



NWIC File No.: 19-1690

Stella D'Oro
Albion Environmental, Inc.
1414 Soquel Drive, Suite 205
Santa Cruz, CA 95062

re: 950 West Beach Street

The Northwest Information Center received your record search request for the project area referenced above, located on the Watsonville West USGS 7.5' quad. The following reflects the results of the records search for the project area and a 0.25 mile radius:

Resources within project area:	P-44-000377.
Resources within 0.25 mile radius:	P-44-001157; 387A-004.
Reports within project area:	None
Reports within 0.25 mile radius:	S-4036, 22657, 31355, 21986, 6722, 25267, 3964, 26671, & 3852.

☐ enclosed ☒ not requested ☐ nothing listed

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Shipwreck Inventory:

☐ enclosed ☒ not requested ☐ nothing listed

***Notes:**

****** Current versions of these resources are available on-line:

Caltrans Bridge Survey: <http://www.dot.ca.gov/hq/structur/strmaint/historic.htm>

Soil Survey: <http://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/?stateId=CA>

Shipwreck Inventory: <http://www.slc.ca.gov/Info/Shipwrecks.html>

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the California Historical Resources Information System (CHRIS).

Sincerely,

Lisa C. Hagel
Researcher



TECHNICAL MEMORANDUM

To: Justin Meek, AICP, Principal Planner, City of Watsonville
From: Shannon Bane, Biologist
Subject: Mountain Propane Project – Biotic Resources
Date: June 4, 2020
CC: David Mack, Project Manager/Senior Planner, Harris & Associates
Att: 1, California Natural Diversity Database, Information for Planning and Consultation, and California Native Plant Society Rare and Endangered Plant Inventory Results

Introduction

This technical memorandum presents the results of Harris & Associates' analysis of potential impacts to biological resources from construction of the proposed Mountain Propane project (project). Impacts were assessed as they relate to existing conditions, the project description, and relevant regulations, including the California Environmental Quality Act (CEQA), federal and state Endangered Species Acts (FESA and CESA), Migratory Bird Treaty Act (MBTA), California Fish and Game Code, California Native Plant Protection Act, and City of Watsonville local ordinances (e.g., Noise Ordinance). Figures and attachments are located at the end of this memorandum.

Project Description

The project area is located at 950 West Beach Street, a previously developed industrial site (currently owned by Mountain Propane and previously owned by Venture Oil Company) within a larger industrial area on the south side of the City of Watsonville (**Figures 1 and 2**). The 0.69-acre project site is zoned General Industrial (IG), and was previously contaminated with hazardous materials that were remediated in 2013. Currently, the project site contains one 50,000-gallon propane tank and various areas of impervious surfaces that are composed of pavement and concrete (**Figure 2**).

The applicant is proposing to relocate the existing 50,000-gallon propane storage tank to the middle of the parcel. The project also includes the phased installation of four new 30,000-gallon propane storage tanks that would result in a total of 170,000 gallons of storage (**Figure 3**). Each of the proposed tanks are fifteen feet in height and would be installed on footings that keep the tanks off the ground, and would occupy approximately 1,750 square feet.

The proposed project would utilize an adjacent rail line for the delivery of the propane. The propane would then be transferred to a truck, and then to the on-site propane storage tanks. Mountain Propane Company would fill bobtail delivery trucks at the site and deliver propane to customers.

Additional site improvements include the removal of concrete and/or asphalt paving not essential to future operations, the repair and resurfacing of existing concrete and asphalt surfaces for the propane tanks, installation of foundation(s) for the propane tanks, tank unloading stations, irrigation and landscaping, gate and fencing installation, bollard installation, liquefied petroleum gas (LPG) piping and appurtenance installation, and private fire hydrant installation (**Figures 3 and 4**).

All elements of the project – including moving the existing tank, installation of new tanks, paving repair, and installation of respective ancillary facilities – would be located on disturbed areas within the existing property (**Figures 3 and 4**).



Methodology

Harris and Associates (Harris) biologists reviewed the project plans and available information about Watsonville Slough, which is within 580 feet of the project site. To identify federally- and state-listed species potentially occurring in the project site, Harris biologists obtained a species list from the USFWS Information for Planning and Conservation (IPaC) online planning tool (U.S. Fish and Wildlife Service 2020), queried the California Department of Fish and Wildlife's California Natural Diversity Database (CNDDDB) for special-status species occurrences within a 2-mile buffer around the project site (California Department of Fish and Wildlife 2020) (**Figure 5**), and queried the California Native Plant Society's (CNPS) Rare and Endangered Plant Inventory (California Native Plant Society 2018) for special-status plant occurrences in the Watsonville West quadrangle. The results of the USFWS species list, CNDDDB query, and CNPS query are provided in **Attachment 1**.

A general habitat and natural resources assessment, including the potential for special-status species and habitats to occur within the project site was conducted during a reconnaissance-level pedestrian survey by Harris biologist Shannon Bane on March 19, 2020.

Results

Project Location

The project site is located at 950 West Beach Street, Watsonville, California 95076. The parcel (APN 018-331-28) consists of 0.69 acres (mostly paved or covered in concrete) and currently houses one 50,000-gallon propane tank. The parcel is located within the Watsonville West 7.5' U.S. Geological Survey (USGS) topographic quadrangle, at DD (NAD 83) -121.77163, 36.90401; UTM 609435E 4084928N Zone 10, PLSS Section M 12S 02E 8. It is located within the Pajaro Watershed (HUC 8), and is approximately 580 feet south of Watsonville Slough.

Habitats

Habitats are influenced by the soils and other physical characteristics within and adjacent to the property. The project site is located within 580 feet of Watsonville Slough; in this location the slough is channelized but does support riparian vegetation (**Figure 5**). Between the slough and the project site are two levees and dense nonnative vegetation, including weeds and nonnative grasses (see description of **Ruderal** habitat for more details, below).

Due to the proximity of the project site to Watsonville Slough, it is located in a FEMA designated 100-year flood zone (Zone AE), and soils within and adjacent to the project site are sandy.

Two habitat types were identified on the property during the field visit and are described below: developed/disturbed and ruderal (**Figure 6**).

Developed/Disturbed

Almost half of the project site (approximately 0.33 acres) is developed/disturbed, covered with degraded concrete and pavement, a 50,000-gallon propane tank, and trash and debris (**Figures 7-9**). Weedy species such as narrow leaf plantain (*Plantago lanceolata*), cut leaf plantain (*Plantago coronopus*), bristly ox-tongue (*Helminthotheca echioides*), wild radish (*Raphanus raphanistrum*), and non-native grasses are growing in cracks and other areas where they were able to take root.

Ruderal

The remaining half of the project site (approximately 0.36 acres) that is not paved has been disturbed, as evidenced by stockpiles of soil, holes in the ground, and weedy and other early-successional species that are common in ruderal habitats (**Figures 10-11**). The soil in this area is sandy, and supports nonnative ruderal species including French broom (*Genista monspessulana*), poison hemlock (*Conium maculatum*), Italian thistle (*Carduus pycnocephalus*), vetch (*Vicia* spp.), and wild radish. Early successional native species seen in this area include coyote brush (*Baccharis pilularis*) and lupine (*Lupinus albifrons*).



Ruderal habitat is also adjacent to the project site, extending approximately 580 feet from the edge of the railroad tracks to the riparian area of Watsonville Slough (**Figures 12-13**). This area is dominated by thick, tall, invasive, nonnative vegetation, including thistles, wild radish, and non-native grasses. The current condition of this area is not conducive for the support or movement of wildlife species.

Common Wildlife Species

Common wildlife species that are expected to occur in the project site include species that are tolerant of disturbance from ongoing operations within the industrial area. Wildlife species certainly use the riparian corridor of Watsonville slough, approximately 580 feet north of the project site, and, to a lesser extent, the open ruderal area between the slough and the project site. However, it is unlikely that anything other than species very tolerant of human disturbance would occur on site due to the lack of vegetation for roosting, shelter, or food.

Urban-adapted species that may be found at the project site include: European starling (*Sturnus vulgaris*), house finch (*Haemorhous mexicanus*), rock dove (*Columba livia*), house mouse (*Mus musculus*), American crow (*Corvus brachyrhynchos*), Eurasian collared dove (*Streptopelia decaocto*), house sparrow (*Passer domesticus*), raccoons (*Procyon lotor*), and western fence lizard (*Sceloporus occidentalis*). No bird species were observed during the biologist's field visit on March 19, 2020.

Special-Status Species That May Potentially Be Affected by the Project

The project site is very unlikely to support special status species because of the developed/disturbed nature of the site and the surrounding industrial uses. However, the project site is located 580 feet south of the Watsonville Slough, which, although channelized near the project site, likely serves as a movement corridor and provides habitat that supports special status species. There are known occurrences of special status species in Watsonville Slough, both upstream and downstream of the project site (**Figure 5** and **Attachment 1**).

The area between the slough and project site includes levees and open space (**Figures 12-13**). As discussed above in the **Habitats** section, this area is dominated by tall, dense stands of invasive nonnative weeds that do not provide quality habitat and make movement of terrestrial species difficult.

Results of the IPaC, CNDDDB and CNPS RareFind database searches are included in **Attachment 1**. The CNDDDB table in **Attachment 1** identifies the potential for special status species to occur on the project site and species that are unlikely to occur based on lack of suitable habitat or other factors. Harris identified suitable habitat for the following species as being potentially affected by the proposed project.

- California Red-Legged Frog (*Rana draytonii*) (CRLF) (Federally Threatened Species; CDFW Species of Special Concern).** CRLF are known to occur in Watsonville Slough both upstream and downstream of the project site (**Figure 5**). The slough and associated riparian habitat are approximately 580 feet from the project site. The slough is channelized through this area of Watsonville, likely providing a movement corridor for CRLF, but no breeding habitat is present through this section.

The soil in and around the project site is sandy and does not support any ground squirrel activity or burrows which would provide upland refugia for CRLF. In addition, there is very little debris that could provide refuge for frogs.

Although no physical barriers exist between the slough and project site, the two tall and steep levees, open space with dense invasive nonnative weeds, and active railroad corridor make it unlikely that CRLF would occur at the project site. And, if CRLF were to travel to or through the project site, they would be exposed to an industrial area and roads, and not additional habitat. The next natural area beyond the adjacent industrial area is the Pajaro River, approximately 0.9 miles away.
- Western Pond Turtle (*Emys marmorata*) (WPT) (CDFW Species of Special Concern, USFS Sensitive Species).** WPT are known to occur locally in Struve Slough and near Crestview Park in association with ponded water. Watsonville Slough does have potentially suitable habitat for WPT upstream and downstream of the project site (where the CNDDDB occurrences were reported). There are sandy soils on the project site, and WPT nest in sandy areas within ½ mile of water. However, there are no ponds in this stretch of Watsonville Slough, and there are barriers between the slough and project site including two levees and dense weedy vegetation that are of low quality, hindering movement of small herpetiles. In addition, the conditions on the project site are



degraded in that the majority of the site is paved, and the unpaved portions are weedy. Based on the low quality habitat adjacent to and within the project site, it is unlikely that WPT would occur there.

- **Robust Spineflower (*Chorizanthe robusta* var. *robusta*) (Federally Endangered Species; USFS Sensitive Species; CNPS 1B.1 Species - plants rare, threatened, or endangered in California and elsewhere and/or seriously threatened in California).** Robust spineflower occurs in mildly disturbed sandy soils. There is one local population reported at Harkins Slough on the Land Trust of Santa Cruz County's Watsonville Slough Farm property. Although loose sand is present within the project site, the site was remediated for hazardous materials in the past; and as a result of this and other industrial uses, the site is disturbed and dominated by invasive, nonnative weeds. The degraded habitat on site is unlikely to support this species.
- **Santa Cruz Tarplant (*Holocarpha macradenia*) (Federally Threatened Species; California Endangered Species; CNPS 1B.1 Species: plants rare, threatened, or endangered in California and elsewhere and/or seriously threatened in California).** Santa Cruz tarplant is found in grasslands in sandy soils. The nearest local occurrences of this species are at Tarplant Hill in Struve Slough, Harkins Slough at High Ground Organics Farm, the Watsonville Municipal Airport, and the Apple Hill neighborhood in Watsonville. The closest population is at Tarplant Hill, approximately 0.5 miles away from the project site. Although soils on the site are sandy, the degraded condition of the soils and nonnative vegetation make it very unlikely that this species would occur on site.
- **Nesting Birds (protected).** Nesting Birds are protected by CEQA, the MBTA, and the California Fish and Game Code. Nesting birds may occur on the edge of the property in shrubs or on the ground during nesting season (from February 1 to September 1).

Critical Habitat

The project site does not fall within the boundaries of Critical Habitat for any listed species.

Impact Analysis

Potential impacts to identified biological resources from implementing the proposed project are discussed below.

Construction Impacts

Project construction activities that could potentially impact biological resources at the project site include relocating the existing propane tank, installing four new tanks, and implementing other site improvements as described in the Introduction above. However, the site has been previously developed and disturbed, so no new habitat impacts would occur. Shrubs at the fenceline/perimeter of the property and ruderal/weedy plant species throughout the property would be removed. Grading would redistribute soils throughout the project site. Some existing pavement and asphalt would also be removed, increasing the total amount of permeable surface. Repairs would be made to the existing concrete and pavement areas, and, where necessary, new concrete or pavement would be installed over existing infrastructure to provide a stable foundation for the tanks. Construction noise may affect any wildlife in the immediate vicinity of the work area.

Although no sensitive wildlife or plant species are anticipated to be present within the project site during construction, it is possible due to the project site's proximity to Watsonville Slough. If sensitive wildlife species were to occur on the project site during construction, there is a potential for "incidental take" under the FESA and/or CESA. "Take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct; incidental take is a take that results from activities that are otherwise lawful. Avoidance and minimization measures to avoid take of special status species are included in under **5. Best Management Practices and Avoidance and Minimization Measures**. When implemented, these measures would avoid take of sensitive wildlife and plant species, and no mitigation would be needed.

Best Management Practices and Avoidance and Minimization Measures

The following Best Management Practices (BMPs) and Avoidance and Minimization Measures would be included in the project construction specifications and/or as conditions of approval to minimize potential impacts to sensitive biological resources.



Avoidance and Minimization Measure 1: Preconstruction Surveys

California Red-Legged Frog and Western Pond Turtle

To prevent incidental take of California red-legged frog (CRLF) and Western Pond Turtle (WPT), preconstruction surveys shall be conducted by a qualified biologist within 48-hours of the start of construction activities to make sure that these species are not present on site. Surveys of open areas and any debris piles or crevices where a CRLF could take refuge and sandy soils where WPT could nest shall be surveyed. If any CRLF or WPT individuals or WPT nests are located, a buffer shall be established to protect it. Any animal(s) found during surveys shall be allowed to leave the property of its own accord. Construction may not start until the animal(s) has/have left the property.

Special Status Plants

Although no special status plants are expected to be present on the property, a qualified biologist shall survey the site prior to construction. If a special status plant occurs on site, the plant and immediate surrounding area shall be flagged and protected from impacts. If there is no way to protect the plant(s), construction shall be put on hold while the biologist consults with USFWS and/or CDFW (depending on the listing agency) for guidance. If this occurs, it is likely that mitigation would be needed, including removing and saving topsoil from graded areas and replacing it on open areas within the project site, and future management of the site to protect the species.

Nesting Birds

To protect nesting birds, no project activities shall be completed from February 1 through August 31 unless the following Avian Nesting Surveys are completed by a qualified biologist.

- **Birds of Prey.** Typically, a survey for nesting birds of prey is conducted prior to project construction to ensure that active raptor nests are not impacted by construction activities. Because there is a 500-foot avoidance buffer required for active nests of birds of prey, and the closest trees that could support nesting raptors are in the riparian corridor associated with Watsonville Slough, approximately 580 feet north of the project site, no surveys for nesting raptors are included for this project.
- **Other Avian Species.** A qualified biologist shall survey for nesting activity within the project site and a 250-foot radius within 7 days prior to starting project activities. If any nesting activity is detected, the qualified biologist shall designate nests and nest substrate (trees, shrubs, ground, or burrows) as an Environmentally Sensitive Area (ESA) and protected with a minimum 250-foot buffer until young have fledged and are no longer reliant on the nest site or parental care. Additional surveys would be needed if construction is halted for 7 days or more.

Avoidance and Minimization Measure 2: Education Materials and Training

A binder with information containing environmental requirements for the project, including avoidance of special-status species, shall be created and kept at the project site at all times. In addition, prior to starting the project, all employees, contractors, and visitors who will be present during project construction shall receive training from a qualified biologist on the contents of the binder, including species identification, avoidance and minimization measures, and stop work and reporting requirements (if any).

Avoidance and Minimization Measure 3: Protective Fencing

Protective fencing to exclude special status species shall be installed after the completion of preconstruction surveys for CRLF and WPT (**Avoidance and Minimization Measure 1**), and the qualified biologist has determined that no special status species are present on site. Protective fencing shall be constructed to provide a solid barrier that will not allow the passage of sensitive species into the project site during construction (similar to the one shown in **Figure 14-16**). The qualified biologist shall delineate where the contractor shall install fencing and inspect the fencing prior to construction to ensure that the fencing was installed correctly. Fencing shall be inspected daily for integrity by a designated and qualified individual, and any necessary repairs shall be made prior to the start of construction that day.



If any CRLF or WPT are found within the project site at any time, the contractor shall stop work immediately and contact a qualified biologist, who shall inspect the animal and site to ensure that it leaves of its own volition (no animals may be picked up and moved). Work shall restart when the biologist deems the site clear. The regulatory agencies shall then be consulted, and daily monitoring of the site may be required.

Avoidance and Minimization Measure 4: Work Timing

Many of the special-status animals with a potential to occur within the project site are active at dusk and during the night. To avoid impacts to these species, all work activities shall be confined to daylight hours (between 7:00 a.m. and 7:00 p.m.) per the City's Noise Ordinance.

Conclusion and Recommendations

It is unlikely that special status species would occur within the project site due to the developed/disturbed conditions of the site. However, Watsonville Slough (located approximately 580 feet north of the project site) and the special status species that occur therein, are within dispersal distance for CRLF and WPT. Although unlikely, it is possible that a dispersing CRLF and/or WPT may inadvertently end up near or in the project site. Furthermore, nesting birds may occur in shrubs or ground vegetation during nesting season (February 1 through August 31), and vegetation removal, grading, or noise may harm or disturb any active nests in or near the project site. With the implementation of BMPs and avoidance and minimization measures, project construction would not result in incidental take of any special status species, and the potential impact would be less than significant.

To summarize, the following BMPs and Avoidance and Minimization Measures would be implemented.

- Within 7 days of the start of construction, preconstruction surveys shall be conducted for nesting birds by a qualified biologist. Buffers shall be established, if necessary, to prevent construction noise impacts to active nests.
- Within 48 hours, preconstruction surveys for CRLF and WPT shall be conducted by a qualified biologist. Any animals found within the project site shall be allowed to leave of their own volition; and construction shall not proceed until the animal(s) left the property.
- Before the start of construction, a construction education program presented by a qualified biologist shall be required of all construction workers and visitors to the site. This program would explain what sensitive species/resources may be encountered and how to avoid any impacts to them. A binder with all relevant information regarding sensitive resources shall be kept on site by the contractor throughout the duration of project implementation.
- Before the start of construction and after the qualified biologist determines that no special status species are present on site, protective fencing shall be installed by the contractor, at the qualified biologist's direction. The fencing shall be inspected daily by a designated and qualified individual for integrity, and any repairs shall be made to ensure that no special status species would be able to enter the property during construction.
- Construction shall be limited to daylight hours (7:00 a.m. to 7:00 p.m.) to prevent noise disturbance to sensitive receptors.

References

- California Department of Fish and Wildlife. 2020. California Natural Diversity Database. Available online at <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data#43018407-rarefind-5>. Accessed June 25, 2018.
- California Native Plant Society (CNPS). 2020. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society, Sacramento, CA. Available online at: <http://www.rareplants.cnps.org>. Accessed June 25, 2018.
- USFWS. 2020. Information for Planning and Conservation online planning tool. Available at: <https://ecos.fws.gov/ipac/>. Accessed June 25, 2018.

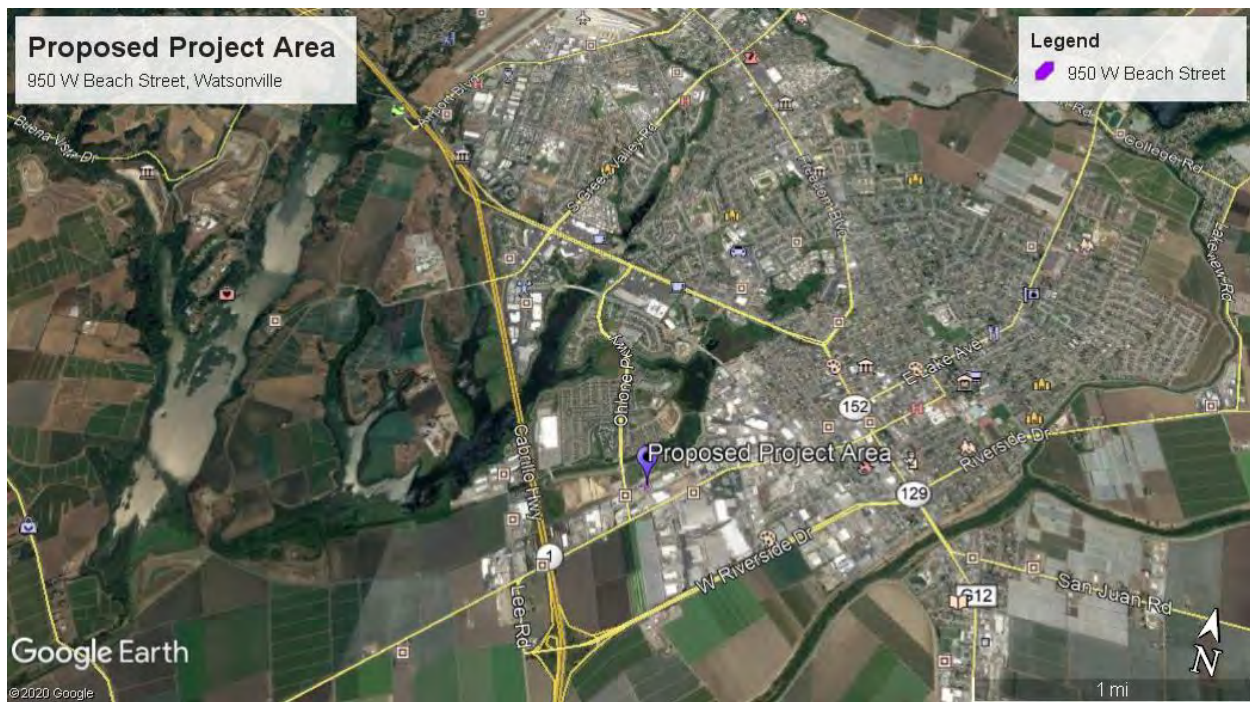


Figure 1. Regional Map of Project Site (Proposed Project Site)



Figure 2. Proposed Project Site

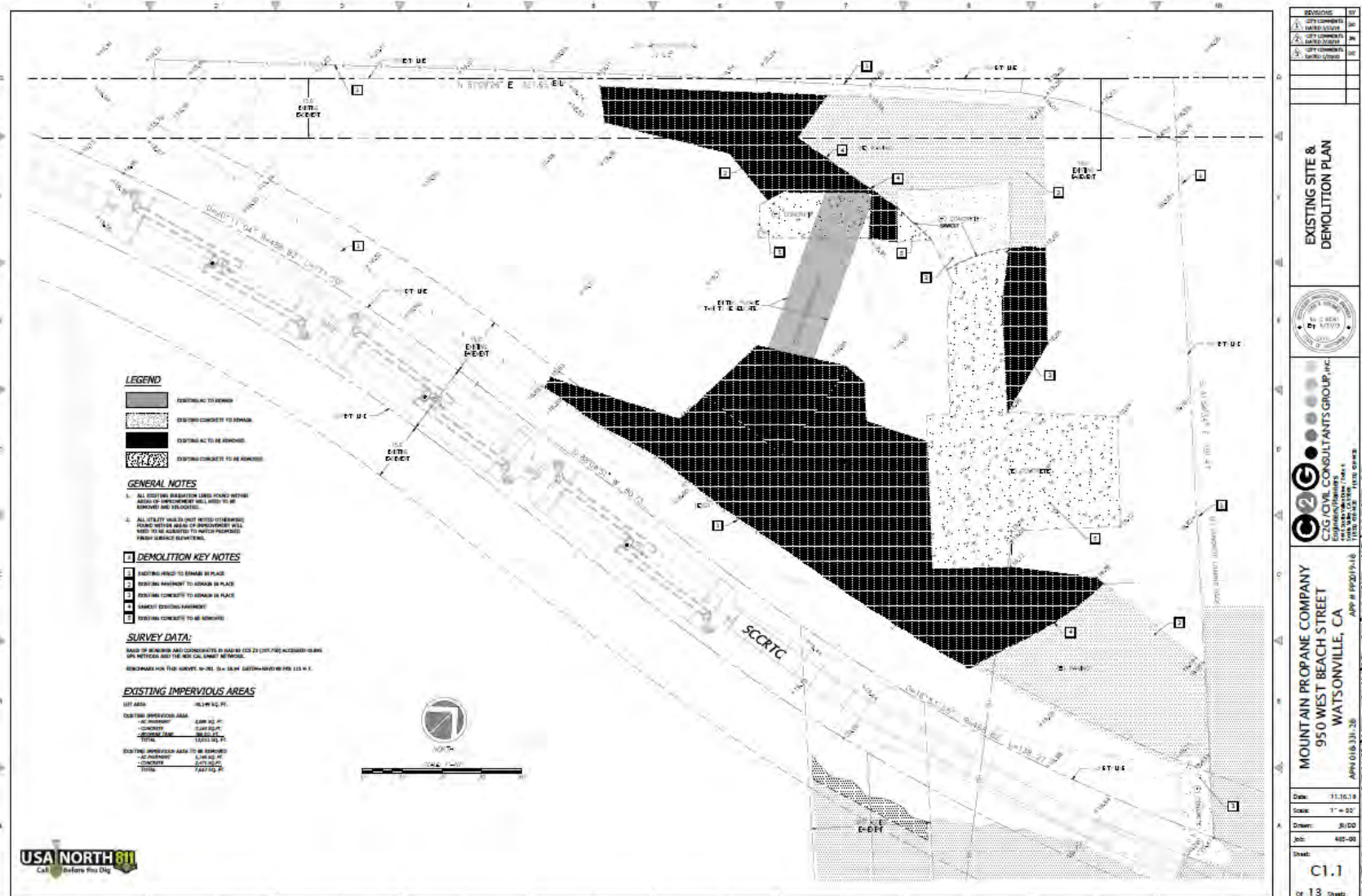
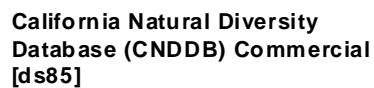



Figure 4. Existing Site and Demolition Plan (including Concrete and Asphalt Removal Areas)

Figure 5. CNDDDB Map of the Project Area



- | | |
|---|----------------------------------|
|  | Plant (80m) |
|  | Plant (specific) |
|  | Plant (non-specific) |
|  | Plant (circular) |
|  | Animal (80m) |
|  | Animal (specific) |
|  | Animal (non-specific) |
|  | Animal (circular) |
|  | Terrestrial Comm. (80m) |
|  | Terrestrial Comm. (specific) |
|  | Terrestrial Comm. (non-specific) |
|  | Terrestrial Comm. (circular) |
|  | Aquatic Comm. (80m) |
|  | Aquatic Comm. (specific) |
|  | Aquatic Comm. (non-specific) |
|  | Aquatic Comm. (circular) |
|  | Multiple (80m) |
|  | Multiple (specific) |
|  | Multiple (non-specific) |
|  | Multiple (circular) |
|  | Sensitive EO's (Commercial only) |

1:18,056

A number line with two scales. The top scale is labeled in miles (mi) with major tick marks at 0, 0.15, 0.3, and 0.6. The bottom scale is labeled in kilometers (km) with major tick marks at 0, 0.25, 0.5, and 1. There are 10 equal intervals between 0 and 0.6 miles, and 4 equal intervals between 0 and 1 kilometer. The scales are aligned such that 0.3 miles corresponds to 0.5 kilometers.

March 31, 2020



Figure 6: Habitats

Habitat types within the project area

Legend

- Developed/Disturbed
- Ruderal





Figure 7. Degraded Asphalt in the Project Site



Figure 8. Degraded Asphalt and Stockpiled Rock in the Project Site



Figure 9. Existing Propane Tank and Ruderal (Weedy) Vegetation



Figure 10. Soil Stockpile with Ruderal (Weedy) Vegetation



Figure 11. Soil Stockpile and Ruderal (Weedy) Vegetation in the Project Site



Figure 12. Open Space Area between the Project Site (beyond the right side of the photo) and Watsonville Slough (beyond the left side of the photo)



Figure 13. Levee and Open Space between the Project Site (beyond the levee) and Watsonville Slough (beyond the left side of the photo)

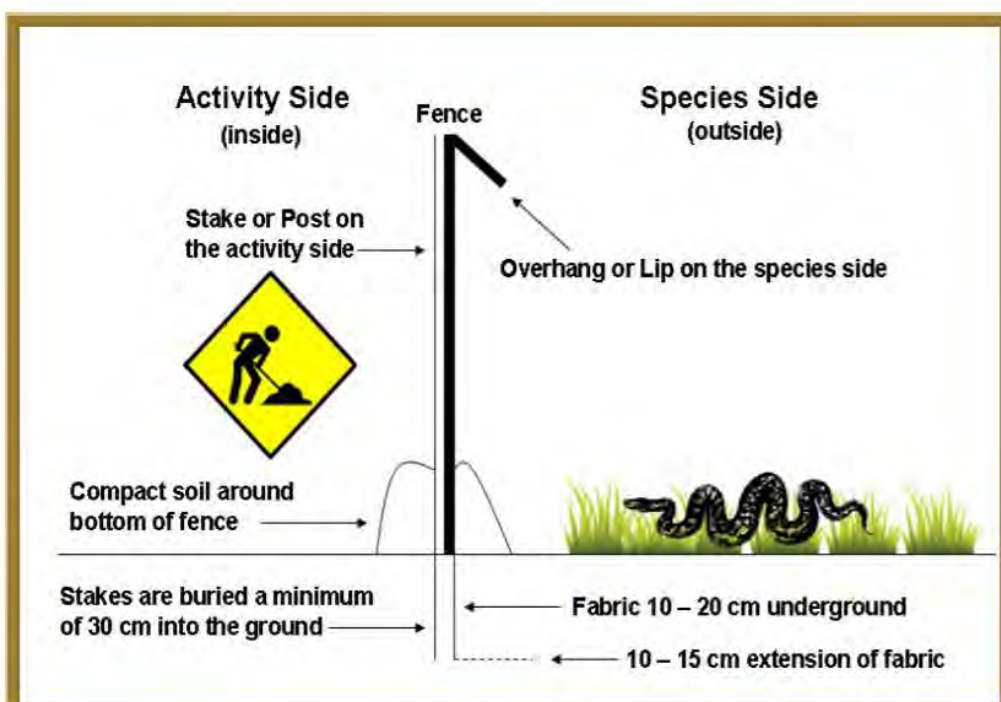


Figure 14. Exclusion Fencing

A side view of a basic exclusion fence including an overhang or flexible lip (optional) to deter animals from climbing or jumping over the fence. Placement of the stake on the activity side or the inside of the excluded area is also illustrated.



Figure 15. Photograph of a Drift Fence

**Attachment 1. California Natural Diversity Database, Information for Planning and
Consultation, and California Native Plant Society Rare and
Endangered Plant Inventory Results**

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CNDDDB Results for Mountain Propane Project

City of Watsonville, CA

April 2, 2020

Scientific Name	Common Name	Status (Fed/State/Other)	Habitat	Notes
Animal				
<i>Accipiter cooperii</i>	Cooper's hawk	-/-/WL	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks.	This occurrence was reported in 2014, and documents a nest in Crestview Park, approximately 1.7 miles from the project site. No suitable nesting or foraging habitat is located on site, although potential habitat is located in Watsonville Slough, approximately 580 feet away.
<i>Agelaius tricolor</i>	tricolored blackbird	-/T/SSC, S, BCC	Highly colonial species, most numerous in Central Valley & vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.	No habitat on site. Nearest occurrences are in freshwater marshes with cattails, tules, and other dense vegetation in Hansen and Struve Sloughs, approximately 0.5 miles away from the project site.
<i>Bombus occidentalis</i>	western bumble bee	-/C/S	Once common & widespread, species has declined precipitously from central CA to southern B.C., perhaps from disease.	No suitable habitat is available within the project site. Although the occurrence slightly overlaps with the project site, the record is vague and old (reported in 1959). It is likely that this population is extirpated.
<i>Emys marmorata</i>	western pond turtle	-/-/SSC, S	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	WPT are known to occur in Struve Slough and near Crestview Park, in association with ponded water. Watsonville Slough does have potentially suitable habitat, and there are sandy soils on the property. However, conditions between the slough and project site contain two levees and dense weedy vegetation, the conditions on the project site are degraded (the majority of the site is paved, and unpaved portions are weedy). It is unlikely that WPT would occur on the project site.
<i>Eucyclogobius newberryi</i>	tidewater goby	E/-/SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	No suitable habitat on or near the property. Tidewater goby have been reported in the Pajaro River (3 mi north of Moss Landing); the Pajaro River does not connect to Watsonville Slough and is approximately 0.9 miles away.
<i>Falco peregrinus anatum</i>	American peregrine falcon	D/D/FP, S, BCC	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	An Americal peregrine falcon nest was reported on the smokestack of powerplant at Moss Landing. No nesting or foraging habitat is present on site, but there is foraging habitat approximately 580 feet away in Watsonville Slough.
<i>Rana draytonii</i>	California red-legged frog	T/-/SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	Although no habitat is present on site, the project site is within 580 feet of Watsonville Slough, which is known to support CRLF both up and downstream from the project site. Although the slough is channelized in this area, it could provide movement corridor for CRLF. A railroad track/corridor and open space with two levees are located between Watsonville Slough and the project site. The open space area supports ruderal upland habitat that is densely vegetated with weeds. Although it is unlikely that CRLF would move through the steep levees and thick vegetation and end up on the project site, preconstruction surveys and best management practices will be implemented to prevent CRLF from entering the property before and during construction, including preconstruction surveys and physical barriers (e.g., drift fencing).
<i>Riparia riparia</i>	bank swallow	-/T/S	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	This occurrence is from a vague record from 1962; the nesting colony was likely associated with the banks of the Pajaro River.

CNDDDB Results for Mountain Propane Project

City of Watsonville, CA

April 2, 2020

Plant				
Chorizanthe robusta var. robusta	robust spineflower	E/-/1B.1, S	Cismontane woodland, coastal dunes, coastal scrub, chaparral. Sandy terraces and bluffs or in loose sand. 9-245 m.	There is one population reported at Harkins Slough on the Land Trust of Santa Cruz County's Watsonville Slough Farm property. Although loose sand is present on the project site, the site is disturbed and dominated by invasive nonnative weeds. The degraded habitat on site is unlikely to support this species.
Holocarpha macradenia	Santa Cruz tarplant	T/E/1B.1	Coastal prairie, coastal scrub, valley and foothill grassland. Light, sandy soil or sandy clay; often with nonnatives. 10-220 m.	No habitat on site. Nearest occurrences are at Tarplant Hill in Struve Slough, Harkins Slough at High Ground Organics farm, the Watsonville airport, and Apple Hill neighborhood in Watsonville. Closest population is at Tarplant Hill, approximately 0.5 miles away from the project site. Although soils on the site are sandy, the degraded condition of the soils and nonnative vegetation make it very unlikely that this species would occur on site.
Monolopia gracilens	woodland woollythreads	-/-/1B.2	Chaparral, valley and foothill grassland, cismontane woodland, broadleafed upland forest, North Coast coniferous forest. Grassy sites, in openings; sandy to rocky soils. Often seen on serpentine after burns, but may have only weak affinity to serpentine. 120-975 m.	This occurrence is a record from 1915, documenting a population along the Pajaro River, likely extirpated. Although soils on the site are sandy, the degraded condition of the soils and nonnative vegetation make it very unlikely that this species would occur on site.
Key				
E: Federally Endangered		1B.1: Plants rare, threatened, or endangered in California and elsewhere; Seriously threatened in California		
T: Federally Threatened		1B.2: Plants rare, threatened, or endangered in California and elsewhere; Moderately threatened in California		
C: Candidate Species		1B.3: Plants rare, threatened, or endangered in California and elsewhere; Not very threatened in California		
D: Delisted				
SSC: CDFW Species of Special Concern				
S: USFS or BLM Sensitive Species				
FP: CDFW Fully Protected Species				
BCC: USFWS Bird of Conservation Concern				

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Santa Cruz County, California



Local office

Ventura Fish And Wildlife Office

☎ (805) 644-1766

📠 (805) 644-3958

2493 Portola Road, Suite B
Ventura, CA 93003-7726

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME

STATUS

Attachment 1

San Joaquin Kit Fox *Vulpes macrotis mutica*

Endangered

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/2873>

Birds

NAME	STATUS
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8104	Endangered
Least Bell's Vireo <i>Vireo bellii pusillus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/5945	Endangered
Marbled Murrelet <i>Brachyramphus marmoratus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/4467	Threatened
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/6749	Endangered
Western Snowy Plover <i>Charadrius nivosus nivosus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/8035	Threatened

Reptiles

NAME	STATUS
San Francisco Garter Snake <i>Thamnophis sirtalis tetrataenia</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/5956	Endangered

Amphibians

NAME	STATUS
California Red-legged Frog <i>Rana draytonii</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/2891	Threatened

California Tiger Salamander *Ambystoma californiense* Threatened
 There is **final** critical habitat for this species. Your location is outside the critical habitat.
<https://ecos.fws.gov/ecp/species/2076>

Santa Cruz Long-toed Salamander *Ambystoma macrodactylum* Endangered
croceum
 There is **proposed** critical habitat for this species. The location of the critical habitat is not available.
<https://ecos.fws.gov/ecp/species/7405>

Fishes

NAME	STATUS
Tidewater Goby <i>Eucyclogobius newberryi</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/57	Endangered

Flowering Plants

NAME	STATUS
Marsh Sandwort <i>Arenaria paludicola</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2229	Endangered
Monterey Gilia <i>Gilia tenuiflora</i> ssp. <i>arenaria</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/856	Endangered
Monterey Spineflower <i>Chorizanthe pungens</i> var. <i>pungens</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/396	Threatened
Santa Cruz Tarplant <i>Holocarpha macradenia</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/6832	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A
BREEDING SEASON IS INDICATED
FOR A BIRD ON YOUR LIST, THE
BIRD MAY BREED IN YOUR
PROJECT AREA SOMETIME WITHIN
THE TIMEFRAME SPECIFIED,

Attachment 1

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WHICH IS A VERY LIBERAL
ESTIMATE OF THE DATES INSIDE
WHICH THE BIRD BREEDS
ACROSS ITS ENTIRE RANGE.
"BREEDS ELSEWHERE" INDICATES
THAT THE BIRD DOES NOT LIKELY
BREED IN YOUR PROJECT AREA.)

Allen's Hummingbird *Selasphorus sasin*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9637>

Breeds Feb 1 to Jul 15

Bald Eagle *Haliaeetus leucocephalus*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Breeds Jan 1 to Aug 31

Black Turnstone *Arenaria melanocephala*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

Burrowing Owl *Athene cunicularia*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/9737>

Breeds Mar 15 to Aug 31

Clark's Grebe *Aechmophorus clarkii*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds Jan 1 to Dec 31

Common Yellowthroat *Geothlypis trichas sinuosa*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/2084>

Breeds May 20 to Jul 31

Golden Eagle *Aquila chrysaetos*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1680>

Breeds Jan 1 to Aug 31

Lawrence's Goldfinch *Carduelis lawrencei*

Breeds Mar 20 to Sep 20

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9464>

Long-billed Curlew *Numenius americanus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/5511>

Marbled Godwit *Limosa fedoa*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9481>

Nuttall's Woodpecker *Picoides nuttallii*

Breeds Apr 1 to Jul 20

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/9410>

Oak Titmouse *Baeolophus inornatus*

Breeds Mar 15 to Jul 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9656>

Rufous Hummingbird *Selasphorus rufus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/8002>

Short-billed Dowitcher *Limnodromus griseus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9480>

Song Sparrow *Melospiza melodia*

Breeds Feb 20 to Sep 5

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Spotted Towhee *Pipilo maculatus clementae*

Breeds Apr 15 to Jul 20

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/4243>

Tricolored Blackbird *Agelaius tricolor*

Breeds Mar 15 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/3910>

Whimbrel *Numenius phaeopus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9483>

Willet *Tringa semipalmata*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Wrentit *Chamaea fasciata*

Breeds Mar 15 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence ()

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Attachment 1

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To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

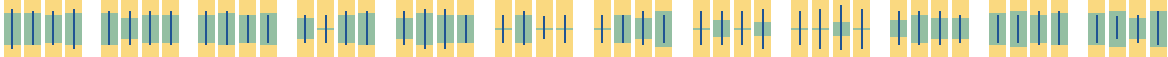
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



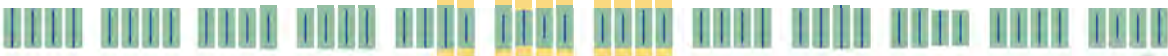
Burrowing Owl
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



Clark's Grebe
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



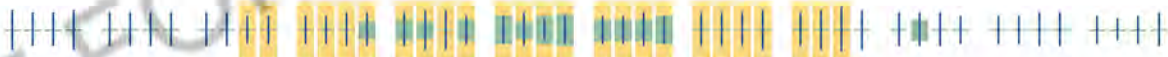
Common Yellowthroat
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



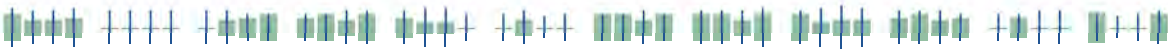
Golden Eagle
Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Lawrence's Goldfinch
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

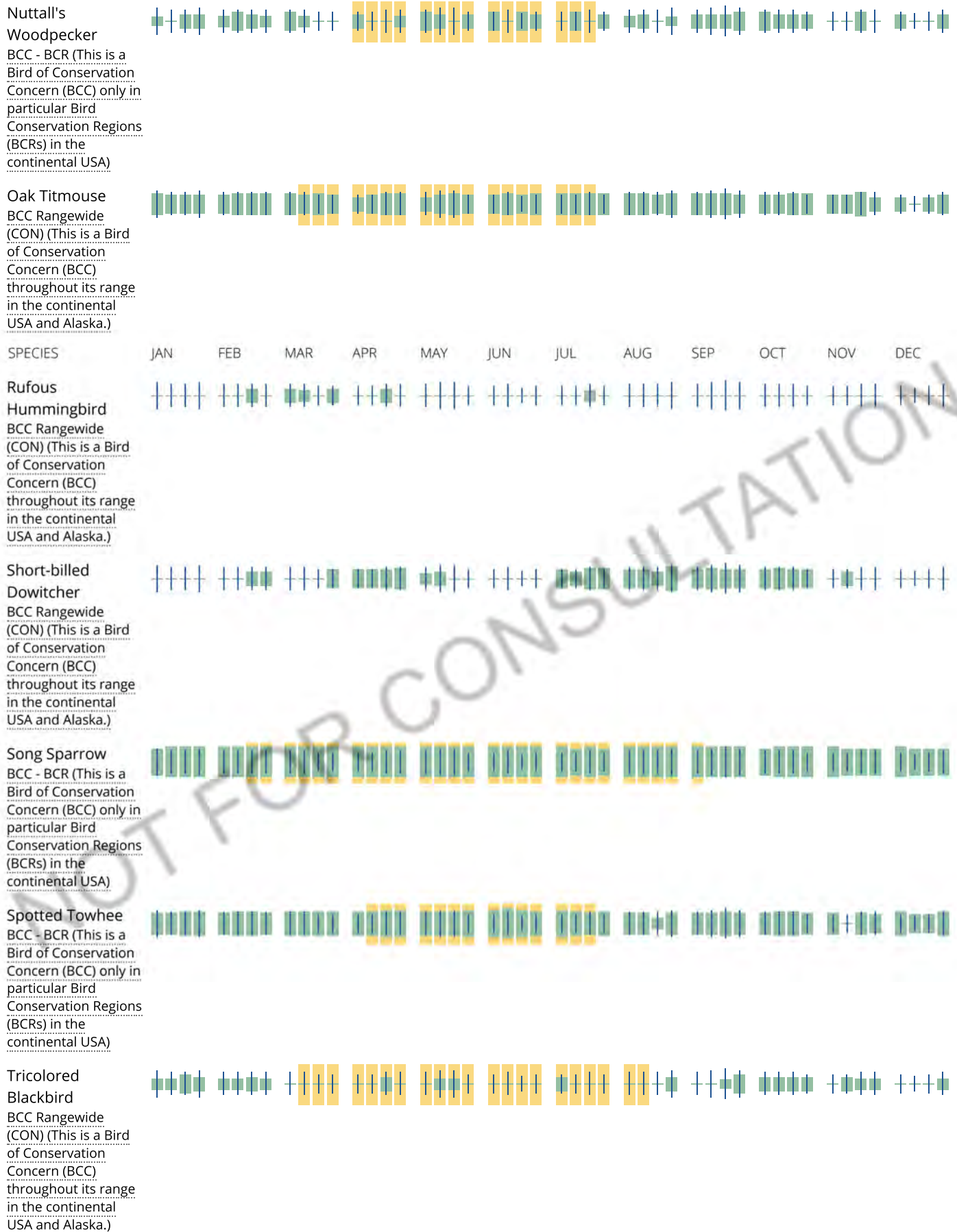


Long-billed Curlew
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Marbled Godwit
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)





Whimbrel
BCC Rangewide
(CON) (This is a Bird
of Conservation
Concern (BCC)
throughout its range
in the continental
USA and Alaska.)



Willet
BCC Rangewide
(CON) (This is a Bird
of Conservation
Concern (BCC)
throughout its range
in the continental
USA and Alaska.)



Wrentit
BCC Rangewide
(CON) (This is a Bird
of Conservation
Concern (BCC)
throughout its range
in the continental
USA and Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look

carefully at the survey effort (indicated by the black vertical bar) and for the existence of the “no data” indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ “Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds” at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

THERE ARE NO KNOWN WETLANDS AT THIS LOCATION.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

Attachment 1

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The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

California Native Plant Society
Rarefind Results, April 2, 2020

Scientific Name	Common Name	Rare Plant Rating	CESA	FESA	Blooming Period	Habitat	Micro Habitat	Elevation	Elevation	Notes
<i>Abies bracteata</i>	bristlecone fir	1B.3	None	None		Broadleafed upland forest, Chaparral, Lower montane coniferous forest, Riparian woodland	rocky	1555	5100	Known only from the Santa Lucia Mtns. Threatened by non-native plants. Possibly threatened by road maintenance.
<i>Acanthomintha lanceolata</i>	Santa Clara thorn-mint	4.2	None	None	Mar-Jun	Chaparral (often serpentinite), Cismontane woodland, Coastal scrub	rocky	1200	3935	Possibly threatened by non-native plants, grazing, and hydrological alterations.
<i>Acanthomintha obovata</i> ssp. <i>cordata</i>	heart-leaved thorn-mint	4.2	None	None	Apr-Jul	Chaparral (openings), Cismontane woodland, Pinyon and juniper woodland, Valley and foothill grassland	clay	1540	5050	Possibly threatened by vehicles and grazing. See Madroño 38(4):278-286 (1991) for original description.
<i>Acanthomintha obovata</i> ssp. <i>obovata</i>	San Benito thorn-mint	4.2	None	None	Apr-Jul	Chaparral, Cismontane woodland, Valley and foothill grassland	heavy clay, alkaline, serpentinite	1500	4920	Threatened by grazing.
<i>Agrostis blasdalei</i>	Blasdale's bent grass	1B.2	None	None	May-Jul	Coastal bluff scrub, Coastal dunes, Coastal prairie		150	490	Historical occurrences need field surveys. Threatened by agriculture, recreation, development, and competition from non-native plants. Includes <i>A. blasdalei</i> var. <i>marinensis</i> , which is state-listed Rare.
<i>Agrostis lacuna-vernalis</i>	vernal pool bent grass	1B.1	None	None	Apr-May	Vernal pools (mima mounds)		145	475	Known only from Butterfly Valley and Machine Gun Flats of Ft. Ord National Monument. Possibly threatened by non-native plants, road construction, vehicles, grazing, and hydrological alterations. Similar to <i>A. blasdalei</i> , <i>A. densiflora</i> , and <i>A. variabilis</i> . Not in TJM 2. See Journal of the Botanical Research Institute of Texas 5(2):421-426 (2011) for original description.
<i>Allium hickmanii</i>	Hickman's onion	1B.2	None	None	Mar-May	Closed-cone coniferous forest, Chaparral (maritime), Coastal prairie, Coastal scrub, Valley and foothill grassland		200	655	Threatened by urbanization, grazing, non-native plants, trampling, road construction, and military activities. See Bulletin of the Torrey Botanical Club 30:483-502 (1903) for original description.
<i>Allium howellii</i> var. <i>sanbenitense</i>	San Benito onion	1B.3	None	None	Apr-May	Chaparral (openings), Valley and foothill grassland	Clay, often steep slopes	1365	4480	Possibly threatened by grazing and development. See <i>Herbertia</i> 12:68 (1945) for original description, and <i>Plant Life</i> 28:66 (1972)
<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	1B.2	None	None	Apr-Jul	Broadleafed upland forest (openings), Chaparral, Cismontane woodland		2000	6560	Threatened by development and habitat alteration. Potentially threatened by road maintenance. See Manual of the Flowering Plants of California, p. 556 (1925) by W.L. Jepson for original
<i>Amsinckia douglasiana</i>	Douglas' fiddleneck	4.2	None	None	Mar-May	Cismontane woodland, Valley and foothill grassland	Monterey shale, dry	1950	6400	Possibly threatened by agriculture.
<i>Amsinckia lunaris</i>	bent-flowered fiddleneck	1B.2	None	None	Mar-Jun	Coastal bluff scrub, Cismontane woodland, Valley and foothill grassland		500	1640	Many collections old; current status information needed. Does plant occur in SHA and SIS counties? Threatened by development and mining. Possibly threatened by non-native plants.
<i>Anomobryum julaceum</i>	slender silver moss	4.2	None	None		Broadleafed upland forest, Lower montane coniferous forest, North Coast coniferous forest	damp rock and soil on outcrops, usually on roadcuts	1000	3280	Infrequent in CA but abundant in much of its range. See <i>Pl. Crypt. Brit. Fasc.</i> 4:16 (1801) for original description, and <i>Bryothr. Eur.</i> 25:331 (1873) for revised nomenclature.
<i>Antirrhinum ovatum</i>	oval-leaved snapdragon	4.2	None	None	May-Nov	Chaparral, Cismontane woodland, Pinyon and juniper woodland, Valley and foothill grassland	clay or gypsum, often alkaline	1000	3280	Appears only in favorable years. Threatened by grazing and vehicles. See Bulletin of the Torrey Botanical Club 32:213 (1905) for original description.
<i>Arabis blepharophylla</i>	coast rockcress	4.3	None	None	Feb-May	Broadleafed upland forest, Coastal bluff scrub, Coastal prairie, Coastal scrub	rocky	1100	3610	Threatened by competition. Possibly threatened by overgrazing. See <i>Rhodora</i> 43(511):348-349 (1941) for taxonomic treatment, and <i>Contributions from the Gray Herbarium</i> 204:149-154 (1973)
<i>Arctostaphylos andersonii</i>	Anderson's manzanita	1B.2	None	None	Nov-May	Broadleafed upland forest, Chaparral, North Coast coniferous forest	openings, edges	760	2495	Confused with other species merged with it as varieties. Threatened by development and road maintenance. See <i>Proceedings of the American Academy of Arts and Sciences</i> 11:83 (1876) for original description, and <i>North American Flora</i> 29:98 (1914) for additional information.
<i>Arctostaphylos cruzensis</i>	Arroyo de la Cruz manzanita	1B.2	None	None	Dec-Mar	Broadleafed upland forest, Coastal bluff scrub, Closed-cone coniferous forest, Chaparral, Coastal scrub, Valley and foothill grassland	sandy	310	1015	Possibly threatened by development and grazing. Potentially threatened by frequent wildfires and fire suppression activities. See <i>Leaflets of Western Botany</i> 9:218 (1962) for original description.
<i>Arctostaphylos edmundsii</i>	Little Sur manzanita	1B.2	None	None	Nov-Apr(May)	Coastal bluff scrub, Chaparral	sandy	105	345	Threatened by foot traffic and non-native plants. Includes <i>A. edmundsii</i> var. <i>parvifolia</i> , which is state-listed Rare. See <i>Leaflets of Western Botany</i> 6(10):202 (1952) for original description and 9(12):188-196 (1961) for information.
<i>Arctostaphylos gabilanensis</i>	Gabilan Mountains manzanita	1B.2	None	None	Jan	Chaparral, Cismontane woodland	granitic	700	2295	Not in The Jepson Manual. See Madroño (51)3: 322 (2004) for original description.
<i>Arctostaphylos glutinosa</i>	Schreiber's manzanita	1B.2	None	None	(Nov)Mar-Apr	Closed-cone coniferous forest, Chaparral	diatomaceous shale	685	2245	Threatened by road construction. See <i>American Midland Naturalist</i> 23:617 (1940) for original description.
<i>Arctostaphylos hookeri</i> ssp. <i>hookeri</i>	Hooker's manzanita	1B.2	None	None	Jan-Jun	Closed-cone coniferous forest, Chaparral, Cismontane woodland, Coastal scrub	sandy	536	1760	Threatened by agriculture, development, fire suppression, and competition with <i>Eucalyptus</i> .

Arctostaphylos hooveri	Hoover's manzanita	4.3	None	None	Feb-Jun	Broadleafed upland forest, Chaparral (rocky), Cismontane woodland, Lower montane coniferous forest		1035	3395	See Leaflets of Western Botany 9:152 (1961) for original description.
Arctostaphylos montereyensis	Toro manzanita	1B.2	None	None	Feb-Mar	Chaparral (maritime), Cismontane woodland, Coastal scrub	sandy	730	2395	Threatened by development. See Leaflets of Western Botany 10:88 (1964) for original description.
Arctostaphylos obispoensis	Bishop manzanita	4.3	None	None	Feb-Jun	Closed-cone coniferous forest, Chaparral, Cismontane woodland	serpentinite, rocky	1005	3295	See Leaflets of Western Botany 2:8 (1937) for original description.
Arctostaphylos ohloneana	Ohlone manzanita	1B.1	None	None	Feb-Mar	Closed-cone coniferous forest, Coastal scrub	siliceous shale	530	1740	Possibly threatened by road maintenance and vehicles. Potentially threatened by Phytophthora root rot. See Madroño 55(3):238-243 for original description.
Arctostaphylos pajaroensis	Pajaro manzanita	1B.1	None	None	Dec-Mar	Chaparral (sandy)		760	2495	Threatened by development and non-native plants. Possibly threatened by road construction. See Journal of the Elisha Mitchell Scientific Society 56:41 (1940) for original description.
Arctostaphylos pumila	sandmat manzanita	1B.2	None	None	Feb-May	Closed-cone coniferous forest, Chaparral (maritime), Cismontane woodland, Coastal dunes, Coastal scrub	sandy, openings	205	675	Threatened by urbanization, and by military activities at Ft. Ord.
Arctostaphylos regismontana	Kings Mountain manzanita	1B.2	None	None	Dec-Apr	Broadleafed upland forest, Chaparral, North Coast coniferous forest	granitic or sandstone	730	2395	Plants north of Big Basin in SCR Co. (408B) look intermediate; identification uncertain. Threatened by urbanization. Not regenerating well. See Leaflets of Western Botany 1:77 (1933) for
Arctostaphylos silvicola	Bonny Doon manzanita	1B.2	None	None	Jan-Mar	Closed-cone coniferous forest, Chaparral, Lower montane coniferous forest	inland marine sands	600	1970	Threatened by sand mining and urbanization. See Erythea 8:101 (1938) for original description.
Arenaria paludicola	marsh sandwort	1B.1	CE	FE	May-Aug	Marshes and swamps (freshwateror brackish)	sandy, openings	170	560	Threatened by vehicles, development, erosion, hydrological alterations, and non-native plants. Individuals re-introduced in Black Lake Cyn. in 1995. Introduced population in Los Osos well established as of 2003. Experimental introduction also underway in Nipomo as of 2004. Collection from Mexico needs confirmation. See Proceedings of the California Academy of Natural Sciences 3:61 (1863) for original description.
Aristocapsa insignis	Indian Valley spineflower	1B.2	None	None	May-Sep	Cismontane woodland (sandy)		600	1970	Threatened by development. See Bulletin of the California Academy of Sciences 1:275 (1885) for original description, Great Basin Naturalist Memoirs 2:169-190 (1978) for taxonomic treatment, and Phytologia 66(2):83-88 (1989) for revised nomenclature and taxonomic treatment.
Aspidotis carlotta-halliae	Carlotta Hall's lace fern	4.2	None	None	Jan-Dec	Chaparral, Cismontane woodland	usually serpentinite	1400	4595	Fertile hybrid between A. californica and A. densa; sometimes backcrosses. See American Journal of Botany 44:738 (1957) for original description, and American Fern Journal 58:141 (1968) for revised nomenclature.
Astragalus macrodon	Salinas milk-vetch	4.3	None	None	Apr-Jul	Chaparral (openings), Cismontane woodland, Valley and foothill grassland	sandstone, shale, or serpentinite	950	3115	
Astragalus nuttallii var. nuttallii	ocean bluff milk-vetch	4.2	None	None	Jan-Nov	Coastal bluff scrub, Coastal dunes		120	395	Possibly threatened by foot traffic and road maintenance. See Leaflets of Western Botany 5(6):107 (1948) for revised nomenclature.
Astragalus tener var. tener	alkali milk-vetch	1B.2	None	None	Mar-Jun	Playas, Valley and foothill grassland (adobe clay), Vernal pools	alkaline	60	195	Threatened by development, competition from non-native plants, and habitat destruction, especially agricultural conversion. Possibly threatened by trampling. Potentially threatened by energy transmission line construction. See Proceedings of the American Academy of Arts and Sciences 6:206 (1864) for original description, and Systematic Botany 17(3):367-379 (1992) for distributional information.
Astragalus tener var. titi	coastal dunes milk-vetch	1B.1	CE	FE	Mar-May	Coastal bluff scrub (sandy), Coastal dunes, Coastal prairie (mesic)	often vernal mesic areas	50	165	Threatened by urbanization, recreational activities, and non-native plants. See Bulletin of the Torrey Botanical Club 32:195-196 (1905) for original description, and Memoirs of the New York Botanical Garden 13:1048 (1964) for taxonomic treatment.
Atriplex coronata var. coronata	crownscale	4.2	None	None	Mar-Oct	Chenopod scrub, Valley and foothill grassland, Vernal pools	alkaline, often clay	590	1935	Does plant occur in SJQ Co.? Similar to A. cordulata and A. vallicola. See Proceedings of the American Academy of Arts and Sciences 9:114 (1874) for original description.
Baccharis plummerae ssp. glabrata	San Simeon baccharis	1B.2	None	None	Jun	Coastal scrub		480	1575	Probably threatened by grazing. See Vascular Plants of San Luis Obispo County, p. 302 (1970) by R. Hoover for original description.
Benitoa occidentalis	western lessingia	4.3	None	None	May-Nov	Chaparral, Cismontane woodland, Coastal scrub, Valley and foothill grassland	Clay or serpentinite	1070	3510	See Novon 2(3):213-214 (1992) for revised nomenclature.

Bryoria spiralis	twisted horsehair lichen	1B.1	None	None		North Coast coniferous forest (immediate coast)	Usually on conifers	30	100	Largest known population is on the Samoa Peninsula in HUM Co. Possibly threatened by coastal development, air pollution, and climate change. Usually on Picea sitchensis, Pinus contorta var. contorta, Pseudotsuga menziesii, Abies grandis, and Tsuga heterophylla. Similar to B. pseudocapillaris and Sulcaria badia. See Bulletin of the California Lichen Society 15(1):4-6 (2008) for CALS Conservation Committee sponsorship.
Calandrinia breweri	Brewer's calandrinia	4.2	None	None	(Jan)Mar-Jun	Chaparral, Coastal scrub	sandy or loamy, disturbed sites and burns	1220	4005	Potentially threatened by development. Possibly threatened by fire suppression and road maintenance. Plant appears to be widely scattered but uncommon everywhere, and most collections are old; needs field surveys. See Proceedings of the American Academy of Arts and Sciences 11:124 (1876) for original description.
Calochortus fimbriatus	late-flowered mariposa lily	1B.3	None	None	Jun-Aug	Chaparral, Cismontane woodland, Riparian woodland	often serpentinite	1905	6250	Threatened by grazing, development, road maintenance, and fire suppression. See Proceedings of the California Academy of Sciences III 2:133 (1901) for original description.
Calochortus umbellatus	Oakland star-tulip	4.2	None	None	Mar-May	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest, Valley and foothill grassland	often serpentinite	700	2295	Possibly threatened by recreational activities. See Proceedings of the Academy of Natural Sciences of Philadelphia 20(6):168 (1868) for original description, and Proceedings of the California Academy of Sciences III 2:123-124 (1901) for taxonomic treatment.
Calochortus uniflorus	pink star-tulip	4.2	None	None	Apr-Jun	Coastal prairie, Coastal scrub, Meadows and seeps, North Coast coniferous forest		1070	3510	Threatened by agriculture, development, and non-native plants.
Calycadenia micrantha	small-flowered calycadenia	1B.2	None	None	Jun-Sep	Chaparral, Meadows and seeps (volcanic), Valley and foothill grassland	Roadsides, rocky, talus, scree, sometimes serpentinite, sparsely vegetated areas	1500	4920	Most populations small. Surveys at type locality unsuccessful in 2005. Threatened by road maintenance, and potentially threatened by fuel breaks, development, alteration of fire regimes, non-native plants, military activities, and feral pigs. Formerly included in C. truncata ssp. microcephala, a synonym of C. truncata in TJM (1993). See SIDA 21(2):261 (2004) for original description.
Calycadenia villosa	dwarf calycadenia	1B.1	None	None	May-Oct	Chaparral, Cismontane woodland, Meadows and seeps, Valley and foothill grassland	rocky, fine soils	1350	4430	Probably consists of northern and southern unrecognized subspecies. Habitat lost to construction of San Antonio Reservoir; also threatened by urbanization, vehicles, grazing, feral pigs, alteration of fire regimes, road construction, road maintenance, and non-native plants.
Calyptridium parryi var. hesseae	Santa Cruz Mountains pussypaws	1B.1	None	None	May-Aug	Chaparral, Cismontane woodland	sandy or gravelly, openings	1530	5020	Threatened by alteration of fire regime, development, non-native plants, and mining.
Calystegia collina ssp. venusta	South Coast Range morning-glory	4.3	None	None	Apr-Jun	Chaparral, Cismontane woodland, Valley and foothill grassland	serpentinite or sedimentary	1490	4890	Can be relatively abundant and tolerant of disturbance. See Kew Bulletin 35(2):328 (1980) for original description.
Camissonia benitensis	San Benito evening-primrose	1B.1	None	FT	Apr-Jun	Chaparral, Cismontane woodland, Valley and foothill grassland	serpentinite alluvium, clay or gravelly	1280	4200	Known only from the New Idria area. Seriously threatened by vehicles. Protected in part at ACEC (BLM). See Contributions from the U.S. National Herbarium 37(5):332 (1969) for original description.
Camissoniopsis hardhamiae	Hardham's evening-primrose	1B.2	None	None	Mar-May	Chaparral, Cismontane woodland	sandy, decomposed carbonate, disturbed or burned areas	945	3100	Threatened by proposed road construction in SLO Co; also threatened by grazing, mining, military activities, non-native plants, road maintenance, and vehicles. See Contributions from the U.S. National Herbarium 37(5):301 (1969) for original description.
Campanula californica	swamp harebell	1B.2	None	None	Jun-Oct	Bogs and fens, Closed-cone coniferous forest, Coastal prairie, Meadows and seeps, Marshes and swamps (freshwater), North Coast coniferous forest	mesic	405	1330	Many occurrences have few plants. Threatened by competition, grazing, development, marsh habitat loss, logging, road maintenance, and trampling. See Proceedings of the California Academy of Sciences I 2:158 (1861) for original description.
Carex comosa	bristly sedge	2B.1	None	None	May-Sep	Coastal prairie, Marshes and swamps (lake margins), Valley and foothill grassland		625	2050	Location, rarity, and endangerment information needed; need historical quads for SFO Co. Fairly widely distributed, but apparently rarely collected. Threatened by marsh drainage and road maintenance. Endangered in ID, endangered in OR, and state-listed as Sensitive in WA.
Carex obispoensis	San Luis Obispo sedge	1B.2	None	None	Apr-Jun	Closed-cone coniferous forest, Chaparral, Coastal prairie, Coastal scrub, Valley and foothill grassland	often serpentinite seeps, sometimes gabbro; often on clay soils	820	2690	Threatened by grazing, non-native plants, military activities, and mining. Possibly threatened by recreational activities.
Carex saliniformis	deceiving sedge	1B.2	None	None	May-Jun(Jul)	Coastal prairie, Coastal scrub, Meadows and seeps, Marshes and swamps (coastal salt)	mesic	230	755	Possibly threatened by grazing. See Bulletin of the Torrey Botanical Club 36(8):477 (1909) for original description.

Carlquistia muirii	Muir's tarplant	1B.3	None	None	Jul-Aug(Oct)	Chaparral (montane), Lower montane coniferous forest, Upper montane coniferous forest	granitic	2500	8200	Possibly threatened by recreational activities. A synonym of Raillardiopsis muirii in The Jepson Manual (1993). See Botany of California 1:618 (1876) for original description, and Novon 9:462-471 (1999) for revised nomenclature
Castilleja ambigua var. ambigua	johnny-nip	4.2	None	None	Mar-Aug	Coastal bluff scrub, Coastal prairie, Coastal scrub, Marshes and swamps, Valley and foothill grassland, Vernal pools margins		435	1425	Threatened by development. See C. ambigua ssp. ambigua in TJM 2. See Phytologia 90(1):63-82 (2008) for revised nomenclature.
Castilleja ambigua var. insalutata	pink Johnny-nip	1B.1	None	None	May-Aug	Coastal prairie, Coastal scrub		100	330	Threatened by development. Possibly threatened by non-native plants. See C. ambigua ssp. insalutata in TJM 2. See Manual of the Flowering Plants of California (Jepson 1925) for original taxonomy and Phytologia 90(1):63-82 (2008) for revised nomenclature.
Castilleja latifolia	Monterey Coast paintbrush	4.3	None	None	Feb-Sep	Closed-cone coniferous forest, Cismontane woodland (openings), Coastal dunes, Coastal scrub	sandy	185	605	Threatened by non-native plants and sand mining.
Caulanthus lemmonii	Lemmon's jewelflower	1B.2	None	None	Feb-May	Pinyon and juniper woodland, Valley and foothill grassland		1580	5185	Need quads for SBT Co. Threatened by development, grazing, and vehicles. See Proceedings of the American Academy of Arts and Sciences 23:261 (1888) for original description, and Aliso 4(3):503 (1960) for revised nomenclature.
Ceanothus rigidus	Monterey ceanothus	4.2	None	None	Feb-Apr(Jun)	Closed-cone coniferous forest, Chaparral, Coastal scrub	sandy	550	1805	Threatened by development. Plants identified as C. rigidus in SLO and SBA cos. are part of the C. cuneatus complex, and may belong to an undescribed taxon.
Centromadia parryi ssp. congdonii	Congdon's tarplant	1B.1	None	None	May-Oct(Nov)	Valley and foothill grassland (alkaline)		230	755	Severely threatened by development. Possibly threatened by grazing and non-native plants. A synonym of Hemizonia parryi ssp. congdonii in TJM (1993). See Botanical Gazette 22:169 (1896) for original description, and Novon 9:462-471 (1999) for revised nomenclature.
Chlorogalum purpureum var. purpureum	Santa Lucia purple amole	1B.1	None	FT	Apr-Jun	Chaparral, Cismontane woodland, Valley and foothill grassland	gravelly, clay	385	1265	Known only from Ft. Hunter Liggett and Camp Roberts. Threatened by habitat fragmentation, habitat conversion, non-native plants, foot traffic, vehicles, and military activities. Potentially threatened by grazing. See Zoe 4:159 (1893) for original description.
Chorizanthe biloba var. immemora	Hernandez spineflower	1B.2	None	None	May-Aug(Sep)	Chaparral, Cismontane woodland	Usually serpentinite, often gravelly, sometimes clay	1115	3660	Possibly threatened by trampling. See Phytologia 66(2):137-139 (1989) for original description.
Chorizanthe breweri	Brewer's spineflower	1B.3	None	None	Apr-Aug	Closed-cone coniferous forest, Chaparral, Cismontane woodland, Coastal scrub	serpentinite, rocky or gravelly	800	2625	Threatened by pipeline construction. Possibly threatened by road construction, road maintenance, and vehicles. Closely related to C. staticoides. See Proceedings of the American Academy of Arts and Sciences 12:270 (1877) for original description, and Phytologia 66(2):163-164 (1989) for taxonomic treatment.
Chorizanthe douglasii	Douglas' spineflower	4.3	None	None	Apr-Jul	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Valley and foothill grassland	sandy or gravelly	1600	5250	Possibly threatened by non-native plants. See Phytologia 66(2):118-120 (1989) for taxonomic treatment.
Chorizanthe minutiflora	Fort Ord spineflower	1B.2	None	None	Apr-Jul	Chaparral (maritime), Coastal scrub	Sandy openings	150	490	Discovered in 1994 by R. Morgan. Threatened by lack of disturbance and chaparral succession. Also threatened by non-native plants. See Phytoneuron 63:1-9 (2014) for original description.
Chorizanthe palmeri	Palmer's spineflower	4.2	None	None	Apr-Aug	Chaparral, Cismontane woodland, Valley and foothill grassland	rocky, serpentinite	945	3100	Does plant occur in SBT Co.? Isolated populations show local differences. Taxonomic revision in Phytologia 66(4):295-441 (1989) indicates species occurs mainly in the Santa Lucia Mtns. of MNT and SLO counties. See Proceedings of the American Academy of Arts and Sciences 12:271 (1877) for original description, and Phytologia 66(2):135-137 (1989) for taxonomic treatment.
Chorizanthe pungens var. hartwegiana	Ben Lomond spineflower	1B.1	None	FE	Apr-Jul	Lower montane coniferous forest (maritime ponderosa pine sandhills)		610	2000	Known only from sandhill parklands in the Santa Cruz Mtns. Threatened by sand mining, development, and non-native plants. See C. pungens in The Jepson Manual. See Annals of the Missouri Botanical Garden 21:37 (1934) for original description, and Phytologia 66(2):123-126 (1989) for taxonomic treatment, Fremontia 24(4):8-11 (1996) for taxonomic discussion, and Madroño 45(2):119-127 (1998) for ecological information.

Chorizanthe pungens var. pungens	Monterey spineflower	1B.2	None	FT	Apr-Jun(Jul-Aug)	Chaparral (maritime), Cismontane woodland, Coastal dunes, Coastal scrub, Valley and foothill grassland	sandy	450	1475	Collected in SLO Co. only once (1842). Threatened by foot traffic, urbanization, recreational development and activities, agriculture, military activities, and non-native plants. Possibly threatened by road construction. See C. pungens in The Jepson Manual. See Phytologia 66(2):123-125 (1989) for taxonomic treatment, and Fremontia 24(4):8-11 (1996) for taxonomic discussion.
Chorizanthe rectispina	straight-awned spineflower	1B.3	None	None	Apr-Jul	Chaparral, Cismontane woodland, Coastal scrub		1035	3395	Possibly threatened by development and non-native plants. See Annals of the Missouri Botanical Garden 21:72 (1934) for original description, and Phytologia 66(2):143 (1989) for taxonomic treatment.
Chorizanthe robusta var. hartwegii	Scotts Valley spineflower	1B.1	None	FE	Apr-Jul	Meadows and seeps (sandy), Valley and foothill grassland (mudstone and Purisima outcrops)		245	805	Known only from Scotts Valley. Threatened by development, vehicles, and non-native plants. See C. robusta in TJM (1993). See Phytologia 67(5):357-360 (1989) for revised nomenclature, and Fremontia 24(4):8-11 (1996) for taxonomic discussion.
Chorizanthe robusta var. robusta	robust spineflower	1B.1	None	FE	Apr-Sep	Chaparral (maritime), Cismontane woodland (openings), Coastal dunes, Coastal scrub	sandy or gravelly	300	985	Threatened by development, recreation, mining, and non-native plants. See C. robusta in The Jepson Manual. See Phytologia 66(2):130-131 (1989) for taxonomic treatment, and Fremontia 24(4):8-11 (1996) for taxonomic discussion.
Chorizanthe ventricosa	potbellied spineflower	4.3	None	None	May-Sep	Cismontane woodland, Valley and foothill grassland	serpentinite	1235	4050	Closely related to C. palmeri. See Leaflets of Western Botany 2(2):193 (1939) for original description, and Phytologia 66(2):139-140 (1989) for taxonomic treatment.
Cirsium occidentale var. compactum	compact cobwebby thistle	1B.2	None	None	Apr-Jun	Chaparral, Coastal dunes, Coastal prairie, Coastal scrub		150	490	Threatened by grazing and insect predation, and potentially by road construction and development. Some inland plants weakly separated from var. occidentale. Compact, low-growing plants from MNT Co. (344C) are probably not var. compactum.
Cirsium scariosum var. loncholepis	La Graciosa thistle	1B.1	CT	FE	May-Aug	Cismontane woodland, Coastal dunes, Coastal scrub, Marshes and swamps (brackish), Valley and foothill grassland	mesic, sandy	220	720	Threatened by development, vehicles, groundwater pumping, and non-native plants. Possibly threatened by grazing.
Clarkia breweri	Brewer's clarkia	4.2	None	None	Apr-Jun	Chaparral, Cismontane woodland, Coastal scrub	often serpentinite	1115	3660	Threatened by cattle grazing, and potentially by reservoir construction.
Clarkia concinna ssp. automixa	Santa Clara red ribbons	4.3	None	None	(Apr)May-Jun(Jul)	Chaparral, Cismontane woodland		1500	4920	See Madroño 34(1):41-47 (1987) for original description.
Clarkia jolonensis	Jolon clarkia	1B.2	None	None	Apr-Jun	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland		660	2165	Can be confused with C. lewisii. Threatened by grazing. Possibly threatened by foot traffic and non-native plants. See Madroño 20(6):322 (1970) for original description.
Clarkia lewisii	Lewis' clarkia	4.3	None	None	May-Jul	Broadleafed upland forest, Closed-cone coniferous forest, Chaparral, Cismontane woodland, Coastal scrub		1195	3920	Possibly threatened by non-native plants. Can be confused with C. jolonensis. See Annals of the Missouri Botanical Garden 64:642 (1977) for revised taxonomy.
Clinopodium mimuloides	monkey-flower savory	4.2	None	None	Jun-Oct	Chaparral, North Coast coniferous forest	streambanks, mesic	1800	5905	See Satureja mimuloides in The Jepson Manual (1993). See Rev. Gen. Pl. 2: 515 (1891) for revised nomenclature.
Collinsia antonina	San Antonio collinsia	1B.2	None	None	Mar-May	Chaparral, Cismontane woodland		365	1200	Possibly threatened by grazing and road maintenance. As treated here, includes sspp. antonina and purpurea. A synonym of C. parryi in The Jepson Manual. See Leaflets of Western Botany 10:133-135 (1964) for original description, and Madroño 49(4):295-297 (2002) for discussion of taxonomic distinctiveness.
Collinsia multicolor	San Francisco collinsia	1B.2	None	None	(Feb)Mar-May	Closed-cone coniferous forest, Coastal scrub	sometimes serpentinite	250	820	Threatened by non-native plants, foot traffic and urbanization.
Cordylanthus rigidus ssp. littoralis	seaside bird's-beak	1B.1	CE	None	Apr-Oct	Closed-cone coniferous forest, Chaparral (maritime), Cismontane woodland, Coastal dunes, Coastal scrub	sandy, often disturbed sites	515	1690	Threatened by development, energy projects, road widening, vehicles, and military operations. Possibly threatened by non-native plants. See Bulletin of the Torrey Botanical Club 45:399-423 (1918) for original description, and Systematic Botany Monographs 10:35-48 (1986) for taxonomic treatment.
Corethrogyne leucophylla	branching beach aster	3.2	None	None	May,Jul,Aug,Sep,Oct,Dec	Closed-cone coniferous forest, Coastal dunes		60	195	Move to CRPR 4? Potentially threatened by development. Needs taxonomic study; a synonym of Lessingia filaginifolia var. filaginifolia in TJM (1993).
Cryptantha rattanii	Rattan's cryptantha	4.3	None	None	Apr-Jul	Cismontane woodland, Riparian woodland, Valley and foothill grassland		915	3000	See C. decipiens in The Jepson Manual.

Cypripedium fasciculatum	clustered lady's-slipper	4.2	None	None	Mar-Aug	Lower montane coniferous forest, North Coast coniferous forest	usually serpentinite seeps and streambanks	2435	7990	Widely scattered, but most occurrences small. Not seen recently in SCL or SMT counties. Threatened by logging and horticultural collecting. Monitoring needed for protected populations on USFS lands to assess reproduction, which may be inadequate. Threatened in ID, candidate for state listing in OR, and state-listed as Threatened in WA. See Proceedings of the American Academy of Arts and Sciences 17:380 (1882) for original description, Lindleyana 2(1):553-57 (1987) for distributional information, and Fremontia 17(2):17-19 (1989) and The Wild Orchids of California, p. 65-68 (1995) by R. Coleman for species accounts.
Cypripedium montanum	mountain lady's-slipper	4.2	None	None	Mar-Aug	Broadleafed upland forest, Cismontane woodland, Lower montane coniferous forest, North Coast coniferous forest		2225	7300	Widely scattered, but most occurrences small. Many protected populations on USFS land not reproducing. Threatened by logging and horticultural collecting. Possibly threatened by road maintenance, vehicles, recreational activities, non-native plants, alteration of fire regimes, and grazing. On watch list in OR. See Fremontia 17(2):17-19 (1989) and The Wild Orchids of California, p. 69-72 (1995) by R. Coleman for species accounts.
Dacryophyllum falcifolium	tear drop moss	1B.3	None	None		North Coast coniferous forest	carbonate	275	900	Known in CA from Monterey and Santa Cruz Counties. See Novon 14: 70-74 (2004) for original description.
Deinandra halliana	Hall's tarplant	1B.2	None	None	(Mar)Apr-May	Chenopod scrub, Cismontane woodland, Valley and foothill grassland	clay, sometimes alkaline	950	3115	Threatened by grazing and non-native plants. Appears only in unusually wet years. A synonym of Hemizonia halliana in The Jepson Manual. See Madroño 3(1):12 (1935) for original description, and Novon 9:462-471 (1999) for revised nomenclature.
Delphinium californicum ssp. interius	Hospital Canyon larkspur	1B.2	None	None	Apr-Jun	Chaparral (openings), Cismontane woodland (mesic), Coastal scrub		1095	3595	Threatened by vehicles and recreational activities. See Leaflets of Western Botany 2:137 (1938) for original description.
Delphinium gypsophilum ssp. parviflorum	small-flowered gypsum-loving larkspur	3.2	None	None	(Mar)Apr-Jun	Cismontane woodland, Valley and foothill grassland	Rocky clay, sometimes serpentinite.	350	1150	Move to List 1B? Previously on List 4.3; apparently rarer than previously thought. May not be distinct from D. gypsophilum; a synonym of this plant in TJM 2. Needs further study. Threatened by grazing. Possibly threatened by road widening. See Brittonia 8(1):5 (1954) for original description, and Madroño 48(2):90-97 (2001) for alternate taxonomic treatment.
Delphinium hutchinsoniae	Hutchinson's larkspur	1B.2	None	None	Mar-Jun	Broadleafed upland forest, Chaparral, Coastal prairie, Coastal scrub		427	1400	Threatened by foot traffic, non-native plants, recreational activities, grazing and trampling. See Bulletin of the Torrey Botanical Club 78:379 (1951) for original description.
Delphinium recurvatum	recurved larkspur	1B.2	None	None	Mar-Jun	Chenopod scrub, Cismontane woodland, Valley and foothill grassland	alkaline	790	2590	Many occurrences historical; need current information on status. Much habitat converted to agriculture; also threatened by grazing, trampling, and non-native plants.
Delphinium umbraculorum	umbrella larkspur	1B.3	None	None	Apr-Jun	Chaparral, Cismontane woodland		1600	5250	Possibly threatened by grazing. Hybridizes with D. parryi ssp. parryi. See Brittonia 8:19 (1954) for original description, and Phytologia 67(6):490-491 (1989) for taxonomic treatment.
Elymus californicus	California bottle-brush grass	4.3	None	None	May-Aug(Nov)	Broadleafed upland forest, Cismontane woodland, North Coast coniferous forest, Riparian woodland		470	1540	Possibly threatened by fire suppression.
Eriastrum luteum	yellow-flowered eriastrum	1B.2	None	None	May-Jun	Broadleafed upland forest, Chaparral, Cismontane woodland	sandy or gravelly	1000	3280	Threatened by vehicles and grazing. Possibly threatened by development. See Madroño 8:81 (1945) for revised nomenclature.
Eriastrum virgatum	virgate eriastrum	4.3	None	None	May-Jul	Coastal bluff scrub, Chaparral, Coastal dunes, Coastal scrub	sandy	700	2295	Threatened by competition, grazing, and development.
Ericameria fasciculata	Eastwood's goldenbush	1B.1	None	None	Jul-Oct	Closed-cone coniferous forest, Chaparral (maritime), Coastal dunes, Coastal scrub	sandy, openings	275	900	Known only from the Monterey Bay area. Threatened by development. See Bulletin of the Torrey Botanical Club 32: 215 (1905) for original description, and Madroño 57(2):77-84 (2010) for effects of fire and restoration information.
Eriogonum argillosum	clay buckwheat	4.3	None	None	Mar-Jun	Cismontane woodland (serpentinite or clay)		800	2625	See Phytologia 66(4):376 (1989) for taxonomic treatment.
Eriogonum butterworthianum	Butterworth's buckwheat	1B.3	CR	None	Jun-Jul	Chaparral (sandstone), Valley and foothill grassland	sandy	740	2430	See Leaflets of Western Botany 9(9-10):153-154 (1961) for original description, and Phytologia 66(4):328 (1989) for taxonomic treatment. Potentially threatened by foot traffic.
Eriogonum eastwoodianum	Eastwood's buckwheat	1B.3	None	None	May-Sep	Cismontane woodland, Valley and foothill grassland	sandy, shale, talus, or barren clay	1000	3280	Marginally distinct from E. temblorense and E. vestitum; only fully mature plants can be identified with certainty. Potentially threatened by road maintenance and grazing. See Leaflets of Western Botany 2: 133 (1938) for original description, and Phytologia 66(4): 374-375 (1989) and Flora North America 5: 417-418 (2005) for taxonomic treatment.

Eriogonum elegans	elegant wild buckwheat	4.3	None	None	May-Nov	Cismontane woodland, Valley and foothill grassland	Usually sandy or gravelly, often washes, sometimes roadsides	1525	5005	Similar to E. baileyi. See Pittonia 2:161-216 (1891) for original description.
Eriogonum heermannii var. occidentale	western Heermann's buckwheat	1B.2	None	None	Jul-Oct	Cismontane woodland (openings)	Often serpentinite; usually roadsides or alluvium floodplains, rarely clay or shale slopes	795	2610	Previously CRPR 4.2; rarer than originally thought. Possibly threatened by hydrological alterations caused by past vehicle use. See Leaflets of Western Botany 1(4):30 (1932) for original description, and Phytologia 66(4):314-316 (1989) for taxonomic treatment.
Eriogonum nortonii	Pinnacles buckwheat	1B.3	None	None	(Apr)May-Aug(Sep)	Chaparral, Valley and foothill grassland	sandy, often on recent burns	975	3200	See Phytologia 66(4):376 (1989) for taxonomic treatment.
Eriogonum nudum var. decurrens	Ben Lomond buckwheat	1B.1	None	None	Jun-Oct	Chaparral, Cismontane woodland, Lower montane coniferous forest (maritime ponderosa pine sandhills)	sandy	800	2625	Threatened by development and sand mining. See Phytologia 66(4):329-333 (1989) for taxonomic treatment.
Eriogonum nudum var. indictum	protruding buckwheat	4.2	None	None	(Apr)May-Oct(Dec)	Chaparral, Chenopod scrub, Cismontane woodland	clay, serpentinite	1463	4800	Not always distinct from var. auriculatum in FRE and SBT counties. See Flora of California 1(4):421 (1914) by W.L. Jepson for original description, and Phytologia 66(4):329-332 (1989) for taxonomic treatment.
Eriogonum temblorense	Temblor buckwheat	1B.2	None	None	(Apr)May-Sep	Valley and foothill grassland (clay or sandstone)		1000	3280	Marginally distinct from E. eastwoodianum; needs study. Threatened by energy development. See Leaflets of Western Botany 10:45 (1963) for original description, and Phytologia 66(4):375 (1989) for taxonomic treatment.
Eriogonum umbellatum var. bahiiforme	bay buckwheat	4.2	None	None	Jul-Sep	Cismontane woodland, Lower montane coniferous forest	rocky, often serpentinite	2200	7220	See Phytologia 66(4): 341-346 (1989) for taxonomic treatment.
Eriophyllum jepsonii	Jepson's woolly sunflower	4.3	None	None	Apr-Jun	Chaparral, Cismontane woodland, Coastal scrub	sometimes serpentinite	1025	3365	
Erysimum ammophilum	sand-loving wallflower	1B.2	None	None	Feb-Jun	Chaparral (maritime), Coastal dunes, Coastal scrub	sandy, openings	60	195	Need quads for SRO Isl. Occurrences from SDG Co. previously included in this species are E. capitatum ssp. capitatum. Threatened by development.
Erysimum franciscanum	San Francisco wallflower	4.2	None	None	Mar-Jun	Chaparral, Coastal dunes, Coastal scrub, Valley and foothill grassland	often serpentinite or granitic, sometimes roadsides	550	1805	Rare and declining in SCR Co. Possibly threatened by recreational activities and non-native plants. Includes E. franciscanum var. crassifolium. Inland plants approach E. capitatum. See Aliso 4(1):118-121 (1958) for original description.
Erysimum menziesii	Menzies? wallflower	1B.1	CE	FE	Mar-Sep	Coastal dunes		35	115	Plants treated as sspp. eurekaense (known only from the Humboldt Bay area; threatened by development, vehicles, and non-native plants), menziesii (nearly extirpated on the Monterey Peninsula; seriously threatened by development, vehicles, deer browsing, and non-native plants), and yadonii (known only from near Marina on Monterey Bay; threatened by development and sand mining) are not validly published; see these names in TJM (1993). See Zoe 5(6-8):103 (1901) for original description.
Erysimum teretifolium	Santa Cruz wallflower	1B.1	CE	FE	Mar-Jul	Chaparral, Lower montane coniferous forest	inland marine sands	610	2000	Seriously threatened by development, sand mining, and vandalism. See Leaflets of Western Botany 2(5):73 (1938) for original description.
Erythranthe hardhamiae	Santa Lucia monkeyflower	1B.1	None	None	Mar-May	Chaparral (openings)	sandy, sandstone outcrops, sometimes serpentinite	730	2395	Many occurrences historical; needs field surveys. Threatened by development. Possibly threatened by grazing, road maintenance, and non-native plants. Previously identified as E. palmeri. Similar to E. androsacea. Not in TJM 2. See Aliso 30(1):49-68 (2012) for original description.
Eschscholzia hypocoides	San Benito poppy	4.3	None	None	Mar-Jun	Chaparral, Cismontane woodland, Valley and foothill grassland	serpentinite clay	1500	4920	
Extriplex joaquinana	San Joaquin spearscale	1B.2	None	None	Apr-Oct	Chenopod scrub, Meadows and seeps, Playas, Valley and foothill grassland	alkaline	835	2740	Many occurrences extirpated. Need historical quads for TUL Co. Need quads for MNT Co. Report from SLO Co. (247D) needs verification. Threatened by grazing, agriculture, development, and non-native plants. See Proceedings of the American Academy of Arts and Sciences 9:108 (1874) for original description, Proceedings of the Biological Society of Washington 17:99 (1904) for alternative nomenclature, and Systematic Botany 35(4):839-857 (2010) for revised nomenclature.
Fissidens pauperculus	minute pocket moss	1B.2	None	None		North Coast coniferous forest (damp coastal soil)		1024	3360	See Erythra 2:97-101 (1894) for original description.
Fritillaria agrestis	stinkbells	4.2	None	None	Mar-Jun	Chaparral, Cismontane woodland, Pinyon and juniper woodland, Valley and foothill grassland	Clay, sometimes serpentinite	1555	5100	Most populations small. Threatened by development, grazing, and vehicles. Possibly threatened by non-native plants.
Fritillaria falcata	talus fritillary	1B.2	None	None	Mar-May	Chaparral, Cismontane woodland, Lower montane coniferous forest	serpentinite, often talus	1525	5005	Threatened by vehicles. See Flora of California 1(6):309 (1922) by W.L. Jepson for original description, and Madroño 7(5):133-159 (1944) for revised nomenclature.

<i>Fritillaria liliacea</i>	fragrant fritillary	1B.2	None	None	Feb-Apr	Cismontane woodland, Coastal prairie, Coastal scrub, Valley and foothill grassland	Often serpentinite	410	1345	Threatened by grazing, agriculture, urbanization, and non-native plants. Possibly threatened by recreational activities and foot traffic. Quite variable.
<i>Fritillaria ojaiensis</i>	Ojai fritillary	1B.2	None	None	Feb-May	Broadleafed upland forest (mesic), Chaparral, Cismontane woodland, Lower montane coniferous forest	rocky	998	3275	Possibly threatened by road maintenance and recreational activities. Closely related to <i>F. affinis</i> .
<i>Fritillaria viridea</i>	San Benito fritillary	1B.2	None	None	Mar-May	Chaparral, Cismontane woodland	Serpentinite slopes; sometimes streambanks, sometimes rocky, sometimes roadsides	1525	5005	Needs study; plants from MNT Co. may be <i>F. ojaiensis</i> . Threatened by vehicles and expansion of mining. See Proceedings of the California Academy of Sciences 2:9 (1863) for original description.
<i>Galium andrewsii</i> ssp. <i>gatense</i>	phlox-leaf serpentine bedstraw	4.2	None	None	Apr-Jul	Chaparral, Cismontane woodland, Lower montane coniferous forest	serpentinite, rocky	1450	4755	See Brittonia 10:186 (1958) for original description, and Flora of California 4(2):35-36 (1979) by L. Dempster for taxonomic treatment.
<i>Galium californicum</i> ssp. <i>lucense</i>	Cone Peak bedstraw	1B.3	None	None	Mar-Sep	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest	Often rocky, rarely serpentinite	1525	5005	See Madroño 18(4):107 (1965) for original description, and Flora of California 4(2):39-40 (1979) by L. Dempster for taxonomic treatment.
<i>Galium clementis</i>	Santa Lucia bedstraw	1B.3	None	None	(Apr)May-Jul	Lower montane coniferous forest, Upper montane coniferous forest	granitic or serpentinite, rocky	1780	5840	See Leaflets of Western Botany 1:56 (1933) for original description, and Flora of California 4(2):38 (1979) by L. Dempster for taxonomic treatment.
<i>Galium cliftonsmithii</i>	Santa Barbara bedstraw	4.3	None	None	May-Jul	Cismontane woodland		1220	4005	See Brittonia 10:183 (1958) for original description, and Flora of California 4(2):44 (1979) by L. Dempster for taxonomic treatment.
<i>Galium hardhamiae</i>	Hardham's bedstraw	1B.3	None	None	Apr-Oct	Closed-cone coniferous forest, Chaparral	serpentinite	975	3200	See Madroño 16(5):166 (1962) for original description, and Flora of California 4(2):35 (1979) by L. Dempster for taxonomic treatment.
<i>Gilia tenuiflora</i> ssp. <i>amplifaucalis</i>	trumpet-throated gilia	4.3	None	None	Mar-Apr	Cismontane woodland, Valley and foothill grassland	sandy	900	2955	See Aliso 3(3):246 (1956) for original description.
<i>Gilia tenuiflora</i> ssp. <i>arenaria</i>	Monterey gilia	1B.2	CT	FE	Apr-Jun	Chaparral (maritime), Cismontane woodland, Coastal dunes, Coastal scrub	sandy, openings	45	150	Seriously threatened by development, sand mining, vehicles, recreational activities, foot traffic, and non-native plants. Intergrades with ssp. <i>tenuiflora</i> near the Salinas River mouth. See Aliso 3(3):246 (1956) for revised nomenclature.
<i>Githopsis tenella</i>	delicate bluecup	1B.3	None	None	Apr-Jun	Chaparral, Cismontane woodland	mesic, serpentinite	1900	6235	Possibly also in the Cholame Hills, MNT Co.; need confirmation. Threatened by foot traffic and recreational activities. See Systematic Botany 8(4):465 (1983) for original description.
<i>Grimmia torenii</i>	Toren's grimmia	1B.3	None	None		Chaparral, Cismontane woodland, Lower montane coniferous forest	Openings, rocky, boulder and rock walls, carbonate, volcanic	1160	3805	Similar to <i>G. ovalis</i> and <i>G. tergestina</i> . See The Bryologist 111(3):463-475 (2008) for original description.
<i>Grimmia vaginulata</i>	vaginate grimmia	1B.1	None	None		Chaparral (openings)	Rocky, boulder and rock walls, carbonate	685	2245	Potentially threatened by fire. Similar to <i>G. anodon</i> and <i>G. plagiopodia</i> . See Madroño 58(3):190-198 (2011) for original description.
<i>Grindelia hirsutula</i> var. <i>maritima</i>	San Francisco gumplant	3.2	None	None	Jun-Sep	Coastal bluff scrub, Coastal scrub, Valley and foothill grassland	sandy or serpentinite	400	1310	Previously on List 1B. Plants from MNT and SCR counties need verification. Threatened by coastal development and non-native plants. Can be difficult to identify; many herbarium specimens need to be checked for correct identification. May be a hybrid between <i>G. hirsutula</i> var. <i>hirsutula</i> and <i>G. stricta</i> var. <i>platyphylla</i> or <i>G. stricta</i> var. <i>angustifolia</i> ; needs further study. Not in TJM 2. See Pittonia 2:289 (1892) for original description and Novon 2(3):215-217 (1992) for revised nomenclature.
<i>Hesperevax caulescens</i>	hogwallow starfish	4.2	None	None	Mar-Jun	Valley and foothill grassland (mesic, clay), Vernal pools (shallow)	sometimes alkaline	505	1655	Threatened by development and agriculture. Possibly threatened by overgrazing. See Proceedings of the American Academy of Arts and Sciences 7:356 (1868) for revised nomenclature, and Systematic Botany 17(2):293-310 (1992) for taxonomic treatment.
<i>Hesperevax sparsiflora</i> var. <i>brevifolia</i>	short-leaved evax	1B.2	None	None	Mar-Jun	Coastal bluff scrub (sandy), Coastal dunes, Coastal prairie		215	705	Threatened by development, competition with non-native plants, foot traffic, and recreational activities. Potentially threatened by trail construction. May intergrade with var. <i>sparsiflora</i> in the San Francisco Bay area. On review list in OR. See Synoptical Flora of North America 1(2):229 (1884) for original description, and Systematic Botany 17:293-310 (1992) for revised nomenclature.

Hesperocyparis abramsiana var. abramsiana	Santa Cruz cypress	1B.2	CE	FT		Closed-cone coniferous forest, Chaparral, Lower montane coniferous forest	sandstone or granitic	800	2625	Known only from the Santa Cruz Mtns. Threatened by development, agriculture, alteration of fire regimes, and introgression from planted H. macrocarpa and H. glabra. See Cupressus abramsiana in The Jepson Manual (1993); USFWS also uses this name. See Aliso 1:215-222 (1948) for original description, Madroño 2(4):189-194 (1952) for distributional information, and Phytologia 91(1):160-185 and 91(2):287-299 (2009) for taxonomic treatments.
Hesperocyparis goveniana	Gowen cypress	1B.2	None	FT		Closed-cone coniferous forest, Chaparral (maritime)		300	985	Threatened by development and altered fire regimes, and possibly by non-native plants.
Hesperocyparis macrocarpa	Monterey cypress	1B.2	None	None		Closed-cone coniferous forest		30	100	
Hoita strobilina	Loma Prieta hoita	1B.1	None	None	May-Jul(Aug-Oct)	Chaparral, Cismontane woodland, Riparian woodland	usually serpentinite, mesic	860	2820	Threatened by urbanization. Possibly threatened by feral pigs and foot traffic. See North American Flora 24:11 (1919) for revised nomenclature, and Memoirs of the New York Botanical Garden 61:1-114 (1990) for taxonomic treatment.
Holocarpha macradenia	Santa Cruz tarplant	1B.1	CE	FT	Jun-Oct	Coastal prairie, Coastal scrub, Valley and foothill grassland	often clay, sandy	220	720	All extant CCA Co. occurrences (465B, 466A) are introduced; nearly half have failed. Last remaining natural population in the S.F. Bay Area extirpated by development in 1993. Seriously threatened by urbanization, agriculture, non-native plants, and lack of appropriate ecological disturbance. See Fremontia 5(4):15-16 (1978) for species account.
Horkelia cuneata var. sericea	Kellogg's horkelia	1B.1	None	None	Apr-Sep	Closed-cone coniferous forest, Chaparral (maritime), Coastal dunes, Coastal scrub	sandy or gravelly, openings	200	655	Threatened by coastal development. Historical occurrences need field surveys. Occurrence from the Crocker Hills probably last remaining location in S.F. Bay; remaining plants less distinct from ssp. cuneata than those formerly occurring near San Francisco. See Novon 17(3):315-325 (2007) for revised nomenclature.
Horkelia marinensis	Point Reyes horkelia	1B.2	None	None	May-Sep	Coastal dunes, Coastal prairie, Coastal scrub	sandy	755	2475	Populations from near Ft. Bragg, MEN Co. may be varietally distinct. Historical occurrences need field surveys. Threatened by non-native plants and residential development. Possibly threatened by road maintenance and foot traffic. See Systematic Botany 18(1):137-144 (1993) for distributional information.
Horkelia yadonii	Santa Lucia horkelia	4.2	None	None	Apr-Jul	Broadleafed upland forest, Chaparral, Cismontane woodland, Meadows and seeps, Riparian woodland	granitic, sandy	1900	6235	Possibly threatened by vehicles and recreational activities. Confused with H. cuneata ssp. sericea, H. rydbergii, and H. tenuiloba. See Systematic Botany 18(1):139 (1993) for original description.
Hosackia gracilis	harlequin lotus	4.2	None	None	Mar-Jul	Broadleafed upland forest, Coastal bluff scrub, Closed-cone coniferous forest, Cismontane woodland, Coastal prairie, Coastal scrub, Meadows and seeps, Marshes and swamps, North Coast coniferous forest, Valley and foothill grassland	wetlands, roadsides	700	2295	Designated as Endangered in Canada. Threatened by development, grazing, feral pigs, habitat alteration, and competition. Thought to be a larval food plant of the Federally Endangered lotis blue butterfly (Lycaeides argyrognomon ssp. lotis).
Iris longipetala	coast iris	4.2	None	None	Mar-May	Coastal prairie, Lower montane coniferous forest, Meadows and seeps	mesic	600	1970	Many collections old; need field surveys. May hybridize with Iris missouriensis. Threatened by development and trampling.
Juncus luciensis	Santa Lucia dwarf rush	1B.2	None	None	Apr-Jul	Chaparral, Great Basin scrub, Lower montane coniferous forest, Meadows and seeps, Vernal pools		2040	6695	Potentially threatened by development.
Lagophylla diabolensis	Diablo Range hare-leaf	1B.2	None	None	Apr-Sep	Cismontane woodland, Valley and foothill grassland	Clay.	885	2905	Known only from the Diablo Range. Many occurrences historical; need field surveys. Possibly threatened by development and non-native plants. Formerly included within L. dichotoma, but genetic data show that L. diabolensis is actually more closely related to L. ramosissima. See Madroño 60(3):249-254 (2013) for original description.
Lagophylla dichotoma	forked hare-leaf	1B.1	None	None	Apr-May	Cismontane woodland, Valley and foothill grassland	Sometimes clay	335	1100	Threatened by vehicles and non-native plants. Many occurrences historical; need field surveys. Formerly included plants from the Diablo Range, which are now treated as L. diabolensis. Similar to L. minor. See Plantas Hartwegianas pp. 317-318 (1849) by G. Bentham for original description.

<i>Lasthenia californica</i> ssp. <i>macrantha</i>	perennial goldfields	1B.2	None	None	Jan-Nov	Coastal bluff scrub, Coastal dunes, Coastal scrub		520	1705	Threatened by competition from non-native plants and recreational activities. Potentially threatened by trail construction and foot traffic. See Report of the Pacific Railroad Expedition 4:106 (1857) for original description, University of California Publications in Botany 40:59-62 (1966) for taxonomic treatment, and Madrono 48(3): 208 (2001) for revised nomenclature.
<i>Lasthenia conjugens</i>	Contra Costa goldfields	1B.1	None	FE	Mar-Jun	Cismontane woodland, Playas (alkaline), Valley and foothill grassland, Vernal pools	mesic	470	1540	Many historical occurrences extirpated by development and agriculture. Currently threatened by development, habitat alteration, hydrological alterations, overgrazing, and non-native plants. See Pittonia 1:221 (1888) for original description, and Madroño 50(2):83-93 (2003) for ecological information.
<i>Lasthenia ferrisiae</i>	Ferris' goldfields	4.2	None	None	Feb-May	Vernal pools (alkaline, clay)		700	2295	Threatened by development and agriculture. Possibly threatened by vehicles and foot traffic. See University of California Publications in Botany 40:74 (1966) for original description.
<i>Lasthenia leptalea</i>	Salinas Valley goldfields	4.3	None	None	Feb-Apr	Cismontane woodland, Valley and foothill grassland		1065	3495	See Proceedings of the American Academy of Arts and Sciences 6:546 (1865) for original description, University of California Publications in Botany 40:63-66 (1969) for revised nomenclature, and Madroño 48(3):205-210 (2001) for taxonomic treatment.
<i>Layia carnosa</i>	beach layia	1B.1	CE	FE	Mar-Jul	Coastal dunes, Coastal scrub (sandy)		60	195	Threatened by coastal development, foot traffic, vehicles, and non-native plants.
<i>Layia heterotricha</i>	pale-yellow layia	1B.1	None	None	Mar-Jun	Cismontane woodland, Coastal scrub, Pinyon and juniper woodland, Valley and foothill grassland	alkaline or clay	1705	5595	Threatened by agricultural conversion and previous construction of San Antonio Reservoir, grazing, non-native plants, and vehicles. Potentially threatened by road maintenance and wind energy development.
<i>Legenere limosa</i>	legenere	1B.1	None	None	Apr-Jun	Vernal pools		880	2885	Many historical occurrences extirpated. Threatened by grazing, road widening, non-native plants, and development. See Pittonia 2:81 (1890) for original description, North American Flora 32(1):13-14 (1943) for revised nomenclature, and Wasmann Journal of Biology 33(1-2):91 (1975) for distributional information.
<i>Leptosiphon ambiguus</i>	serpentine leptosiphon	4.2	None	None	Mar-Jun	Cismontane woodland, Coastal scrub, Valley and foothill grassland	usually serpentinite	1130	3705	Threatened by non-native plants and habitat alteration. To be expected in other adjacent counties. A synonym of <i>Linanthus ambiguus</i> in TJM (1990). See Botanical Gazette 11:339 (1886) for original description, and Aliso 19(1):55-91 (2000) for revised nomenclature.
<i>Leptosiphon grandiflorus</i>	large-flowered leptosiphon	4.2	None	None	Apr-Aug	Coastal bluff scrub, Closed-cone coniferous forest, Cismontane woodland, Coastal dunes, Coastal prairie, Coastal scrub, Valley and foothill grassland	usually sandy	1220	4005	Many historical occurrences extirpated by development; need status information. A synonym of <i>Linanthus grandiflorus</i> in The Jepson Manual. See Pittonia 2:260 (1892) for revised nomenclature, and Aliso 19(1):55-91 (2000) for taxonomic treatment.
<i>Lessingia hololeuca</i>	woolly-headed lessingia	3	None	None	Jun-Oct	Broadleafed upland forest, Coastal scrub, Lower montane coniferous forest, Valley and foothill grassland	clay, serpentinite	305	1000	Move to List 4? Need location, rarity, and endangerment information. Probably more widespread in the southern Sacramento Valley, southern North Coast Ranges, and northern S.F. Bay. Possibly threatened by grazing, and non-native plants. See Flora Franciscana, p. 377 (1897) by E. Greene for original description, and University of California Publications in Botany 16:40 (1929) for taxonomic treatment.
<i>Lessingia tenuis</i>	spring lessingia	4.3	None	None	May-Jul	Chaparral, Cismontane woodland, Lower montane coniferous forest	openings	2150	7055	Possibly threatened by feral pigs, grazing, and alteration of fire regimes.
<i>Lilium rubescens</i>	redwood lily	4.2	None	None	Apr-Aug(Sep)	Broadleafed upland forest, Chaparral, Lower montane coniferous forest, North Coast coniferous forest, Upper montane coniferous forest	Sometimes serpentinite, sometimes roadsides	1910	6265	Increasingly rare in southern portion of range. Threatened by urbanization, horticultural collecting, logging, road construction and maintenance, non-native plants, and grazing. See Proceedings of the American Academy of Arts and Sciences 14:256 (1879) for original description.
<i>Lomatium parvifolium</i>	small-leaved lomatium	4.2	None	None	Jan-Jun	Closed-cone coniferous forest, Chaparral, Coastal scrub, Riparian woodland	serpentinite	700	2295	Rare in SCR Co.
<i>Lupinus albifrons</i> var. <i>abramsii</i>	Abrams' lupine	3.2	None	None	Apr-Jun	Broadleafed upland forest, Chaparral, Coastal scrub, Lower montane coniferous forest, Valley and foothill grassland	Sometimes serpentinite	2000	6560	Move to List 1B? Possibly more widespread, but only specimens from 320B match the type; plants from SLO Co. are probably var. <i>albifrons</i> .
<i>Lupinus cervinus</i>	Santa Lucia lupine	4.3	None	None	May-Jun	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest		1425	4675	

Lupinus tidestromii	Tidestrom's lupine	1B.1	CE	FE	Apr-Jun	Coastal dunes		100	330	Seriously threatened by coastal development, trampling, hybridization with L. chamissonis, and non-native plants; properly timed grazing may be beneficial. Possibly threatened by seed predation. Includes L. tidestromii var. layneae. Only MNT Co. plants are state-listed Endangered as var. tidestromii. See Erythea 3:17 (1895) for original description.
Madia radiata	showy golden madia	1B.1	None	None	Mar-May	Cismontane woodland, Valley and foothill grassland		1215	3985	Occurrences scattered. Most collections old; field work needed. Threatened by grazing and non-native plants.
Malacothamnus abbottii	Abbott's bush-mallow	1B.1	None	None	May-Oct	Riparian scrub		490	1610	Rediscovered in 1990 by D. Mitchell near Sargent Creek. Threatened by housing development, grazing, energy development, and road construction. See Leaflets of Western Botany 1:215 (1936) for original description.
Malacothamnus aboriginum	Indian Valley bush-mallow	1B.2	None	None	Apr-Oct	Chaparral, Cismontane woodland	Rocky, granitic, often in burned areas	1700	5575	Appears in abundance after fires. Threatened by grazing, vehicles, road maintenance. M. densiflorus specimens from SDG Co. have been confused with this species. See Synoptical Flora of North America 1(1):311 (1897) for original description.
Malacothamnus arcuatus	arcuate bush-mallow	1B.2	None	None	Apr-Sep	Chaparral, Cismontane woodland		355	1165	Threatened by alteration of fire regimes. A synonym of M. fasciculatus in The Jepson Manual. See Manual of the Botany of the Region of San Francisco Bay, p. 66 (1894) by E. Greene for original description, Leaflets of Botanical Observation and Criticism 1:208 (1906) for revised nomenclature, and Leaflets of Western Botany 6(6):132-133 (1951) for taxonomic treatment.
Malacothamnus davidsonii	Davidson's bush-mallow	1B.2	None	None	Jun-Jan	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland		1140	3740	Threatened by urbanization in LAX Co. Potentially threatened by development, maintenance activities and erosion. Intergrades with M. fasciculatus; see Madroño 46(3):142-152 (1999) for information.
Malacothamnus jonesii	Jones' bush-mallow	4.3	None	None	(Mar)Apr-Oct	Chaparral, Cismontane woodland		1075	3525	Includes M. niveus. Treated differently here than in TJM (1993) and TJM 2; which include both M. gracilis and M. niveus as synonyms. See Bulletin of the Southern California Academy of Sciences 24(3):88 (1925) for original description and Leaflets of Western Botany 6(6):135 (1951) for taxonomic treatment.
Malacothamnus palmeri var. involucratus	Carmel Valley bush-mallow	1B.2	None	None	Apr-Oct	Chaparral, Cismontane woodland, Coastal scrub		1100	3610	Threatened by development in MNT Co. A synonym of M. palmeri in TJM (1993). See Synoptical Flora of North America 1(1):310 (1897) for original description and Leaflets of Western Botany 6(6):121 (1951) for revised nomenclature.
Malacothamnus palmeri var. lucianus	Arroyo Seco bush-mallow	1B.2	None	None	(Apr)May-Aug	Chaparral, Cismontane woodland, Meadows and seeps		915	3000	Threatened by road maintenance. A synonym of M. palmeri in TJM (1993) and of M. palmeri var. palmeri in TJM 2; observations by field botanists suggest that recognition is warranted. See Leaflets of Western Botany 7(12):289-290 (1955) for original description.
Malacothamnus palmeri var. palmeri	Santa Lucia bush-mallow	1B.2	None	None	May-Jul	Chaparral (rocky)		360	1180	MNT Co. plants need confirmation. Threatened by alteration of fire regimes. A synonym of M. palmeri in TJM (1993). See Proceedings of the American Academy of Arts and Sciences 12:250 (1877) for original description and Leaflets of Botanical Observation and Criticism 1(15): 208 (1906) for taxonomic treatment.
Malacothrix phaeocarpa	dusky-fruited malacothrix	4.3	None	None	Apr-Jun	Closed-cone coniferous forest, Chaparral	openings, burned or disturbed areas	1400	4595	Similar to M. floccifera. See Madroño 40(2):101 (1993) for original description.
Malacothrix saxatilis var. arachnoidea	Carmel Valley malacothrix	1B.2	None	None	(Mar)Jun-Dec	Chaparral (rocky), Coastal scrub		1036	3400	Threatened by road maintenance. See Bulletin of the Torrey Botanical Club 36:605 (1909) for original description, and American Midland Naturalist 58(2):509 (1957) for revised nomenclature.
Meconella oregana	Oregon meconella	1B.1	None	None	Mar-Apr	Coastal prairie, Coastal scrub		620	2035	Threatened by alteration of fire regimes. Candidate for state listing in OR, and state-listed as Threatened in WA. Not in The Jepson Manual.
Micropus amphibolus	Mt. Diablo cottonweed	3.2	None	None	Mar-May	Broadleafed upland forest, Chaparral, Cismontane woodland, Valley and foothill grassland	rocky	825	2705	Move to List 4? Can be confused with M. californicus. Many occurrences old; need current status information. Potentially threatened by vineyard development. See Proceedings of the American Academy of Arts and Sciences 17:214 (1882) for original description.
Microseris paludosa	marsh microseris	1B.2	None	None	Apr-Jun(Jul)	Closed-cone coniferous forest, Cismontane woodland, Coastal scrub, Valley and foothill grassland		355	1165	Need quads for MEN Co. Similar to M. laciniata spp. leptosepala. See Bulletin of the California Academy of Sciences 2(5):52 (1886) for original description, and Leaflets of Western Botany 5:108 (1948) for revised nomenclature.

Mielichhoferia elongata	elongate copper moss	4.3	None	None		Broadleafed upland forest, Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Meadows and seeps, Subalpine coniferous forest	Metamorphic rock, usually acidic, usually vernal mesic, often roadsides, sometimes carbonate	1960	6430	Previously CRPR 2B.2; more common than originally known. Potentially threatened in PLU Co. by road maintenance. Commonly called copper mosses - distinctive glossy blue-green coloration aids identification. See Bryologia Germanica 2(2):186 (1831) for original description.
Mimulus rattanii ssp. decurtatus	Santa Cruz County monkeyflower	4.2	None	None	May-Jul	Chaparral, Lower montane coniferous forest	margins, gravelly	500	1640	Field work needed. Threatened by sand mining. A synonym of M. rattanii in The Jepson Manual (1993) and TJM 2.
Mimulus subsecundus	one-sided monkeyflower	4.3	None	None	May-Jul	Chaparral, Lower montane coniferous forest		915	3000	A synonym of M. fremontii in TJM (1993). See Annals of the Missouri Botanical Garden 11(2-3):285-286 (1924) for taxonomic treatment.
Monardella antonina ssp. antonina	San Antonio Hills monardella	3	None	None	Jun-Aug	Chaparral, Cismontane woodland		1000	3280	Move to List 4? Possibly threatened by road maintenance, pipeline construction, and feral pigs. Easily confused with M. villosa ssp. villosa, which may be the taxon occurring in ALA, CCA, SBT, and SCL counties; needs clarification.
Monardella antonina ssp. benitensis	San Benito monardella	4.3	None	None	Jun-Jul	Chaparral, Cismontane woodland, Lower montane coniferous forest, Valley and foothill grassland	Usually serpentinite	1570	5150	See Leaflets of Western Botany 8(3):55 (1956) for original description, and Phytologia 72(1):9-16 (1992) for revised nomenclature.
Monardella palmeri	Palmer's monardella	1B.2	None	None	Jun-Aug	Chaparral, Cismontane woodland	serpentinite	800	2625	Possibly threatened by development and trail maintenance.
Monardella sinuata ssp. nigrescens	northern curly-leaved monardella	1B.2	None	None	(Apr)May-Jul(Aug-Sep)	Chaparral (SCR Co.), Coastal dunes, Coastal scrub, Lower montane coniferous forest (SCR Co., ponderosa pine sandhills)	Sandy.	300	985	Threatened by non-native plants. Possibly threatened by development, habitat loss, habitat fragmentation, and climate shifts. Previously included in M. undulata. Similar to M. breweri and M. douglasii. See Novon 19(3):315-345 (2009) for original description.
Monolopia gracilens	woodland woollythreads	1B.2	None	None	(Feb)Mar-Jul	Broadleafed upland forest (openings), Chaparral (openings), Cismontane woodland, North Coast coniferous forest (openings), Valley and foothill grassland	Serpentine	1200	3935	Threatened by development, road maintenance, and road widening. Possibly threatened by logging.
Mucronea californica	California spineflower	4.2	None	None	Mar-Jul(Aug)	Chaparral, Cismontane woodland, Coastal dunes, Coastal scrub, Valley and foothill grassland	sandy	1400	4595	Rare in southern California. Many herbarium records old. Threatened by aggregate mining, vehicles, flood control modification, urbanization, and water percolation projects. Possibly threatened by non-native plants. Includes Chorizanthe californica var. suskendorfii. See Phytologia 66(3):203-205 (1989) for revised nomenclature.
Navarretia nigelliformis ssp. nigelliformis	adobe navarretia	4.2	None	None	Apr-Jun	Valley and foothill grassland vernally mesic, Vernal pools sometimes	clay, sometimes serpentinite	1000	3280	Possibly threatened by grazing. See Leaflets West. Bot. 2: 136 (1938) for original subspecies description.
Navarretia nigelliformis ssp. radians	shining navarretia	1B.2	None	None	(Mar)Apr-Jul	Cismontane woodland, Valley and foothill grassland, Vernal pools	Sometimes clay	1000	3280	Threatened by development. Possibly threatened by grazing and competition from non-native plants. Similar to N. heterandra. See Leaflets of Western Botany 2(8):136 (1938) for original description, and Novon 3(4):331-340 (1993) for revised nomenclature.
Navarretia prostrata	prostrate vernal pool navarretia	1B.1	None	None	Apr-Jul	Coastal scrub, Meadows and seeps, Valley and foothill grassland (alkaline), Vernal pools	Mesic	1210	3970	Threatened by vehicles, road maintenance, and recreational activities. See Proceedings of the American Academy of Arts and Sciences 17:223 (1881) for original description, and Pittonia 1:130 (1887) for revised nomenclature.
Nemacladus secundiflorus var. secundiflorus	large-flowered nemacladus	4.3	None	None	Apr-Jun	Chaparral, Valley and foothill grassland	gravelly, openings	2000	6560	Potentially threatened by wind energy development. See J. Bot. Res. Inst. Texas 2(1):397-400 (2008) for revised nomenclature.
Ophioglossum californicum	California adder's-tongue	4.2	None	None	(Dec)Jan-Jun	Chaparral, Valley and foothill grassland, Vernal pools (margins)	mesic	525	1720	
Orthotrichum kellmanii	Kellman's bristle moss	1B.2	None	None	Jan-Feb	Chaparral, Cismontane woodland	sandstone, carbonate	685	2245	See The Bryologist 107(2): 210 (2004) for original description.
Pedicularis dudleyi	Dudley's lousewort	1B.2	CR	None	Apr-Jun	Chaparral (maritime), Cismontane woodland, North Coast coniferous forest, Valley and foothill grassland		900	2955	Threatened by foot traffic, trail maintenance, and erosion. Potentially threatened by development. Plants from Arroyo de la Cruz (SLO Co.) are somewhat different and warrant further study. See Botanical Gazette 41:316-317 (1906) for original description.
Penstemon rattanii var. kleei	Santa Cruz Mountains beardtongue	1B.2	None	None	May-Jun	Chaparral, Lower montane coniferous forest, North Coast coniferous forest		1100	3610	
Pentachaeta bellidiflora	white-rayed pentachaeta	1B.1	CE	FE	Mar-May	Cismontane woodland, Valley and foothill grassland (often serpentinite)		620	2035	once attributed to this species is actually P. exilis var. aeolica. See Bulletin of the California Academy of Sciences 1:86 (1885) for original description, and University of California Publications in
Pentachaeta exilis ssp. aeolica	San Benito pentachaeta	1B.2	None	None	Mar-May	Cismontane woodland, Valley and foothill grassland		855	2805	foot traffic. Possibly threatened by non-native plants. See University of California Publications in Botany 65:1-41 (1973) for
Pentachaeta fragilis	fragile pentachaeta	4.3	None	None	Mar-Jun	Chaparral, Lower montane coniferous forest (sandy)	often openings	2100	6890	of California Publications in Botany 6(7):170 (1915) for original description and 65:38 (1973) for taxonomic treatment.

Perideridia gairdneri ssp. gairdneri	Gairdner's yampah	4.2	None	None	Jun-Oct	Broadleafed upland forest, Chaparral, Coastal prairie, Valley and foothill grassland, Vernal pools	vernally mesic	610	2000	occurrences uncertain. Can be relatively common locally, especially in northern counties. Is plant extant in SMT Co.? Threatened by agriculture, grazing, non-native plants, habitat alteration, and urbanization. See University of California
Perideridia pringlei	adobe yampah	4.3	None	None	Apr-Jun(Jul)	Chaparral, Cismontane woodland, Coastal scrub, Pinyon and juniper woodland	Serpentine, often clay	1800	5905	Possibly threatened by wind energy development.
Phacelia ramosissima var. austrolitoralis	south coast branching phacelia	3.2	None	None	Mar-Aug	Chaparral, Coastal dunes, Coastal scrub, Marshes and swamps (coastal salt)	sandy, sometimes rocky	300	985	may be misidentified. Many collections old; need field surveys. Threatened by development. Possibly threatened by non-native plants. Characters distinguishing the varieties of P. ramosissima
Pinus radiata	Monterey pine	1B.1	None	None		Closed-cone coniferous forest, Cismontane woodland		185	605	Only three native stands in CA, at Ano Nuevo, Cambria, and the Monterey Peninsula; introduced in many areas. Only one-half of the species' historical extent remains undeveloped on the Monterey Peninsula, and forest destruction has been unevenly distributed over different geomorphic surfaces. Threatened by development, genetic contamination, pine pitch canker disease, and forest fragmentation, especially at Del Monte Forest (MNT Co.) and in SLO Co.; seriously threatened by feral goats on GU Isl. Plants from BA (Cedros Isl.) and GU Isl. are genetically distinct. See Fremontia 18(2):15-21 (1990) for discussion of genetic conservation work.
Piperia candida	white-flowered rein orchid	1B.2	None	None	(Mar)May-Sep	Broadleafed upland forest, Lower montane coniferous forest, North Coast coniferous forest	sometimes serpentine	1310	4300	Difficult to determine rarity as some populations rarely flower. Populations often have small numbers. Threatened by logging. Difficult to identify from herbarium material. See Lindleyana 5(4):205-211 (1990) for original description, and The Wild Orchids of California, p. 109-110 (1995) by R. Coleman for species account.
Piperia leptopetala	narrow-petaled rein orchid	4.3	None	None	May-Jul	Cismontane woodland, Lower montane coniferous forest, Upper montane coniferous forest		2225	7300	Threatened b vegetation/fuels management. See Bulletin of the Torrey Botanical Club 28:270 (1901) for original description, and The Wild Orchids of California, p. 124-125 (1995) by R. Coleman for species account.
Piperia michaelii	Michael's rein orchid	4.2	None	None	Apr-Aug	Coastal bluff scrub, Closed-cone coniferous forest, Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest		915	3000	Recent surveys in VEN Co. have been unsuccessful. Known from SCZ Isl. from a single collection in 1968. Possibly threatened by road widening. See Bulletin of the California Academy of Sciences 1:282 (1885) for original description, Bulletin of the Torrey Botanical Club 28:640 (1901) for revised nomenclature, and The Wild Orchids of California, p. 126-128 (1995) by R. Coleman for species account.
Piperia yadonii	Yadon's rein orchid	1B.1	None	FE	(Feb)May-Aug	Coastal bluff scrub, Closed-cone coniferous forest, Chaparral (maritime)	sandy	755	2475	Threatened by urbanization, recreational development, non-native plants, road maintenance, and herbivory. See Lindleyana 5(4):205-211 (1990) for original description, and The Wild Orchids of California, p. 134-135 (1995) by R. Coleman for species account.
Plagiobothrys chorisianus var. chorisianus	Choris' popcornflower	1B.2	None	None	Mar-Jun	Chaparral, Coastal prairie, Coastal scrub	mesic	160	525	Taxonomic work needed; intergrades with var. hickmanii, and differences may be environmentally induced. Threatened by development, foot traffic, and non-native plants.
Plagiobothrys chorisianus var. hickmanii	Hickman's popcornflower	4.2	None	None	Apr-Jun	Closed-cone coniferous forest, Chaparral, Coastal scrub, Marshes and swamps, Vernal pools		185	605	Does plant occur in SMT Co.? Intergrades with var. chorisianus. See Pittonia 1:13 (1887) for original description, and Contributions from the Arnold Arboretum 3:49 (1932) for revised nomenclature.
Plagiobothrys diffusus	San Francisco popcornflower	1B.1	CE	None	Mar-Jun	Coastal prairie, Valley and foothill grassland		360	1180	Threatened by development and non-native plants. Possibly threatened by grazing and vehicles. Identification difficult; taxonomic work needed. See P. reticulatus var. rossianorum in The Jepson Manual. See Pittonia 1:14 (1887) for original description, and Contributions from the Arnold Arboretum 3:77 (1932) for revised nomenclature.
Plagiobothrys uncinatus	hooked popcornflower	1B.2	None	None	Apr-May	Chaparral (sandy), Cismontane woodland, Valley and foothill grassland		760	2495	Field surveys needed in Gabilan and Santa Lucia ranges to determine status.
Plagiobryoides vinosula	wine-colored tufa moss	4.2	None	None		Cismontane woodland, Mojavean desert scrub, Meadows and seeps, Pinyon and juniper woodland, Riparian woodland	usually granitic rock or granitic soil along seeps and streams, sometimes clay	1735	5690	Threatened by grazing, trampling, and vehicles. Potentially threatened by hydrological alterations. See Revue Bryologique 38(1):6-7 (1911) for original description, and Phytologia 91(3):499 (2009) for revised nomenclature.
Pogogyne clareana	Santa Lucia mint	1B.2	CE	None	Apr-Jul	Chaparral, Cismontane woodland, Riparian woodland	intermittent streams	630	2065	Known only from Ft. Hunter Liggett. Possibly threatened by road maintenance and military activities. See Four Seasons 4(3):22 (1973) for original description.

Polygonum hickmanii	Scotts Valley polygonum	1B.1	CE	FE	May-Aug	Valley and foothill grassland (mudstone and sandstone)		250	820	Known only from Scotts Valley. Fewer than 3500 individuals as of 1998. Threatened by development and non-native plants. Not in TJM (1993). See Novon 5(4):336 (1995) for original description.
Potentilla hickmanii	Hickman's cinquefoil	1B.1	CE	FE	Apr-Aug	Coastal bluff scrub, Closed-cone coniferous forest, Meadows and seeps (vernally mesic), Marshes and swamps (freshwater)		149	490	Seriously threatened by urbanization, recreational activities, non-native grasses, grazing, and the proposed Devil's Slide Bypass highway project. Collections from SON Co. are actually P. uliginosa. See Bulletin of the Torrey Botanical Club 29:77-78 (1902) for original description, and Fremontia 21(1):25-29 (1993) and 24(1):3-11 (1996) for species accounts.
Puccinellia simplex	California alkali grass	1B.2	None	None	Mar-May	Chenopod scrub, Meadows and seeps, Valley and foothill grassland, Vernal pools	Alkaline, vernally mesic; sinks, flats, and lake margins	930	3050	Threatened by hydrological alterations, urbanization, agricultural conversion, development, and habitat fragmentation, disturbance, alteration, and loss; resulting in extirpation of some occurrences. Potentially threatened by solar energy development. Possibly threatened by grazing and proximity to roads. Similar to P. parishii. See Circular, United States Department of Agriculture, Division of Agrostology 16:1 (1899) for original description.
Ramalina thrausta	angel's hair lichen	2B.1	None	None		North Coast coniferous forest	On dead twigs and other lichens	430	1410	Populations in decline, with net loss of 12.5% of sites in three-year period. Potentially threatened by air pollution. In northern CA it is usually found on dead twigs, and has been found on Alnus rubra, Calocedrus decurrens, Pseudotsuga menziesii, Quercus garryana, and Rubus spectabilis. In SON Co. it grows on and among dangling mats of Ramalina menziesii and Usnea spp. Similar to Alectoria sarmentosa, A. vancouverensis, and R. menziesii. See Bulletin of the California Lichen Society 13(1):17 (2006) for CALS Conservation Committee sponsorship.
Ranunculus lobbii	Lobb's aquatic buttercup	4.2	None	None	Feb-May	Cismontane woodland, North Coast coniferous forest, Valley and foothill grassland, Vernal pools	mesic	470	1540	Threatened by urbanization, habitat alteration, agriculture, and development.
Ribes sericeum	Santa Lucia gooseberry	4.3	None	None	Feb-Apr	Broadleafed upland forest, Coastal bluff scrub, Cismontane woodland, North Coast coniferous forest		1220	4005	Known only from the Santa Lucia Mtns.
Rosa pinetorum	pine rose	1B.2	None	None	May,Jul	Closed-cone coniferous forest, Cismontane woodland		945	3100	Possible hybrid of R. spithamea, R. gymnocarpa, or others; needs further study. See Muhlenbergia 1:53 (1904) for original description.
Sanicula hoffmannii	Hoffmann's sanicle	4.3	None	None	Mar-May	Broadleafed upland forest, Coastal bluff scrub, Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest	often serpentinite or clay	300	985	Potentially threatened by development. Possibly threatened by logging.
Sanicula maritima	adobe sanicle	1B.1	CR	None	Feb-May	Chaparral, Coastal prairie, Meadows and seeps, Valley and foothill grassland	clay, serpentinite	240	785	Threatened by foot traffic, non-native plants, recreational activities, trampling, and urbanization. See Botany of California 2:451 (1880) for original description, and University of California Publications in Botany 25:61-62 (1951) for taxonomic treatment.
Senecio aphanactis	chaparral ragwort	2B.2	None	None	Jan-Apr(May)	Chaparral, Cismontane woodland, Coastal scrub	sometimes alkaline	800	2625	Threatened by development. Rare in LAX, ORA, and RIV counties. Need quads for RIV Co. and SCT Isl. Not seen on SCZ Isl. between 1934 and 1991. See Pittonia 1:220 (1888) for original description, and North American Flora II 10:50-139 (1978) for taxonomic treatment.
Senecio astephanus	San Gabriel ragwort	4.3	None	None	May-Jul	Coastal bluff scrub, Chaparral	rocky slopes	1500	4920	See Pittonia 1: 174 (1888) for original description.
Sidalcea hickmanii ssp. hickmanii	Hickman's checkerbloom	1B.3	None	None	May-Jul	Coastal bluff scrub, Chaparral (openings), Cismontane woodland		1220	4005	Threatened by road maintenance. Possibly threatened by fire suppression and grazing. See Fremontia 6(2):8-14 (1978) for discussion of Marble-Cone fire and effects.
Sidalcea malachroides	maple-leaved checkerbloom	4.2	None	None	(Mar)Apr-Aug	Broadleafed upland forest, Coastal prairie, Coastal scrub, North Coast coniferous forest, Riparian woodland	Often in disturbed areas	730	2395	SCL Co. (427A) occurrence based on old specimen, needs confirmation. Threatened by logging and associated road usage, non-native plants, competition, low reproduction, road maintenance, and development. Endangered in OR. See University of Washington Publications in Biology 18:1-96 (1957) for taxonomic treatment.
Silene verecunda ssp. verecunda	San Francisco campion	1B.2	None	None	(Feb)Mar-Jun(Aug)	Coastal bluff scrub, Chaparral, Coastal prairie, Coastal scrub, Valley and foothill grassland	sandy	645	2115	Threatened by development, recreational activities, and non-native plants. Not in TJM 2. See Proceedings of the American Academy of Arts and Sciences 10:344 (1875) for original description, and University of Washington Publications in Biology 13:41-42 (1947) for taxonomic treatment.

Stebbinsoseris decipiens	Santa Cruz microseris	1B.2	None	None	Apr-May	Broadleafed upland forest, Closed-cone coniferous forest, Chaparral, Coastal prairie, Coastal scrub, Valley and foothill grassland	open areas, sometimes serpentinite	500	1640	Threatened by grazing. USFWS uses the name Microseris decipiens. See Contributions from the Dudley Herbarium 4:290-291 (1955) for original description, and American Journal of Botany 78(8):1015-1027 (1991) for revised nomenclature.
Streptanthus albidus ssp. peramoenus	most beautiful jewelflower	1B.2	None	None	(Mar)Apr-Sep(Oct)	Chaparral, Cismontane woodland, Valley and foothill grassland	serpentinite	1000	3280	Historical occurrences need field surveys. Threatened by development, non-native plants, and grazing. Possibly threatened by dam maintenance, road construction and maintenance, and recreational activities. Similar plants from MNT and SLO counties may be S. glandulosus ssp. glandulosus; see this name in TJM 2; further study is underway to determine its relationship to the S. glandulosus complex. See Bulletin of the Torrey Botanical Club 13(1):142 (1886) for original description, and Madroño 14(7):217-227 (1958) for taxonomic treatment.
Stylocline masonii	Mason's neststraw	1B.1	None	None	Mar-May	Chenopod scrub, Pinyon and juniper woodland	sandy	1200	3935	Collected only once (1991) since 1971; need status of occurrences. Most of known sites surveyed unsuccessfully in 1989. Threatened by development and habitat disturbance. See Madroño 39(2):117 (1992) for original description and 43(3):434-435 (1996) for information on recent collection.
Syntrichopappus lemmonii	Lemmon's syntrichopappus	4.3	None	None	Apr-May(Jun)	Chaparral, Joshua tree woodland, Pinyon and juniper woodland	sandy or gravelly	1830	6005	Potentially threatened by non-native plants and vehicles. Possibly threatened by wind energy development.
Systemotheca vortriedei	Vortriede's spineflower	4.3	None	None	May-Sep	Chaparral, Cismontane woodland	sandy or serpentinite	1600	5250	See Great Basin Naturalist Memoirs 2:169-190 (1978) for taxonomic revision, and Phytologia 66(2):83-88 (1989) for revised nomenclature.
Tortula californica	California screw-moss	1B.2	None	None		Chenopod scrub, Valley and foothill grassland	sandy, soil	1460	4790	Need quad for Santa Rosa Island occurrence. See The Bryologist 48:90-92 (1945) for original description.
Toxicoscordion fontanum	marsh zigadenus	4.2	None	None	Apr-Jul	Chaparral, Cismontane woodland, Lower montane coniferous forest, Meadows and seeps, Marshes and swamps	vernally mesic, often serpentinite	1000	3280	See Leaflets of Western Botany 2:41 (1937) for original description, and Phytologia 73(4):307-311 (1992) for revised nomenclature.
Trifolium buckwestiorum	Santa Cruz clover	1B.1	None	None	Apr-Oct	Broadleafed upland forest, Cismontane woodland, Coastal prairie	gravelly, margins	610	2000	Threatened by land clearing and non-native plants. Possibly threatened by road maintenance. See Madroño 39(2):90 (1992) for original description.
Trifolium hydrophilum	saline clover	1B.2	None	None	Apr-Jun	Marshes and swamps, Valley and foothill grassland (mesic, alkaline), Vernal pools		300	985	Many sites likely extirpated; need current information on rarity and endangerment. Need quads for COL Co. Threatened by development, trampling, road construction, and vehicles. See Manual of the Botany of the Region of San Francisco Bay, p.100 (1894) for original description, and Brittonia 32(1):55 (1980) for revised nomenclature.
Trifolium polyodon	Pacific Grove clover	1B.1	CR	None	Apr-Jun(Jul)	Closed-cone coniferous forest, Coastal prairie, Meadows and seeps, Valley and foothill grassland	mesic, sometimes granitic	425	1395	Seriously threatened by urbanization, recreation, foot traffic, and trampling. Potentially threatened by non-native plants. A synonym of T. variegatum (phase 4) in The Jepson Manual, but appears to be distinct. See Pittonia 3:215 (1897) for original description.
Trifolium trichocalyx	Monterey clover	1B.1	CE	FE	Apr-Jun	Closed-cone coniferous forest (sandy, openings, burned areas)		305	1000	Discovered in Big River Forest (TCF), MEN Co. by K. Heise and G. Hulse-Stephens in 2011. Seriously threatened by urbanization and altered fire regimes. Appears to be a fire follower. Possibly of hybrid origin. See Muhlenbergia 1:55 (1904) for original description and Madroño 59(3):167 (2012) for discovery of MEN Co. occurrence.
Triteleia ixioides ssp. cookii	Cook's triteleia	1B.3	None	None	May-Jun	Closed-cone coniferous forest, Cismontane woodland	serpentinite seeps	700	2295	See Aliso 8(8):273 (1975) for revised nomenclature.
Triteleia lugens	dark-mouthed triteleia	4.3	None	None	Apr-Jun	Broadleafed upland forest, Chaparral, Coastal scrub, Lower montane coniferous forest		1000	3280	Threatened by development. Related to T. ixioides; needs further study. See Bulletin of the California Academy of Sciences 2(6):142 (1886) for original description, and American Midland Naturalist 25:87-88 (1941) for taxonomic treatment.
Tropidocarpum capparideum	caper-fruited tropidocarpum	1B.1	None	None	Mar-Apr	Valley and foothill grassland (alkaline hills)		455	1495	Rediscovered in 2000 on Ft. Hunter Liggett (DOD). Possibly threatened by grazing, military activities, trampling, and non-native plants. See Pittonia 1:217 (1888) for original description, and Novon 11:292-293 (2001) for taxonomic information.
Usnea longissima	Methuselah's beard lichen	4.2	None	None		Broadleafed upland forest, North Coast coniferous forest	On tree branches; usually on old growth hardwoods and conifers	1460	4790	Threatened by development, road maintenance, and logging. See CALS Conservation Committee sponsorship by E. Peterson (2005) for additional information.



TECHNICAL MEMORANDUM

To: Justin Meek, AICP, Principal Planner, City of Watsonville
From: David J.R. Mack, AICP, Project Manager/Senior Planner
Topic: Mountain Propane Project – Hazards and Hazardous Materials
Date: June 4, 2020
CC: Kate Giberson, Project Director, Harris & Associates

Introduction

Harris & Associates has received and reviewed the information provided by Mountain Propane Company (applicant) relating to their proposed Mountain Propane Tank Relocation and Filling Station Project (project), which includes the storage of hazardous materials (liquid propane) on their property, which was previously used for propane storage, in the City of Watsonville (City).

The purpose of this technical memorandum is to determine potential environmental impacts of the project as they relate to compliance with the California Environmental Quality Act (CEQA). Accordingly, the methodology used is to address the questions related to Hazards and Hazardous Materials in the CEQA Guidelines Appendix G, Environmental Checklist Form.

The information in this memorandum is based on project description information provided by the applicantⁱ, field survey, and research conducted by Harris & Associates staff.

Project Location and Setting

The project is located at 950 West Beach Street in the City of Watsonville (**Figure 1**). The 0.69-acre project site is a previously developed industrial site, currently owned by Mountain Propane and previously owned by Venture Oil Company and used for propane storage. The site was previously contaminated with hazardous materials (petroleum hydrocarbons) that were remedied in 2013^{ii, iii, iv}. Currently, the project site is comprised of impervious pavement and concrete surfaces, heavily disturbed unpaved areas, and a 50,000-gallon propane storage tank that is not currently in use.

The triangular shaped site is surrounded by industrial land uses to the west, east and south and the Santa Cruz Branch Rail Line to the north. North of the railroad tracks, there is undeveloped land planned for mixed use development (Manabe-Ow Specific Plan) and the Watsonville Slough.

Project Description

The applicant is proposing to relocate the existing 50,000-gallon propane storage tank westward to the middle of the site and to install four new 30,000-gallon propane storage tanks in phases, resulting in a total of 170,000-gallons of propane storage at the project site. The four new tanks would be approximately 15 feet in height and would occupy approximately 1,750 square feet in the area currently occupied by the 50,000-gallon tank, which is approximately 15-feet in height.

Additional site improvements include: asphalt paving, bollard installation, foundation construction for the propane tanks, tank unloading stations, irrigation and landscaping, gate and fencing installation, liquefied propane gas (LPG) piping and appurtenance installation, and private fire hydrant installation.



The propane storage tanks and LPG piping and appurtenance equipment would be installed and maintained in accordance with California Code of Regulations, Title 8, Article 7, Section 536^v. The tanks and LPG piping would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keeps errant propane from being released. This system is similar to the systems used and in place for commercial gas/fueling stations. The site would be under video monitoring when company personnel is not onsite and throughout the evening.

The applicant would utilize the adjacent rail line for the delivery of the propane, which would then be transferred to a truck and then to the on-site propane storage tanks, and would fill bobtail delivery trucks at the site and deliver propane to customers. The transport rail and truck facilities would be operated and maintained in accordance with Federal Code of Regulations, Title 49, Part 174 (Carriage by Rail)^{vi} and CHP Form 800C (Vehicles Transporting Hazardous Materials)^{vii}.

The project would be implemented in two phases. Phase 1 involves rotating and relocating the existing 50,000-gallon storage tank to allow easier access for filling and distribution and would be implemented this year (2020). Phase 2 involves adding 120,000 gallons of storage (in four new 30,000-gallon storage tanks) and would be implemented within 2-3 years, contingent on demand and development of business services.

Zoning Compliance

The project site is zoned "IG" or "General Industrial", which allows *petroleum products refining and storage* as a Conditional Use, pursuant to the issuance of a Special Use Permit. Therefore, the proposed use of the propane storage and filling facility can be permitted, and the proposed project is compliant with the provisions for sites zoned IG once a Special Use Permit is obtained.

Potential Impacts

As stated above, this technical memorandum addresses potential hazardous materials impacts based on the questions contained in "Section IX – Hazards ad Hazardous Materials" of the CEQA Guidelines, Appendix G-Environmental Checklist Form, as follows.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

As described in the Project Description above, the proposed project would serve as a liquid propane storage and distribution facility. Liquid propane is proposed to be delivered to the project site via the use of the existing rail lines adjacent to the site. Liquid propane will then be transferred from the rail car to the existing onsite 50,000-gallon storage tank, and then transferred to "bob-tail" distribution trucks for disbursement to customers. When rail car delivery is not available, or if lower quantities of supply are required, liquid propane may also be delivered to the site via traditional 18-wheel transport truck, similar to the delivery of automotive fuel to commercial fueling station sites. However, in this case the project site would not be open to the general public.

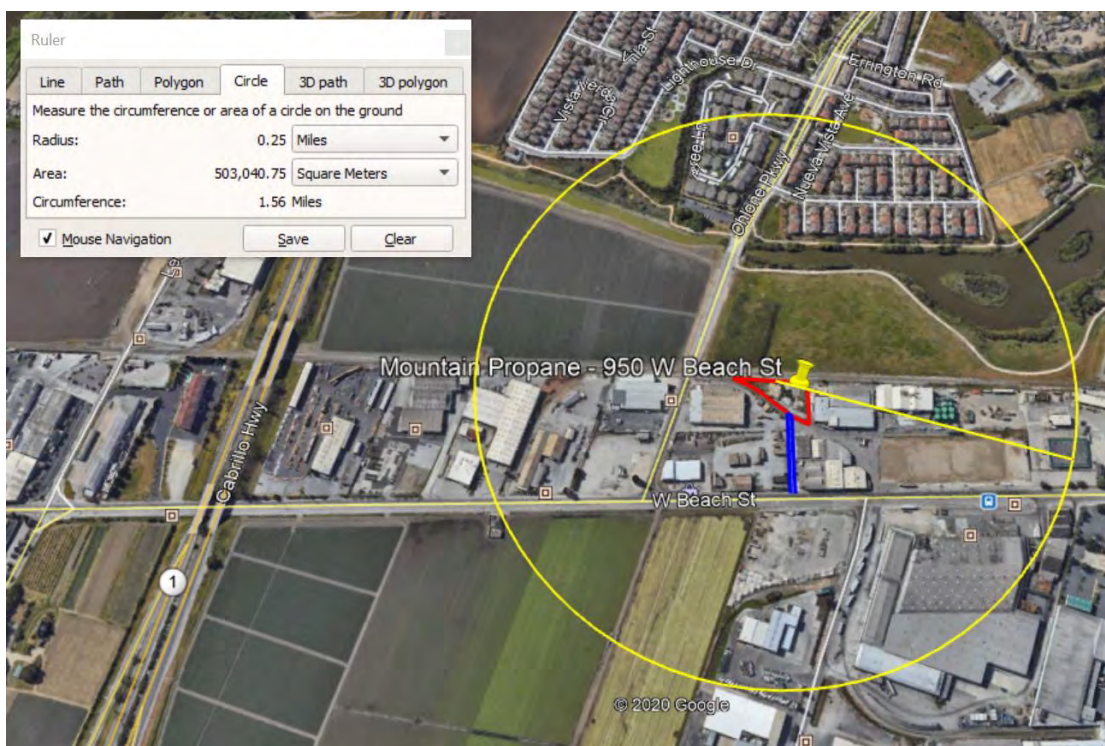
Liquid propane gas is the only potentially hazardous material (fuel) that would be stored onsite. However, as described in the Project Description above, the propane storage and delivery system would be equipped with redundant safety valves and systems that are designed to prevent any major release of propane. The systems would also be equipped with low emission fittings and equipment that keeps errant propane from being released. The site would be under video monitoring when company personnel is not onsite and throughout the evening. Additionally, the transport of liquid propane to the project site and to customers would be in accordance with regulations and requirements found in California Highway Patrol Form 800C. There would be no other hazardous materials used, transported, or disposed at the project site or elsewhere.



Therefore, the project would not create a significant hazard to the public or the environment through the transport, use, or disposal of liquid propane or other hazardous materials; and it would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile on existing or proposed school?

The project site is located within an existing industrial zoned, previously disturbed area, and is not within one-quarter mile of an existing or proposed school. The closest school is Ceiba College Preparatory Academy, located at 260 W Riverside Drive, which is one mile east of the project site and outside the 0.25-mile radius shown in the figure below. Therefore, the project would not have the potential to emit hazardous emissions or handle hazardous materials, substance, or waste in the vicinity of any school.



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

The project site was previously contaminated with hazardous materials (petroleum hydrocarbons) but was remediated in 2013. At this time, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, according to the California Department of Toxic Substances Control EnviroStor database (www.envirostor.dtsc.ca.gov) and the California Water Resources Control Board GeoTracker database (www.geotracker.waterboards.ca.gov) on July 20, 2019. Therefore, the project would not create a significant hazard to the public or environment.

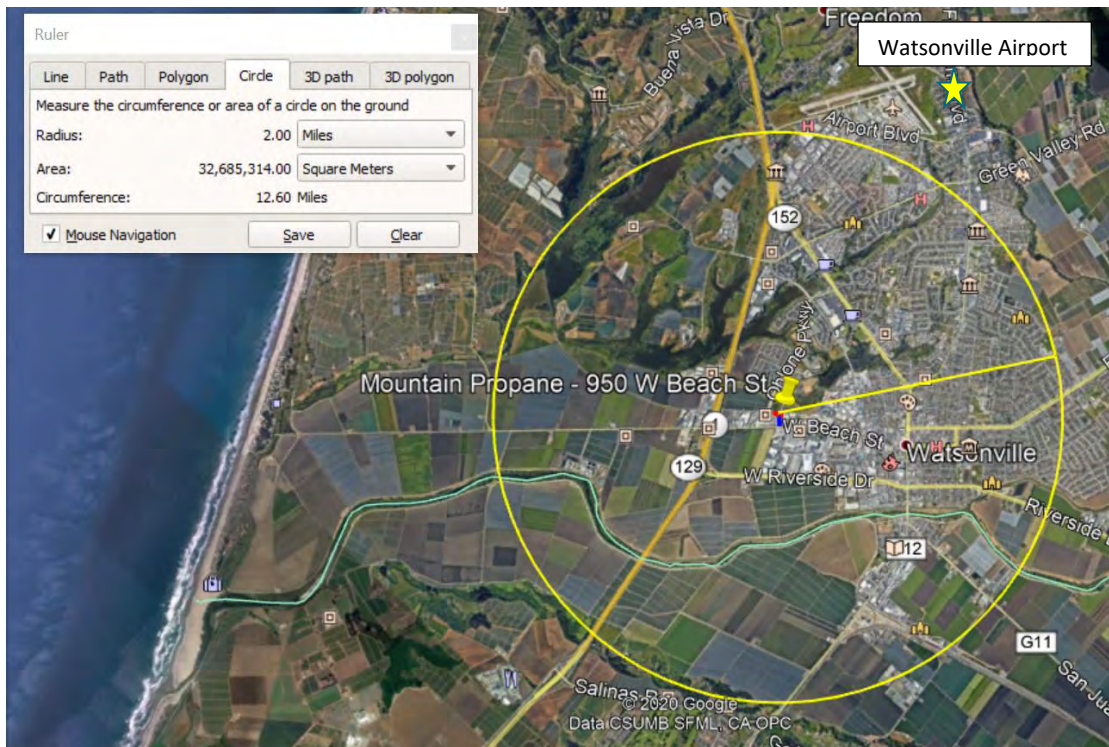
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project site is located within an existing industrial area, surrounded by industrial land uses, and is not located within an airport land use plan, or within two miles of a public airport or public use airport. The Watsonville Municipal Airport is located 2.15 miles north of the project site, as shown in the figure below.



Liquid propane would be delivered to the site via rail car or 18-wheel transport truck, and would be transported off the site in bobtail delivery trucks to customers. Furthermore, the site would not be open to the public and would serve as a distribution site for delivery of propane to off-site areas. As described in the project description and the discussion under questions “a” and “b”, the propane storage and delivery system would be equipped with safety features, and the transport would be in accordance with applicable laws and regulations.

Although operating the transport vehicles would result in some increased noise in and around the project area, it is an industrial area without sensitive land uses or a significant number of people residing or working in the area. The vehicular noise would disseminate as the vehicles leave the area. Therefore, the project would not create excessive noise for people residing or working in the area.



f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The project site is located within an existing industrial area and is not a part of, and would not interfere with an adopted emergency response plan or emergency evacuation plan. The project site has adjacent open space and clear access to leave the property in the event of an emergency.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The project site is located within an existing industrial urban area. According to the Santa Cruz County Wildland Fire Map, the nearest wildland fire area is located 1.59 miles to the most western portion of the project site. Therefore, and the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving or resulting from wildland fires.



Recommended Best Management Practices and Conditions of Approval

1. During construction and excavation activities, if hydrocarbon contamination is encountered, work must be stopped immediately, and the contamination must be reported to Santa Cruz County Environmental Health at (831) 454-2022 and Tom Sayles at the Water Board (805) 542-4640. This measure is a precaution because the site was formerly contaminated with petroleum hydrocarbons, although the site was remediated and determined a closed case.
2. Prior to storing propane at the site, the applicant must obtain a permit to store hazardous materials from Santa Cruz County Environmental Health. To obtain a hazardous materials permit, the applicant must create an account on the CERS (California Environmental Reporting System) website (<https://cers.calepa.ca.gov/>) and submit a Hazardous Materials Management Plan online. For additional information contact the Environmental Health office at (831) 454-2200 and ask to speak to one of the Hazardous Materials Inspectors or Hazardous Material Program Manager.

References

ⁱ City of Watsonville Environmental Information Form, dated 01/23/2019.

ⁱⁱ Water Board Closure Summary, dated July 14, 2014.

ⁱⁱⁱ Water Board Closure Letter, dated July 15, 2014.

^{iv} GeoTracker Case Summary, dated July 20, 2018.

^v California Code of Regulations, Title 8, Section 536, printed May 7, 2020.

^{vi} Code of Federal Regulations, Title 49, Part 174.304, printed May 7, 2020.

^{vii} California Highway Patrol Form 800C, printed May 7, 2020.

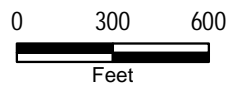
CITY OF WATSONVILLE



Source: County of Santa Cruz Imagery 2016.



Harris & Associates





TECHNICAL MEMORANDUM

To: Justin Meek, AICP, Principal Planner, City of Watsonville
From: David J. R. Mack, AICP, Project Manager/Senior Planner, Harris & Associates
Subject: Mountain Propane Project - Transportation
Date: June 4, 2020
CC: Kate Giberson, Project Director, Harris & Associates

Introduction

Harris & Associates has received and reviewed the information provided by Mountain Propane Company (applicant) relating to the proposed Mountain Propane Tank Relocation and Filling Station Project (project) and anticipated truck trip/traffic generation to and from the project site.

The purpose of this technical memorandum is to determine potential environmental impacts of the project as they relate to compliance with the California Environmental Quality Act (CEQA). Accordingly, the methodology used is to address the questions in the CEQA Guidelines Appendix G, Environmental Checklist Form, Section XVII. Transportation.

The information in this memorandum is based on project description information provided by the applicant¹, field survey, and research conducted by Harris & Associates staff.

Project Location and Setting

The project is located at 950 West Beach Street in the City of Watsonville (City), shown in **Figure 1**. The 0.69-acre project site is a previously developed industrial site, currently owned by Mountain Propane and previously owned by Venture Oil Company and used for propane storage. Currently, the project site is comprised of impervious pavement and concrete surfaces, heavily disturbed unpaved areas, and a 50,000-gallon propane storage tank that is not currently in use.

The triangular shaped site is surrounded by industrial land uses to the west, east and south and the Santa Cruz Branch Rail Line to the north. North of the railroad tracks, there is undeveloped land planned for mixed use development (Manabe-Ow Specific Plan) and the Watsonville Slough.

Project Description

The applicant is proposing to relocate the existing 50,000-gallon propane storage tank westward to the middle of the site and to install four new 30,000-gallon propane storage tanks in phases, resulting in a total of 170,000 gallons of propane storage at the project site. The four new tanks would be approximately 15 feet in height and would occupy approximately 1,750 square feet in the area currently occupied by the 50,000-gallon tank, which is approximately 15-feet in height.

Additional site improvements include: asphalt paving, bollard installation, foundation construction for the propane tanks, tank unloading stations, irrigation and landscaping, gate and fencing installation, liquefied petroleum gas (LPG) piping and appurtenance installation, and private fire hydrant installation.

The applicant would utilize the adjacent rail line for the delivery of the propane, which would then be transferred to a truck and then to the on-site propane storage tanks, and would fill bobtail delivery trucks at the site and deliver propane to customers. The transport rail and truck facilities would be operated and maintained in

accordance with Federal Code of Regulations, Title 49, Part 174 (Carriage by Rail)ⁱⁱ and CHP Form 800C (Vehicles Transporting Hazardous Materials)ⁱⁱⁱ.

The project would be implemented in two phases. Phase 1 involves rotating and relocating the existing 50,000-gallon storage tank to allow easier access for filling and distribution and would be implemented this year (2020). Phase 2 involves adding 120,000 gallons of storage (in four new 30,000-gallon storage tanks) and would be implemented within 2-3 years, contingent on demand and development of business services.

Following construction, it is estimated that the project would generate approximately 15 roundtrips daily, including 10 bobtail propane delivery trucks, four passenger (worker) vehicles, and up to one heavy-duty truck trip at buildout, after both Phase 1 and 2 are constructed.

Zoning Compliance

The project site is zoned “IG” or “General Industrial”, which allows *petroleum products refining and storage* as a Conditional Use, pursuant to the issuance of a Special Use Permit. Therefore, the proposed use of the propane storage and filling facility can be permitted, and the proposed project is compliant with the provisions for sites zoned IG once a Special Use Permit is obtained.

Potential Impacts

As stated above, this technical memorandum addresses potential transportation impacts based on the questions contained in “Section XVII – Transportation” of the CEQA Guidelines, Appendix G-Environmental Checklist Form, as follows.

XVII. TRANSPORTATION. Would the project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The project includes a total of 15 roundtrips, including passenger vehicles, occurring throughout the workday (10 bobtail delivery truck trips and 5 employee trips). The project site is accessed via an existing driveway off West Beach Street, and has secondary access from a driveway/road located near the Industrial Road/West Beach Street intersection, which runs through the existing industrial complex (**Figure 1**).

The primary roadways used to access the project site are West Beach Road, Industrial Road, Ohlone Parkway, Riverside Drive (Highway 129) and State Route 1. The project site is accessible by pedestrian/bicycle transit, through the use of the existing shoulder/bike lane on West Beach Street. The nearest transit access is along West Beach (to the west), approximately 0.26 mile from the project site.

Ohlone Parkway is a two- to four-lane roadway in western Watsonville, connecting the industrial and agricultural uses north of Riverside Drive (Highway 129), the residential neighborhoods, and commercial uses along Main Street (Highway 152). It is classified as a collector street north of Harkins Slough Road and a minor arterial south of Harkins Slough Road.

Riverside Drive (Highway 129) is a two- to four-lane arterial street in Watsonville. Regionally, it connects State Route 1 in Watsonville with US 101 near San Juan Bautista. In Watsonville, Riverside Drive (Highway 129) is the principal east-west arterial south of the Downtown central business district, connecting the largely residential southeastern portion of the city with the industrial and agricultural uses on the southwestern portion of the city. The Circulation Element of the City’s General Plan designates Highway 129 as the designated truck route between Watsonville and State Route 1.

West Beach Road is a two- to four-lane street in southern Watsonville. It connects industrial and agricultural uses in southeastern Watsonville to the Downtown central business district and residential neighborhoods immediately east of the Downtown. It is classified as a collector street west of Lee Road, an arterial street between Lee Road and Walker Street, and a minor arterial street east of Walker Street.

Industrial Road is a two-lane street in southern Watsonville. It connects Riverside Drive (Highway 129) to West Beach Street. It is classified as an arterial street, is a truck route servicing various properties in the industrially zoned area.



Based on information in the transportation analysis prepared for the nearby Sunshine Vista Home Project to the north (City of Watsonville May 2018), the intersection of Ohlone Parkway/West Beach Street currently operates at a level-of-service (LOS) of “A” for both AM and PM peak hours. The intersection of State Route 1 Northbound Ramps/Riverside Drive (Highway 129) currently operates at LOS “A” for both AM and PM peak hours. The intersection of State Route 1 Southbound Ramps/Riverside Drive (Highway 129) currently operates at LOS “B” for the AM peak and LOS “C” for the PM peak. All of these operational levels are above the standard of LOS “D” or higher.

The anticipated 15 trips/day generated by the project is not expected to result in increased traffic congestion or significant delay(s) upon existing local or regional roadways, change the level of service on the surrounding roadways, or necessitate roadway improvements or expansion. The project would not interfere with any existing or planned transit, bicycle or pedestrian facilities.

Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. *Less-than-Significant.*

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

In response to the passage of Senate Bill 743 in 2013 and other climate change strategies, the Governor’s Office of Planning and Research (OPR) amended the CEQA Guidelines to replace Level-of-Service (LOS) with vehicle miles traveled (VMT) as the measurement for traffic impacts. The “Technical Advisory on Evaluating Transportation Impacts in CEQA,” prepared by OPR (2018) provided recommended thresholds and methodologies for assessing impacts of new developments on VMT. Tying significant thresholds to the State’s GHG reduction goals, the guidance recommends a threshold reduction of 15% under current average VMT levels for residential projects (per capita) and office projects (per employee), and tour-based reduction from current trips for retail projects. Based on the latest estimates compiled from the Highway Performance Monitoring System, the average daily VMT in Santa Cruz County is 18.3 miles per capita. (Department of Finance [DOF] 2018; Caltrans 2018a). The guidelines also recommend a screening threshold for residential and office projects – trip generation under 110 trips per day is generally considered a less-than-significant impact.

The project would produce less than 110 trips/day during both construction and operational phases. The project would involve an estimated total of 15 roundtrips, including passenger vehicles, occurring throughout the workday, which is far below the 100 trips/day threshold. Therefore, the project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b)(1) applicable to land use projects. *Less-than-significant.*

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The project does not involve the construction or alteration of roadways, access roads, or changes to the existing rail line. Therefore, the project would not substantially increase hazards due to a geometric design feature. The project site is zoned for industrial uses, which conditionally allows the establishment of the propane facility. The use occasional use of bobtail filling trucks and refueling trucks would not be an incompatible use. *Less-than-Significant.*

d. Result in inadequate emergency access?

The project site is an existing industrially zoned parcel and would continue to function as an industrial site. The site would be accessed from West Beach Street, utilizing an existing driveway access point. While the project does involve the relocation and addition of propane storage tanks, these activities would not inhibit or block emergency access to the site. Emergency personnel would be able to access using the main driveway off West Beach Street, as well as an additional driveway located near the intersection of Industrial Road/West Beach Street (eastern side of the industrial complex). Furthermore, if needed, emergency access could be obtained from the rear of the site along the existing railway/tracks. *Less-than-significant.*

ⁱ City of Watsonville Environmental Information Form, dated 01/23/2019.

ⁱⁱ Code of Federal Regulations, Title 49, Part 174.304, printed May 7, 2020

ⁱⁱⁱ California Highway Patrol Form 800C, printed May 7, 2020.

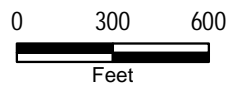
CITY OF WATSONVILLE



Source: County of Santa Cruz Imagery 2016.



Harris & Associates





Central Coast Regional Water Quality Control Board

July 15, 2014

Mr. Tim Fillmore
Santa Cruz County Environmental Health Services
tim.fillmore@co.santa-cruz.ca.us

Dear Mr. Fillmore:

**UST: AHLPORT PETROLEUM (VENTURE OIL), 950 WEST BEACH STREET,
WATSONVILLE, SANTA CRUZ COUNTY – CASE CLOSURE TRANSMITTAL (CASE
NO. 339)**

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff reviewed Weber Hayes and Associates (WHA)'s June 25, 2014 *Monitoring Well Destruction Report* for the subject site. Thank you for the submittal. You have met the requirements for case closure. This concludes the Central Coast Water Board's regulatory oversight for the investigation and cleanup of the underground storage tank (UST) system release. This letter does not relieve you of the requirements of other agencies which may continue to have jurisdiction or require further work. As with any real property, the discovery of additional or previously unidentified contamination at the site may require additional investigation and cleanup. This case is now closed as certified by the enclosed Case Closure letter and Case Closure Summary. All previous orders relating to the underground storage tank release at this site are hereby rescinded.

Residual soil and groundwater contamination may still exist on-site that could pose an unacceptable risk under certain site development activities such as site grading, excavation, or de-watering. The Central Coast Water Board and the appropriate local planning and building departments must be notified prior to any changes in land use, grading activities, excavation, or dewatering. This notification must include a statement that residual soil and groundwater contamination underlie the property and nearby properties. The levels of residual contamination and any associated risks are expected to reduce with time.

DR. JEAN-PIERRE WOLFF, CHAIR | KENNETH A. HARRIS JR., EXECUTIVE OFFICER

3901 Anacosta Place, Suite 101, San Luis Obispo, CA 93401 | www.waterboards.ca.gov/centralcoast



Mr. Fillmore

- 2 -

July 15, 2014

Thank you for your diligence in addressing water quality issues and your continued commitment to the protection of water quality in the Central Coast Region. If you have any questions, please contact **Tom Sayles at (805) 542-4640** or at tsayles@waterboards.ca.gov or Chris Adair at (805) 549-3761.

Sincerely,



Digitally signed by Harvey

C. Packard

Date: 2014.07.15 08:46:26

-07'00'

for

Kenneth A Harris Jr.

Executive Officer

Enclosures: Closure Letter
Case Closure Summary

P:\UST\Regulated Sites\Santa Cruz Co\Watsonville\950 West Beach St\Closure Documents\Closure Transmittal.doc

cc:

Mr. Scott Carson
Santa Cruz County Environmental
Health Services
Scott.Carson@co.santa-cruz.ca.us

Venture Oil Company
12745 Cambridge Drive
Saratoga, CA 95070

Mr. Jered Chaney
Weber Hayes and Associates
jered@weber-hayes.com

Mr. Thomas A. Sayles
Central Coast Water Board
tsayles@waterboards.ca.gov

Mr. Robert Ketley
City of Watsonville Planning Department
robert.ketley@cityofwatsonville.org

Ms. Kendall Stahl
Central Coast Water Board
kStahl@waterboards.ca.gov

Mr. Jim Crowley
Source Control Manager
City of Watsonville
jim.crowley@cityofwatsonville.org

DR. JEAN-PIERRE WOLFF, CHAIR | KENNETH A. HARRIS JR., EXECUTIVE OFFICER

885 Aerovista Place, Suite 101, San Luis Obispo, CA 93401 | www.waterboards.ca.gov/centralcoast

RECYCLED PAPER



Central Coast Regional Water Quality Control Board

July 15, 2014

Mr. Tim Fillmore
Santa Cruz County Environmental Health Services
tim.fillmore@co.santa-cruz.ca.us

Dear Mr. Fillmore:

**UST: AHLPORT PETROLEUM (VENTURE OIL), 950 WEST BEACH STREET,
WATSONVILLE, SANTA CRUZ COUNTY – CASE CLOSURE (CASE NO. 339)**

This letter confirms the completion of site investigation and corrective action for the underground storage tanks formerly located at the above-referenced location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former underground storage tanks are greatly appreciated.

Based on the information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your underground storage tank site is in compliance with the requirements of subdivisions (a) and (b) of Section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to Section 25299.3 of the Health and Safety Code and that no further action related to the petroleum release at the site is required.

Claims for reimbursement of corrective action costs submitted to the Underground Storage Tank Cleanup Fund more than 365 days after the date of this letter or issuance or activation of the Fund's Letter of Commitment, whichever occurs later, will not be reimbursed unless one of the following exceptions applies:

- Claims are submitted pursuant to Section 25299.57, subdivision (k) (reopened UST case); or
- Submission within the timeframe was beyond the claimant's reasonable control, ongoing work is required for closure that will result in the submission of claims beyond that time period, or that under the circumstances of the case, it would be unreasonable or inequitable to impose the 365-day time period.

Dr. Jean-Pierre Wolff, Chair | Kenneth A. Harris, Jr., Executive Officer

335 Avenida Plaza, Suite 101 | San Luis Obispo, CA 93401 | www.waterboards.ca.gov/centralcoast

RECEIVED 8-1-2014

Mr. Fillmore

- 2 -

July 15, 2014

This notice is issued pursuant to Health and Safety Code, Section 25296.10, subdivision (g). If you have any questions, please contact **Tom Sayles at (805) 542-4640** or at tsayles@waterboards.ca.gov or Chris Adair at (805) 549-3761.

Sincerely,



Digitally signed by

Harvey C. Packard

Date: 2014.07.15

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for

Kenneth A Harris Jr.

Executive Officer

P:\UST\Regulated Sites\Santa Cruz Co\Watsonville\950 West Beach St\Closure Documents\Closure Letter.doc

Dr. James P. Wolff, Chair | Kenneth A. Harris, Jr., Executive Officer

805 Andrews Plaza, Suite 101, San Luis Obispo, CA 93401 | www.waterboards.ca.gov

07/15/2014 08:45:08

CENTRAL COAST WATER BOARD
CASE CLOSURE SUMMARY
Leaking Underground Fuel Storage Tank Program

I. Agency Information

Agency Name: Central Coast Water Board	Address: 895 Aerovista Place, Suite 101
City/State/Zip: San Luis Obispo, CA 93401-7906	Phone: (805) 542-4640
Responsible Staff person: Mr. Tom Sayles	Title: Engineering Geologist

II. Case Information

Site Facility Name: Former Venture Oil	USTCF Claim No. N/A	Water Board Case No.
Site Facility Address: 950 West Beach Street, Watsonville, CA 95076	Assessor Parcel No: 018-331-05 & 018-331-06	
Responsible Parties	Address	Phone Number
Santa Cruz County(Abandoned Site)	701 Ocean Street, Santa Cruz, CA	
Property Owner		
Abandoned Site		

III. Tank Information

Tank #	Size in Gallons	Contents	Closed in Place/Removed	Date
1	12,000	Unleaded Gasoline	Removed	10/2006
2	12,000	Unleaded Gasoline	Removed	10/2006
3	12,000	Unleaded Gasoline	Removed	10/2006
4	20,000	Diesel	Removed	10/2006

IV. Release and Site Characterization Information

Cause and type of release: - Gasoline / Diesel release from product piping, - fuel dispensers, - one gasoline UST (1/4" hole observed on bottom of tank)	Was source of release removed to extent practical: Yes, UST over-excavation completed during the 2006 Facility Closure. Additional secondary source excavation occurred in August 2013 to remove contamination detected beneath the area of the former product piping and a fuel dispensers.	
Site characterization complete? Yes	Local Oversight Agency concurrence? Yes	
Monitoring Wells installed? Yes	Number: 5 ¹	Proper screen interval? Yes
Highest GW depth below ground surface: 3.73 ft. bgs. (Zone A) ²	Lowest: 27.3 ft. bgs (Zone B)	Flow Direction: N / NW
Are Water Wells affected? No, One industrial supply well located approximately 550 feet in the eastern side gradient direction of the site.	Hydrologic Unit: Watsonville Hydrologic Area of the Pajaro River Hydrologic Unit (305.10)	

¹ Two wells were damaged during UST removal and overexcavation operations and were subsequently properly destroyed and replaced. Three wells currently exist at the site.

² Two water bearing zones observed, Zone A (shallow) and Zone B (deeper).

CASE CLOSURE SUMMARY

Leaking Underground Storage Tank Program

Page 2

Is the Site on Municipal Water? Yes, (If Yes, Name of Water System) City of Watsonville	
Distance to nearest Water Well(s): 550 feet in the eastern side gradient direction of the site	Well Type/Status: apparently industrial / does not appear to be in use
Distance to nearest Surface Water(s): 550 feet	Has Surface Water(s) been affected? No
Off-site Beneficial use impacts (addresses/locations): N/A	
Is site an active fueling facility: No, Vapor intrusion assessment completed 9/17/2013	
Conceptual Site Model complete? Yes	Date of CSM: 04/20/2012

V. Treatment/Disposal Methods (Attach any additional information)

Material	Amount (Include Units)	Action (Treatment or Disposal Method)	Date
Tanks	4 USTs, 1 AST	Removal and Disposal at Haz-certified Facility	10/2006
Piping	removed	Removal and Disposal at Haz-certified Facility	10/2006
Free Product	n/a	No free product observed after dewatering during tank removal in 2006	N/A
Soil	1,000 cubic yards	Excavation and disposal to Class III landfill	10/2006
	360 cubic yards	Excavation and disposal to Class III landfill	8/2013
Ground Water	7,800 gallons	Pumped out of tank pit during excavation, floating product observed	10/2006

Maximum Documented Contaminant Concentrations--Before and After Cleanup

Contaminant	Soil (mg/kg)		Water (µg/L)		Contaminant	Soil (mg/kg)		Water (µg/L)	
	Before	After	Before	After		Before	After	Before	After
TPH (Gas)	2,800 ¹	290 ²	3,500 ⁷	< 50	1,2-DCA	N/A	N/A	N/A	N/A
TPH (Diesel)	1,500 ³	680 ⁴	270,000 ⁸	< 100	Oil & Grease	N/A	N/A	N/A	N/A
Benzene	< 12	< 0.0050	17 ⁷	< 0.5	Lead	2.4 ⁶	N/A	N/A	N/A
Toluene	< 12	< 0.0050	45 ⁸	< 0.5	MTBE	< 12	< 0.010	32 ⁹	7.0 ¹⁰
Ethylbenzene	0.017 ⁵	< 0.015	8.4 ⁸	< 0.5	TBA	N/A	< 0.050	< 5.0	< 5.0
Xylenes	< 25	< 0.010	59 ⁷	< 1.5	Other				

Comments:

N/A=Not analyzed (Not a constituent of concern for the site)

¹: SW-6, Nov. 1, 2006 – UST Excavation, ²: SW-3, Aug. 28, 2013 – Secondary Source Excavation Soil Confirmation Sample, ³: DP-16-d6, Nov. 16-17, 2011- Data Gap Assessment, ⁴: SW-9, Aug. 28, 2013- Remedial Excavation Soil Confirmation Sample,

⁵: DP-8-d8, Nov. 16-17, 2011- Data Gap Assessment, ⁶: Composite 1 (a-d), Composite 2 (a-d), Oct. 31, 2006 – UST Excavation, ⁷: Pit water, Oct. 31, 2006 – UST Excavation (Grab sample collected from tank pit water),

⁸: Fuel Dispenser Rack, Nov. 8, 2006 – UST Excavation (Grab sample collected from fuel dispenser rack pit water), ⁹: MW-3, Oct. 18, 2006 – Groundwater Monitoring, ¹⁰: MW-3, Sept. 25, 2012 – Groundwater Monitoring

CASE CLOSURE SUMMARY
Leaking Underground Storage Tank Program

Page 3

VI. Closure

Amount of contaminant(s) mass removed: See above, remedial excavation conducted in October 2006 removed 1,000 cubic yards of TPH contaminated soils and 7,800 gallons of TPH contaminated water. Secondary source remedial excavation conducted in August 2013 removed 360 cubic yards of TPH contaminated soils.		
Contaminant and media type: Gasoline and Diesel in soil, slightly elevated MTBE in limited area of groundwater (<10 µg/L) remains in one monitoring well (MW-3).		
Location/depth of residual contaminant mass left-in-place: Some elevated concentrations of TPH were left in soils at a depth of approximately 4 feet bgs adjoining a portion of the former product piping and one of the fuel dispensers following secondary source removal. Some localized residual TPH may also be present in soils at depths of approximately 8 feet bgs along the north, east and south sidewall of the UST excavation. Low level concentrations of MTBE in limited area of groundwater (<10 µg/L) remains in one monitoring well (MW-3).		
Is the plume stable and/or shrinking? Yes	Does remaining plume extend off-site? likely very limited	
Approximate length of hydrocarbon plume (ft.): MTBE limited to one downgradient well.		
Does completed corrective action protect existing and potential beneficial uses per the Basin Plan? Yes		
Does corrective action protect public health for current land use? Yes		
Should corrective action be reviewed if land uses change? Yes		
Monitoring Wells destroyed? Yes	Number destroyed: 5	Number retained: None


VII. Local Agency Representative Data

Agency: Santa Cruz County Environmental Health Services	Address: 701 Ocean Street, Room 312
City/State/Zip Santa Cruz, CA 95060	Phone/Email: (831) 454-2758
Responsible Staff Person: Mr. Scott Carson	Title: Professional Geologist

VIII. Additional Comments

Site Management Requirements: Residual soil and groundwater contamination may still exist on-site that could pose an unacceptable risk under certain site development activities such as site grading, excavation, or de-watering. The Central Coast Water Board, Santa Cruz County Environmental Health Services (SCCEHS), and the appropriate local planning and building departments must be notified prior to any changes in land use, grading activities, excavation, or dewatering. This notification must include a statement that residual soil and groundwater contamination underlie the property and nearby properties. The levels of residual contamination and any associated risks are expected to reduce with time.

IX. Central Coast Water Board Certification

for  Kenneth A. Harris, Jr. - Executive Officer	Digitally signed by Harvey C. Packard Date: 2014.07.15 08:44:17 -07'00'	Date: July 15, 2014
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LIST OF PUBLIC COMMENTERS (in chronological order)

Jennifer Laskin	Daisy Gomez	McKenna Maness
Alfonso Medrano	Elizabeth	Ella Cavlan
Nancy Faulstich	Cancino-Perez	Scott MacWilliam
George Ow, Jr.	Manuel Bersamin	Xochilt Chavez
Graciela Vega Cendejas	Beth Nelson	Zack Jot
Kathleen Kilpatrick	Damian Duron	Imelda Hernández
Benjmain Ow	Isabella Yarme	Alejandro Garcia
Angela Brener	Benjamin Rivero	Jackeline
Joe Appenrodt	Selina Vargas	Castorena-Davila
Maddie McGuire	Mario D. Magaña	Madison Raasch
Stephanie Woods	Erlinda Felix	Richard Kojak
Isiah Castro	Sarah-Hope Parmeter	Willy Elliott-McCrea
Joshua Martinez	Cristian Rameno	Nancy Faulstich
Tarah Fyock	Valeria Montion	Sam Blesich
Magnolia Morris	Daisy Gomez	Alex Romero
Alexia Rodriguez	Leslie Lazo	Savana Maxfield
Elizabeth Atilano	Ella Arnerich	Walter Trinate
Autumn Ricketts	Leonardo Martinez	Gary Plomp
Gail McNulty	Chris Basiletti	Barry Scott
Marisa Ortiz	Mariel Halupa	Leslie Lazo
Samy Sullivan	Yesenia Molina	Zav Hershfield
Maria Heredia	Consuelo Alba-Speyer	Margarida Costa
Santiago Murillo	Sabrina Foraker	Jane Pera
Melody	Natasha Dadlani	Pablo Orozco-Castro
Lillian Uribe Orozco	Jasmine Zamora	
Joey Rocha	Yocelyn Gonzalez	
	Flores	



Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>
Cc: Suzi Merriam <suzi.merriam@cityofwatsonville.org>

Mon, Jul 13, 2020 at 7:48 PM

Forwarding email that CDD received from the City's website regarding [950 W. Beach St.](#)

Several more emails to follow.

----- Forwarded message -----

From: <noreply@civicplus.com>
Date: Sun, Jul 12, 2020 at 7:17 PM
Subject: Online Form Submittal: Contact the Boards and Commissions
To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name	Jennifer
Last Name	Laskin
Email Address	jenniferlaskinesquire@gmail.com
Subject	NO to Propane Storage without Environmental Impact Review
Message	Dear Esteemed Commissioners:

I was a teacher and community organizer in Watsonville from 2003 -2012. I was active with PVFT and taught at Renaissance High School for the entire time. I left Watsonville in 2012 to go to Law School in Washington DC. I am currently a practicing Attorney in Maryland. However, Watsonville is still very close to my heart. I married a local and we stay in almost constant communication with family and friends in the area.

Today someone sent me the full staff report to you regarding the propane storage facility. I am very very distressed to read the Staff recommendations from the City Staff to you -- advising you to approve the process for the proposed Propane Storage and distribution facility. This is on your Tuesday agenda. As a trained Attorney I am SHOCKED they would advise this project not go under an Environmental Impact review due to the "common sense" exception. This actually--- makes no common sense. There will be people who send you detailed analysis and legal reasoning of why this approval would put the city at a health risk, a legal risk, and an economic risk. PLEASE do not allow this to go through without the proper studies on impacts.

I have alerted environmental organizations and other Attorneys

who do this work at the state and national levels. People who have just learned about this (including community members and city council members) are as shocked as I am. This is a very important issues and people are on notice.

Thank you for your time.

Jennifer Laskin, MS, JD, Esquire

File Upload	<i>Field not completed.</i>
Phone	202-
Address	
City	Laurel
State	MD
Zip Code	20707
Staff Directory	View the Staff Directory for the City of Watsonville

Email not displaying correctly? [View it in your browser.](#)

Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Due to COVID 19 Pandemic and the current "Shelter in Place" Order by the County Health Officer I am working remotely.

Please contact me by email and I will respond within 48 hours.



Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>
Cc: Suzi Merriam <suzi.merriam@cityofwatsonville.org>

Mon, Jul 13, 2020 at 7:50 PM

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>
Date: Sun, Jul 12, 2020 at 9:39 PM
Subject: Online Form Submittal: Contact the Boards and Commissions
To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name	Alfonso
Last Name	Medrano
Email Address	alfonsomedrano84@gmail.com
Subject	Propane facility
Message	Good evening, planning committee. I am disappointed that the City of Watsonville's planning committee is thinking of building a fossil facility when we should be thinking of the future and the future is GREEN energy. I don't know who thought this is a good idea but I'll assure you it's not. Massive leaks and explosions are possible and frightening to think about and so close to our wetlands. Please think about a green alternative.
File Upload	<i>Field not completed.</i>
Phone	831-
Address	
City	Watsonville
State	CA
Zip Code	95076

Staff Directory
[View the Staff Directory for the City of Watsonville](#)

Regeneración/Regeneration

PÁJARO VALLEY CLIMATE ACTION

July 13, 2020

Watsonville Planning Commission

275 Main Street

Watsonville, CA 95076



RE: Oppose Bulk Propane Plant, Application No. PP2019-18

Dear Commissioners:

Regeneracion Pajaro Valley Climate Action strongly urges that the commission reject the proposal to allow a bulk propane plant at 950 W Beach St. without an Initial Study to determine the need for a full environmental review under CEQA. The propane plant should be rejected be-

cause allowing a large new fossil fuel facility perpetuates our dependence on the industry and poses serious threats to our environment that must be subjected to an environmental review, as mandated by the California Environmental Quality Act.

Advisory Board

Mayra Bernabe

Organizer, COPA (Communities
Organized for Relational Power in
Action)

Adam Bolaños Scow

Senior Strategist, Public Water
Now

Francisco Estrada

Program Associate,
Pájaro Valley Community Health
Trust; 2019 Mayor, Watsonville

Anne Hayes

Director of Development, Western
Region, Climate Central

Kirsten Liske,

Vice President of Community
Programs, Ecology Action

Nelly Vaquera-Boggs

President,
Pájaro Valley Federation of
Teachers

We disagree with the staff's finding that the project is exempt from CEQA as "common sense" because "there is no possibility that the project would have a significant effect on the environment." The common sense exception to CEQA only applies "where it can be seen with *certainty* that there is *no possibility* that the activity in question may have a significant effect on the environment."

In fact, staff's own Environmental Memo highlights several potential major environmental impacts that demand a full CEQA review.

The Environmental Memo states diesel trucks would be used often to transport the propane from the proposed bulk propane facility. The construction of permanent infrastructure that relies on pollution-spewing trucks transporting fuel that would be burned either locally or transported elsewhere would worsen our climate crisis and the harmful conditions facing our already vulnerable population.

The Environmental Memo also notes that the proposed facility would be serviced by trains and trucks but fails to recognize the significant environmental effects of trains and trucks carrying propane, and the possibility of accidents and spills.

Regeneración/Regeneration

PÁJARO VALLEY CLIMATE ACTION

The proposed project would be adjacent to the rail-trail project that is currently under construction. Putting a large propane tank above the rail trail is highly inappropriate as bikers, joggers, walkers, and birders should not need to worry about a massive explosion when exploring the area.

The beautiful Watsonville slough system -an estuarine habitat that supports many federal and state listed threatened and endangered species- is located 580 feet away from the proposed site. Many species of birds, fish, and plants call the area home that could be adversely impacted or completely eliminated by the new propane plant and its environmental impacts. Note that, the June 25, 2020 Planning Commission Memorandum states that the site previously held four fuel storage tanks and that those tanks eventually leaked, causing the site to be listed as a LUST Cleanup Site by the State Water Resources Board. Additionally, the site is located within a 100-year flood plain, making it highly susceptible to further accidents that could cause irreversible harm to our fragile ecosystems.

Finally, our region must eliminate its dependence on the fossil fuel industry. Fossil fuel pollution has devastating health consequences that are often perpetrated against marginalized communities. If the city is to meet goals for rapid decarbonization by 2030 in order to slow warming to a 1.5-degree limit in accordance with the Paris Agreement, we cannot allow the continued construction of pollution emitting facilities.

As time is running out to make meaningful progress on climate change we must make rapid progress towards electrification and renewable energy. Supporting new fossil fuel infrastructure undermines Watsonville's health, climate goals, and overall well-being.

For all of these reasons we urge you to deny this application.

Sincerely,

Nancy Faulstich

Nancy Faulstich, Director

Representing Regeneración - Pajaro Valley Climate Action



Fwd: 950 West Beach - Public Hearing July 14

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Jul 13, 2020 at 7:59 PM

To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <georgeowjr@aol.com>

Date: Mon, Jul 13, 2020 at 2:59 PM

Subject: Re: [950 West Beach](#) - Public Hearing July 14

To: deborah.muniz@cityofwatsonville.org <deborah.muniz@cityofwatsonville.org>, andrew.m.ow@outlook.com <andrew.m.ow@outlook.com>, david@c2gengrs.com <david@c2gengrs.com>, david.mack@weareharris.com <david.mack@weareharris.com>, jim.crowley@cityofwatsonville.org <jim.crowley@cityofwatsonville.org>, mragdalempc@gmail.com <mragdalempc@gmail.com>, Rebecca.Supplee@santacruzcounty.us <Rebecca.Supplee@santacruzcounty.us>, richkojack@sbcglobal.net <richkojack@sbcglobal.net>, Tom.Sayles@waterboards.ca.gov <Tom.Sayles@waterboards.ca.gov>, mscwilliam@yahoo.com <mscwilliam@yahoo.com>, williamgeorgeow@gmail.com <williamgeorgeow@gmail.com>, matt.huffaker@cityofwatsonville.org <matt.huffaker@cityofwatsonville.org>, tamara.vides@cityofwatsonville.org <tamara.vides@cityofwatsonville.org>, Alan.Smith@grunskylaw.com <Alan.Smith@grunskylaw.com>

Dear Deborah Muniz

Thank you for sending me the email below last Thursday. I am sending you my letter in response. Would you please get copies to all members of the Planning Commission, appropriate staff members (apart from those copied above) and City Council members. Thank you very much. Would you please let me know that you received my letter and that you will do this for me. Thank you very much.

George Ow, Jr.

Owner of adjacent property to [950 West Beach Street](#).

George Ow, Jr.
Ow Family Properties
203 Highland Avenue
Santa Cruz, CA, 95060
georgeowjr@aol.com
831-

July 13, 2020

Re: 950 West Beach Street, Propane Project.

Dear Watsonville Planning Commission,

We have been working with the City of Watsonville for over 25 years on many projects and would like to comment on the proposed propane gas facility at [950 West Beach Street](#), which is near our Manabe-Ow Business Park property.

1. We got notice Friday morning, July 10, via an email that was sent on 5:36 PM Thursday night, for the Planning Commission Meeting of Tuesday, July 14. This is the first that we heard about the project. That's really short notice and not consistent with past notices we've received or sent to notify nearby property owners prior to public hearings.
2. The staff report states that the facility, if approved, will store 50,000 gallons of propane gas, expanding to 170,000 gallons in two to three years, and will receive perhaps millions of gallons annually via truck and rail yet is exempt from environmental review under CEQA. This is one of the most unbelievable things I can recall in my real estate career, which is over five decades long. It's hard to imagine that a 170,000 gallon facility filled with a toxic, explosive substance could possibly be exempt from environmental review under CEQA as a matter of common sense. Would the same analysis and recommendations occur in any other local jurisdiction? Would Santa Cruz or Capitola or Scotts Valley recommend approval of a bulk propane facility without environmental review? I doubt it very, very much.

Attachment 1

Page 223 of 412

Attachment 8 page 7 of 117

3. I have led our family businesses for 50-plus years and have direct experience having property near two propane gas companies near our property in Scotts Valley. People feel that large visible propane tanks are dangerous and do not want to live or have their businesses near them, which led the City of Scotts Valley to make them leave. That cost the City millions of dollars and lots of headache. When the propane companies did leave, they left pollution and problems that are still there to be cleaned up and arguments about who was responsible for what—a typical situation with fossil fuel operators and their highly paid consultants, who always say that there will never be any danger or any pollution. Talk to the people who were left picking up the pieces after a propane or other fossil fuel spill, leak, or explosion—and the resulting injuries, deaths, contamination and headaches—and they will tell you: don't believe fossil fuel companies and their experts and don't let them locate near you, don't let them in your city. What other city in the region is putting in propane gas or fossil fuel operations of this magnitude? None that I am aware of.

4. We have been working in good faith with the City of Watsonville to responsibly build out and develop the Manabe-Ow Business Park, which was annexed by the City from the County over a decade ago with the goal of bringing good jobs and positive economic development to the city. We think that building this propane facility will make it harder to attract tenants and move forward with quality development on our property. Would you want your work next to this proposed facility? If you are the owner of a company, would you like to put your company close to 170,000 gallons of propane? The propane project is going to bring minimal positive economic development and/or jobs on under 1 acre of land—while devaluing hundreds (if not thousands) of acres of surrounding land and properties—not a good trade.

5. Our professional concerns are secondary to the biggest problem: the danger to the people of Watsonville. There is a long and tragic history of propane and other fossil fuel disasters. In the past, this may have been a necessary tradeoff for the heat and propulsion that fossil fuels provide. That is no longer the case. Renewable energy sources can make clean electricity. Battery electric motors and hydrogen fuel cells can propel cars and trucks. We have electric ovens and stoves and HVAC systems. We can and should avoid fossil fuels and their negative effects on our water, air, and physical safety. The gas company applicant needs a special use permit to legally build its facility; Watsonville should tell them "NO," especially without environmental review.

6. We are entrepreneurial business people who remember our immigrant roots and we care about Watsonville and its people. We like to get things done and support local organizations and causes. Here are some things that we have done in Watsonville.

a. We have helped create over 1,200 jobs by taking empty buildings and filling them or building new buildings and filling them, thereby allowing local residents to pay for shelter, food, health care, and everything else people need to survive and thrive. We have brought companies like FedEx Ground, FoxShox, Harrell's, Threshold, Ramos Furniture, and others to Watsonville and we have helped multiple companies expand their operations, like Driscoll's.

b. We love Cabrillo College, our most accessible college. I went to a community college. We have given over 1,600 Cabrillo College American Dream Scholarships in Santa Cruz County and over 1,000 went to students from Pajaro Valley Schools over the past 30 years.

c. We believe in the transformative power of books and know that knowledge is power. We are Angel Donors to the Watsonville Libraries and are part of the team that produced the permanent Farmworker's Exhibit.

d. We believe in nurturing the person and are Angel Donors to: Second Harvest Food Bank, Pajaro Valley Shelter Services, Pajaro Valley Prevention and Student Assistance, Santa Cruz Land Trust and Major Donors to: Pajaro Valley Historical Association, Watsonville YMCA-YWCA, Pajaro Valley Unified School District.

e. We are Angel Donors of Watsonville Brillante and have taken a lead role in helping Kathleen Crocetti and team create a world-class art project at City Hall that celebrates the people of Watsonville. The first section, the first 10%, the "Strawberry Picker-Mayan Warrior," is up for all to see. Our dream is for Watsonville to become as famous for public art in the United States as Barcelona is in Spain.

Thank you for your consideration and service to the City of Watsonville and its great people. Please do the right thing and vote against the proposed propane project.

Sincerely,

George Ow, Jr.

CC: Matt Huffaker, Suzi Merriam, Justin Meek, Alan Smith

-----Original Message-----

From: Deborah Muniz <deborah.muniz@cityofwatsonville.org>

To: Andrew Ow <andrew.m.ow@outlook.com>; David Dauphin <david@c2gengrs.com>; David Mack

<david.mack@weareharris.com>; George Ow, Jr. <georgeowjr@aol.com>; Jim Crowley <jim.crowley@cityofwatsonville.org>; Matt

Ragsdale <mragsdalempc@gmail.com>; Rebecca Supplee <Rebecca.Supplee@santacruzcounty.us>; Richard Kojack

<richkojack@sbcglobal.net>; Tom Sayles <Tom.Sayles@waterboards.ca.gov>; William Kojack <mscwilliam@yahoo.com>

Ow <williamgeorgeow@gmail.com>
Sent: Thu, Jul 9, 2020 5:38 pm
Subject: 950 West Beach - Public Hearing July 14

Dear Interested Parties:

Re: City of Watsonville July 14, 2020 Planning Commission Remote/Teleconference meeting
Public Hearing for proposed propane storage and transfer facility at [950 W. Beach St.](#)

Agenda (attached) and meeting materials are available on the City's website at:

<https://watsonville.legistar.com/DepartmentDetail.aspx?ID=35945&GUID=A658B547-06B2-478D-8B74-E9794104AF88&R=f8ce6c59-2e1f-4bc0-ad32-dbb070dbfcb4>

Please refer to the Agenda for further details on how to view the meeting; participate before the meeting; and/or participate during the meeting.

Any questions, contact me.

--

Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

[250 Main St., Watsonville, CA 95076](#)

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

**Due to COVID 19 Pandemic and the current "Shelter in Place" Order by the County Health Officer I am working remotely.
Please contact me by email and I will respond within 48 hours.**



Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Jul 13, 2020 at 8:06 PM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Jul 13, 2020 at 2:24 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Graciela

Last Name Vega Cendejas

Email Address gvegacendejas@gmail.com

Subject Propane Facility

Message I am concerned at about the Propane Facility proposed for the city of Watsonville; we need a Environmentally Action Report submitted. It is concerning that the propane station could affect our health and it is being rushed.

File Upload *Field not completed.*

Phone 831-

Address

City Watsonville

State CA

Zip Code 95076

Staff Directory

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Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Jul 13, 2020 at 8:07 PM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Jul 13, 2020 at 3:35 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Kathleen

Last Name Kilpatrick

Email Address dorioktk@gmail.com

Subject Propane tanks on W. Beach

Message Just found out about this project, on your calendar for approval tomorrow. The consultant (hired by whom?) determined no environmental impacts, and that no CEQUA evaluation is needed?! Not problems with hazardous materials even though 170,00 gals of liquid propane would be stored and distributed? No traffic issues in spite of the large tanker trucks and trains required to haul 2.5 million gals a year in and out of our city? No concerns about explosions or leaks affecting nearby businesses, homes, school, and wetlands? If there was a risk/benefit analysis done, who will benefit and how? Tax revenues? How much propane is needed locally, and who uses it? This can't employ many people. And what are the risks and benefits of fostering the use of fossil fuel and greenhouse gas? Doesn't Watsonville have a Climate Action Plan?

All these questions and more could be addressed in the CEQUA process. It may be possible that this could be done safely, but the health of the public and our environment outweigh private profits. Please insist upon a CEQUA plan. We have the right to know, and to express our concerns.

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Phone 831-

Address

City Watsonville

Attachment 1

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Attachment 8 page 11 of 117

State	CA
Zip Code	95076
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Justin Meek <justin.meek@cityofwatsonville.org>

Fwd: Online Form Submittal: Contact the Boards and Commissions

1 message

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Jul 13, 2020 at 8:08 PM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Jul 13, 2020 at 3:46 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Benjmain

Last Name Ow

Email Address benjaminmow@gmail.com

Subject Letter Opposing the Proposed Propane Plant at [950 W Beach Street](#)

Message Dear Watsonville Planning Commissioners,

Please read the attached detailed letter of strong opposition to the proposed propane plant at [950 W Beach Street](#). Thank you very much for your time, consideration, and service to the Watsonville community!

Sincerely,

Benjamin Ow and the entire Ow Family

File Upload [Letter to Watsonville Planning Commission re Proposed Propane Facility - 7.13.20.pdf](#)

Phone 8314271189

Address [105 RULOFSON STREET](#)

Attachment 1

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City	SANTA CRUZ
State	CA
Zip Code	95060
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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

[250 Main St., Watsonville, CA 95076](#)

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Due to COVID 19 Pandemic and the current "Shelter in Place" Order by the County Health Officer I am working remotely. Please contact me by email and I will respond within 48 hours.

East Ohlone Watsonville, LLC
Ow Family – Ohlone Parkway, LLC
Ow Family – Lee Road, LLC
1601 41st Ave #202
Capitola, CA 95010

July 13, 2020

Dear Watsonville Planning Commission,

This letter respectfully requests that you reject the proposal for a Special Use Permit to allow a bulk propane plant without any environmental review at 950 W Beach Street, Application No. PP2019-18. The Planning Commission should reject the bulk propane plant as proposed because it would not serve the City of Watsonville or its residents. The proposed project is not in consistent with Watsonville's General Plan, would generate hazardous vehicular traffic, does not comply with the special use standards required of structures that store liquid petroleum products in Watsonville, and would be materially detrimental to the public health, safety, convenience and welfare of the people of Watsonville, and would result in material damage and prejudice to neighboring properties in the vicinity. Furthermore, it is likely that approving the proposed project would lead to litigation against the City of Watsonville because allowing massive fossil fuel facilities without environmental review is contrary to California law. Additionally, the proposed project is not in the interests of the residents of Watsonville because the project would be detrimental to public health, the environment, and the economy, including surrounding property values.

The Proposed Bulk Propane Plant Is Subject To CEQA And The Proposed Approval Is Contrary to Law

The Planning Commission should reject the proposed bulk propane project because no environmental review has been done, which is contrary to CEQA. The proposed bulk propane project is a "project" within the meaning of CEQA, is not exempt, and thus approval as proposed would be inappropriate.

The Proposed Plant Is Subject To CEQA

The proposal at issue is whether or not to approve the construction of a permanent 170,000 gallon propane storage facility. "It is state policy in California that 'the long-term protection of the environment ... shall be the guiding criterion in public decisions.'" *Davidon Homes v. City of San Jose*, 54 Cal. App. 4th 106, 112 (Cal. Ct. App. 1997) (quoting Cal. Pub. Resources Code § 21001, subd. (d)). "'With narrow exceptions, CEQA requires an EIR [environmental impact report] whenever a public agency proposes to approve or to carry out a project that may have a significant effect on the environment.'" *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394, 401 (Cal. Ct. App. 2012) (quoting *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 390-91 (1988)). Accordingly, CEQA clearly applies to the proposed project.

The Proposed Plant Is Not Exempt From CEQA Because There Is The Possibility That The Project Could Have A Significant Effect On The Environment

The proposal attempts to avoid environmental review by claiming that it is "common sense" that the CEQA does not apply to the proposed bulk propane facility because "there is no possibility that

East Ohlone Watsonville, LLC
Ow Family – Ohlone Parkway, LLC
Ow Family – Lee Road, LLC
1601 41st Ave #202
Capitola, CA 95010

the project would have a significant effect on the environment.” This claim fails because there is the possibility of a significant effect on the environment. “The required burden of a party challenging [the common sense] exemption is slight.” *Chung*, 210 Cal. App. 4th at 400. This slight burden is met here where there is evidence that the proposed project could have a significant effect on the environment. In fact, the factual record already establishes that the project could have a significant effect on the environment.

We know that approving the project would lead to construction that would affect the built environment. That is enough to render the common sense exemption inapplicable. In fact, California law refuses apply the common sense exemption to much less definite situations. In *Paulek v. Western Riverside County*, 238 Cal. App. 4th 583, 611-14 (Cal. Ct. App. 2015), the California Court of Appeal analyzed the application of the common sense exemption to the removal of a conservation overlay from a portion of real property. The court held that the common sense exemption was inapplicable to the removal of the conservation overlay *even though development was not planned on the property* because the “change in designation embodies a fundamental land use decision that has the potential for causing ultimate physical changes in the environment.” *Id.* At 614 (citations omitted). The proposed project is the approval of a bulk propane plant. Approval would result in a significant change to the built environment. It would affect the air, water, noise, look, and feel of the property and its surrounding environment. And it would do so significantly. The common sense exemption for CEQA does not apply.

City staff relies on an Environmental Memorandum and Technical Memorandum dated June 4, 2020 (the “Environmental Memo”) to find the project exempt from CEQA as common sense. Notably, the Environmental Memo does not list a single similar project in all of California that has been found to be exempt from CEQA. Nor does the Environmental Memo list any regulations or cases that support its assertion that it is common sense that CEQA does not apply to the approval and construction of a bulk propane facility. There is absolutely no factual record of any bulk propane projects in the entire state of California that have been found to have no significant environmental impacts, let alone no possibility of a significant environmental impact. Indeed, the only projects cited by the Environmental Memo are a storage facility in Schuyler County, New York and a refinery in Detroit Michigan. And it’s not clear that those projects should be used as a basis of comparison for the current project because as the Environmental Memo concedes “[d]etailed specifications of project equipment are unknown as this time.” Environmental Memo page 10 of 170. To rely on the calculations for out-of-state projects whose similarities to the current project are unknown would be arbitrary and capricious. The proposed project should be rejected because it could have a significant environmental impact.

California Law And The Current Site Shows That Propane Plants Can Have A Significant Effect On The Environment

The common sense exception to CEQA only applies “[w]here it can be seen with **certainty** that there is **no possibility** that the activity in question may have a significant effect on the environment.” *Davidon Homes*, 54 Cal. App. 4th at 112 (emphasis added) (holding that the City of San Jose failed to comply with CEQA in determining that an ordinance was exempt from CEQA as common sense because it was not supported by the record). California law, however, has long recognized the significant effect

East Ohlone Watsonville, LLC
Ow Family – Ohlone Parkway, LLC
Ow Family – Lee Road, LLC
1601 41st Ave #202
Capitola, CA 95010

that bulk propane facilities can have on the environment. For example, in *Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70 (Cal. Ct. App. 2010), the California Court of Appeal reviewed a full EIR for a proposed petroleum facility and found the environmental review lacking.

The Environmental Memo also notes that the proposed facility would be serviced by trains and trucks but fails to recognize the significant environmental effects that trains and trucks carrying propane can have. In fact, incredibly, the Environmental Memo does not even evaluate the possibility of a train derailment, truck or car crash, or other catastrophic event. Compare that to the extensive modeling and risk assessment done in evaluating the EIR for a proposed petroleum project in *Rodeo Citizens Assn. v. County of Contra Costa*, 22 Cal. App. 5th 214 (Cal. Ct. App. 2018). Here's how the EIR at issue in *Rodeo Citizens Assn.* describes the risks inherent in rail transport of propane:

Rail transport of [liquid propane gas], either propane or butane, entails risk. With an unregulated release, a liquid pool may rapidly form and a flammable vapor cloud may begin to spread over the surrounding area. If such a vapor cloud finds an ignition source, the cloud can flash back and even explode if a portion of the flammable gas is in a congested area. This may result in damage to persons and property within the vicinity of the vapor cloud. It is also possible for a sustained torch fire (caused by burning [liquid propane gas] released through a puncture in the tank car) to develop a torch fire emitting a radiant heat flux ... which could lead to injury or fatality depending on how close people are to the fire. In addition to the typical consequences of a hydrocarbon release, [liquid propane gas] in a closed vessel such as a tank car has the potential to undergo a BLEVE [boiling liquid expanding vapor explosion] if the vessel fails catastrophically.

Id. At 229. The proposed project would put the people and businesses of Watsonville at risk of injury or death (and significant environmental impacts!) and it should not be approved without an actual assessment of the real risks involved and whether those risks are worth it.

The application claims that it is common sense that a bulk propane facility would have no possibility of having a significant environmental impact yet the current site shows that this is incorrect. The June 25, 2020 Planning Commission Memorandum notes that the site previously held four fuel storage tanks and that those tanks eventually leaked, causing the site to be listed as a LUST Cleanup Site by the State Water Resources Board. Fossil fuel facilities often fail, leading to massive costs to the surrounding communities. One of the worst industrial disasters in history is the San Juanico disaster, where a liquid petroleum gas storage plant exploded, triggering fires that killed between 500 and 600 people and left as many as 7,000 others with severe burns. In 1989, faulty propane and butane facility leaked gas near a railroad in the Soviet Union, leading to an explosion that killed 575 people. In 2013, a Blue Rhino propane plant in Florida exploded, injuring eight workers. The list of propane facility disasters is long and tragic. It is the furthest thing from common sense to approve a bulk propane facility adjacent to a railway in a floodplain in an area known for powerful earthquakes without environmental review.

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Unfortunately, even fossil fuel projects that avoid disaster can have significant negative environmental impacts. The Environmental Memo notes that propane combustion produces particulate matter, sulfur dioxides, nitrogen oxide, carbon monoxide, greenhouse gas, and methane, each of which can have devastating environmental impacts. Accordingly, even the best case scenario for the environment if this project is built is far from good. The proposed bulk propane plant should be denied.

The Proposed Bulk Propane Project Is Not Consistent With Watsonville's General Plan and EIR

Watsonville's General Plan and associated EIR indicate how inappropriate approval of this facility without environmental review would be. The General Plan's discussion of Industrial zoning notes the general categories of allowed uses, which do not include petroleum refining or storage, and that "[t]he intent of the district is to serve the industrial needs of the community." General Plan page 52. Nothing in the record indicates how or why this bulk propane plant would serve the industrial needs of the community. Further, the General Plan's EIR notes that its goals include ensuring "that future development is consistent with the General Plan through use of the City's zoning ordinance, development standards, capital improvement program, and environmental review process;" "support[ing] public and private beautification, and promote pride in community appearance;" "protect[ing] surface and groundwater resources;" "protect[ing] air, water, soil, biotic resources from damage by exposure to hazardous materials;" and "reduc[ing] the potential danger related to the use, storage, transport, and disposal of hazardous materials to an acceptable level of risk." General Plan EIR at 1-15, 1-18, & 1-20. Approval of a bulk propane plant without any environmental review is not consistent with the goals and purposes of Watsonville's General Plan and EIR. This project should be denied.

A Special Use Permit Is Inappropriate For The Proposed Project

The application for a special use permit should be denied because the findings required for approval of a special use permit cannot be made. When considering a Special Use Permit, Watsonville's Municipal Code instructs the Planning Commission to make, among others, the following findings:

- (a) The proposed use at the specified location is consistent with the policies of the General Plan and the general purpose and intent of the applicable district regulations...
- (c) The proposed use will not generate pedestrian or vehicular traffic which will be hazardous or conflict with the existing and anticipated traffic in the neighborhood...
- (f) The proposed special use complies with all additional standards imposed on it by the particular provisions of this chapter and all other requirements of this title applicable to the proposed special use and uses within the applicable base zoning district; and
- (g) The proposed special use will not be materially detrimental to the public health, safety, convenience and welfare, and will not result in material damage or prejudice to other property in the vicinity.

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Watsonville Municipal Code 14-12.513. Here, none of those required findings can be made. As noted above, the proposed facility is not compatible with the General Plan or with the purpose and intent of the applicable district regulations. Furthermore, the proposed project will increase vehicular traffic that will be hazardous to the neighborhood. How do we know? Look at the warnings when driving near a truck carrying propane. Significantly increasing the number of large propane-carrying trucks and trains will materially increase the amount of hazardous traffic to the area. Additionally, the application fails to satisfy the provisions of Watsonville Municipal Code section 14-44 regarding Onshore Oil Facilities, which are defined as any structure or development created for the purpose of storing, transporting, or processing liquid petroleum products, excluding the transportation, storage or retail sale of gasoline or motor oil.

Watsonville Municipal Code 14-44.020. Whenever a Special Use Permit is sought to permit a facility such as the one proposed here, “the City Council shall determine whether the [proposal] is in conformity with the ... General Plan and whether [it] further the health, safety, and welfare of the people of the City of Watsonville.” Watsonville Municipal Code 14-44.010(a). As detailed below, the proposed bulk propane facility would not further the health, safety, and welfare of the people of the City of Watsonville. The proposed facility would also be materially detrimental to the public health, safety, convenience and welfare and would result in material damage and prejudice to other properties in the vicinity. Accordingly, the proposed application should be denied by the Planning Commission, which may not even have authority under Watsonville’s municipal code to approve the proposed facility.

The Proposed Bulk Propane Plant Is Not In The Interests Of Watsonville’s Residents

In addition to the legal reasons listed above illustrating that the project should not be approved because it does not comply with CEQA, the project should not be approved because it is not in the best interests of the residents of Watsonville. The community and the world is moving away from fossil fuels. We know that time is running out to make meaningful progress on climate change. We know that fossil fuel pollution has devastating health consequences, consequences that all too often are perpetrated against marginalized communities. We know that the future is electrification and renewable energy. Supporting permanent massive fossil fuel infrastructure is bad for Watsonville’s health and economic wellbeing, and should be avoided.

Building Massive Fossil Fuel Infrastructure Is Bad for the Environment

California recognizes that fossil fuels and, accordingly, fossil fuel infrastructure are bad for the environment. Governor Newsom has been particularly vocal about the need to abandon fossil fuels. Last May, his budget noted that California “recognizes the need for careful study and planning to decrease demand and supply of fossil fuels....” Last October, Governor Newsom signed six bills to move California away from fossil fuels. At the time, he noted that, “California is a leader in the fight to transition away from fossil fuels. These bills put intentions into action.” The vast majority of scientists and governments agree that massive reductions in greenhouse gas emissions are needed by 2030. One of the only ways to massively reduce greenhouse gas emissions is to reduce our use of fossil fuels. See, e.g. <https://www.vox.com/2016/9/19/12938086/electrify-everything>. We can move away from fossil

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fuels without a massive hit to the economy or our quality of life if we engage in a massive push for electrification (e.g. many cities requiring electric appliances rather than natural gas ones) and cleaning up the electric grid (e.g. by shutting down coal and natural gas power plants and replacing them with solar and wind power plants and battery storage). We cannot do it by continuing to build fossil fuel infrastructure.

The science and public policy are clear: fossil fuels and infrastructure that promotes and enables fossil fuel use are bad for the environment. The proposed bulk propane facility would be bad for the environment and should not be approved.

Building Massive Fossil Fuel Infrastructure Is Bad For Public Health

The more we study about air pollution, the more we learn how horrible its effects are. *See, e.g.,* <https://www.vox.com/future-perfect/2019/12/11/20996968/air-pollution-cognitive-impact>. Air pollution has massive negative effects on cognition, on respiratory issues, and on quality of life. We should be doing all we can to decrease air pollution, not increase it.

California recognizes how bad diesel and propane are for public health. For example, as part of its mission to reduce air pollution, the California Air Resources Board recently approved regulations to require electric truck manufacturing to speed up the transition from fossil fuel-based vehicles. In announcing the regulations, CARB Chair Mary D. Nichols noted that, “Diesel vehicles are the workhorses of the economy, and we need them to be part of the solution to persistent pockets of dirty air in some of our most disadvantaged communities. Now is the time – the technology is here and so is the need for investment.” Studies also indicate that living near oil and gas facilities increase the risk of disease. <https://www.sciencedaily.com/releases/2018/04/180409103920.htm>

According to the Environmental Memo, diesel trucks would be used often to transport the propane from the proposed bulk propane facility. The construction of permanent infrastructure that relies on pollution-spewing trucks transporting a fossil fuel that would eventually be burned either locally (bad) or transported far away (also bad!) is terrible for public health. It should not be allowed.

The Proposed Plant Should Be Rejected To Avoid Perpetuating Environmental Racism

There is a long history of environmental racism in the United States and abroad. Historically, people put polluting facilities in marginalized communities, particularly communities of color, because those communities had less power. There is now a growing movement to prevent new fossil fuel facilities in communities of color. Watsonville, a predominantly Latinx city, should be part of the future, not part of the past, and reject the proposed bulk propane plant. Furthermore, there is a school located a mile away from the proposed plant. How can we be confident that the school is outside of the blast radius of the plant if no calculations have been done regarding potential catastrophic events? The proposed plant should be rejected.

Building Massive Fossil Fuel Infrastructure Would Be Bad For Watsonville’s Economy

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There is abundant evidence that future economic growth will be in sectors like clean energy, electric vehicles, computer science, and life and biosciences and that there will not be economic growth in fossil fuel-related industries. In fact, many predict a carbon bubble that will burst as the world moves away from massively polluting fossil-fuel based infrastructure to clean, renewable sources of energy. See, e.g., <https://www.theguardian.com/environment/2018/jun/04/what-is-the-carbon-bubble-and-what-will-happen-if-it-bursts>. Perhaps more importantly, oil and gas infrastructure has been found to depress nearby property values, including residential property values over 2 miles away. <https://core.ac.uk/reader/6960284>. A two-mile radius of the proposed facility incorporates scores of Watsonville homes. Further decreasing their property values during a recession bordering on a depression is not a wise choice. Straddling Watsonville with a large permanent fossil fuel tank will not only fail to help Watsonville's economy, it will almost surely severely hinder it.

The proposed site is adjacent to some of the last large parcels of developable land in the City of Watsonville. Those parcels could become a corporate headquarters or clean-tech research and development facility or local manufacturing plant or, if changes are made to the relevant specific plan, a large mixed-use or residential project. Placing a massive, imposing propane facility could scare off potential users or future residents. Would Tesla want to locate next to a massive propane facility? Would Driscoll's? Would anyone? Unlikely. Accordingly, the project should not be approved.

The Proposed Project Is Incompatible With The Adjacent Rail Trail And Nearby Slough

The proposed project would be adjacent to the rail trail project that is currently under construction. One of the main goals of the rail trail project is to allow pedestrian and bike travel, which are environmentally friendly ways to traverse our beautiful community. Putting a gigantic propane tank above the rail trail would make the rail trail much less inviting and much more likely to lead to a catastrophic event. Biker, joggers, walkers, and birders should not need to worry about a massive explosion when exploring the area.

The beautiful Watsonville slough system is also quite near the proposed site. Many species of birds, fish, and plants call the area home. Any development should be sensitive to their local habitats. It is not in their interest to put a bulk propane plant nearby, especially one that has not gone through environmental review. Accordingly, the proposed project should be denied.

Approving Massive Fossil Fuel Infrastructure During A Respiratory Pandemic Hitting Watsonville Hard Would Be Particularly Inappropriate

The COVID-19 pandemic is hitting the United States hard, and California in particular right now. Sadly, the local outbreak is concentrated in Watsonville. Despite Watsonville having fewer people than the City of Santa Cruz, it has nearly triple the number of confirmed COVID-19 cases. We also know that COVID-19 is a disease that can wreak havoc on respiratory systems and that air pollution is linked with increased vulnerability to COVID-19. See, e.g., <https://news.stanford.edu/2020/06/30/links-covid-19-air-pollution/>. It would be particularly egregious to approve a massive fossil fuel facility without environmental review while COVID-19 is causing devastating impacts on the City. Please do not do it.

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Approval Of The Proposed Project Is Inappropriate Because Proper Notice Was Not Given

Watsonville's Municipal Code requires mailed notice prior to the Planning Commission or any other final decision-maker holds a public hearing. Watsonville Municipal Code 14-10.095. Such mailed notice must be mailed no less than ten calendar days prior to the hearing, including to surrounding property owners within a three hundred foot radius drawn from the perimeter limits of the subject property. Our properties are within a three hundred foot radius of the subject property and we have not received mailed notice. Accordingly, approval of the proposed project would not be appropriate.

The reasons listed above indicate why it would be illegal and a bad idea to approve the bulk propane facility as proposed. We respectfully request that you reject the project as proposed.

Sincerely,

Benjamin Ow, Manager

Andrew Ow, Esq.

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MEMORANDUM

I. ISSUES PRESENTED

- a. Is the approval of a Special Use Permit for a bulk propane plant exempt from environmental review due to CEQA's common sense exemption?
- b. May the Watsonville Planning Commission approve a Special Use Permit for a bulk propane plant or is there a different process required?
- c. What is the proper level of environmental review for a Special Use Permit for the proposed bulk propane plant at 950 West Beach Street in Watsonville?

II. BRIEF ANSWERS

- a. The approval of a Special Use Permit for a bulk propane plant is not exempt from environmental review due to CEQA's common sense exemption because it is possible that a bulk propane plant could have a significant environmental impact.
- b. The Watsonville Planning Commission may not approve a Special Use Permit for a bulk propane plant at 950 West Beach Street because Watsonville Municipal Code 14-44 requires the City Council to make certain findings and for any such Special Use Permit to be approved by a referendum vote of the people of Watsonville before a Special Use Permit for any structure or development created for the purpose of storing or transporting liquid petroleum products becomes effective.
- c. An environmental impact report should be conducted on the proposed project at 950 West Beach Street in Watsonville to satisfy CEQA because the proposed bulk propane plant could, and likely would, have significant environmental impacts.

III. DISCUSSION

- a. The Approval Of Special Use Permits For Bulk Propane Plants Are Not Exempt From Environmental Review Due to CEQA's Common Sense Rule

The California Environmental Quality Act ("CEQA") was designed and is implemented to protect the environment by requiring environmental review and analysis before most developments in the state may be approved. There are multiple levels of analysis to determine whether an approval is subject to environmental review. First, one must determine if a "project" is at issue. Here, there is no dispute that a project is at issue. Second, one must determine if a project is exempt from CEQA. Here, the issue is whether the approval of a Special Use Permit for a bulk propane plant is exempt from CEQA due to the "common sense" exemption found in CEQA Guidelines Section 15061(b)(3).

The "common sense" exemption allows for projects to be exempt from environmental review when "it can be seen with ***certainty*** that there is ***no possibility*** that the activity in question may have a significant effect on the environment." *Davidon Homes v. City of San Jose*, 54 Cal. App. 4th 106, 112 (Cal. Ct. App. 1997) (emphasis added). This rule, along with California case law, indicates that it would be inappropriate for a bulk propane plant to avoid environmental review by applying CEQA's common sense exemption because it cannot be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment. Because the legal test for the

common sense exemption is so strict, California courts are reluctant to let projects use it and the “required burden of a party challenging [the common sense] exemption is slight.” *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394, 400-(Cal. Ct. App. 2012). Searches of California cases have been unable to find any California case approving the construction of any building or structure using the common sense exemption, let alone a bulk propane plant, because structures can have significant environmental effects and it’s not common sense that they should be exempt from CEQA. In fact, allowing buildings or structures to be exempt from CEQA as common sense would allow the exemption to swallow the rule and prevent CEQA from protecting California’s residents and the environment.

A review of California cases and planning documents indicates that it would be inappropriate for the common sense exemption to be used to approve a bulk propane plant. California cases that allow use of the common sense exemption do not allow for new buildings or structures, but rather allow for governmental changes that do not affect the built environment and/or will improve the environment by engaging in native plant restoration. Planning documents are consistent with this case law.¹ Attempts to use the common sense exemption to apply to governmental actions that would or could affect the built environment are rejected by California courts.

It is instructive to compare *Paulek v. Western Riverside County*, 238 Cal. App. 4th 583 (Cal. Ct. App. 2015) and *California Farm Bureau Federation v. California Wildlife Conservation Board*, 143 Cal. App. 173 (Cal. Ct. App. 2006) with *CREED-21 v. City of San Diego*, 234 Cal. App. 4th 488 (Cal. Ct. App. 2015) and *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394 (Cal. Ct. App. 2012). In *Paulek*, at issue was whether the common sense exemption applied to the removal of a conservation overlay from a portion of real property. 238 Cal. App. 4th at 611. The court held that the common sense exemption was inapplicable to the removal of the conservation overlay **even though development was not planned on the property** because the “change in designation embodies a fundamental land use decision that has the potential for causing ultimate physical changes in the environment.” *Id.* At 614 (citations omitted). *Paulek* shows that if a governmental action could possibly lead to physical changes that could have an adverse impact on the environment, the common sense exemption does not apply.²

In *California Farm Bureau Federation*, the issue was whether the conversion of agricultural land into a protected wildlife habitat was exempt from environmental review under CEQA. 143 Cal. App. at 173. When analyzing whether the common sense exemption applied, the Court of Appeal noted that the “common sense exemption is reserved for those obviously exempt projects where its absolute and precise language clearly applies” and that the “lead agency has the burden to show the project comes within the common sense exemption.” *Id.* at 185 (internal quotations and citation omitted).

¹ An example is this Elk Grove Planning Commission staff report for the acquisition of an existing building by the city, which notes that the common sense exemption applies because the “subject property is occupied by an existing commercial building ... and there are no plans to modify the existing use” and the “acquisition ... does not approve any development project, nor does it disturb the physical environment.”

https://elkgrove.granicus.com/MetaViewer.php?view_id=13&clip_id=1743&meta_id=142276

² See also *Rominger v. County of Colusa*, 229 Cal. App. 4th 690 (Cal. Ct. App. 2014) (holding that CEQA’s common sense exemption did not apply because the lead agency failed to show “that there is no possibility that the approval of the [proposed] subdivision may result in a significant effect on the environment” because “it remains an eminently reasonable possibility that the creation of smaller parcels that are easier to finance **will** lead to development that might not occur, and to attendant significant effects on the environment.”) (emphasis in original).

Despite arguments that “a mere change in use of land from agriculture to wildlife habitat is not of itself an adverse environmental impact” and that there would be “environmental benefits of changing the use of agricultural land to habitat,” “the project involve[d] the physical reshaping of the land to create wetlands and uplands for habitat.” *Id.* at 185-86. And that physical changing of the land would require heavy machinery. *Id.* at 186. The Court of Appeal noted that even environmentally beneficial projects may have environmental costs, “which must be considered and assessed.” *Id.* Because the lead agency had not adequately shown that there was no possibility that the project, considered as a whole, would not cause significant environmental impacts, the common sense exemption to CEQA did not apply and environmental review was required. *Id.* at 187.

In *CREED-21*, the Court of Appeal analyzed whether CEQA’s common sense exemption applied to approving the planting of native vegetation on an approximately 2,385-square foot area that was mostly bare dirt with a few nonnative plants. 234 Cal. App. 4th at 511-12. The opinion notes:

Although the revegetation plan would change or alter the site's 2011 physical conditions, it is only "a substantial, or potentially substantial, adverse change in any of the physical conditions" that constitutes a "significant effect on the environment" within the meaning of CEQA. (Guidelines, § 15382, italics added; see § 21068.) Because the revegetation plan indisputably would improve the site's physical conditions compared to its 2011 physical conditions, that plan would not result in any adverse change in its physical conditions. Therefore, the revegetation plan could have no significant effect on the environment within the meaning of CEQA.

Id. at 512. The Court of Appeal accordingly held that there was no possibility that the activity in question would have a significant negative effect on the environment, and therefore the common sense exemption to CEQA applied.

In *Chung*, a city held a ballot measure that would require the city to seek competitive bids for trash service, but there was no anticipated change to the actual levels of service or transportation trips from trash servicers. 210 Cal. App. 4th at 396-97. A resident sued arguing, among other things, that the ballot measure was illegal because it did not go through environmental review. *Id.* at 397-98. At trial, the court held that the ballot measure was not a “project” within the meaning of CEQA and, alternatively, even if it were a project the common sense exemption would apply because the plaintiff had not “raised a reasonable argument to suggest a possibility of an adverse impact. There is no fair argument that the proposed measure alone would reasonably result in a foreseeable increase in trucks servicing the City.” *Id.* at 400. On appeal, the Court of Appeal upheld the trial court’s finding that the ballot measure was not a “project” subject to CEQA. *Id.* at 406.

Paulek, California Farm Bureau Federation, CREED-21, and Chung illustrate that CEQA’s common sense exemption does not apply to any governmental approval that could potentially result in a change to the built environment or a negative effect on the environment. In order for the common sense exemption to apply, there must not be any possible change to the built environment and no foreseeable change to other activities, such as truck trips or heavy machinery use, that could negatively affect the environment. The approval of a Special Use Permit for a bulk propane would result in a change to the built environment; increase the use and storage of hazardous materials, which has a negative effect on the environment; and increase activities that have a negative effect on the environment, such as truck and train trips. Accordingly, a bulk propane plant fails each element of the

test for whether CEQA's common sense exemption applies. In fact, it is common sense that a bulk propane facility could, and likely would, have a significant negative impact on the environment. Accordingly, it would be inappropriate to approve a bulk propane plant without environmental review by using the common sense exemption.

- b. Watsonville's Municipal Code Requires The City Council To Make Certain Findings And For Special Use Permits For Bulk Liquefied Propane Storage Facilities To Be Approved By A Majority Of The City Council Before Any Such Special Use Permit Becomes Effective

The plain language of Watsonville's Municipal Code mandates that a Special Use Permit for a liquefied propane storage facility cannot become effective the City Council makes particular findings and the people of Watsonville approve the Special Use Permit by a referendum vote.

Watsonville Municipal Code Section 14-16.603 sets forth the uses that require a Special Use Permit in areas of Watsonville zoned IG – General Industrial District, which is the zoning for 950 West Beach Street. Watsonville Municipal Code § 14-16.603. Petroleum products refining and storage requires a Special Use Permit. *Id.* For most Special Use Permits, the proper procedure for obtaining one is set forth in Watsonville Municipal Code Sections 14-12.508 – 14-12.512, and requires approval by the Planning Commission. *Id.* at §§ 14-12.508 – 14-12.512. For “onshore oil facilities,” however, the Watsonville Municipal Code sets forth a different approval process. *Id.* at §§ 14-44.010 – 14-44.070. An “onshore oil facility” is defined as “any structure or development created for the purpose of storing, transporting, or processing liquid petroleum products, excluding the transportation, storage or retail sale of gasoline or motor oil.” § 14-44.020. The “proposed project [at 950 West Beach Street] would serve as a liquid propane storage and distribution facility.” Technical Memorandum p. 162 of 170. Propane is a petroleum product. *E.g.*, Technical Memorandum p. 167 of 170; *Honolulu Oil Corp. v. Franchise Tax Board*, 60 Cal.2d 417, 422 (1963). Therefore, the proposed bulk propane project at 950 West Beach Street is an onshore oil facility because it is a facility for the storage of a liquefied petroleum product and is not for the storage of gasoline or motor oil.

Watsonville's Municipal Code sets forth strict requirements for the approval of a Special Use Permit for an onshore oil facility:

Whenever an [applicant] seeks a Special Use Permit issued by the City Council as required by Section 14-16.603 of this Code, to permit the development and operation within the City of any onshore oil facility, in addition to the findings required for approval by Section 14-10.607 of this Code, ***the City Council shall*** determine whether [it] is in conformity with the coastal policies, if applicable, and General Plan and whether [it] furthers the health, safety, and welfare of the people of the City of Watsonville. ***If the City Council makes the findings required*** by Section 14-10.607 of this Code and finds that [it] is consistent with the coastal policies, if applicable, and the General Plan and is not injurious to the health, safety and welfare of the people of the City, ***it shall submit the proposed Special Use Permit to a referendum vote of the people***³ at either a special election or the then-upcoming general election in accordance with the State Elections Code or Article XIII

³ The applicant seeking the Special Use Permit for an onshore oil facility shall pay, to the extent permitted by law, any and all costs associated with the special or general election required herein. *Id.* at § 14-44.030.

of the City Charter. ***The proposed Special Use Permit shall not become effective unless approved by a majority of the Watsonville electors voting in the election.***

Id. at § 14-44.010(b) (emphasis added). Watsonville's Municipal Code clearly states that a Special Use Permit for a bulk liquefied propane facility shall not become effective unless the City Council makes certain findings and it is approved by a majority of Watsonville electors voting in a referendum election. Accordingly, the Planning Commission cannot decide whether or not to issue a Special Use Permit for the proposed bulk liquefied propane plant at 950 West Beach Street and before any Special Use Permit for the project can become effective the City Council must find that the project would improve the health, safety, and welfare of the people of Watsonville and it must be approved by a majority of Watsonville electors voting in a referendum election.

c. An Environmental Impact Report Should Be Conducted For The Proposed Bulk Propane Facility At 950 West Beach

An environmental impact report should be conducted for the proposed propane project at 950 West Beach Street so Watsonville's residents and officials can make an informed decisions before approving a Special Use Permit. In *Muzzy Ranch v. Solano County Airport Commission*, 60 Cal. Rptr. 3d 247, 250-51 (2007), the California Supreme Court described how CEQA applies to governmental approvals before holding that the adoption of a land use compatibility plan that embraced existing restrictions on development were exempt from CEQA.⁴ *Muzzy Ranch* describes CEQA's three-tier process. *Id.* at 252. The first tier is jurisdictional and requires an agency to evaluate whether an activity is a project subject to CEQA. *Id.* Projects are broadly defined and there is no debate that the proposal for a bulk propane plant at 950 West Beach Street is a project subject to CEQA. *E.g.*, Technical Memorandum pages 1-2 of 170.

The second tier of CEQA sets forth exemptions. *Id.* If a project is exempt from CEQA, no further environmental review is necessary. *Id.* at 252-53 (internal citations omitted). As discussed above, the common sense exemption does not apply to the proposed bulk propane project at 950 West Beach Street.

If a project is not exempt from CEQA, the reviewing agency must "conduct an initial study to determine if the project may have a significant effect on the environment." *Id.* at 253 (internal quotation omitted). If there is no substantial evidence that a project ***or any of its aspects may*** cause a significant effect on the environment, the agency must prepare a 'negative declaration' that briefly describes the reasons supporting its determination." *Id.* (emphasis added and internal quotations omitted). When an agency finds that substantial evidence exists that an aspect of a project may cause a significant effect on the environment, the agency "***must ensure*** that a full environmental impact report is prepared on the proposed project." *Id.* (emphasis added and internal citations omitted).

Here a full environmental impact report is appropriate due to the proposed use and its proposed location. The applicant wants to operate a large bulk propane facility. These types of facilities can have a significant impact on the environment, which, for CEQA purposes, is defined as "the ***physical conditions which exist*** within the area ***which will be affected by a proposed project***, including land, air

⁴ Like *Chung* and *CREED-21*, *Muzzy Ranch* is notably distinguishable from the facts at issue here because it did not allow a change of the built environment, which could have a significant environmental effect; rather, it allowed the status quo to persist, and thus was found to be exempt from CEQA.

water, minerals, flora, fauna, noise, [and] objects of historic or aesthetic significance.” *CREED-21*, 234 Cal. App. 4th 488, 503 (internal quotation omitted and alteration and emphasis in original). The Staff Report and Technical Memorandum note that there previously was a propane facility at the site that leaked, causing hazardous materials contamination and the need for remediation, which is a significant effect on the environment. *E.g.*, Technical Memorandum page 161 of 170. Propane leaks and hazardous materials contamination are not the only potential significant environmental effects of the proposed project. Propane is both a pollutant and extremely combustible. A full environmental impact report is needed so the people of Watsonville can adequately assess whether a Special Use Permit would further the safety, healthy, and welfare of the community.

The proposed facility’s operations must be assessed as well as its location. The location is adjacent to railroad tracks and near an airport. What type of effect could a train or plane crash have on the environment if the propane facility were allowed? The people of Watsonville have a right to know. Other proposed propane facilities have analyzed the risks, allowing the relevant agencies to make informed decisions. For example, in *Rodeo Citizens Assn. v. County of Contra Costa*, 22 Cal. App. 5th 214 (Cal. Ct. App. 2018), an environmental impact report described the risks inherent in transporting propane by rail:

Rail transport of [liquid propane gas], either propane or butane, entails risk. With an unregulated release, a liquid pool may rapidly form and a flammable vapor cloud may begin to spread over the surrounding area. If such a vapor cloud finds an ignition source, the cloud can flash back and even explode if a portion of the flammable gas is in a congested area. This may result in damage to persons and property within the vicinity of the vapor cloud. It is also possible for a sustained torch fire (caused by burning [liquid propane gas] released through a puncture in the tank car) to develop a torch fire emitting a radiant heat flux ... which could lead to injury or fatality depending on how close people are to the fire. In addition to the typical consequences of a hydrocarbon release, [liquid propane gas] in a closed vessel such as a tank car has the potential to undergo a BLEVE [boiling liquid expanding vapor explosion] if the vessel fails catastrophically.

Id. at 229. The environmental impact report for 950 West Beach Street should also assess the noises that would accompany the project, including additional train and truck trips, and what impacts, if any, they would have on the community, especially nearby businesses and residents.

An environmental impact report is also important so mitigation measures can be proposed and analyzed. Should there be increased setbacks from the property lines for the proposed propane tanks?⁵ Are special security measures needed? What could be done to best protect the health, safety, and welfare of the people of Watsonville?

The project site is across railroad tracks from land in the Manabe Ow Business Park, which are some of the last significant vacant developable parcels in the City. The City has long strived to bring jobs and an improved quality life to the community by developing the Manabe

⁵ At least one unpublished California case notes that an environmental impact report’s mitigation measures included additional setbacks for propane tanks at a proposed development. *Citizens for the Protection & Preservation of Wawona v. Mariposa County*, F057922 No. 9222 p. 70 (Cal. Ct. App. July 8, 2010).

Ow Business Park. An environmental impact report should evaluate what effects, if any, the propane facility would have on the Manabe Ow Business Park and whether the facility would potentially prevent some types of development on the vacant parcels (including uses, such as residential, hotel, and/or recreation, that business park may not be zoned for currently but could be a use desired by the City in the future).

IV. CONCLUSION

The project applicant for a bulk liquefied propane facility in Watsonville is seeking to avoid environmental review by using CEQA's common sense exception. Based on CEQA's guidelines and California case law, it is not appropriate to use the common sense exemption to approve a Special Use Permit for the proposed project. Additionally, Watsonville's Municipal Code requires the City Council to find that the project would improve Watsonville's health, safety, and welfare and for the voters of Watsonville to approve the contemplated Special Use Permit before it becomes effective. A full environmental impact report should be completed so the City Council is aware of all the potential significant environmental impacts of the project so it can make informed findings before any votes are cast.



Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Jul 13, 2020 at 8:09 PM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Jul 13, 2020 at 5:24 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Angela

Last Name Brener

Email Address angela_mango@yahoo.com

Subject STOP Propane Gas Facility

Message Environmental Impact Review needed for proposed Propane Gas facility at [950 West Beach St.](#) I teach in Watsonville and I'm concerned for the safety of my students and their families.

File Upload *Field not completed.*

Phone 831-

Address

City Ben Lomond

State CA

Zip Code 95005

Staff Directory

[View the Staff Directory for the City of Watsonville](#)



Justin Meek <justin.meek@cityofwatsonville.org>

Fwd: Online Form Submittal: Contact the Boards and Commissions

1 message

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Jul 13, 2020 at 8:10 PM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Jul 13, 2020 at 6:52 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Joe

Last Name Appenrodt

Email Address appenrodt1@aol.com

Subject APNS 018-331-05&06

Message RE: Proposal for Propane Facility Meeting 7-14-20

File Upload [Planning Commission 950 W. Beach.docx](#)

Phone 8312348554

Address [4375 Capitola Road](#)

City Capitola

State CA

Zip Code 95010

Staff Directory

[View the Staff Directory for the City of Watsonville](#)
Email not displaying correctly? [View it in your browser.](#)

Attachment 1

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Due to COVID 19 Pandemic and the current "Shelter in Place" Order by the County Health Officer I am working remotely. Please contact me by email and I will respond within 48 hours.

July 13, 2020

Dear Planning Commission Members,

As a property owner of 890 W. Beach Street, I would like to express my concerns over the proposed use of 950 W. Beach as an unmanned bulk propane facility.

These are my concerns:

-Propane tank storage poses a high safety risk that we feel could compromise the safety of our tenants and their businesses should an accident occur. Being Cal/OSHA approved is not a guarantee.

-The 200 employees of our tenant, Smith and Vandiver (S&V) will be sharing an alleyway for exiting the property with the propane truck's entrance and exit. There is a blind curve on the property when S&V employees are exiting and propane trucks are entering. The probability of an accident is high.

- The visibility onto W. Beach St is limited with the combination of trucks, cars and trains in a dense area.

-This facility would be "sandwiched" between multiple properties. Multiple large propane storage tanks are unsightly and will limit development options for the surrounding property owners.

-What is our guarantee that this facility will be used as a bulk facility only and not available for retail sales in the future? Their entrance and exit could not accommodate additional traffic.

-What is our guarantee this facility will be monitored for safety over the years? There is no room for error with multiple propane storage tanks on a property located close to businesses with employees. Here is an article regarding a propane explosion at the property owner's/applicant's property. We do not want this risk. Does the City of Watsonville? <https://www.santacruzsentinel.com/2014/02/22/boulder-creek-propane-blast-prompts-company-owner-to-move-tank/>

We recommend the Planning Commission deny this application. There are simply too many unanswered questions and concerns.

Regards-

Joe Appenrodt

Appenrodt Commercial Properties

831-234-8554

Boulder Creek propane blast prompts company owner to move tank

By **SANTA CRUZ SENTINEL** and **STEPHEN BAXTER** |

PUBLISHED: February 22, 2014 at 12:00 a.m. | UPDATED: September 11, 2018 at 12:00 a.m.

BOULDER CREEK — The owner of Felton-based Mountain Propane said Friday he would remove a 4,000-gallon tank from his home on Two Bar Road after an explosion injured a worker and damaged two homes.

A tank that large is illegal on a residential property, according to the Santa Cruz County Planning Department, but Mountain Propane owner Richard Kojak said he did not know that.

“Because it makes people uncomfortable I’m going to get rid of it,” Kojak said. “It wasn’t involved in the incident, it was just in the proximity. I realize that this incident is scary for folks, but I don’t want people to think we’re in any way lax on safety. It’s absolutely our priority and always has been.”

A spokeswoman for the California Division of Occupational Safety and Health said Friday that it continued to probe if any workplace safety laws were violated. The investigation could take four months or more, said Erika Monterroza, a Cal/OSHA spokeswoman.

It will include interviews with witnesses and the worker, as well as a review of employee training records and potentially lab analysis from the blast, she said. If laws were broken, the company could face \$5,000 to \$70,000 in fines.

Investigators visited Kojak’s property at 15675 Two Bar Road on Wednesday.

Firefighters initially said the property was on Bar King Road, which is its cross street on the rural property off Highway 9.

Wednesday’s blast about 10:45 a.m. alarmed neighbors and briefly set fire to two homes near Bar King Road and Rincon Way.

A 36-year-old Mountain Propane driver was setting up a fuel transfer from a 500-gallon propane tank on a flatbed truck to a 4,000-gallon tank on the ground, according to Kojak and Cal/OSHA.

A valve broke on the truck and propane escaped, said Kojak. A small fire started near the tank and the worker extinguished it, but more fuel found its way downhill to two homes.

Within about a minute, a wall heater's pilot light sparked a blast that neighbors said sounded like an earthquake. The worker was thrown to the ground from the explosion.

A metal storage unit near the 4,000-gallon tank was blackened and torn apart, and small fires ignited along the road. It took firefighters about 30 minutes to contain.

No one else was injured, but the worker was transported by ambulance to Santa Clara Valley Medical Center and released that day.

Kojak said the 4,000-gallon tank was on his property because he had planned to build a kiln. The project never happened.

"This is really the first incident that we've had. It was unfortunate but it was very fortunate because no one was seriously hurt."

Mountain Propane has been distributing propane for about six years. It spun off from Mountain Service Co., a Felton company that has sold parts for propane systems and related equipment since 1979.

Cal/OSHA records show that neither company has been investigated in the past.

"We welcome it," Kojak said of the investigation.

"Any time there's an incident it needs to be thoroughly investigated to make sure it doesn't happen again."

Follow Sentinel reporter Stephen Baxter at [Twitter.com/sbaxter_sc](https://twitter.com/sbaxter_sc)



[CDD] Watsonville Propane Facility

Maddie McGuire <maddie.b.mcguire@gmail.com>

Mon, Jul 13, 2020 at 3:57 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Hello,

I am a concerned resident of the Interlaken area of Watsonville, and I have come to know that there is a proposal for the establishment of a propane plant on West Beach Street. I am emailing to express my concern that the establishment of such a plant is NOT in accordance with the City's Climate Action Plan to move Watsonville AWAY from dependence on fossil fuels. Additionally, I am especially concerned about the environmental effects this facility may have on the Watsonville Slough and other nearby natural areas. It seems that this plant would pose countless environmental threats, including potential for groundwater contamination and harm to fragile ecosystems.

I do not support the establishment of the propane plant, and sincerely hope that the Planning Commission's vote tomorrow reflects that lack of support. I would hope that the leaders of my town put environmental concerns first in times of global climate crisis such as now. Thank you for your time.

Best,

Maddie McGuire



[CDD] Propane facility, vote no!

'Stephanie A Woods' via CDD <cdd@cityofwatsonville.org>

Mon, Jul 13, 2020 at 9:52 PM

Reply-To: Stephanie A Woods <swoodsies@icloud.com>

To: suzi.merriam@cityofwatsonville.org, cdd@cityofwatsonville.org

Hello,

I am a local resident of Monterey County and grew up in this area. I am very concerned to hear that a propane facility is proposed to be built in Watsonville. The potential for leaks that could harm the environment are great and we need to protect our fragile ecosystems in the Monterey Bay that support the lives and livelihoods of the people who live here. Also, the plant would be within the 100 year flood plain, and with extreme climate events becoming more regular in occurrence, there is an even greater risk of potential contamination of our already precious and dwindling water supply. This plant would continue our dependence on fossil fuels which is not in line with the goals and interests of the people who live here. I urge you to listen to the people and protect the precious resources we have from further degradation.

In trust,
Stephanie Woods



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Propane Facility near Watsonville Slough

1 message

'isiah_castro89@yahoo.com' via CDD <cdd@cityofwatsonville.org>

Mon, Jul 13, 2020 at 10:00 PM

Reply-To: "isiah_castro89@yahoo.com" <isiah_castro89@yahoo.com>

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>, "suzi.merriam@cityofwatsonville.org" <suzi.merriam@cityofwatsonville.org>

To whom it may concern,

My name is Isiah Castro. I have been a resident of the city of Watsonville all my life and have thoroughly enjoyed the growth of our great city. Yet, growth without proper acknowledgement to what natural beauties this city has cannot be overlooked when thinking about building a propane facility so close to the Watsonville Slough.

Having visited the area of the slough near Ramsey park, I can attest to the power of nature that is there and the many types of animals that inhabit the area. Putting a propane facility on unsettled ground, which could very well cause severe damage to the ecosystem, is unwise and too nearsighted for a great city such as Watsonville.

This should not be something that should be permitted in the area. Think of the ecosystem that could be destroyed by this course of action

I hope that those in power think of more than just monetary gain and think about life as a whole.

Thank you for your time.

Isiah Castro

[Sent from Yahoo Mail on Android](#)



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Re: NO PROPANE FACILITY!

1 message

Joshua Martinez <joshuarincon0@gmail.com>

Mon, Jul 13, 2020 at 10:13 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

On Mon, Jul 13, 2020 at 10:11 PM Joshua Martinez <joshuarincon0@gmail.com> wrote:

Hello,

Hope y'all are having a good day but I just want to say that I really believe y'all should reject the proposal of a new propane facility! It's hurting our environment and the United States already has lost over 90 percent of its sloughs and California is the star that has the most slough out of all the stew and this is just going to hurt our air, water, and ecosystems. This is going to affect us residents especially the ones that live here in Watsonville but I am speaking for myself and my parents who don't know how emails work and all this that we strongly oppose this proposal and about the propane facility, I get the it might help in some way but it's not going to be worth affecting all of us please take us in consideration!

Sincerely,

Joshua Martínez

Nancy Martínez

Miguel García



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Fwd: Deny Propane Facility in Watsonville Slough

1 message

Tarah Fyock <tarahfyock@gmail.com>

Mon, Jul 13, 2020 at 11:04 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

----- Forwarded message -----

From: **Tarah Fyock** <tarahfyock@gmail.com>

Date: Mon, Jul 13, 2020 at 11:03 PM

Subject: Deny Propane Facility in Watsonville Slough

To: cdd@cityofwatsonville.org <cdd@cityofwatsonville.org>

To whom it may concern,

Please reconsider the application of the newly-proposed propane site on the Watsonville slough because of the dangers that this may bring. The future of the slough, including all of its organisms, depends on the decisions made today. If we accept this major propane site and in the future it fails and our water and animals are severely harmed, I do believe we will look back at this moment and wonder if we could have changed anything to prevent this from happening. Please don't let this happen.

Sincerely,

Tarah Fyock of Santa Cruz County



[CDD] Proposed Propane Project in Watsonville Slough

Magnolia Morris <magnolia.juliet@gmail.com>

Mon, Jul 13, 2020 at 11:21 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Dear Watsonville Planning Commission,

I am a resident of Marina, and I am concern about the proposed Propane Project though Watsonville slough. It appears that environmental concerns are being pushed aside in order to commit to an action that is ultimately counterproductive to the city's Climate Action Plan.

It is irresponsible to put future generations of our community in a position to be cleaning up even more of an environmental mess than we are already facing. I urge you to complete and consider the results of a full environmental impact report.

Furthermore, I urge you to take this opportunity to seek renewable energy options to meet community needs. This is a time for thinking of the future, and not just immediate energy needs.

Sincerely,
Magnolia



[CDD] Propane facility

Lexiii Rodriguez <alexiarodriguezk@gmail.com>

Tue, Jul 14, 2020 at 12:23 AM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Hello ,my name is Alexia and I am a resident of Watsonville and I am twenty years old. It has come to my understanding that today July 14th the planning commission will vote on allowing a Propane Facility to be built on our slough. As I write this email I ask that the future of our environment and ecosystem is kept in mind, along with the safety of our community and future generations to come. The propane facility will bring a number of potential problems if built, for one it is not in line with the city's climate action plan that's seeks to reduce the use of fossil fuels. It will also disrupt our beautiful sloughs ecosystem. It is in my opinion as a resident that this plan be declined as I would love to share our slough with my future children and grandchildren without the fear that this facility may impact our groundwater as well. It is to my knowledge that the site will be built on a flood plain which will increase the likelihood for toxic environmental disasters. I know that as a community we residents care about our City and I hope that you all do to and with this brief email I hope that my concern is taken in with consideration for our community.

Thank you,
Alexia R.



[CDD] Proposal threatening Watsonville slough

'Liz Atilano' via CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 12:29 AM

Reply-To: Liz Atilano <e.atilano@ymail.com>

To: Ari Parker <ari.parker@cityofwatsonville.org>, Rebecca Garcia <rebecca.garcia@cityofwatsonville.org>, "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>, "suzi.merriam@cityofwatsonville.org" <suzi.merriam@cityofwatsonville.org>

Hello,

I urge you to deny the application to the proposal you are set to meet about on Tuesday. I also have some questions, I ask you please take the time to respond to the community.

Why is the proposal set to be allowed as "common sense exemption" despite countless environmental threats?

Do you support the City's Climate Action Plan?

Is Watsonville prepared to handle potential toxic environmental disasters?

Is Watsonville prepared to handle groundwater contamination that could threaten drinking water and fragile ecosystems?

This project shouldn't be fast tracked. We need a Environmental Impact Assessment. We need to put our community's health, safety & well being front and center.

Thank you for your time.

Elizabeth
District 7



[CDD] No Propane Facilities in My Home

Autumn Ricketts <autumn.ricketts14@gmail.com>
To: cdd@cityofwatsonville.org

Tue, Jul 14, 2020 at 7:14 AM

Hello,

My name is Autumn Ricketts. I am 19 years old, born and raised in Watsonville. For as long as I can remember, I have lived in houses bordering the sloughs.

I have countless memories of the sloughs throughout my childhood, all of them fond. This has always been my backyard and my home. I remember staring wide eyed through my window at a fox leading her kits through my backyard. I remember a grouchy old owl, his feathers always in disarray whenever I caught a glimpse of him, that would hoot during the day instead of at night. In the mornings, a hummingbird would tap on the glass of my bedroom window. I always felt like she was saying hi.

Even today, the slough is my safe space. Whenever I go outside to answer a phone call, I always get asked, "What is all that noise? Are you at a zoo?" The birds sing beautifully throughout the day. Our native tree frogs lull me to sleep at night with their song. When I need a moment to myself, I head to the trails along Struve slough.

I remember watching a Bill Nye episode about wetlands in my 5th grade science class. In one demonstration, he showed how wetlands like our sloughs actually clean the water that passes through them. Our sloughs are a place of life, healing, and cleansing. Allowing a propane facility only a few hundred of feet from such an important part of our community would be nothing other than a mistake.

Growing up near the sloughs has affected me in so many ways. I have grown to be passionate and protective of the native flora and fauna of my town. As people who live near, and benefit from the proximity to our little slice of nature, it is our duty to protect it as fiercely as we can. We should not allow such a beautiful place, that inspires passion in the children that grow up around it, to come to harm.

Best regards,

Autumn Ricketts



[CDD] Please read at today's public hearing RE: Item C (950 W. Beach St)

Gail McNulty <gail.mcnulty@gmail.com>

Tue, Jul 14, 2020 at 8:58 AM

To: Justin.meek@cityofwatsonville.org, cdd@cityofwatsonville.org

Dear Planning Commissioners,

I am not a Watsonville resident but my heart goes out to families who live near this proposed project, people who work in the vicinity, families who take shelter while grieving a child experiencing cancer at Jacob's Heart just down the street, and others who may be forced to live with a new danger if this project goes forward.

Please consider postponing your vote on this project and taking more time to engage people in a community process to see how people feel about this plan now — as we all work to envision a transformed future beyond COVID-19.

So much has changed since this project was first proposed...

- We are all becoming more aware of the narrowing window of opportunity to prevent the worst impacts of the escalating climate crisis by ending our dependence on fossil fuels and other harmful systems.
- We're beginning to understand what it means to be witnessing the 6th mass extinction and why this is happening. According to the UN, "[Nature is declining globally at rates unprecedented in human history.](#)"
- The global pandemic which has taken a disproportionate toll on low income communities of color is highlighting how [environmental racism leaves communities vulnerable](#). According to a [July 2 Patch.com](#) story, "Watsonville has more than double the cases that Santa Cruz has, even though census estimates indicate about 10,000 more people live in Santa Cruz." Why are Watsonville residents experiencing a disproportionately high impact of COVID-19?

Around the world, the pandemic along with the resulting societal trauma and economic decline are being referred to as "the global pause". A window of opportunity to rethink how and why all of this is happening and carefully consider how we might emerge from this experience in a way that might regenerate our amazing planet in time to allow our children and future generations to thrive.

Please take advantage of this "global pause" to reconsider how [950 W. Beach Street](#) might be developed in a way that will bring the most good and the least harm to the people who live, work, and play in this area.

Thank you,

Gail McNulty
Mother and climate activist
Gail McNulty
831.425.3580 (Home)
571.283.9567 (Cell)

"You have to act as if it were possible to radically transform the world. And you have to do it all the time."—ANGELA
DAVIS



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Protect the Slough and it's endangered animals!

1 message

Marisa Ortiz <marisaortiz29@gmail.com>

Tue, Jul 14, 2020 at 9:41 AM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Hello, my name is Marisa and I am a resident of Watsonville. It is CRITICAL that we save endangered wildlife and preserve their habitats. Please deny the application to build a plant in the slough! We need to protect our environment and it's inhabitants!

Thank you.



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Propane facility

samy sullivan <saga831sullivan@gmail.com>
To: cdd@cityofwatsonville.org

Tue, Jul 14, 2020 at 9:49 AM

Please DENY the admittance of a new propane facility built on, near, or around our BEAUTIFUL SLOUGH here in watsonville. I
IMPLORE YOU to do the RIGHT THING!!!!

Thank you.



Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Jul 14, 2020 at 10:24 AM

To: Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Jul 13, 2020 at 9:39 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Maria

Last Name Heredia

Email Address xochisol@yahoo.com

Subject Agenda Item 5.C

Message

Dear Esteemed Planning Commissioner,

This is in reference to Item 5C of Agenda for July 14, 2020. I am a member of the Sea View Ranch Neighborhood Association. I only became aware of Agenda item 5C because a friend from out of town saw this on your agenda with Planning Staff recommending approval without an EIR, and a "common sense" exemption from CEQA. I am a longtime Watsonville resident, PVUSD parent, active community member, essential employee and busy keeping people afloat during this global Covid 19 pandemic. I have less time to spare to become aware of the many proposed agenda items coming before you to the Planning Commission or to the City of Watsonville for consideration and vote. I am very incredulous that planning staff are asking you to approve this item without a full EIR requirement and a CEQA "common sense" exemption. My read is they are asking you to rubber stamp this agenda item. However residents in the local area and the greater Watsonville area urge you to vote NO to a Special Use Permit for agenda item 5C. The only environmental review done is through referencing of an "environmental memo", and a reference of "common sense" CEQA exemption. Please consider the following reasons. (Sorry this is long, but important for you to consider.) 1. The Proposed Plant Is Subject To CEQA The proposal at issue is whether or not to approve the construction of a permanent 170,000 gallon propane storage facility. "It is state policy in California that 'the long-term protection of the environment ... shall be the guiding criterion in public decisions.'" Davidon Homes v. City of San Jose, 54 Cal.

Attachment 1

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App. 4th 106, 112 (Cal. Ct. App. 1997) (quoting Cal. Pub. Resources Code § 21001, subd. (d)). “With narrow exceptions, CEQA requires an EIR [environmental impact report] whenever a public agency proposes to approve or to carry out a project that may have a significant effect on the environment.” Chung v. City of Monterey Park, 210 Cal. App. 4th 394, 401 (Cal. Ct. App. 2012) (quoting Laurel Heights Improvement Assn. v. Regents of University of California, 47 Cal.3d 376, 390-91 (1988)). Accordingly, CEQA clearly applies to the proposed project. 2. In addition, The Proposed Plant Is Not Exempt From CEQA Because There Is The Possibility That The Project Could Have A Significant Effect On The Environment

The proposal attempts to avoid environmental review by claiming that it is “common sense” that the CEQA does not apply to the proposed bulk propane facility because “there is no possibility that the project would have a significant effect on the environment.” This claim fails because there is the possibility of a significant effect on the environment. “The required burden of a party challenging [the common sense] exemption is slight.” Chung v. City of Monterey Park, 210 Cal. App. 4th 394, 400 (Cal. Ct. App. 2012). This slight burden is met here where there is evidence that the proposed project could have a significant effect on the environment. In fact, the factual record already establishes that the project could have a significant effect on the environment.

City staff relies on an Environmental Memorandum and Technical Memorandum dated June 4, 2020 (the “Environmental Memo”) to find the project exempt from CEQA as common sense. Notably, the Environmental Memo does not list a single similar project in all of California that has been found to be exempt from CEQA. Nor does the Environmental Memo list any regulations or cases that support its assertion that it is common sense that CEQA does not apply to the approval and construction of a bulk propane facility. There is absolutely no factual record of any bulk propane projects in the entire state of California that have been found to have no significant environmental impacts, let alone no possibility of a significant environmental impact. Indeed, the only projects cited by the Environmental Memo are a storage facility in Schuyler County, New York and a refinery in Detroit Michigan. And it’s not clear that those projects should be used as a basis of comparison for the current project because as the Environmental Memo concedes “[d]etailed specifications of project equipment are unknown as this time.” Environmental Memo page 10 of 170. To rely on the calculations for out-of-state projects whose similarities to the current project are unknown would be arbitrary and capricious. The proposed project should be rejected because it could have a significant environmental impact. 3. To conclude, California Law And The Current Site Shows That Propane Plants Can Have A Significant Effect On The Environment

The common sense exception to CEQA only applies “[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.” Davidon Homes, 54 Cal. App. 4th at 112 (emphasis added) (holding that the City of San Jose failed to comply with CEQA in determining that an ordinance was exempt from CEQA as common sense because it was not supported by the record). California law, however, has long recognized the significant effect that bulk propane facilities can

have on the environment. For example, in *Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70 (Cal. Ct. App. 2010), the California Court of Appeal reviewed a full EIR for a proposed petroleum facility and found the environmental review lacking.

The Environmental Memo also notes that the proposed facility would be serviced by trains and trucks but fails to recognize the significant environmental effects that trains and trucks carrying propane can have. In fact, incredibly, the Environmental Memo does not even evaluate the possibility of a train derailment, truck or car crash, or other catastrophic event. Compare that to the extensive modeling and risk assessment done in evaluating the EIR for a proposed petroleum project in *Rodeo Citizens Assn. v. County of Contra Costa*, 22 Cal. App. 5th 214 (Cal. Ct. App. 2018). Here's how the EIR at issue in *Rodeo Citizens Assn.* describes the risks inherent in rail transport of propane:

Rail transport of [liquid propane gas], either propane or butane, entails risk. With an unregulated release, a liquid pool may rapidly form and a flammable vapor cloud may begin to spread over the surrounding area. If such a vapor cloud finds an ignition source, the cloud can flash back and even explode if a portion of the flammable gas is in a congested area. This may result in damage to persons and property within the vicinity of the vapor cloud. It is also possible for a sustained torch fire (caused by burning [liquid propane gas] released through a puncture in the tank car) to develop a torch fire emitting a radiant heat flux ... which could lead to injury or fatality depending on how close people are to the fire. In addition to the typical consequences of a hydrocarbon release, [liquid propane gas] in a closed vessel such as a tank car has the potential to undergo a BLEVE [boiling liquid expanding vapor explosion] if the vessel fails catastrophically.

Id. At 229. The proposed project would put the people and businesses of Watsonville at risk of injury or death (and significant environmental impacts!) and it should not be approved without an actual assessment of the real risks involved and whether those risks are worth it.

The application claims that it is common sense that a bulk propane facility would have no possibility of having a significant environmental impact yet the current site shows that this is incorrect. The June 25, 2020 Planning Commission Memorandum notes that the site previously held four fuel storage tanks and that those tanks eventually leaked, causing the site to be listed as a LUST Cleanup Site by the State Water Resources Board. Fossil fuel facilities often fail, leading to massive costs to the surrounding communities. One of the worst industrial disasters in history is the San Juanico disaster, where a liquid petroleum gas storage plant exploded, triggering fires that killed between 500 and 600 people and left as many as 7,000 others with severe burns. In 1989, faulty propane and butane facility leaked gas near a railroad in the Soviet Union, leading to an explosion that killed 575 people. In 2013, a Blue Rhino propane plant in Florida exploded, injuring eight workers. The list of propane facility disasters is long and tragic. It is the furthest thing from common sense to approve a massive propane facility adjacent to a railway in a floodplain in an area known for massive earthquakes without environmental review. Unfortunately, even fossil fuel projects that avoid disaster can have significant negative environmental impacts. The Environmental Memo notes that propane combustion produces

particulate matter, sulfur dioxides, nitrogen oxide, carbon monoxide, greenhouse gas, and methane, each of which can have devastating environmental impacts. Accordingly, even the best case scenario for the environment if this project is built is far from good. The proposed bulk propane plant should be denied. Thanks so much for your consideration. I will be viewing the meeting online. Sincerely, Maria Heredia.

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Phone	831-
Address	
City	Watsonville
State	California - CA
Zip Code	95076
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Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Fossil Fuel

Santiago Murillo <santiagomurillo21@gmail.com>

Mon, Jul 13, 2020 at 5:21 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Terrible thing what the city is proposing. Shame on you, we should be separating ourself from old customs and move forward to more renewable energy. Instead of a fossil fuel plant we should be investing solar panels or recharge stations around town. Please don't do this as we're dooming ourselves if it happens.



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Gas tanks

Melody <babica@att.net>
To: cdd@cityofwatsonville.org

Mon, Jul 13, 2020 at 6:06 PM

We do not want large gas tanks on Beach St. They would be near our homes and are dangerous to us all in many ways. The FedEx building is bad enough, please stop degrading our neighborhood and our city.

Sent from my iPhone



[CDD] Environmental Action

Lillian Uribe Orozco <liuribe@csumb.edu>
To: cdd@cityofwatsonville.org

Tue, Jul 14, 2020 at 10:59 AM

To whom this may concern:

I am voicing my opinion on the new Propane Facility on the Watsonville Slough.

We are fortunate enough to live in a city with sloughs all around us. Very few cities have sloughs. In 2014, I enrolled in the W.A.T.C.H program. I was taught about how precious sloughs. I feel very blessed to have this knowledge and to have had the opportunity to learn about my hometown's environment. Not many people can say the samething. Because of the sloughs, many tourists come to our city to see the hundreds of birds we attract. Students have the opportunity to study the animal life within and around the slough.

With that said, I believe the application should be DENIED. If this application goes through, we will be hurting ourselves. The water will likely be contaminated. Students will be at risk when studying at these sites. Tourists will take their money else where. Passing this application will be a very selfish act. Not only will the environment be at risk, but so will the people who live and visit our beautiful home.

Thank you for your time,

Lillian Uribe Orozco



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Propane Facility DENY

'Joey Rocha' via CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 11:31 AM

Reply-To: "joeyrocha77@yahoo.com" <joeyrocha77@yahoo.com>

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

You need to deny the facility you guys are planning on proposing. Not only would it be bad for the environment but ESPECIALLY the slough,

DENY

I'll also be attending to deny it aswell

[Sent from Yahoo Mail on Android](#)



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD]

Daisy Gomez <gomez1127.dg@gmail.com>

Tue, Jul 14, 2020 at 11:31 AM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

DENY THE APPLICATION !!



[CDD] Propane Facility on Watsonville Slough

Elizabeth Cancino-Perez <ecancino-perez@ucmerced.edu>

Tue, Jul 14, 2020 at 12:24 PM

To: "suzi.merriam@cityofwatsonville.org" <suzi.merriam@cityofwatsonville.org>, "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Hi,

My name is Elizabeth Cancino and I have been a resident in this city for about 20 years. I am emailing you in regards to the proposal of building a propane facility near the wetlands. This is a threat to our environment and our community we live in. I am concerned about our health and the damage it will cause to our ecosystem. Please consider this while making the decision.

Best,

Elizabeth Cancino-Perez

University of California, Merced
Computer Science and Engineering B.S
ecancino-perez@ucmerced.edu
Pronouns: Her/She/Hers



Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Tue, Jul 14, 2020 at 12:35 PM

Re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>
Date: Tue, Jul 14, 2020 at 12:02 PM
Subject: Online Form Submittal: Contact the Boards and Commissions
To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name MANUEL

Last Name BERSAMIN

Email Address mbersami@hartnell.edu

Subject Public Hearing to consider Special Use Permit with Design Review and Environmental Review (PP2019-18) to allow the establishment of a propane storage and transfer facility (aka bulk propane plant) on a 0.7± acre property located at [950 W Beach Street](#) (APN 018- 331-28; formerly APNs 018-331-05 and -06).

Message Please vote to add a mandatory California Environmental Quality Act (CEQA) report for this project. There are always transients in this area and it IS POSSIBLE that a fire can occur. During my time on the Watsonville City Council there was a major fire near this area of a cold storage facility. We need the California Environmental Quality Act (CEQA) report to go over what are the potential dangers to the District 1 environment including the wetlands and wildlife if these propane tanks were to leak, be damaged or be set afire by human interaction. This project is occurring on Watsonville's Westside, and as a person raised on the westside and as the former city councilman for almost 9 years, I can testify that many projects occurred on the westside that did environmental damage to the area. From the PCBs in transformers that were once stored on Walker Street to pollution leaking into the sloughs, the Westside has had many injuries to the delicate environment of the wetlands before the city passed policies to restore the wetlands. This was a form of environmental racism that continued unabated for many years. Any project that is proposed for the wetlands should have a mandatory California Environmental Quality Act (CEQA) report done. The days of environmental racism anywhere in Watsonville should end. A California Environmental Quality Act (CEQA) report should be mandated here to protect the citizens

Attachment 1

Page 274 of 412

Attachment 8 page 58 of 117

of Watsonville, the inhabitants of District 1, the Watsonville Wetlands that we spent millions to reclaim, the wildlife that is now thriving (including the raccoons that raid my backyard) and to set a precedent for future city policies that involve development anywhere within the city limits. Please mandate a California Environmental Quality Act (CEQA) report for this and all projects!

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State	CA
Zip Code	95076
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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

**Due to COVID 19 Pandemic and the current "Shelter in Place" Order by the County Health Officer I am working remotely.
Please contact me by email and I will respond within 48 hours.**



[CDD] propane proposal on the Watsonville slough

Beth Nelson <bethknitter@gmail.com>

Tue, Jul 14, 2020 at 12:41 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

I am writing as a concerned citizen of Watsonville. The slough is a remnant of the vast wetlands that were one in California. It purifies our water and provides critical habitat for many species in our unique coastal location. Please do not let this city be tarnished and our wetland polluted by allowing a propane facility to locate in our community. This is a dangerous industry to allow into our agricultural based community. All it takes is one accident to render the land here unusable for generations and put the people and wildlife here at risk. It is also very dangerous for our groundwater supply. This is a limited resource and this industry can put our entire community at risk of losing our supply of potable water.

Please do not approve this proposal.

Beth Nelson
634 Lincoln St
Watsonville, CA



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Propane facility by slough

The Maker Of Rub-a-dub <rub_a_dub@hotmail.com>

Tue, Jul 14, 2020 at 12:44 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>, "suzi.merriam@cityofwatsonville.org" <suzi.merriam@cityofwatsonville.org>

Please deny this application. The slough is very important to me. Bird watching and fishing. If anything were to happen, this facility will be 580 feet from the slough. The other thing is we are supposed to be cutting back on our fossil fuel dependency, this doesnt help that. I can not make it to the planning commission meeting so I hope this email is taken into consideration. I bought my home here 23 years ago, the wildlife at the slough is part of my life, please keep it safe. Money is not that important.

Damian Duron

[322 Palm Ave Watsonville California](#)

831

Sent from my Verizon, Samsung Galaxy smartphone



[CDD] Vote against the proposed propane facility on Watsonville slough

Isabella Yarme <isabellayarme@gmail.com>
To: cdd@cityofwatsonville.org

Tue, Jul 14, 2020 at 12:53 PM

My name is Isabella Yarme and I am a resident of Santa Cruz, CA. I am emailing about the proposal for the propane facility on the Watsonville slough.

The proposed site for this project is located 580 feet from the Watsonville slough. This slough is a complex habitat and supports many (federal and state listed) threatened and endangered species.

The site is located in a 100-year floodplain, increasing the likelihood for toxic environmental disasters. There is a potential for spills and leaks causing groundwater contamination. The previous site contained leaking underground storage tanks (warranting EPA LUST cleanup). Groundwater contamination could threaten drinking water and the fragile ecosystem of the slough. Because of the countless environmental threats, there is need for initial study and thorough environmental review.

This proposal is NOT in line with the city's Climate Action Plan that seeks to reduce and eliminate dependence on fossil fuels. I urge you to consider the dangers of this operation, the health of the community, and the health of the environment. Please vote against the implementation of this facility.

Thank you,
Isabella



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] New Propane Facility

Benjamin Rivero <benjaminrivero@berkeley.edu>

Tue, Jul 14, 2020 at 12:55 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

To whom it may concern,

I wanted to write this email to voice my disapproval of the new Propane facility that may potentially threaten our cities health. It would be horrendous to see this new project contaminate our groundwater which will lead to even worse consequences like affect our fragile local eco systems and our communities drinking water. It's always important to put our communities health, wether it be the ecosystem or people, first.

Kind Regards,
Benjamin Rivero



[CDD] About the Facility in the Slough....

Selina Vargas <vargasselina@gmail.com>

Tue, Jul 14, 2020 at 1:05 PM

To: cdd@cityofwatsonville.org, suzi.merrium@cityofwatsonville.org, cityclerk@cityofwatsonville.org

To the City of Watsonville Planning Commision & to whom it may concern,

Hi there ! My name is Selina Vargas. I am a professional dog walker in Watsonville as well as dog owner to my Golden Retriever, Ziggy & German Shepard mix, Kaia. I have lived here for over 15 years. I take many of my four legged clients as well as my own dogs through the trails in Watsonville Slough where the facility is going to be built. The proposed propane facility will make me have second thoughts about using these trails. Not only will it be an eyesore, but I am also concerned with the health of the wildlife and environment surrounding the proposed facility.

I worry about the destruction of wildlife. Ziggy, Kaia, and I use the many benches along the trails to observe the birds. I didn't realize some of these same birds were on endangered species lists. 90% of wetlands in California have been destroyed according to the City of Watsonville webpage. The proposed propane facility is bound to stress the environment in which it is placed. I ask myself and the planning commission why we are exasperating circumstances for creatures that are already struggling. By creatures, I mean not only the various endangered species but ourselves as well.

The proposed propane facility is not in-line with the City of Watsonville's objective to create a greener planet. The facility is bound to impact the quality of life for its neighbors. Likely unintended waste will seep into our environment regardless of how careful we may be, thus contaminating water and air in its surrounding areas. As a dog walker, I don't tend to visit Pinto Lake as often due to the contamination of its waterways as recent as 2014. I don't want to lose another great city attraction to city negligence. I urge the City Planning Commission to deny the proposed application for this facility. The proposed facility will foster a dependence on fossil fuels, opposite of our intended direction forward as a community for a better earth. We need to take care of what we have now so we don't spend millions on restoration and conservation later.

Thank you for your time & consideration,
Selina Vargas



[CDD] Watsonville Slough Defense

Mario Magana <lemonadearizonas@gmail.com>

Tue, Jul 14, 2020 at 1:50 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

To whom this defense is recieved,

Good afternoon and blessings. My name is Mario Magaña, a young advocate for environmental & wildlife protections. This text is being written in opposition of the proposed action in Watsonville for any construction near the sensitive habitats and ecology of the aforementioned Slough. The proposal abolishes the city's Climate Action Plan, would encourage the consumption & usage of fossil fuels (which should be reduced) and makes space for potential contamination directly in the sensitive habitats we should be taking greater care of! Thank you for your time, and for allowing me and my allies a chance to be heard.

Best regards,
Mario D. Magaña



[CDD] RE: Watsonville Slough Propane Facility

e felix <erlindafelix1997@gmail.com>

Tue, Jul 14, 2020 at 1:52 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

My name is Erlinda Felix, and I am a resident of Watsonville. I am writing to demand that the Community Development Department deny the application of any propane facilities in close proximity to our wetlands. It is an outrage to know that a facility like such will be so close to a floodplain, allowing for a disruption to the daily lives of our local and endangered wildlife. I wholeheartedly align myself with Watsonville's Climate Action Plan and I believe that it is our duty as a community to become more environmentally friendly; however, it is also our duty to not disrupt the ecosystems we coexist with. That includes not building infrastructures that will drive them away.

The Watsonville wetlands are home to more than twenty wildlife species that are in danger of extinction and over two hundred more that depend on their preservation as a means for their survival. Fast-tracking a proposal on a "Common Sense Exemption" is lazy and irresponsible, and the residents of Watsonville demand more from their leaders. Once more, I urge you to see reason and deny any application for a propane facility.

Thank you for your time,

Erlinda Felix
46 Magnolia Dr, Watsonville CA
erlindafelix1997@gmail.com



Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Tue, Jul 14, 2020 at 2:02 PM

Re; [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>
Date: Tue, Jul 14, 2020 at 1:16 PM
Subject: Online Form Submittal: Contact the Boards and Commissions
To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Sarah-Hope

Last Name Parmeter

Email Address shpamet@ucsc.edu

Subject Industrial Propane Plant

Message I am writing to object to the fast-tracking of an industrial propane plant on West Beach Street. A project of this type needs a full environmental impact report and significant additional community input. As a Watsonville resident, I treasure my town, its diversity, and its resources. I do not want the safety of any of us—people, pets, wildlife—put at risk by a plant storing propane.

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Address

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State CA

Zip Code 95076-3637

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[CDD] Propane Facility Concerns

Cristian Rameno <ramenocrisian@gmail.com>
To: cdd@cityofwatsonville.org

Tue, Jul 14, 2020 at 1:22 PM

To whom may be reading this,

My name is Cristian Rameno, I am a proud 20 year old citizen of The city of Watsonville, was raised and born here and look forward to my own families future. When I attended Watsonville High School I took an environmental course offered by the local Monterey Bay Aquarium. In this **Highschool leveled course** I learned that only 5% of freshwater in the world is left and Watsonville is lucky to be a part of the 5% ([Freshwater Resource](#)). Watsonville Sloughs **should be protected at all costs!** In 2015 Watsonville city council approved the climate action plan that is supposed to reduce carbon emission level in our city. High levels are dangerous for **OUR** community. To locate a Propane facility center near a reserve that our city should protect is illogical and frankly irrational. 580 feet might not seem a lot to a person but we must not forget that animals inhabit the slough, and water is an element that can be tainted and contaminated. In these remaining years of our planets our decisions matter. I would encourage you to take a look at The City Of Watsonville's own webpage on our wetlands and I ask you to empathize with our planet for the future decision on the propane facility.

Thank you,

Cristian Rameno



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Fwd: Proposal threatens our sloughs and future

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Tue, Jul 14, 2020 at 2:03 PM

----- Forwarded message -----

From: **Suzi Merriam** <suzi.merriam@cityofwatsonville.org>
Date: Tue, Jul 14, 2020 at 12:19 PM
Subject: Fwd: Proposal threatens our sloughs and future
To: Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Alan Smith <alan.smith@cityofwatsonville.org>

----- Forwarded message -----

From: **Valeria Montion** <v.montion1000@gmail.com>
Date: Tue, Jul 14, 2020 at 12:05 PM
Subject: Proposal threatens our sloughs and future
To: suzi.merriam@cityofwatsonville.org <suzi.merriam@cityofwatsonville.org>

I am OPPOSING the proposal to build another polluting fossil fuel site in Watsonville , we are home to many wonderful and endangered species . Environmental damage is huge risk that many of us are NOT willing to take . We love our unique sloughs and do not want groundwater contamination ! I am a resident here in Watsonville and have been for the past 15 years .

--



Suzi Merriam

Community Development
Department Director

831.768.3050

250 Main Street
Watsonville CA, 95076



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Fwd:

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Tue, Jul 14, 2020 at 2:03 PM

----- Forwarded message -----

From: **Suzi Merriam** <suzi.merriam@cityofwatsonville.org>
Date: Tue, Jul 14, 2020 at 11:37 AM
Subject: Fwd:
To: Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Alan Smith <alan.smith@cityofwatsonville.org>

----- Forwarded message -----

From: **Daisy Gomez** <gomez1127.dg@gmail.com>
Date: Tue, Jul 14, 2020 at 11:34 AM
Subject:
To: suzi.merriam@cityofwatsonville.org <suzi.merriam@cityofwatsonville.org>

Pleassseeeee deny the application!!! Save the slough.

--



--

Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

**Due to COVID 19 Pandemic and the current "Shelter in Place" Order by the County Health Officer I am working remotely.
Please contact me by email and I will respond within 48 hours.**



[CDD] New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

noreply@granicusideas.com <noreply@granicusideas.com>
To: cdd@cityofwatsonville.org

Tue, Jul 14, 2020 at 12:53 PM



New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Leslie Lazo submitted a new eComment.

Meeting: Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Item: C. 20-446 AN APPLICATION FOR A SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT [950 WEST BEACH STREET, WATSONVILLE, CALIFORNIA](#) (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

eComment: Hi, I am speaking in opposition to the building of the new Propane Facility. I think it is disgusting how you are even considering this, especially when knowing the potential damages it poses towards Elkhorn Slough and the surrounding wildlife. The facility will poison Elkhorn Slough, it is nearly impossible for all the chemicals to remain contained, especially at such close proximity to the slough. It will be like begging for an environmental disaster to occur. The fact that an Initial Study and Environmental Review was dismissed because its a "common sense exemption" is BS. Let's be honest, the only benefit of this propane facility is that your pockets will be filled and the citizens of Watsonville along with the environment will get screwed over. This facility would hold Watsonville back in the fight against fossil fuels, what's the point in banning plastic bags and straws if you'll just bring the fossil fuels to us? Empty actions will do nothing. I care deeply about Watsonville, which is why I sincerely ask you all to consider to consequences and vote against the construction of the propane facility.

[View and Analyze eComments](#)

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[CDD] New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

noreply@granicusideas.com <noreply@granicusideas.com>
To: cdd@cityofwatsonville.org

Tue, Jul 14, 2020 at 2:24 PM



New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Ella Arnerich submitted a new eComment.

Meeting: Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Item: C. 20-446 AN APPLICATION FOR A SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT [950 WEST BEACH STREET, WATSONVILLE, CALIFORNIA](#) (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

eComment: Planning Commission, As a 5th generation member of the Watsonville community and an employee in Watsonville, I ask that you consider the environmental impacts of the construction of this facility. The site's close proximity to the slough and the beautiful wildlife in the area should be a major concern of our city. Please consider the long-term impacts of building this propane facility. Listen to the citizens of Watsonville who are begging for our city to move away from fossil fuels and towards clean energy. It is your responsibility to protect the humans and wildlife who call Watsonville home. Thank you for bring on the right side of history and listening to the people over profit.

[View and Analyze eComments](#)

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[CDD] Proposed propane facility in Watsonville slough

Leonardo Martinez <leom00535@gmail.com>

Tue, Jul 14, 2020 at 2:38 PM

To: cdd@cityofwatsonville.org, suzi.miriam@cityofwatsonville.org

Greetings,

I have recently become aware that the city council will vote on the approval for the construction of a propane facility in the Watsonville slough area.

I disapprove of this proposal as it may damage the ecosystem that surrounds Watsonville and harm endangered species of animals that reside in the slough areas. I also disapprove as the city council was very hesitant on approving the Pajaro Valley High School football field and track. To me it is very clear that the profit and city interest is a very big influence on these votes.

The city council didn't want allow the constitution of the PVHS field as it may harm endangered species and disrupt their peaceful lives in the slough with loud cheers from the games. They delayed the construction for many years and even tried to stop it due to the complaint of the Watsonville Airport, who I believe an influence in the city council. However they are now going to vote on a facility that will harm animals and plants in worse ways than a football field could. In this case there is no major figures arguing or complaining against this propane facility.

I urge the city council to vote against it as the facility can also harm air quality and contaminate the groundwater that we use. The cost of future consequences may cost more to repair than to prevent the facility.

Thank you,
Leonardo Martinez



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Fwd: Proposed Propane Storage Facility

City Council <citycouncil@cityofwatsonville.org>
To: CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 2:46 PM

----- Forwarded message -----

From: **Chris Basiletti** <cbasiletti@gmail.com>
Date: Mon, Jul 13, 2020 at 6:28 PM
Subject: Proposed Propane Storage Facility
To: <citycouncil@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>

Dear City Council Members,

I am expressing my concern about the siting of a Propane storage facility in Watsonville. At the very least there should be a thorough EIR before even considering approving this project. The proposed site is near many homes and schools.

Thank you for you service to our community.

Sincerely,

Chris Basiletti
Watsonville, CA



[CDD] Fwd: No propane storage

City Council <citycouncil@cityofwatsonville.org>
To: CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 2:46 PM

----- Forwarded message -----

From: **Mariel Halupa** <cayucos48@gmail.com>
Date: Mon, Jul 13, 2020 at 9:49 PM
Subject: No propane storage
To: <citycouncil@cityofwatsonville.org>

Block the city from propane storage especially since no CEQUA has been done. Other Bay Area cities said NO.
Don't let this happen.
Mariel Halupa
District 7
Please read message on Nextdoor Site.
Explanation is spot on.

Sent from my iPhone
Mariel Halupa



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Fwd: Propane gas in Watsonville

City Council <citycouncil@cityofwatsonville.org>
To: CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 2:46 PM

----- Forwarded message -----

From: **Yesenia Molina** <imix.ym@gmail.com>
Date: Tue, Jul 14, 2020 at 9:07 AM
Subject: Propane gas in Watsonville
To: <citycouncil@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>

It is a historical fact that marginalized communities of color consistently and systematically live in less healthy areas. By allowing this propane gas facility to be built in Watsonville you are putting my community at risk. what would we do if there was a gas leak and we didn't know, how would you feel if there was a large fire in Watsonville due to this gas leak? Please choose to never feel worried about our town due to building this propane gas facility. Choose our community, choose Watsonville, deny the propane gas facility.

Thank you



[CDD] Fwd: Propane Project Proposal - We need a complete environmental impact assessment

City Council <citycouncil@cityofwatsonville.org>
To: CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 2:46 PM

----- Forwarded message -----

From: consuelo@baymoon.com <consuelo@baymoon.com>
Date: Tue, Jul 14, 2020 at 9:38 AM
Subject: Propane Project Proposal - We need a complete environmental impact assessment
To: <citycouncil@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>

Dear Planning Commission,

My name is Consuelo Alba-Speyer. My husband John Speyer and I have been a residents of Watsonville for over 20 years. We live and work in downtown, District 5.

We are co-founders of the Watsonville Film Festival and have been active in numerous cultural, educational and environmental causes for two decades. We love this community and do our part to contribute to its well being and vibrancy.

This weekend we learned that there is a proposal to build an industrial propane gas facility in town, that City staff is recommending to approve, that is it's exempt from environmental review under the California Environmental Quality Act.

We are very concerned about this project and disagree with the rationale that a tank / facility storing 50,000 gallons of a toxic, explosive gas is exempt from a complete environmental impact assessment.

It's no OK that the community was not informed about this proposal beforehand to provide input, and now the City just wants to move forward and approve it! We believe this not in the best interest of the residents.

We should be considering green energy alternatives, instead of installing a huge deposit for fossil fuels. It's dangerously close to the sloughs.

We urge you to vote for a complete environmental impact assessment before moving forward with this project.

Sincerely,
Consuelo Alba-Speyer
John Speyer



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] NO PROPANE FACILITY IN OUR SLOUGH

Sabrina Foraker <sabrina.foraker@gmail.com>

Tue, Jul 14, 2020 at 2:50 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Do not risk our lives and our ecosystems for profits and greed. Our town does not need this! We also don't need three McDonalds and no speed bumps where people walk and get killed by our towns reckless selfish drivers. Focus on fixing what is here before cramming new 'facilities' to the water line and harming everything around. Haven't we built enough onto our wetlands? I am a native Watsonville resident and am saddened by how this town has changed. Keep Watsonville original!!! Don't make us just another gentrified town forgotten by newer generations. I hope you have read up to this point. I doubted anyone would.



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Propane Facility on the Watsonville Slough

Natasha Dadlani <ndadlani17@gmail.com>

Tue, Jul 14, 2020 at 3:09 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Hi,

I'm a resident of Santa Cruz and have many friends that live and work in Watsonville. I'm writing to ask you to deny the proposal to build the propane facility.

This is your community too and you should be working to protect it at all costs.

Thank you,
Natasha Dadlani



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] New propane facility!

Jasmine Zamora <jasmine_zamora@pvusd.net>

Tue, Jul 14, 2020 at 3:10 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>, "suzi.merriam@cityofwatsonville.org" <suzi.merriam@cityofwatsonville.org>

Dear city of watsonville, please make a through consideration of the tremendous decisions you have ahead of yourself. A decision that not only affects the current population of watsonville but many generations to come!

Proper testing must be done before you even consider this! It will be placed next to a very much alive ecosystem.

Also remember the city out in place a climate action plan to reduce the dependence on fossil fuels and by putting a major propane company in Watsonville will not be align with such plan! Please make sure you consider all possibilities!



[CDD] Watsonville Environmental Issue

Yocelyn Gonzalez Flores <jocegonzalez831@gmail.com>
To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 3:16 PM

Hello,

Good afternoon my name is Yocelyn Gonzalez. I am a resident of the city of Watsonville. I am contacting you today because of the recent proposal to build a fossil fuel site in Watsonville and from what I've heard it will be located near the wetlands. This shouldn't be allowed to happen! I want you to consider the following: The wetlands are an important and essential part of our community. As a recent graduate from the Watsonville Wetlands Watch program, I've learned that the wetlands are much more than a scenery view. This ecosystem provides a home for many different species of animals, aid in the prevention of floods, and filtration of water. As an educator for the youth, our backyard is the wetlands. When it comes to teaching about environmental issues, maintaining our environment healthy and clean, the wetlands are crucial. It's what makes Watsonville special and stand out. Let us not forget this city is agriculture based and members of our community both rely on it's fruits and are an essential factor in their growth/production. If this proposal were to be set in motion, our community will soon see the consequences. The safety of our residents would be in jeopardy as a result of the contamination within the air and water. Needless to say, our leaders already aren't implementing the changes to save our planet. Instead making the situation worse! The building of the fossil fuel plant would increase global warming, pollution in our atmosphere, and lead to the advancement of the irreversible damage to the planet we call home. Our community's health would see an increase in respiratory and heart diseases which would only lead to more hospital bills, among other expenses, for an already impoverished community. The majority of our residents of Watsonville can be identified as low-income hardworking people who would suffer from the incompetent actions of those who are greedy and craving money. The health of the people and the environment should be the priority. Not the building of a new Propane facility in the Watsonville Slough. I hope you take this into account when making your decision. Thank you for your time.

Sent from [Mail](#) for Windows 10



[CDD] Propane facility on watsonville slough

McKenna Maness <mckennarmaness@gmail.com>

Tue, Jul 14, 2020 at 3:21 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org, cityclerk@cityofwatsonville.org

Hi,

I work in Watsonville with youth and families and it's important to me to speak up on their behalf when needed, so I'm emailing to say please deny the application for the propane facility to be allowed to locate on the Watsonville Slough.

Each day as I commute to work I admire the slough as I drive on Main st. It's a truly underrated piece of natural beauty in this community. Please give it the value it deserves by not allowing it without environmental review. It should not be designated as a common sense exemption, and all potential threats to the environment must be thoroughly analyzed. This proposal threatens the environment and endangered species, and the facility location thats being proposed is just too close for comfort to the slough.

Furthermore, the proposal is not in line with a vision for a greener Watsonville. In no way should the city support any measures that continue our dependence on fossil fuels at this time. It's just digging us into a deeper hole to keep utilizing these quick fixes and making choices for temporary financial gain that hurts the town in the long run. The site is also within a floodplain, which increases potential for catastrophe as climate change gets worse. We're going to see worse and worse draught statewide, and anything likely to threaten drinking water should not be approved. Spills and leaks, like what occurred at the previous site, would be a disaster for the people and the ecosystem in this town.

Please deny the propane facility application. This town deserves better than that.

best,
McKenna



[CDD] Propane Facility

Ella Cavlan <ellajcavlan@gmail.com>

Tue, Jul 14, 2020 at 3:28 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>, "suzi.merriam@cityofwatsonville.org" <suzi.merriam@cityofwatsonville.org>

Hello,

I am concerned about the new facility that is to be built on the Watsonville Slough. I know that action will be sought today and I am emailing you, asking for you to deny the application!

There are countless environmental threats and it threatens the slough itself. This proposal will continue our dependence on fossil fuels, the site is located in a 100-year floodplain that would increase the likelihood of toxic disasters, and there is potential for spills and leaks.

SAY NO TO THE PROPOSAL!

Thank you,
Ella Cavlan



[CDD] Propane Facility on Watsonville Slough

Scott MacWilliam <csmacwill4@gmail.com>

Tue, Jul 14, 2020 at 3:31 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Dear Planning Commission,

I urge you to please conduct an Environmental Review and Impact Study before allowing the Propane facility to be constructed in close proximity to an intact wetland - a habitat type that has been widely decimated in the contiguous U.S.

There are federal and state listed threatened and endangered species in the slough that must be protected by law.

There is a high potential for groundwater contamination.

The previous site contained leaking underground storage tanks that warranted an EPA clean-up effort. Don't make the same mistake twice.

Sincerely,

Scott MacWilliam



[CDD] Watsonville Community Member Thoughts on Propane Facility

XOCHILT CHAVEZ-ORTIZ <xochav97@g.ucla.edu>

Tue, Jul 14, 2020 at 3:33 PM

To: cdd@cityofwatsonville.org

Cc: suzi.merriam@cityofwatsonville.org

Hello,

My name is Xochilt Chavez and I am a current resident and community member of Watsonville. Today the Planning Commission will vote on allowing a massive new Propane Facility on the Watsonville Slough and I would like to express my concerns and reasons for my opposition to this proposal.

First and foremost, the Watsonville Slough is home to an abundance of wildlife and species, both threatened and endangered, in the Central Coast. I believe the new Propane Facility will affect the wildlife that tries to live peacefully in the slough, causing pollution to the water. This will not only create a major threat to the slough and all its wildlife inhabitants, but to the ocean and ocean wildlife as well. The Watsonville Slough, in fact, drains the rest of the neighboring sloughs and acts as a pump as it flows water from our wetlands into the ocean at Palm Beach. This proposed site will be located 580 feet away from the slough, which will potentially create spills and leaks causing groundwater contamination in neighboring areas that will eventually flow into the wetlands and ultimately the ocean. Not only will this threaten clean drinking water but the fragile ecosystems of the slough as well.

I do not believe the city is taking the slough's endangered/threatened wildlife and community wellness into consideration with this plan. As a resident, I do not approve of the way the city is handling this proposal, as it is set to be allowed as "Common Sense Exemption" despite the numerous environmental threats. Furthermore, this proposal is not in line with the City's Climate Action Plan which seeks to reduce and eliminate dependence on fossil fuels. As a city and community, we should strive for a better Watsonville that takes the environmental measures and plans seriously in order to create a cleaner environmental future for our town.

I am asking to please deny the application for this proposal. Not only will you protect the community but Watsonville Slough wildlife as well.

Thank you and best regards,

Xochilt Chavez



[CDD] Opposition of new Propane Facility along Watsonville Slough

Zack Jot <zackj7878@gmail.com>

Tue, Jul 14, 2020 at 3:54 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

City of Watsonville,

I am emailing to demand that today, you deny the application for a new propane facility to be constructed along the Watsonville Slough. I oppose the construction of this facility as it threatens the environment of the slough and Watsonville as a whole, as well as the world in a more general sense. Specifically, a propane facility would threaten endangered species living in the adjacent slough. The site is also located in a floodplain, which means the facility would be primed to cause toxic environmental disasters such as contaminating the groundwater which would poison both the natural environment as well as drinking water. Finally, I believe that continuing to depend on the fossil fuel industry would be a mistake for Watsonville, as it is becoming ever more clear that the fossil fuel industry is a threat to humankind and life as we know it.

I strongly urge you to deny the application during the meeting at 6pm tonight. Although I cannot attend, I stand with all those who stand against the construction of this facility.

Zack Jot



[CDD] PROPANE FACILITY

'imelda hernandez' via CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 4:26 PM

Reply-To: imelda hernandez <sjoetonito@yahoo.com>

To: cdd@cityofwatsonville.org

Good evening,,

As a member of this community I urge you to please deny the application for the new propane facility to be located near the Slough. For the safety and well being of the present and the future residents please deny the application for a propane facility.

Thank you,

Imelda Hernández



Justin Meek <justin.meek@cityofwatsonville.org>

Please read at public hearing RE: Item C

1 message

Alejandro Garcia <agar9118@gmail.com>

Tue, Jul 14, 2020 at 8:34 AM

To: justin.meek@cityofwatsonville.org

Dear Esteemed Commissioners,

My name is Alejandro Garcia and I was born and raised in Watsonville. Having left the area only briefly for college, I was excited to return to the only city I've known - or at least I thought I knew. It was during my time in college that I would learn about the harmful effects that the toxic industries that operate within this City have on the health of the people in this community. A study I read for one of my courses revealed that during my time in elementary school (MacQuiddy & Salsipuedes), agricultural fields not more than 1.5 miles away were being sprayed with thousands of pounds of the now-banned pesticide methyl bromide. To add insult to injury, school district officials at the time deemed community outcry as "unnecessary hysteria". I have no doubt that my cancer diagnosis in my senior year of high school was due to the negligence and failure of City, County and school district officials.

The time is long overdue to end the cruel and discriminatory practice of making South County the county's dumping ground for risky and toxic projects. This project will put residents of this community who live and work near the proposed site in unnecessary danger and expose them to the pollutants released with the transport of this material. The current pandemic has revealed city residents' susceptibility to a virus whose risks are compounded by underlying health conditions due to the area's current environmental hazards. Projects like the one proposed today would only look to add to the problem. Watsonville residents deserve better.

Attachment 1

Page 304 of 412

Justin Meek <justin.meek@cityofwatsonville.org>

Fwd: Propane Facility

1 message

Suzi Merriam <suzi.merriam@cityofwatsonville.org>

Tue, Jul 14, 2020 at 4:13 PM

To: Alan Smith <alan.smith@cityofwatsonville.org>, Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>

----- Forwarded message -----

From: **Jackeline Castorena** <jakki.castorena.9@icloud.com>

Date: Tue, Jul 14, 2020 at 1:52 PM

Subject: Propane Facility

To: <cdd@cityofwatsonville.org>, <suzi.merriam@cityofwatsonville.org>

Hello, I am a member of the community and am very concerned with the threat to our sloughs and watershed. Can I have more information and view an environmental review of the project?

Thank you.

Jackeline Castorena-Davila

--



Justin Meek <justin.meek@cityofwatsonville.org>

Fwd: July 14th Public Comment: Propane Facility and protection of the Watsonville slough

1 message

Suzi Merriam <suzi.merriam@cityofwatsonville.org>

Tue, Jul 14, 2020 at 4:12 PM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Alan Smith <alan.smith@cityofwatsonville.org>

----- Forwarded message -----

From: **Madison Raasch** <mraasch1928@gmail.com>

Date: Tue, Jul 14, 2020 at 2:28 PM

Subject: July 14th Public Comment: Propane Facility and protection of the Watsonville slough

To: <ccd@cityofwatsonville.org>, <suzi.merriam@cityofwatsonville.org>

Hello, my name is Madison and I recently moved out of the county to attend university. While serving on the Cabrillo College Board of Trustees as Student Trustee, I developed working/advocacy relationships with many residents of Watsonville. Many of my constituents were students from Watsonville and I value my neighboring town's people and environment. I am writing to demand that the commission denies the application for the Propane Facility. It's insulting to the land and the people of Watsonville that the commission would be considering allowing the proposal as a "common sense exemption" to normal environmental review/study processes (which are in place for a reason). I don't think that the commission should have the authority to neglect environmental impact reviews and consideration under the subjective, unscientific "common sense exemption." The slough houses a complex ecology that needs to be maintained as a matter of survival, both for the federal and state-listed threatened/endangered species, for Watsonville residents and for the people of the broader county. The Climate Crisis, enabled by our dependence on fossil fuels, has ever-expanding consequences for basic human survival. The city needs to follow the City's own Climate Action Plan, which in part commands that the city reduce/eliminate dependence on fossil fuels. Approving this facility would be in contradiction to the City's own Climate Action Plan, to the interests of the land of Watsonville and the people and countless species of animal that live on it. This particular site is located in a 100-year floodplain, which dramatically increases the likelihood of groundwater contamination and other environmental degradation that destroys the health of the ecosystems that support local residents. I want to reiterate how inappropriate and dangerous this imposition of a massive, new propane facility would be on the land and the people of Watsonville- the land and people you are supposed to be serving. I urge the commission to do the right and safe thing by denying the application for the facility. Should the city approve this site, I am certain that members who vote yes will be held accountable by their constituents in November for their part in the further degradation of our local environment and for their role in enabling the fossil fuel industry's verifiable destruction of our planet. Thank you for your time.

--
-Madison

--

**Suzi Merriam**Community Development
Department Director

831.768.3050

250 Main Street
Watsonville CA, 95076

Attachment 1

Page 306 of 412



Justin Meek <justin.meek@cityofwatsonville.org>

Fwd: Online Form Submittal: Contact the Boards and Commissions

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Fri, Jul 17, 2020 at 6:13 PM

To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>

Cc: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>

Fyi - Correspondence from Richard Kojak (owner of Mt. Propane) re: [950 W. Beach St.](#)

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Fri, Jul 17, 2020 at 1:34 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Richard

Last Name Kojak

Email Address richkojak@sbcglobal.net

Subject [950 West Beach St.](#)

Message Please see the attached letter regarding the planned propane facility on the agenda for September 2nd.

File Upload [bulk plant letter.docx](#)

Phone 8313359193

Address [6576 Highway 9](#)

City Felton

State CA

Zip Code 95018

Staff Directory

[View the Staff Directory for the City of Watsonville](#)

Email not displaying correctly? [View it in your browser.](#)

Attachment 1

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Due to COVID 19 Pandemic and the current "Shelter in Place" Order by the County Health Officer I am working remotely. Please contact me by email and I will respond within 48 hours.

Mountain Propane Service Inc.
6576 Highway 9
Felton, CA 95018

Watsonville Planning Commission
275 Main Street
Watsonville, CA 95076

Dear Watsonville Planning Commissioners,

The planned propane facility at 950 West Beach in Watsonville will bring many benefits to our community. Propane is essential and by far the most viable source of heating, hot water, and cooking for many rural residents of Santa Cruz and surrounding counties. Propane is also used extensively in agricultural operations for irrigation pumps, non-toxic weed and pest control, freeze prevention, crop drying, soil sterilization, greenhouse heat, etc. Propane is commonly used for a clean burning fuel to operate emergency stand-by generators for all types of critical facilities and homes. Propane is clean burning and in fact heating a home with a high efficiency propane furnace produces much less pollution than a typical electric furnace. Propane is domestically produced and plentiful. Propane is non-toxic and has no potential for ground or water pollution.

Propane is safe when handled properly. Because of state of the art, built-in redundant safety features, serious accidents in a facility of the type proposed for 950 West Beach are almost unheard of in recent times. The facility is specifically designed to minimize the release of any propane into the environment and control any release caused by an unforeseen accident or fire. The storage tanks themselves are intrinsically safe due to their construction and size. The tanks are self-refrigerating meaning even an intense nearby fire would not generate enough heat to cause them to fail. The propane industry has a good track record for safety and at Mountain Propane Service we are committed to building and operating the safest possible propane facility.

This facility will be the first and only rail-based propane terminal in our county. This is important because rail is by far the safest most fuel-efficient mode of transportation for propane. Every delivery we receive by rail keeps four semi-trucks off our highways. This efficiency reduces the carbon footprint of our community. This propane already enters our community by truck. This facility makes it safer and reduces pollution. This facility will also help make the local rail system more viable at a time when the Santa Cruz Regional Transportation District is working to restore rail service throughout the county.

Propane provides good living wage jobs to our community. This facility will directly provide jobs for drivers, technicians, dispatchers, and support staff. Indirectly, many other jobs are needed to keep the supply chain operating, including the many agricultural and maintenance jobs that are directly related to the use of propane.

There have been a few concerns expressed as to the potential for this facility to reduce property values in the immediate vicinity. There have been several studies in California regarding this concern, and it

has been shown that facilities of this type, appropriately located within designated industrial zones, do not have a negative impact on the surrounding property values. This facility will have landscaping including many trees that will be watered by an environmentally friendly cistern system. Drought resistant, environmentally friendly landscaping will allow the facility to blend into the surroundings and be pleasing to look at, particularly from the side facing the proposed future industrial park development across the tracks and when viewing it from the rail trail development along the tracks.

The fact that this facility qualifies for a commonsense exemption from a full CEQA review is predicated on independent studies by experts hired by the City of Watsonville to determine the potential biological, habitat, traffic, air quality, and archeological impacts the facility may have on the property and surrounding environment. These studies are generally part of a full CEQA review and in each study, it was determined that there is a certainty that this facility will not have a negative impact on the environment. Propane is a liquid while contained in the tank but if it leaks into the atmosphere it immediately vaporizes and dissipates making it impossible for it to contaminate the earth or water. Propane cannot get into our sensitive marine environment, drinking water, or habitats. Propane is a non-toxic substance and does not deplete the ozone layer.

Propane is clean burning and efficient, in fact most of the propane burning appliances we install operate at efficiencies of 95% or better. Propane appliances generate less carbon than electric appliances because most available electricity comes from burning other fossil fuels and generally it takes twice as much fuel to deliver the same amount of energy to homes and businesses in the form of electricity. It should be noted that the propane industry is committed to replacing petroleum-based propane with renewable, carbon neutral, propane derived from biomass and as a byproduct of refining bio diesel. This facility will be used to distribute renewable propane as soon as it becomes commercially available.

This propane facility will be built on previously developed land that currently has concrete foundations on it. No habitat will be destroyed and no animals will be displaced. In fact, the amount of paved over land will be reduced by this project. The site will be self-sustaining because the landscape will be watered by storm water stored in a cistern system. The land in question is in an industrial area and is near an existing bio diesel tank farm. This is an entirely appropriate site for a facility of this type. There are no nearby homes and this facility poses no danger to surrounding businesses because it is a safe facility.

It should be noted that the owner of Mountain Propane (myself) is a local resident and businessman. I started Mountain Service Company in 1979 and launched Mountain Propane Service 25 years later in 2004. My companies are responsible members of our community committed to the service of others. I love this community and the beautiful and diverse natural environment. Although I chose another career path, Environmental Science was my major in college. It is imperative to me that my activities contribute to the wellbeing of my fellow man and the planet we live on. The services we offer are considered essential to the community. Tens of thousands of homes, many businesses including restaurants, many institutions such as State parks, Ben Lomond conservation camp, Camp Hammer, Camp Campbell, Loma Prieta School and many others too numerous to list rely on propane for their heating, hot water, cooking, and emergency power generation. Many local school buses rely on propane as a clean burning alternative motor fuel. Agriculture relies on propane for irrigation pumping, nontoxic weed and pest control, crop drying, freeze prevention, etc. Even the surrounding industrial businesses use propane to propel their forklifts.

Mountain Propane Service has a good safety track record. Safety is our number one priority. The one accident we did have was caused by a faulty valve on a customer owned residential tank built in the 1960's that we were taking out of service due to safety concerns. Although the accident was sensationalized by the media, an investigation by Cal Osha found that there were no major safety violations and no serious injuries. This kind of accident will not happen at this facility because the valves and overall design will prevent this type of failure. The plant will be operated and carefully maintained by trained professionals. The local fire department, Department of Industrial Relations, Cal Osha, The Department of Homeland Security, the environmental health department and others will have oversight of this facility.

I have been in business since I was 20 years old, you might say my businesses have owned me for my entire adult life. This facility is the pinnacle of my life's work. It has been carefully planned and in the works for the last three years. I have done everything in my power to ensure that the project is good for all concerned and I hope you will vote to allow it to be completed.

Sincerely

Richard Kojak
CEO Mountain Propane Service Inc.

Justin Meek <justin.meek@cityofwatsonville.org>

Fwd: FW: WATSONVILLE PROPANE GASUPDATE. July 15, 2020

1 message

Matt Huffaker <matt.huffaker@cityofwatsonville.org>

Tue, Jul 21, 2020 at 8:59 AM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>

FYI

----- Forwarded message -----

From: **Willy Elliott-McCrea** <willy@thefoodbank.org>

Date: Tue, Jul 21, 2020 at 8:54 AM

Subject: FW: WATSONVILLE PROPANE GASUPDATE. July 15, 2020

To: Matt Huffaker <matt.huffaker@cityofwatsonville.org>

Matt

As you can see I received call and email from George Ow late last week. I just let him know that I will be reviewing the material and sharing with my team this week.

As a neighbor, I can understand some possible concerns. I have worked very hard over the years to avoid getting involved in land use uses. And before I would possibly reach out to 2H Advisory Board Member Rebecca Garcia to express any doubts, I really wanted an opportunity to connect phone or email to help see the larger picture.

Please let me know.

Thanks

Willy



Willy Elliott-McCrea
Chief Executive Officer
(831) 498-4112
willy@thefoodbank.org

Despina Rieke
Executive Assistant
831-232-8332
des@thefoodbank.org

800 Ohlone Pkwy, Watsonville, CA 95076



Attachment 1

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From: Despina Rieke <despina@thefoodbank.org>
Sent: Thursday, July 16, 2020 12:07 PM
To: Willy Elliott-McCrea <willy@thefoodbank.org>
Subject: FW: WATSONVILLE PROPANE GASUPDATE. July 15, 2020

From: georgeowjr@aol.com <georgeowjr@aol.com>
Sent: Thursday, July 16, 2020 11:51 AM
To: Despina Rieke <despina@thefoodbank.org>; williamgeorge.ow@gmail.com; benjamin@owcommercial.com; andrew.m.ow@outlook.com
Subject: Fwd: WATSONVILLE PROPANE GASUPDATE. July 15, 2020

Hi Des--please get to Willy Elliott-McCrea ASAP. Thank you.

Hi Willy. This is the email I just left a message in your phone machine about. I hope you and Second Harvest are surviving this pandemic as well as possible. This past week has been a crazy one because of a land use issue. Were you notified that a propane gas tank facility was set up to be approved two days ago, without environmental review, across the street from you (and across the railroad tracks from me)? Here is a package of information for you to look at and share with your team. Through raising a ruckus, we were able to get the item pulled and it is now set for September 1. We should all work together. George.

George Ow, Jr.
Ow Family Properties
[203 Highland Avenue](#)
[Santa Cruz, CA, 95060](#)
georgeowjr@aol.com
cell: 831-247-4748

July 13, 2020

Re: [950 West Beach Street](#), Propane Project.

Dear Watsonville Planning Commission,

We have been working with the City of Watsonville for over 25 years on many projects and would like to comment on the proposed propane gas facility at [950 West Beach Street](#), which is near our Manabe-Ow Business Park property.

Attachment 1

Page 313 of 412

1. We got notice Friday morning, July 10, via an email that was sent on 5:36 PM Thursday night, for the Planning Commission Meeting of Tuesday, July 14. This is the first that we heard about the project. That's really short notice and not consistent with past notices we've received or sent to notify nearby property owners prior to public hearings.
2. The staff report states that the facility, if approved, will store 50,000 gallons of propane gas, expanding to 170,000 gallons in two to three years, and will receive perhaps millions of gallons annually via truck and rail yet is exempt from environmental review under CEQA. This is one of the most unbelievable things I can recall in my real estate career, which is over five decades long. It's hard to imagine that a 170,000 gallon facility filled with a toxic, explosive substance could possibly be exempt from environmental review under CEQA as a matter of common sense. Would the same analysis and recommendations occur in any other local jurisdiction? Would Santa Cruz or Capitola or Scotts Valley recommend approval of a bulk propane facility without environmental review? I doubt it very, very much.
3. I have led our family businesses for 50-plus years and have direct experience having property near two propane gas companies near our property in Scotts Valley. People feel that large visible propane tanks are dangerous and do not want to live or have their businesses near them, which led the City of Scotts Valley to make them leave. That cost the City millions of dollars and lots of headache. When the propane companies did leave, they left pollution and problems that are still there to be cleaned up and arguments about who was responsible for what—a typical situation with fossil fuel operators and their highly paid consultants, who always say that there will never be any danger or any pollution. Talk to the people who were left picking up the pieces after a propane or other fossil fuel spill, leak, or explosion—and the resulting injuries, deaths, contamination and headaches—and they will tell you: don't believe fossil fuel companies and their experts and don't let them locate near you; don't let them in your city. What other city in the region is putting in propane gas or fossil fuel operations of this magnitude? None that I am aware of.
4. We have been working in good faith with the City of Watsonville to responsibly build out and develop the Manabe-Ow Business Park, which was annexed by the City from the County over a decade ago with the goal of bringing good jobs and positive economic development to the city. We think that building this propane facility will make it harder to attract tenants and move forward with quality development on our property. Would you want your work next to this proposed facility? If you are the owner of a company, would you like to put your company close to 170,000 gallons of propane? The propane project is going bring minimal positive economic development and/or jobs on under 1 acre of land —while devaluing hundreds (if not thousands) of acres of surrounding land and properties—not a good trade.
5. Our professional concerns are secondary to the biggest problem: the danger to the people of Watsonville. There is a long and tragic history of propane and other fossil fuel disasters. In the past, this may have been a necessary tradeoff for the heat and propulsion that fossil fuels provide. That is no longer the case. Renewable energy sources can make clean electricity. Battery electric motors and hydrogen fuel cells can propel cars and trucks. We have electric ovens and stoves and HVAC systems. We can and should avoid fossil fuels and their negative effects on our water, air, and physical safety. The gas company applicant needs a special use permit to legally build its facility; Watsonville should tell them "NO," especially without environmental review.
6. We are entrepreneurial business people who remember our immigrant roots and we care about Watsonville and its people. We like to get things done and support local organizations and causes. Here are some things that we have done in Watsonville.
 - a. We have helped create over 1,200 jobs by taking empty buildings and filling them or building new buildings and filling them, thereby allowing local residents to pay for shelter, food, health care, and everything else people need to survive and thrive. We have brought companies like FedEx Ground, FoxShox, Harrell's,

Attachment 1

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Threshold, Ramos Furniture, and others to Watsonville and we have helped multiple companies expand their operations, like Driscoll's.

b. We love Cabrillo College, our most accessible college. I went to a community college. We have given over 1,600 Cabrillo College American Dream Scholarships in Santa Cruz County and over 1,000 went to students from Pajaro Valley Schools over the past 30 years.

c. We believe in the transformative power of books and know that knowledge is power. We are Angel Donors to the Watsonville Libraries and are part of the team that produced the permanent Farmworker's Exhibit.

d. We believe in nurturing the person and are Angel Donors to: Second Harvest Food Bank, Pajaro Valley Shelter Services, Pajaro Valley Prevention and Student Assistance, Santa Cruz Land Trust and Major Donors to: Pajaro Valley Historical Association, Watsonville YMCA-YWCA, Pajaro Valley Unified School District.

e.

We are Angel Donors of Watsonville Brillante and have taken a lead role in helping Kathleen Crocetti and team create a world-class art project at City Hall that celebrates the people of Watsonville. The first section, the first 10%, the "Strawberry Picker-Mayan Warrior," is up for all to see. Our dream is for Watsonville to become as famous for public art in the United States as Barcelona is in Spain.

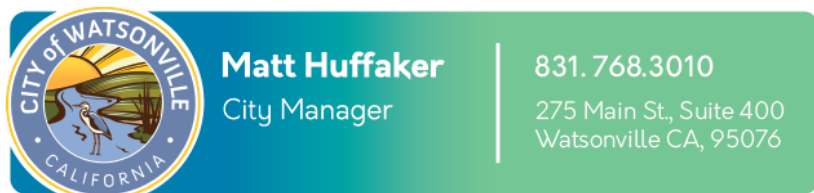
Thank you for your consideration and service to the City of Watsonville and its great people. Please do the right thing and vote against the proposed propane project.

Sincerely,







George Ow, Jr.

CC: Matt Huffaker, Suzi Merriam, Justin Meek, Alan Smith

--



6 attachments

 Boulder Creek propane blast prompts 2.22.2014.docx 19K	company owner to move tank - Sentinel Article -
 Watsonville Planning Commission 61K	Letter - George Ow, Jr. - 7.13.20.pdf
 Letter to Watsonville Planning 198K	Commission re Proposed Propane Facility - 7.13.20.pdf
 Planning Commission Agenda - 304K	7.14.20.pdf
 Propane Special Use Permit Staff 873K	Report 7.9.20.pdf
 5 Environmental Review w Tech 12024K	Memos.pdf

Regeneración/Regeneration

PÁJARO VALLEY CLIMATE ACTION

August 17, 2020

Watsonville Planning Commission

275 Main Street

Watsonville, CA 95076



RE: No position: Bulk Propane Plant, Application No. PP2019-18

Dear Commissioners:

After more review of available documents and consultations, we believe that the City of Watsonville followed the law in terms of granting a permit to Mountain Propane for a storage facility including building additional storage tanks. We want to rescind our earlier statement of opposition to the propane facility and replace it with this letter.

Advisory Board

Mayra Bernabe

Organizer, COPA (Communities Organized for Relational Power in Action)

Adam Bolaños Scow

Senior Strategist, Public Water Now

Francisco Estrada

Program Associate, Pájaro Valley Community Health Trust; 2019 Mayor, Watsonville

Anne Hayes

Director of Development, Western Region, Climate Central

Kirsten Liske,

Vice President of Community Programs, Ecology Action

Nelly Vaquera-Boggs

President, Pájaro Valley Federation of Teachers

We understand that customers in rural areas are currently dependent on propane for heating.

We understand that transporting fuel by rail is much safer and less polluting than transporting by truck.

We believe that the City of Watsonville has acted wisely by limiting this permit to 20 years.

For the record, we will not take a position on the upcoming vote re permitting Bulk Propane Plant, Application No. PP2019-18.

We would like this question clarified:

Why do you believe a full Environmental Impact Report is not warranted, even if not required by law?

Our recommendations and perspective:

—We need to develop a local policy or a change to the General Plan going forward of no new fossil fuel infrastructure

—Propane is a dying industry, along with all fossil fuels

—We demand oversight to ensure the facility is developed in the safest and most responsible way (according to reports, the owner has already broken the law on his own property, and affected his neighbors)

—The City's process for informing residents and environmental organizations needs to be more transparent and accessible, and delivered in a timely manner.

Regeneración/*Regeneration*

PÁJARO VALLEY CLIMATE ACTION

Moving forward, our region must move away from fossil fuels. Fossil fuel pollution has devastating health consequences that are often perpetrated against marginalized communities. The City of Watsonville should not be encouraging the construction of such facilities in the future.

As time is running out to make meaningful progress on climate change we must make rapid progress towards electrification and renewable energy.

Sincerely,

Nancy Faulstich

Nancy Faulstich, Director

Representing Regeneración - Pajaro Valley Climate Action



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Urgent: Oppose the Propane Facility on the Watsonville Slough

2 messages

'Sam Bleisch' via CDD <cdd@cityofwatsonville.org>

Tue, Jul 14, 2020 at 5:23 PM

Reply-To: Sam Bleisch <sbleisch@ucsc.edu>

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Hello,

I am a resident of Watsonville and I am urging you to oppose the city's proposal to build another facility in this area. This should NOT be set as a "common sense exception".

The proposal threatens the environment, which supports many federal and state listed threatened & endangered species--especially if it were to leak. It has in the past.

I am asking you to please OPPOSE the propane facility. If the plant spilled, we would have to face groundwater contamination in a mostly POC community.

This is racial environmental pollution.

This goes against the City's Climate Action Plan--we need to reduce our dependence on fossil fuels.

Thank you.

--

Best,

Sam Bleisch



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] New Propane Facility on Watsonville Slough

2 messages

Alex Romero <alexromeroreyes09@gmail.com>

Tue, Jul 14, 2020 at 5:29 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Dear Planning Commission,

I email you as a concerned former resident, with friends and family in the city of Watsonville to ask that the proposal for the new Propane Facility be denied. In unison with other concerned members of the community, I ask for an expansion of initial field study and environmental review of the land targeted for this proposal as well as the impacts it may potentially have on our community. I'd like to think that the well-being of Watsonville's environment and its residents is being thoroughly and responsibly evaluated at every step of this process.

Thank you

Alex R.



[CDD] Deny Proposal of Propane Facility

2 messages

Savana Maxfield <savana@millermaxfield.com>

Tue, Jul 14, 2020 at 6:21 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>, "suzi.merriam@cityofwatsonville.org" <suzi.merriam@cityofwatsonville.org>

My name is Savana Maxfield and I am a resident of Santa Cruz. I am emailing about the proposal for the propane facility on the Watsonville slough.

The proposed site for this project is located 580 feet from the Watsonville slough. This slough is a complex habitat and supports many (federal and state listed) threatened and endangered species.

The site is located in a 100-year floodplain, increasing the likelihood for toxic environmental disasters. There is a potential for spills and leaks causing groundwater contamination. The previous site contained leaking underground storage tanks (warranting EPA LUST cleanup). Groundwater contamination could threaten drinking water and the fragile ecosystem of the slough. Because of the countless environmental threats, there is need for initial study and thorough environmental review.

This proposal is NOT in line with the city's Climate Action Plan that seeks to reduce and eliminate dependence on fossil fuels. I urge you to consider the dangers of this operation, the health of the community, and the health of the environment. Please vote against the implementation of this facility.

Thank you,
Savana Maxfield



Fwd: Online Form Submittal: Contact the Boards and Commissions

1 message

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Mon, Aug 24, 2020 at 6:41 PM

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Tue, Jul 14, 2020 at 8:38 PM

Subject: Online Form Submittal: Contact the Boards and Commissions

To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Walter

Last Name Trindade

Email Address scfoodshare@gmail.com

Subject Propane facility near Watsonville Slough

Message

Hi there,
I'm a resident of Watsonville, CA and I am firmly against the building a polluting fossil fuel site in Watsonville. We do not need to contribute to the fossil fuel industry any longer and should not be investing in it. The site is too close and will endanger the Watsonville slough, which is a beautiful and important ecosystem that supports endangered birds, fish, and mammals.
Because the site is on a floodplain, there is high risk of groundwater contamination. We do not need to risk contaminating the drinking water of Watsonville or the ecosystems that the groundwater supports.

File Upload *Field not completed.*

Phone *Field not completed.*

Address 40

City Watsonville

State CA

Zip Code 95076

Staff Directory
[View the Staff Directory for the City of Watsonville](#)



[CDD] Fw: Rail and Propane Facility

2 messages

GARY PLOMP <plomp@sbcglobal.net>

Sat, Jul 25, 2020 at 5:12 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Respectfully, I ask the Planning Commission to support Rail and Propane Facility. Thank you! (see below)

----- Forwarded Message -----

From: GARY PLOMP <plomp@sbcglobal.net>

To: felipe.hernandez@cityofwatsonville.org <felipe.hernandez@cityofwatsonville.org>; cityclerk@cityofwatsonville.org <cityclerk@cityofwatsonville.org>; aurelio.gonzalez@cityofwatsonville.org <aurelio.gonzalez@cityofwatsonville.org>; ari.parker@cityofwatsonville.org <ari.parker@cityofwatsonville.org>; francisco.estrada@cityofwatsonville.org <francisco.estrada@cityofwatsonville.org>; Lowell Hurst <lowell.hurst@cityofwatsonville.org>; Trina Coffman <trina.coffman@cityofwatsonville.org>

Sent: Friday, July 24, 2020, 4:01:46 PM PDT

Subject: RE: Rail and Propane Facility

Watsonville City Council
400 Main St.
Watsonville, CA 95076

RE: Rail and Propane Facility

Hon. Members of the City Council:

It has come to my attention that a propane company wishes to construct a facility at [950 W. Beach St](#) which will be served by the the Santa Cruz branch rail line.

Typical of anything that involves the railroad in Santa Cruz County, there are people who are opposed to this. Sadly, they do not have the facts and are putting out misinformation and negative rhetoric.

.First of all, it is NOT being built on the slough or near the slough. Second, using the existing rail line to transport propane is 4x more efficient and in regard to emissions, environmentally more sound and safe than diesel trucks.

One misguided anti-rail individual has referred to this as "Environmental Racism" which is preposterous! That makes no sense whatsoever!

Progressive Rail (dba. St. Paul & Pacific) has in the last two years, infused new life into the industrial district of Watsonville garnering new customers, business and adding needed jobs. Adding the propane facility will only serve to enhance the economy at a time when it matters most!

Considering that the railroad and the propane facility is in Watsonville's best interest, I respectfully ask that you vote "YES" in September. Thank you for your attention to my letter.

GP-15 City of Watsonville
(k.hill photo)

Gary V. Plomp



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67K

Attachment 1

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Attachment 8 page 107 of 117



[CDD] In Support of the Proposed Propane Rail Transloading Facility

2 messages

Barry Scott <barry_scott@sbcglobal.net>

Sat, Jul 25, 2020 at 8:17 AM

Reply-To: Barry Scott <barry_scott@sbcglobal.net>

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Cc: Lowell Hurst <lowell.hurst@cityofwatsonville.org>, "felipe.hernandez@cityofwatsonville.org" <felipe.hernandez@cityofwatsonville.org>, "francisco.estrada@cityofwatsonville.org" <francisco.estrada@cityofwatsonville.org>, "aurelio.gonzalez@cityofwatsonville.org" <aurelio.gonzalez@cityofwatsonville.org>, "ari.parker@cityofwatsonville.org" <ari.parker@cityofwatsonville.org>, "cityclerk@cityofwatsonville.org" <cityclerk@cityofwatsonville.org>, Trina Coffman <trina.coffman@cityofwatsonville.org>

Dear Watsonville Planning Commission and Council members,

I write in support of approval of construction of the proposed propane transloading facility at 950 W. Beach Street.

Construction of this facility will not increase local use of propane, a vital commodity used by local homes and businesses, but it will make the movement of this product safer and more efficient.

I don't make these claims lightly. I serve as the State Coordinator for the National Energy Education Development Project. And, I'm proud to have been selected by Monterey Bay Community Power as their "Clean Energy Hero" for the month of June, 2020. <https://www.mbcommunitypower.org/clean-energy-heroes/>

Transporting LPG (propane) or any other freight by rail is 16x safer than transporting same by truck! "Railroads and trucks carry roughly equal hazmat ton-mileage, but trucks have 16 times more hazmat releases than railroads. Statistically, railroads are the safer form of transportation for hazardous materials." <http://steelinterstate.org/topics/rail-vs-truck-and-auto-safety-record>

In addition, transporting LPG (propane) or any other freight by rail is 4x more fuel efficient than transporting freight by truck thereby reducing GHG emissions by 75% over truck transport! (see attached file titled Environmental Benefits of Moving Freight by Rail.pdf)

Please use sound science and common sense to guide your decision and approve the construction of this safe and modern facility, thus reducing truck traffic and promoting local business while reducing greenhouse gas production and risk of accidents.

Many thanks,

Barry

--

Barry Scott
State Program Director
The NEED Project
Office: 831.612.6574
Mobile: 209.482.5663
www.need.org



Environmental Benefits of Moving Freight by Rail.pdf
160K

The Environmental Benefits of Moving Freight by Rail

ASSOCIATION OF AMERICAN RAILROADS

JUNE 2017

Summary

Railroads are the most environmentally sound way to move freight over land. On average, **trains are four times more fuel efficient than trucks.** They also **reduce highway gridlock, lower greenhouse gas emissions, and reduce emissions of particulate matter and nitrogen oxides.** Through the use of greener technologies and more efficient operating practices, our nation's privately owned freight railroads are committed to even greater environmental excellence in the years ahead.

Freight Railroads and Fuel Efficiency Go Hand in Hand

Freight railroads are the environmentally friendly way to move freight:

- ✓ In 2016, U.S. freight railroads moved a ton of freight an average of **468 miles per gallon of fuel** — up from 235 miles in 1980 (see Figure 1). **That's a 99 percent improvement.**
- ✓ On average, railroads are **four times more fuel efficient than trucks**, according to an independent study for the Federal Railroad Administration.
- ✓ Greenhouse gas emissions are directly related to fuel consumption. That means **moving freight by rail instead of truck lowers greenhouse gas emissions by 75 percent.**
- ✓ If just 10 percent of the freight that moves by Class 7 or Class 8 (the largest) trucks moved by rail instead, fuel savings would be around **1.5 billion gallons per year** and **annual greenhouse gas emissions would fall by approximately 17 million tons** — equivalent to removing around 3.2 million cars from the highways for a year or planting 400 million trees.

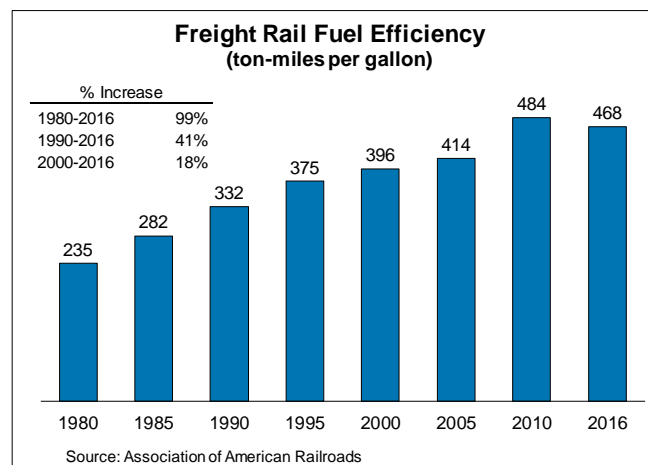


Figure 1

A Multi-Faceted Approach to Conserving Fuel

U.S. freight railroads' volume in 2016 was much higher than it was in 1980, but their fuel consumption was much lower. How did railroads do this? Through technological innovations, new investments, improved operating practices, and a lot of hard work. Among many other things, railroads have:

- ✓ Acquired thousands of **new, more efficient locomotives** and removed from service thousands of older, less fuel efficient locomotives.
- ✓ **Increased the amount of freight in rail cars and on trains.** Thanks to improved freight car design, the use of longer trains, and other factors, the amount of freight railroads carried in an average train in 2016 was 3,533 tons, up from 2,923 tons in 2000.
- ✓ Developed and implemented **highly advanced computer software systems** that, among other things, calculate the most fuel-efficient speed for a train over a given route; determine the most efficient spacing and timing of trains on a railroad's system; and monitor locomotive functions and performance to ensure peak efficiency.
- ✓ Installed idling-reduction technologies, such as **stop-start systems** that shut down a locomotive when it is not in use and restart it when it is needed, and expanded the use of **distributed power** (positioning locomotives in the middle of trains) to reduce the total horsepower required for train movements.
- ✓ Provided **employee training** to help locomotive engineers develop and implement best practices and improve awareness of fuel-efficient operations.

Freight Railroads Fight Highway Gridlock

Railroads help reduce the huge economic costs of highway congestion:

- ✓ According to the Texas Transportation Institute's 2015 Urban Mobility Scorecard, **highway congestion cost Americans \$160 billion** in wasted time (6.9 billion hours) and wasted fuel (3.1 billion gallons) in 2014. Lost productivity, cargo delays, and other costs add tens of billions of dollars to this tab.
- ✓ **A single freight train, though, can replace several hundred trucks**, freeing up space on the highway for other motorists. Shifting freight from trucks to rail also **reduces highway wear and tear and the pressure to build costly new highways**.



Freight Railroads Mean Fewer Harmful Emissions

The Environmental Protection Agency (EPA) regulates emissions of particulate matter (PM) and nitrogen oxides (NOx) from locomotives and trucks.¹ For locomotives, EPA regulations are based on progressively more stringent “tiers.” The most recent locomotive standards are “Tier 4” standards and apply to all locomotives built or remanufactured since 2015. EPA standards for locomotives and trucks are phased in over time. This means that the percentage of the overall locomotive and truck fleets that meet the newest, most stringent standards is constantly

¹ Particulate matter consists of airborne microscopic solid particles and liquid droplets. Nitrogen oxides are highly reactive acids that, among other things, interact with water, oxygen, and other chemicals to form acid rain and haze.

rising as older locomotives and trucks that don't meet the standards go out of service and are replaced by newer units that do.²

A March 2015 study³ by an economist at the Congressional Budget Office (CBO) compiled data from a variety of sources to estimate the unpriced external costs — that is, costs to society not covered by taxes — associated with freight transport by rail and truck. The study estimated that **the external costs associated with emissions of particulate matter, nitrogen oxides, and carbon dioxide are three to five times higher for trucks than for railroads.**⁴ In other words, moving freight by rail rather than by highway significantly reduces the harmful emissions that the EPA regulates.

Figures 2 through 4 below, which cover emissions of particulate matter, nitrogen oxides, and carbon dioxide from locomotives and trucks, are based on EPA and industry data and are broadly consistent with the CBO study's findings. The charts contain information on emissions for both rail and highway movements based on the existing locomotive and truck mix, and also show what hypothetical emissions would be if all locomotives and trucks met the most stringent existing EPA standards.

Figure 2 covers emissions of particulate matter (PM). The bars on the left refer to rail movements; the bars on the right refer to highway movements. For both rail and highway, heavier movements (e.g., coal or other bulk products) yield fewer emissions per ton-mile than lighter movements (e.g., intermodal containers). The height of the bars in Figure 2 reflect the range of PM emissions based on the commodities being hauled. Put another way, the top of the bars approximate emissions per ton-mile for, say, light intermodal containers, while the bottom of each bar approximates emissions for, say, heavy coal shipments. The average for all movements is near the middle of each bar.

In Figure 2, the top bar on the rail side shows the approximate range of rail PM emissions given the existing locomotive fleet. The bottom bar on the rail side shows what PM emissions would be if all existing locomotives met Tier 4 standards. Eventually, as locomotives that do not meet Tier 4 standards are phased out and replaced by locomotives that do, the lower bar will become increasingly representative of actual rail PM emissions.

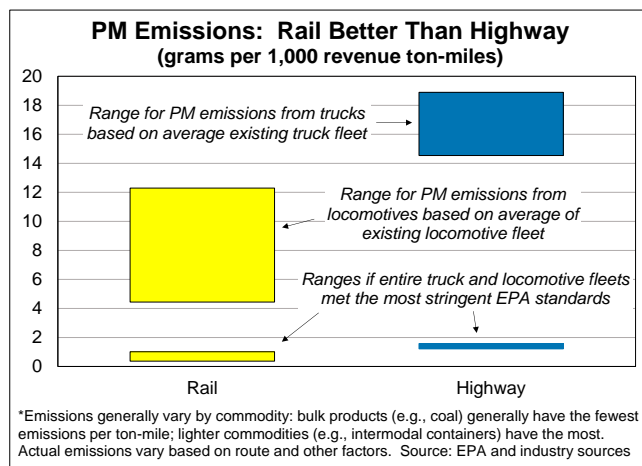


Figure 2

² A phase-in is the only feasible way to incorporate new standards without bringing freight movements, and therefore the economy, to a halt.

³ David Austin, Pricing Freight Transport to Account for External Costs, Congressional Budget Office Working Paper 2015-03, March 2015. Available at <https://www.cbo.gov/publication/50049>.

⁴ In addition to harmful effects from exhaust emissions, these costs to society include, among other things, wear and tear on roads and bridges; delays caused by traffic congestion; and injuries, fatalities, and property damage from accidents. The CBO study finds that, in total, "The unpriced external costs of transporting freight by truck (per ton-mile) are around eight times higher than by rail."

The bars on the right side of Figure 2 cover PM emissions for highway movements. The range of emissions for the current truck fleet (represented by the upper right bar in Figure 2) is higher than the range of PM emissions for the current locomotive fleet (the upper left bar in Figure 2). Likewise, the range of PM emissions if all trucks on the road today met the most stringent EPA standards (the lower right bar in Figure 2) is higher than the range of PM movements if all locomotives met the most stringent EPA (the lower left bar in Figure 2).

Put another way, under current EPA emissions standards, moving freight by rail results in fewer emissions of particulate matter than moving freight by highway. That holds today and will hold in the future as newer trucks and locomotives enter their respective fleets.

The story is the same for emissions of nitrogen oxides (NO_x), shown in Figure 3. **NO_x emissions when moving freight by rail are significantly lower than emissions for moving freight by highway**, both for the existing locomotive and truck fleets and for the hypothetical case in which all locomotives and trucks meet the most stringent EPA NO_x standards. This is demonstrated in Figure 3 by the fact that the respective rail bars are lower than the corresponding highway bars.

Finally, Figure 4 refers to rail and highway emissions of carbon dioxide, one of the primary greenhouse gases. The EPA's Tier 4 locomotive regulations do not target rail emissions of carbon dioxide directly, so the range of CO₂ emissions for rail is the same for the existing locomotive fleet (in which some locomotives meet Tier 4 standards and some do not) as it is for a fleet where all units met Tier 4 standards. For trucks, the range of CO₂ emissions would be slightly lower than it currently is if all trucks met the most stringent EPA standards, but they still far exceed rail emission rates. Rail CO₂ emissions per ton-mile are approximately one-fourth of truck emissions per ton-mile. **This means that, for carbon dioxide, as for particulate matter and nitrogen oxides, emissions associated with rail movements are significantly lower than emissions associated with highway movements.**

Railroads recognize the importance of environmental excellence and will continue to work to ensure that they remain the environmentally friendly way to move freight.

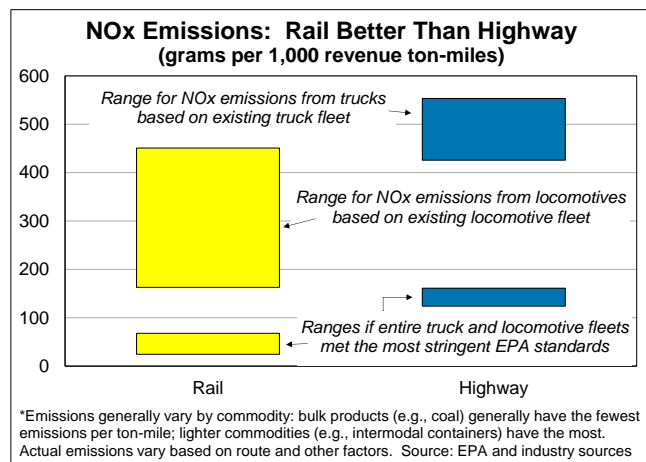


Figure 3

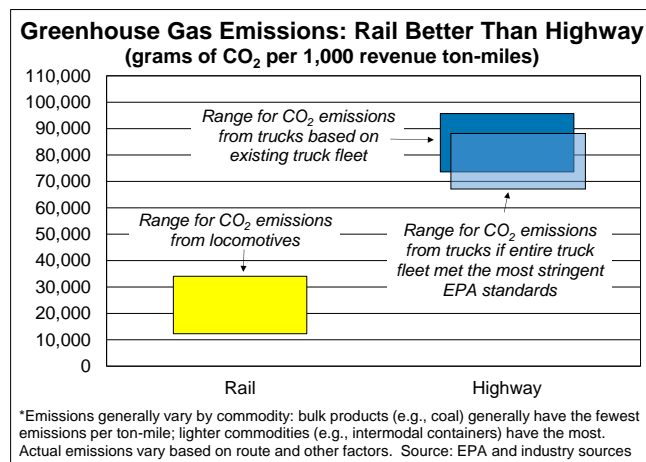


Figure 4



Fwd: Propane Facility

1 message

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Mon, Aug 24, 2020 at 6:36 PM

----- Forwarded message -----

From: **Leslie Lazo** <lazolesliee@gmail.com>

Date: Wed, Jul 22, 2020 at 6:32 PM

Subject: Propane Facility

To: <felipe.hernandez@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>, <ari.parker@cityofwatsonville.org>, <aurelio.gonzalez@cityofwatsonville.org>, <citycouncil@cityofwatsonville.org>, <francisco.estrada@cityofwatsonville.org>, <lowell.hurst@cityofwatsonville.org>, <rebecca.garcia@cityofwatsonville.org>, <trina.coffman@cityofwatsonville.org>

Hello,

Last city council meeting, it was decided to postpone the vote for the Propane Facility until September 1st. I have pledged to, up until that date, email you all about the issues the facility can cause to our community. I will be covering the following topics: environmental racism, climate change, the performative nature of plastic bans, and extinction, in no particular order. This week, I have decided to cover environmental racism. I invite you all to grab a cup of tea or coffee, and please consider my arguments as to why you should not approve the propane facility.

So, what does environmental racism have to do with Watsonville? Everything.

As you probably already know, environmental racism refers to how minorities, specifically black and brown people, tend to live in areas where they are constantly exposed to harmful chemicals and pollution. Although this may not sound like a problem Watsonville is currently facing, truth is, we are. [This article](#) highlights the dangers farmworkers face when constantly exposed to chemicals, and although the chemical referred to in the article is no longer legal, it is clear that farmworkers, and their children, are breathing toxic air.

The air latinx fieldworkers of Watsonville breathe is already dangerous, why add a propane facility on top of that? The facility will be near houses and apartments where fieldworkers and other Watsonville citizens live. A rundown part of town should not equate to the dismissal of the health and safety of Watsonville citizens. Don't disregard their health for the sake of a business that could bring a couple of jobs to Watsonville, and let's face it, poor latinx people will be working at the facility which exposes them to even more toxic air.

I will end this letter with a powerful quote I learned in my class at UCSC. **"Breathing spaces" are "racialized geographies," which may lead to the "criminalization of embodiment."** I'd like to believe Watsonville is a progressive town, so I urge you all to vote against the approval of this facility, for it will only slowly kill Watsonville citizens.

If you have any questions, please feel free to email me, I'd love to hear your thoughts about what I had to say and I am also open to a discussion.

Best Regards,
Leslie Lazo



Fwd: Online Form Submittal: Contact the Boards and Commissions

1 message

Deborah Muniz <deborah.muniz@cityofwatsonville.org>
To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

Mon, Aug 24, 2020 at 6:37 PM

----- Forwarded message -----
From: <noreply@civicplus.com>
Date: Thu, Jul 16, 2020 at 10:51 PM
Subject: Online Form Submittal: Contact the Boards and Commissions
To: <deborah.muniz@cityofwatsonville.org>

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name	Zav
Last Name	Hershfield
Email Address	zhershfield@gmail.com
Subject	No Propane Facility in Watsonville
Message	I'm writing today to oppose the construction of a propane facility in Watsonville. We are far past the time when more fossil fuel development is at all safe for the planet.
File Upload	<i>Field not completed.</i>
Phone	<i>Field not completed.</i>
Address	<i>Field not completed.</i>
City	<i>Field not completed.</i>
State	<i>Field not completed.</i>
Zip Code	95062

Staff Directory
[View the Staff Directory for the City of Watsonville](#)

Email not displaying correctly? [View it in your browser.](#)



[CDD] Deny Application for Propane Facility on Watsonville Slough

2 messages

Margarida Costa <mgcosta923@gmail.com>

Wed, Jul 15, 2020 at 12:33 AM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Dear Watsonville City Planning Commission,

I am urging the Watsonville Planning Commission as a fellow long-life resident to deny the proposal for a new propane facility on Watsonville Slough. I'm certain the commission is aware of the environmental damage that such a fossil fuel site will have on our community.

The proposal being allowed "Common Sense Exemption" does not take away the fact that it will still be extremely contaminating to our ecosystems and will threaten our air and water, and will prolong Watsonville's continued dependence on the fossil fuel industry despite efforts to eliminate the city's dependency on fossil fuels.

The proposed site will be near several federal and state listed threatened and endangered species, which will cause pollution and environmental devastation to those valuable ecosystems. If approved, the facility will increase the likelihood for toxic environmental disasters because of the site being located on a 100-year floodplain. A new propane facility has the potential for spills and leaks which can also cause groundwater contamination. Groundwater contamination threatens our community's drinking water and our fragile ecosystems.

The proposal, along with Watsonville's continuing dependency on the fossil fuel industry, completely goes against the city's Climate Action Plan that seeks to reduce and eliminate dependence on fossil fuels. Please do what is right for our community and our ecosystems and deny the application for a propane facility on Watsonville Slough.

Best Regards,
Margarida Costa
UC Santa Cruz
95076



Elena Ortiz <elena.ortiz@cityofwatsonville.org>

[CDD] Propane Facility in Watsonville Slough

2 messages

Jane Pera <janepera@gmail.com>

Tue, Jul 14, 2020 at 8:38 PM

To: cdd@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org

Hi there,

I'm a resident of Watsonville, CA and I am firmly against the building a polluting fossil fuel site in Watsonville. We do not need to contribute to the fossil fuel industry any longer and should not be investing in it. The site is too close and will endanger the Watsonville slough, which is a beautiful and important ecosystem that supports endangered birds, fish, and mammals.

Because the site is on a floodplain, there is high risk of groundwater contamination. We do not need to risk contaminating the drinking water of Watsonville or the ecosystems that the groundwater supports.

Thank you,
Jane



[CDD] Fwd: 950 West Beach Street Project

1 message

City Clerk <cityclerk@cityofwatsonville.org>
To: CDD <cdd@cityofwatsonville.org>

Thu, Jul 16, 2020 at 3:25 PM

----- Forwarded message -----

From: **Pablo Orozco-Castro** <pablo.therapy831@gmail.com>
Date: Tue, Jul 14, 2020 at 11:35 PM
Subject: 950 West Beach Street Project
To: <lowell.hurst@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>

Dear Lowell Hurst,

I write to you regarding the proposed project on [950 West Beach Street](#), a project that will bring 50,000 gallons of propane and 30k gallon tanks within the next 2-3 years. This project has not undergone proper environmental review. As a constituent of Watsonville I am concerned about how this will impact our community and the implications of environmental racism that this perpetrates.

This project shouldn't be fast tracked. We need a Environmental Impact Assesment. We need to put our community's health, safety & well being in mind.

Thank you

Sincerely Pablo Orozco-Castro , ASW



Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] Fwd: 950 West Beach St. (proposed propane tank facility) Agenda Item No. 5.B.

4 messages

Irwin Ortiz <irwin.ortiz@cityofwatsonville.org>

Fri, Aug 28, 2020 at 9:02 AM

To: CDD <cdd@cityofwatsonville.org>

----- Forwarded message -----

From: Dr. Manny Nunez <mnunez@mpusd.k12.ca.us>

Date: Thu, Aug 27, 2020 at 9:48 PM

Subject: Re: 950 West Beach St. (proposed propane tank facility)

Agenda Item No. 5.B.

To: <citycouncil@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>

Good evening City Council,

I am writing this email to express my strong opposition to allowing the edification of a propane tank near my residential home. I live in Santa Catalina and San Gabriel Ct, I can see the train tracks from the second floor of my home.

This project comes as quite a surprise to my family and extended family/neighbors, we just recently heard about this project. I feel that there is a lack of transparency from the city on this project and we are rushing to get it done. I had to find out via a friend's Facebook.

The proposed facility poses a danger to our neighborhood and to the community as a whole. A primary concern is the fire hazard to the residential community and the nearby business. 7 years ago a similar facility in Florida caused a major explosion and injured workers, this does not seem something we would want in our community. Please reference the article below:
<https://www.usatoday.com/story/news/nation/2013/07/30/florida-gas-plant-blast/2598483/>

Finally, what is the environmental impact on the trails, slough, wetlands, plants, animals, that are very near the proposed facility? We have yet to see an Environmental Impact Study on the proposed location. If any information is available, our community should have a right to review the results of such studies. Should all of these things not be fully vetted out before making a proposal and decision?

I trust that you all will vote in opposition to this project. We believe in you and it's time that you respond to our call.

With Gratitude,

Dr. Manuel Nuñez
Assistant Superintendent of Human Resources

To schedule a meeting with me, please contact Kim Eggleston at 831-645-1272 or via email at keggleston@mpusd.k12.ca.us

CONFIDENTIALITY NOTICE: This communication and its attachments may

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] Propane Facility

4 messages

ruby vasquez <vasquezruby@hotmail.com>

Sun, Aug 30, 2020 at 8:36 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Not a good idea!

This would have slipped right on by had it not been brought to local community attention by someone who lives on the East coast!!

Where is the "transparency"? How can a project which can present great danger to our community be considered? And be asking for a "special permit" not even go through the proper procedures and safety protocols!

If this propane facility is something needed by our county find another location in north county. I'm sure that wouldn't even be considered.

As commissioners I'm sure you see the racial and socioeconomic issues that this project brings forth: it's just another repetition of the historical inequities that have always been allowed to take place in certain communities.

This must be a NO vote.

Thank you for your time.

Ruby Vasquez,

Life long Watsonville community member

Sent from my iPhone

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 9:40 AM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

Fyi - Re: 950 W. Beach St. (propane facility)

I will be forwarding you all emails that CDD receives and they will also be posted on the website.

[Quoted text hidden]

--

Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 5:05 PM

To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

----- Forwarded message -----

From: **ruby vasquez** <vasquezruby@hotmail.com>

Date: Sun, Aug 30, 2020 at 8:36 PM

Subject: [CDD] Propane Facility

To: cdd@cityofwatsonville.org <cdd@cityofwatsonville.org>

[Quoted text hidden]

[Quoted text hidden]

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Fwd: Propane

2 messages

Beatriz Flores <beatriz.flores@cityofwatsonville.org>

Mon, Aug 31, 2020 at 9:49 AM

To: Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Tamara Vides <tamara.vides@cityofwatsonville.org>, Matt Huffaker <matt.huffaker@cityofwatsonville.org>

**Beatriz Vázquez Flores, MMC**

City Clerk - (831)768-3040 or (831)768-3042

275 Main St., Suite 400, Watsonville CA, 95076

beatriz.flores@cityofwatsonville.org

Business Hours: 8:00 am to 5:00 pm Monday - Friday.

----- Forwarded message -----

From: **Gary Green** <ggreen983@hotmail.com>

Date: Sun, Aug 30, 2020 at 3:02 PM

Subject: Propane

To: <felipe.hernandez@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>

DO NOT APPROVE the new propane tank project.

It is dangerous, ridiculous and stupid project.

We do not (or at least I don't)

Want to continue to make a Watsonville the toxic dumping ground for Santa Cruz County.

Please show some intelligence and vision.

Thank you

Gary Green

Freedom Ca

Sent from my iPhone

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 4:26 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

--

Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Fwd: Propane Facility

2 messages

Beatriz Flores <beatriz.flores@cityofwatsonville.org>

Mon, Aug 31, 2020 at 9:48 AM

To: Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Tamara Vides <tamara.vides@cityofwatsonville.org>, Matt Huffaker <matt.huffaker@cityofwatsonville.org>

**Beatriz Vázquez Flores, MMC**

City Clerk - (831)768-3040 or (831)768-3042

275 Main St., Suite 400, Watsonville CA, 95076

beatriz.flores@cityofwatsonville.org

Business Hours: 8:00 am to 5:00 pm Monday - Friday.

----- Forwarded message -----

From: **ruby vasquez** <vasquezruby@hotmail.com>

Date: Sun, Aug 30, 2020 at 8:39 PM

Subject: Propane Facility

To: felipe.hernandez@cityofwatsonville.org <felipe.hernandez@cityofwatsonville.org>, cityclerk@cityofwatsonville.org <cityclerk@cityofwatsonville.org>

Not a good idea!

This would have slipped right on by had it not been brought to local community attention by someone who lives on the East coast!!

Where is the "transparency"? How can a project which can present great danger to our community be considered? And be asking for a "special permit" not even go through the proper procedures and safety protocols!

If this propane facility is something needed by our county find another location in north county. I'm sure that wouldn't even be considered.

As city council representatives, I'm sure you see the racial and socioeconomic issues that this project brings forth: it's just another repetition of the historical inequities that have always been allowed to take place in certain communities.

This must be a NO vote.

Thank you for your time.

Ruby Vasquez,

Life long Watsonville community member

Sent from my iPhone

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 4:20 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

--

Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Online Form Submittal: Contact the Boards and Commissions

5 messages

noreply@civicplus.com <noreply@civicplus.com>

Mon, Aug 31, 2020 at 10:49 AM

To: deborah.muniz@cityofwatsonville.org

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Benjamin

Last Name Ow

Email Address benjaminmow@gmail.com

Subject Please Reject Propane Plant Proposal at 950 W Beach Street

Message August 31, 2020

Dear Watsonville Planning Commission,

This letter respectfully requests that you recommend denying the proposal for a Special Use Permit to allow a bulk propane plant without any environmental review at 950 W Beach Street, Application No. PP2019-18. The Planning Commission should recommend denying a special use permit for the bulk propane plant as proposed because it would not serve the City of Watsonville or its residents. The proposed project is not consistent with Watsonville's General Plan, would generate hazardous vehicular traffic, does not comply with the special use standards required of structures that store liquid petroleum products in Watsonville, and would be materially detrimental to the public health, safety, convenience and welfare of the people of Watsonville, and would result in material damage and prejudice to neighboring properties in the vicinity. Furthermore, it is likely that approving the proposed project would lead to litigation against the City of Watsonville because allowing massive fossil fuel facilities without environmental review is contrary to California law. Additionally, the proposed project is not in the interests of the residents of Watsonville because the project would be detrimental to public health, the environment, and the economy, including surrounding property values.

The Proposed Bulk Propane Plant Is Subject To CEQA And
The Proposed Approval Is Contrary to Law

The Planning Commission should reject the proposed bulk propane project because no environmental review has been done, which is contrary to the California Environmental Quality

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Act ("CEQA"). The proposed bulk propane project is a "project" within the meaning of CEQA, is not exempt, and thus approval as proposed would be inappropriate.

The Proposed Plant Is Subject To CEQA

The project applicant requests approval of the construction of a permanent 170,000 gallon propane storage facility; this request should be denied. There are multiple levels of analysis to determine whether an approval is subject to environmental review. First, one must determine if a "project" is at issue. The application for a permit to construct a bulk propane plant is clearly a "project" within the meaning of CEQA and neither the project applicant nor city staff claims otherwise. "It is state policy in California that 'the long-term protection of the environment ... shall be the guiding criterion in public decisions.'" *Davidon Homes v. City of San Jose*, 54 Cal. App. 4th 106, 112 (Cal. Ct. App. 1997) (quoting Cal. Pub. Resources Code § 21001, subd. (d)). "With narrow exceptions, CEQA requires an EIR [environmental impact report] whenever a public agency proposes to approve or to carry out a project that may have a significant effect on the environment." *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394, 401 (Cal. Ct. App. 2012) (quoting *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 390-91 (1988)). Accordingly, CEQA clearly applies to the proposed project.

The Proposed Plant Is Not Exempt From CEQA Because There Is The Possibility That The Project Could Have A Significant Effect On The Environment

The second level of CEQA review requires a determination of whether a project is exempt from CEQA. The proposal attempts to avoid environmental review by claiming that it is "common sense" that the CEQA does not apply to the proposed bulk propane facility because "there is no possibility that the project would have a significant effect on the environment." This claim fails because there is the possibility of a significant effect on the environment. "The required burden of a party challenging [the common sense] exemption is slight." *Chung*, 210 Cal. App. 4th at 400. This slight burden is met here where there is evidence that the proposed project could have a significant effect on the environment. In fact, the factual record already establishes that the project could have a significant effect on the environment. We know that approving the project would lead to construction that would affect the built environment. That is enough to render the common sense exemption inapplicable. California cases that allow use of the common sense exemption do not allow for new buildings of structures, but rather allow for governmental changes that do not affect the built environment and/or will improve the environment by engaging in native plant restoration. Planning documents are consistent with this case law. Attempts to use the common sense exemption to apply to governmental actions that would or could affect the built environment are rejected by California courts.

It is instructive to compare *Paulek v. Western Riverside County*, 238 Cal. App. 4th 583 (Cal. Ct. App. 2015) and *California*

Bureau Federation v. California Wildlife Conservation Board, 143 Cal. App. 173 (Cal. Ct. App. 2006) with CREED-21 v. City of San Diego, 234 Cal. App. 4th 488 (Cal. Ct. App. 2015) and Chung v. City of Monterey Park, 210 Cal. App. 4th 394 (Cal. Ct. App. 2012). In Paulek, at issue was whether the common sense exemption applied to the removal of a conservation overlay from a portion of real property. 238 Cal. App. 4th at 611. The court held that the common sense exemption was inapplicable to the removal of the conservation overlay even though development was not planned on the property because the "change in designation embodies a fundamental land use decision that has the potential for causing ultimate physical changes in the environment." Id. At 614 (citations omitted). Paulek shows that if a governmental action could possibly lead to physical changes that could have an adverse impact on the environment, the common sense exemption does not apply. In California Farm Bureau Federation, the issue was whether the conversion of agricultural land into a protected wildlife habitat was exempt from environmental review under CEQA. 143 Cal. App. at 173. When analyzing whether the common sense exemption applied, the Court of Appeal noted that the "common sense exemption is reserved for those obviously exempt projects where its absolute and precise language clearly applies" and that the "lead agency has the burden to show the project comes within the common sense exemption." Id. at 185 (internal quotations and citation omitted). Despite arguments that "a mere change in use of land from agriculture to wildlife habitat is not of itself an adverse environmental impact" and that there would be "environmental benefits of changing the use of agricultural land to habitat," "the project involve[d] the physical reshaping of the land to create wetlands and uplands for habitat." Id. at 185-86. And that physical changing of the land would require heavy machinery. Id. at 186. The Court of Appeal noted that even environmentally beneficial projects may have environmental costs, "which must be considered and assessed." Id. Because the lead agency had not adequately shown that there was no possibility that the project, considered as a whole, would not cause significant environmental impacts, the common sense exemption to CEQA did not apply and environmental review was required. Id. at 187.

In CREED-21, the Court of Appeal analyzed whether CEQA's common sense exemption applied to approving the planting of native vegetation on an approximately 2,385-square foot area that was mostly bare dirt with a few nonnative plants. 234 Cal. App. 4th at 511-12. The opinion notes:

Although the revegetation plan would change or alter the site's 2011 physical conditions, it is only "a substantial, or potentially substantial, adverse change in any of the physical conditions" that constitutes a "significant effect on the environment" within the meaning of CEQA. (Guidelines, § 15382, italics added; see § 21068.) Because the revegetation plan indisputably would improve the site's physical conditions compared to its 2011 physical conditions, that plan would not result in any adverse

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change in its physical conditions. Therefore, the revegetation plan could have no significant effect on the environment within the meaning of CEQA.

Id. at 512. The Court of Appeal accordingly held that there was no possibility that the activity in question would have a significant negative effect on the environment, and therefore the common sense exemption to CEQA applied.

In *Chung*, a city held a ballot measure that would require the city to seek competitive bids for trash service, but there was no anticipated change to the actual levels of service or transportation trips from trash servicers. 210 Cal. App. 4th at 396-97. A resident sued arguing, among other things, that the ballot measure was illegal because it did not go through environmental review. Id. at 397-98. At trial, the court held that the ballot measure was not a "project" within the meaning of CEQA and, alternatively, even if it were a project the common sense exemption would apply because the plaintiff had not "raised a reasonable argument to suggest a possibility of an adverse impact. There is no fair argument that the proposed measure alone would reasonably result in a foreseeable increase in trucks servicing the City." Id. at 400. On appeal, the Court of Appeal upheld the trial court's finding that the ballot measure was not a "project" subject to CEQA. Id. at 406.

Paulek, *California Farm Bureau Federation*, *CREED-21*, and *Chung* illustrate that CEQA's common sense exemption does not apply to any governmental approval that could potentially result in a change to the built environment or a negative effect on the environment. In order for the common sense exemption to apply, there must not be any possible change to the built environment and no foreseeable change to other activities, such as truck trips or heavy machinery use, that could negatively affect the environment. The approval of a Special Use Permit for a bulk propane would result in a change to the built environment; increase the use and storage of hazardous materials, which has a negative effect on the environment; and increase activities that have a negative effect on the environment, such as truck and train trips. Accordingly, a bulk propane plant fails each element of the test for whether CEQA's common sense exemption applies. In fact, it is common sense that a bulk propane facility could, and likely would, have a significant negative impact on the environment. Accordingly, the attempt here to approve a permit to allow the construction of a bulk propane plant while avoiding environmental review by relying on CEQA's common sense exemption should be rejected and the Planning Commission should recommend denial of the requested special use permit.

The project applicant attempts to use an Environmental Memorandum and Technical Memorandum dated June 4, 2020 (the "Environmental Memo") to claim that the project is exempt from CEQA as common sense. Notably, the Environmental Memo does not list a single similar project in all of California that has been found to be exempt from CEQA. Nor does the Environmental Memo list any regulations or cases that support its assertion that it is common sense that CEQA does not apply

to the approval and construction of a bulk propane facility. There is absolutely no factual record of any bulk propane projects in the entire state of California that have been found to have no significant environmental impacts, let alone no possibility of a significant environmental impact. Indeed, the only projects cited by the Environmental Memo are a storage facility in Schuyler County, New York and a refinery in Detroit Michigan. And it's not clear that those projects should be used as a basis of comparison for the current project because as the Environmental Memo concedes "[d]etailed specifications of project equipment are unknown as this time." Environmental Memo page 10 of 170. To rely on the calculations for out-of-state projects whose similarities to the current project are unknown would be arbitrary and capricious. The proposed project should be rejected because it could have a significant environmental impact and it would not be proper to use CEQA's common sense exemption to approve the project.

California Law And The Current Site Shows That Propane Plants Can Have A Significant Effect On The Environment
The common sense exception to CEQA only applies "[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment." *Davidon Homes*, 54 Cal. App. 4th at 112 (emphasis added) (holding that the City of San Jose failed to comply with CEQA in determining that an ordinance was exempt from CEQA as common sense because it was not supported by the record). California law, however, has long recognized the significant effect that bulk propane facilities can have on the environment. For example, in *Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70 (Cal. Ct. App. 2010), the California Court of Appeal reviewed a full EIR for a proposed petroleum facility and found the environmental review lacking.

The Environmental Memo also notes that the proposed facility would be serviced by trains and trucks but fails to recognize the significant environmental effects that trains and trucks carrying propane can have. In fact, incredibly, the Environmental Memo does not even evaluate the possibility of a train derailment, truck or car crash, or other catastrophic event. Compare that to the extensive modeling and risk assessment done in evaluating the EIR for a proposed petroleum project in *Rodeo Citizens Assn. v. County of Contra Costa*, 22 Cal. App. 5th 214 (Cal. Ct. App. 2018). Here's how the EIR at issue in *Rodeo Citizens Assn.* describes the risks inherent in rail transport of propane: Rail transport of [liquid propane gas], either propane or butane, entails risk. With an unregulated release, a liquid pool may rapidly form and a flammable vapor cloud may begin to spread over the surrounding area. If such a vapor cloud finds an ignition source, the cloud can flash back and even explode if a portion of the flammable gas is in a congested area. This may result in damage to persons and property within the vicinity of the vapor cloud. It is also possible for a sustained torch fire (caused by burning [liquid propane gas] released through a puncture in the tank car) to develop a torch fire emitting a

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radiant heat flux ... which could lead to injury or fatality depending on how close people are to the fire. In addition to the typical consequences of a hydrocarbon release, [liquid propane gas] in a closed vessel such as a tank car has the potential to undergo a BLEVE [boiling liquid expanding vapor explosion] if the vessel fails catastrophically.

Id. At 229. The proposed project would put the people and businesses of Watsonville at risk of injury or death (and significant environmental impacts!) and it should not be approved without an actual assessment of the real risks involved and whether those risks are worth it.

The application claims that it is common sense that a bulk propane facility would have no possibility of having a significant environmental impact yet the current site shows that this is incorrect. The June 25, 2020 Planning Commission

Memorandum notes that the site previously held four fuel storage tanks and that those tanks eventually leaked, causing the site to be listed as a LUST Cleanup Site by the State Water Resources Board. Fossil fuel facilities often fail, leading to massive costs to the surrounding communities. One of the worst industrial disasters in history is the San Juanico disaster, where a liquid petroleum gas storage plant exploded, triggering fires that killed between 500 and 600 people and left as many as 7,000 others with severe burns. In 1989, faulty propane and butane facility leaked gas near a railroad in the Soviet Union, leading to an explosion that killed 575 people. In 2013, a Blue Rhino propane plant in Florida exploded, injuring eight workers. The list of propane facility disasters is long and tragic. It is the furthest thing from common sense to approve a bulk propane facility adjacent to a railway in a floodplain in an area known for powerful earthquakes without environmental review.

Unfortunately, even fossil fuel projects that avoid disaster can have significant negative environmental impacts. The Environmental Memo notes that propane combustion produces particulate matter, sulfur dioxides, nitrogen oxide, carbon monoxide, greenhouse gas, and methane, each of which can have devastating environmental impacts. Accordingly, even the best case scenario for the environment if this project is built is far from good. The proposed bulk propane plant should be denied.

CEQA's Infill Exemption Cannot Be Used For This Project Because Of The Project's Likely Significant Environmental Effects and Incompatibility with Watsonville's General Plan The City of Watsonville Memorandum dated August 12, 2020 attempts to exempt the proposed propane plant from environmental review pursuant to CEQA by relying on the infill exemption. This is a change from the previous City of Watsonville Memorandum dated June 25, 2020. Despite this new attempt to use a different CEQA exemption, the August 12 Memorandum relies on the earlier environmental memorandum that does not mention the infill exemption. In order for a project to properly use CEQA's infill exemption, the project must be consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable

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zoning designation and regulations. In addition, approval of the project must not result in any significant effects relation to traffic, noise, air quality, or water quality.

As discussed below, the project is not consistent with Watsonville's General Plan, EIR, and zoning designation and regulations. As discussed above and below, the project could and likely would result in significant effects relating to traffic, noise, air quality, and water quality. Accordingly, the attempted use of CEQA's infill development is entirely inappropriate for this project. The Planning Commission should recommend that the application for a special use permit should be denied.

The Proposed Bulk Propane Project Is Not Consistent With Watsonville's General Plan and EIR

Watsonville's General Plan and associated EIR indicate how inappropriate approval of this facility without environmental review would be. The General Plan's discussion of Industrial zoning notes the general categories of allowed uses, which do not include petroleum refining or storage, and that "[t]he intent of the district is to serve the industrial needs of the community." General Plan page 52. Nothing in the record indicates how or why this bulk propane plant would serve the industrial needs of the community. Further, the General Plan's EIR notes that its goals include ensuring "that future development is consistent with the General Plan through use of the City's zoning ordinance, development standards, capital improvement program, and environmental review process;" "support[ing] public and private beautification, and promote pride in community appearance;" "protect[ing] surface and groundwater resources;" "protect[ing] air, water, soil, biotic resources from damage by exposure to hazardous materials;" and "reduc[ing] the potential danger related to the use, storage, transport, and disposal of hazardous materials to an acceptable level of risk." General Plan EIR at 1-15, 1-18, & 1-20. Approval of a bulk propane plant without any environmental review is not consistent with the goals and purposes of Watsonville's General Plan and EIR. This project should be denied.

A Special Use Permit Is Inappropriate For The Proposed Project And Cannot Be Issued Without Certain Findings Being Made By The City Council And A Vote By The People Of Watsonville

Watsonville's Municipal Code mandates that a Special Use Permit for a liquefied propane storage facility cannot become effective the City Council makes particular findings and the people of Watsonville approve the Special Use Permit by a referendum vote.

Watsonville Municipal Code Section 14-16.603 sets forth the uses that require a Special Use Permit in areas of Watsonville zoned IG – General Industrial District, which is the zoning for 950 West Beach Street. Watsonville Municipal Code § 14-16.603. Petroleum product refining and storage requires a Special Use Permit. Id. For most Special Use Permits, the proper procedure for obtaining one is set forth in Watsonville Municipal Code Sections 14-12.508 – 14-12.512, and requires approval by the Planning Commission. Id. at §§ 14-12.508

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14-12.512. For “onshore oil facilities,” however, the Watsonville Municipal Code sets forth a different approval process. Id. at §§ 14-44.010 – 14.44.070. An “onshore oil facility” is defined as “any structure or development created for the purpose of storing, transporting, or processing liquid petroleum products, excluding the transportation, storage or retail sale of gasoline or motor oil.” § 14-44.020. The “proposed project [at 950 West Beach Street] would serve as a liquid propane storage and distribution facility.” Technical Memorandum p. 162 of 170. Propane is a petroleum product. E.g., Technical Memorandum p. 167 of 170; Honolulu Oil Corp. v. Franchise Tax Board, 60 Cal.2d 417, 422 (1963). Therefore, the proposed bulk propane project at 950 West Beach Street is an onshore oil facility because it is a facility for the storage of a liquefied petroleum product and is not for the storage of gasoline or motor oil. Watsonville’s Municipal Code sets forth strict requirements for the approval of a Special Use Permit for an onshore oil facility: Whenever an [applicant] seeks a Special Use Permit issued by the City Council as required by Section 14-16.603 of this Code, to permit the development and operation within the City of any onshore oil facility, in addition to the findings required for approval by Section 14-10.607 of this Code, the City Council shall determine whether [it] is in conformity with the coastal policies, if applicable, and General Plan and whether [it] furthers the health, safety, and welfare of the people of the City of Watsonville. If the City Council makes the findings required by Section 14-10.607 of this Code and finds that [it] is consistent with the coastal policies, if applicable, and the General Plan and is not injurious to the health, safety and welfare of the people of the City, it shall submit the proposed Special Use Permit to a referendum vote of the people at either a special election or the then-upcoming general election in accordance with the State Elections Code or Article XIII of the City Charter. The proposed Special Use Permit shall not become effective unless approved by a majority of the Watsonville electors voting in the election.

Id. at § 14-44.010(b) (emphasis added). Watsonville’s Municipal Code clearly states that a Special Use Permit for a bulk liquefied propane facility shall not become effective unless the City Council makes certain findings and it is approved by a majority of Watsonville electors voting in a referendum election. Accordingly, the Planning Commission cannot decide whether or not to issue a Special Use Permit for the proposed bulk liquefied propane plant at 950 West Beach Street and before any Special Use Permit for the project can become effective the City Council must find that the project would improve the health, safety, and welfare of the people of Watsonville and it must be approved by a majority of Watsonville electors voting in a referendum election.

The Required Findings For An Approval Of A Bulk Propane Plant Cannot Be Made

In order to approve a bulk propane plant such as the one proposed, which is an onshore oil facility for purposes of Watsonville’s Municipal Code, the project must comply with all

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of the regular requirements of a special use permit as well as heightened requirements. Neither the regular requirements nor the heightened requirements are met for the proposed project. The Proposed Project Does Not Satisfy The Regular Special Use Permit Requirements

The Planning Commission should recommend denial of the application for a special use permit because the findings required for approval of a special use permit cannot be made. When considering a Special Use Permit, Watsonville's Municipal Code instructs the Planning Commission to make, among others, the following findings:

(a) The proposed use at the specified location is consistent with the policies of the General Plan and the general purpose and intent of the applicable district regulations...

(c) The proposed use will not generate pedestrian or vehicular traffic which will be hazardous or conflict with the existing and anticipated traffic in the neighborhood...

(f) The proposed special use complies with all additional standards imposed on it by the particular provisions of this chapter and all other requirements of this title applicable to the proposed special use and uses within the applicable base zoning district; and

(g) The proposed special use will not be materially detrimental to the public health, safety, convenience and welfare, and will not result in material damage or prejudice to other property in the vicinity.

Watsonville Municipal Code § 14-12.513. Here, none of those required findings can be made.

As noted above, the proposed facility is not compatible with the General Plan or with the purpose and intent of the applicable district regulations.

Furthermore, the proposed project will increase vehicular traffic that will be hazardous to the neighborhood. Propane is a hazardous substance. When the previous propane plant on the site leaked, it caused significant environmental damage and necessitated significant remediation. When there was a propane explosion at the property owner's home it caused a serious injury and a significant fire.

<https://www.santacruzsentinel.com/2014/02/22/boulder-creek-propane-blast-prompts-company-owner-to-move-tank/>

Finally, the proposed project would be detrimental to the public health, safety, convenience, and welfare of Watsonville, and will result in material damage or prejudice to other property in the vicinity.

The more we study about air pollution, the more we learn how horrible its effects on public health are. See, e.g.,

<https://www.vox.com/future-perfect/2019/12/11/20996968/air-pollution-cognitive-impact>.

Burning propane increases air pollution, as do diesel trucks that transport propane. Air pollution has massive negative effects on cognition, on respiratory issues, and on quality of life. We should be doing all we can to decrease air pollution, not increase it.

California recognizes how bad diesel and propane are for public health. For example, as part of its mission to reduce air

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pollution, the California Air Resources Board recently approved regulations to require electric truck manufacturing to speed up the transition from fossil fuel-based vehicles. In announcing the regulations, CARB Chair Mary D. Nichols noted that, "Diesel vehicles are the workhorses of the economy, and we need them to be part of the solution to persistent pockets of dirty air in some of our most disadvantaged communities. Now is the time – the technology is here and so is the need for investment." Studies also indicate that living near oil and gas facilities increase the risk of disease.

<https://www.sciencedaily.com/releases/2018/04/180409103920.htm>

According to the Environmental Memo, diesel trucks would be used often to transport the propane from the proposed bulk propane facility. The construction of permanent infrastructure that relies on pollution-spewing trucks transporting a fossil fuel that would eventually be burned either locally (bad) or transported far away (also bad!) is terrible for public health. It should not be allowed.

The proposed project also would be detrimental to the safety and welfare of Watsonville. Massive fuel facilities are essentially massive bombs. They can, and with tragic regularity, do explode. Allowing so much new propane infrastructure in Watsonville makes it more likely there will be a fire or explosion or leak. It reduces the safety and welfare of the community. Accordingly, the Planning Commission should recommend that the proposed project should be rejected.

The Proposed Project Does Not Satisfy the Heightened Requirements of Onshore Oil Facilities

Watsonville Municipal Code § 14-44.010(b) requires that an onshore oil facility, like the proposed bulk propane plant, further the health, safety, and welfare of the people of Watsonville. As shown above, the proposed project would be detrimental to the health, safety, and welfare of the people of Watsonville. It certainly would not further the health, safety, and welfare of the people of Watsonville. There is absolutely nothing in the record that would support such a finding. Accordingly, this project should not be approved or be recommended for approval.

The Proposed Bulk Propane Plant Is Not In The Interest Of Watsonville's Residents

The project should not be approved because it is not in the best interest of the residents of Watsonville. The community and the world is moving away from fossil fuels. We know that time is running out to make meaningful progress on climate change. We know that fossil fuel pollution has devastating health consequences, consequences that all too often are perpetrated against marginalized communities. We know that the future is electrification and renewable energy. Supporting permanent massive fossil fuel infrastructure is bad for Watsonville's health and economic wellbeing, and should be avoided.

Building Massive Fossil Fuel Infrastructure Is Bad for the Environment

California recognizes that fossil fuels and, accordingly, fossil fuel infrastructure are bad for the environment. Governor

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Newsom has been particularly vocal about the need to abandon fossil fuels. Last May, his budget noted that California "recognizes the need for careful study and planning to decrease demand and supply of fossil fuels...." Last October, Governor Newsom signed six bills to move California away from fossil fuels. At the time, he noted that, "California is a leader in the fight to transition away from fossil fuels. These bills put intentions into action." The vast majority of scientists and governments agree that massive reductions in greenhouse gas emissions are needed by 2030. One of the only ways to massively reduce greenhouse gas emissions is to reduce our use of fossil fuels. See, e.g. <https://www.vox.com/2016/9/19/12938086/electrify-everything>. We can move away from fossil fuels without a massive hit to the economy or our quality of life if we engage in a massive push for electrification (e.g. many cities requiring electric appliances rather than natural gas ones) and cleaning up the electric grid (e.g. by shutting down coal and natural gas power plants and replacing them with solar and wind power plants and battery storage). We cannot do it by continuing to build fossil fuel infrastructure.

The terrible and tragic wild fires that are plaguing are county and our state or only the most recent reminder of the terrible effects that climate change is having on our community. Across the country, multiple hurricanes are forming in the Gulf of Mexico. We are living in unprecedented times and we must do all that we can to reduce greenhouse gas emissions to slow the rate of climate change. Building fossil fuel infrastructure is the last thing we need.

The science and public policy are clear: fossil fuels and infrastructure that promotes and enables fossil fuel use are bad for the environment. The proposed bulk propane facility would be bad for the environment and should not be approved.

The Proposed Plant Should Be Rejected To Avoid Perpetuating Environmental Racism

There is a long history of environmental racism in the United States and abroad. Historically, people put polluting facilities in marginalized communities, particularly communities of color, because those communities had less power. There is now a growing movement to prevent new fossil fuel facilities in communities of color. Watsonville, a predominantly Latinx city, should be part of the future, not part of the past, and reject the proposed bulk propane plant. Furthermore, there is a school located a mile away from the proposed plant. How can we be confident that the school is outside of the blast radius of the plant if no calculations have been done regarding potential catastrophic events? The Planning Commission should recommend denying the special use permit that applicant seeks.

Building Massive Fossil Fuel Infrastructure Would Be Bad For Watsonville's Economy

There is abundant evidence that future economic growth will be in sectors like clean energy, electric vehicles, computer science, and life and biosciences and that there will not be economic growth in fossil fuel-related industries. In fact,

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predict a carbon bubble that will burst as the world moves away from massively polluting fossil-fuel based infrastructure to clean, renewable sources of energy. See, e.g., <https://www.theguardian.com/environment/2018/jun/04/what-is-the-carbon-bubble-and-what-will-happen-if-it-bursts>. Perhaps more importantly, oil and gas infrastructure has been found to depress nearby property values, including residential property values over 2 miles away. <https://core.ac.uk/reader/6960284>. A two-mile radius of the proposed facility incorporates scores of Watsonville homes. Further decreasing their property values during a recession bordering on a depression is not a wise choice. Straddling Watsonville with a large permanent fossil fuel tank will not only fail to help Watsonville's economy, it will almost surely severely hinder it.

The proposed site is adjacent to some of the last large parcels of developable land in the City of Watsonville. Those parcels could become a corporate headquarters or clean-tech research and development facility or local manufacturing plant or, if changes are made to the relevant specific plan, a large mixed-use or residential project. Placing a massive, imposing propane facility could scare off potential users or future residents. Would Tesla want to locate next to a massive propane facility? Would Driscoll's? Would anyone? Unlikely. Accordingly, the project should not be approved.

The Proposed Project Is Incompatible With The Adjacent Rail Trail And Nearby Slough

The proposed project would be adjacent to the rail trail project that is currently under construction. One of the main goals of the rail trail project is to allow pedestrian and bike travel, which are environmentally friendly ways to traverse our beautiful community. Putting a gigantic propane tank above the rail trail would make the rail trail much less inviting and much more likely to lead to a catastrophic event. Biker, joggers, walkers, and birders should not need to worry about a potential explosion when exploring the area.

The beautiful Watsonville slough system is also quite near the proposed site. Many species of birds, fish, and plants call the area home. Any development should be sensitive to their local habitats. It is not in their interest to put a bulk propane plant nearby, especially one that has not gone through environmental review. The massive opposition to the proposed project from local wildlife, environmental groups, and concerned residents illustrates how inappropriate this project is for the proposed site. Therefore, the Planning Commission should recommend that the proposed project should be denied.

Approving Massive Fossil Fuel Infrastructure During A Respiratory Pandemic And Historic Wild Fires Would Be Particularly Inappropriate

The COVID-19 pandemic is hitting the United States hard, and California in particular right now. Sadly, the local outbreak is concentrated in Watsonville. Despite Watsonville having fewer people than the City of Santa Cruz, it has nearly triple the number of confirmed COVID-19 cases. We also know that COVID-19 is a disease that can wreak havoc on respiratory

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systems and that air pollution is linked with increased vulnerability to COVID-19. See, e.g., <https://news.stanford.edu/2020/06/30/links-covid-19-air-pollution/>. It would be particularly egregious to approve a massive fossil fuel facility without environmental review while COVID-19 is causing devastating impacts on the City. Please do not do it.

Similarly, the pollution levels and air quality in Watsonville and around the county have been terrible recently due to the local wildfires. The smoke and particulate matter are a public health hazard. Such pollution is terrible on its own and even worse when combined with the COVID-19 pandemic. We need better air quality, not worse. We also need fewer hazards in the City of Watsonville if wildfires strike nearby. We respectfully request that you reject the project as proposed.

The Proposed Project Should Be Rejected Because It Does Not Comply With CEQA, Does Not Fulfill Watsonville Municipal Code Requirements, And Would Be Bad For The Community As shown above, the application for a special use permit to construct a bulk propane plant at 950 W Beach Street in Watsonville should be rejected. The application should be rejected because it inappropriately seeks to exempt itself from environmental review using inapplicable exemptions in a manner incompatible with California law. It should also be rejected because the application does not and cannot comply with the requirements for bulk liquified propane plants found in Watsonville 's Municipal Code. Finally, it should be rejected because it is a project that would harm public health, be bad for the environment, decrease property values, and put the people of Watsonville in danger. For the foregoing reasons, we respectfully request that the Planning Commission recommend denial of the proposed special use permit for a bulk propane plant.

Sincerely,

Benjamin Ow, Manager
Andrew Ow, Esq.
East Ohlone Watsonville, LLC
Ow Family – Ohlone Parkway, LLC
Ow Family – Lee Road, LLC

File Upload	<i>Field not completed.</i>
Phone	8312471175
Address	1601 41st Ave #202
City	Capitola
State	CALIFORNIA
Zip Code	95010

Staff Directory
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Email not displaying correctly? View it in your browser.

noreply@civicplus.com <noreply@civicplus.com>
To: deborah.muniz@cityofwatsonville.org

Mon, Aug 31, 2020 at 4:05 PM

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Consuelo
Last Name Alba
Email Address consuelo@baymoon.com
Subject NO to the Propane Facility

Message

Dear Planning Commissioners,

[REDACTED] My name is Consuelo Alba. I am an Executive Director of a local non-profit, and I have lived in downtown Watsonville for over 20 years.

[REDACTED] I wrote a letter to you earlier urging the City to require a complete environmental impact assessment for the industrial propane tank facility project, since City staff was just recommending approval based on "common sense." I am writing again today to ask you not to approve this project. I am deeply concerned about two issues:

[REDACTED] 1. The dangers of building a massive propane facility so close to schools, businesses, neighborhoods and sloughs. This is a dangerous project in an already disadvantaged community. What other city in Santa Cruz County would approve a such risky project so close to its downtown? This is another example of environmental racism.

[REDACTED] 2. Conducting "business as usual." Climate change is real, and we need to move away from fossil fuels, period. I commend the City for having a Climate Action & Adaptation Plan. Now, we must take every step to implement the plan, not ignore it. The City should not grant a permit for a business connected to the highly-polluting petroleum fracking industry (an industry which is actually dying out). New business projects must look toward the future of green energy, not the past.

[REDACTED] Please VOTE NO.

[REDACTED] Thank you,
~Consuelo Alba

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Phone 8313258724

Address 209 E 5th St

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City Watsonville

State CA

Zip Code 95076

Staff Directory

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[Quoted text hidden]

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 4:49 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 5:07 PM

To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Aug 31, 2020 at 4:05 PM

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 10:53 AM

To: Justin Meek <justin.meek@cityofwatsonville.org>

----- Forwarded message -----

From: <noreply@civicplus.com>

Date: Mon, Aug 31, 2020 at 4:05 PM

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[Quoted text hidden]

[Quoted text hidden]

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] AN APPLICATION FOR SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

4 messages

Leticia Magana <letym1228@gmail.com>

Mon, Aug 31, 2020 at 12:47 PM

To: cdd@cityofwatsonville.org, citycouncil@cityofwatsonville.org, cityclerk@cityofwatsonville.org, Robert Ornelas <robert@bravoandassociates.com>

Dear Planning Commissioners,

As a lifetime resident of Watsonville and registered voter, I **strongly urge** all commissioners to **DENY** the proposal to place 170,000 gallons of propane in our **BACK YARD!** I live at 1228 San Gabriel Ct, Watsonville, CA about 1,000 yards from the proposed placement of multiple 50,000/30,000 propane tanks.

Please see the attached complete letter.

Leticia Magana Ornelas

 **Propane Tank LO.pdf**
2390K

Beatriz Flores <beatriz.flores@cityofwatsonville.org>

Mon, Aug 31, 2020 at 1:47 PM

To: Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>



Beatriz Vázquez Flores, MMC

City Clerk - (831)768-3040 or (831)768-3042

275 Main St., Suite 400, Watsonville CA, 95076

beatriz.flores@cityofwatsonville.org

Business Hours: 8:00 am to 5:00 pm Monday - Friday.

[Quoted text hidden]

 **Propane Tank LO.pdf**
2390K

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 3:00 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

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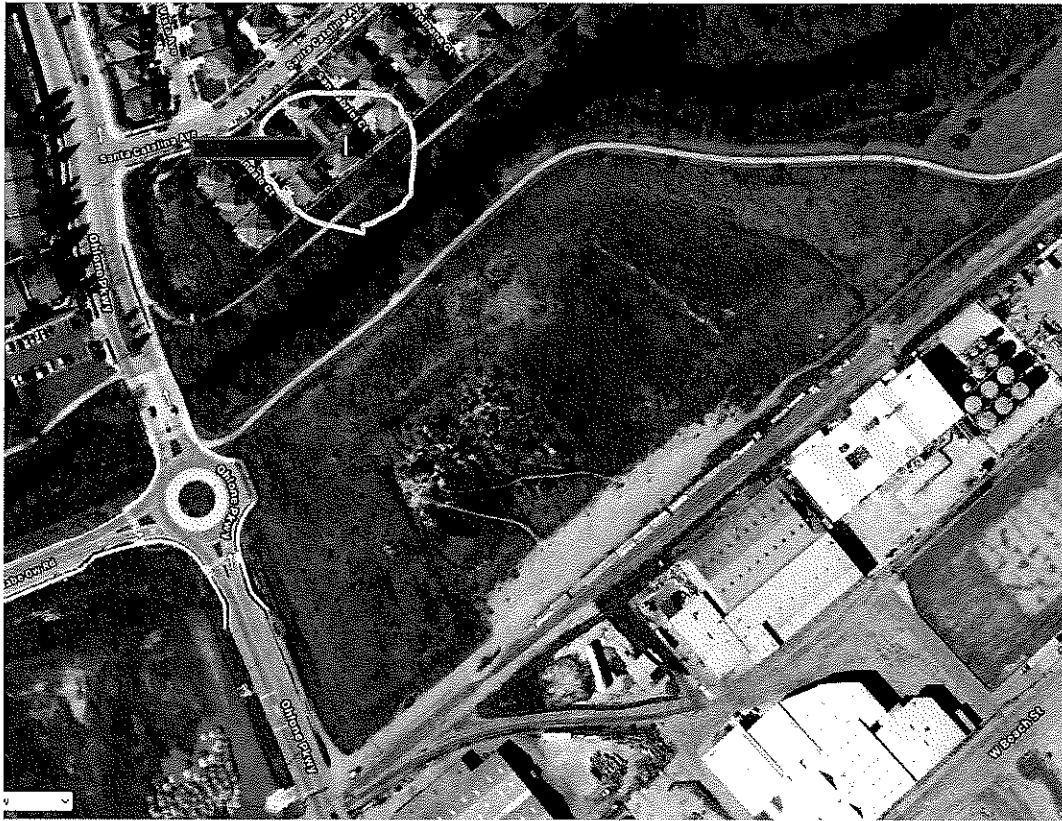
8/31/2020

RE:

AN APPLICATION FOR SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

Dear Planning Commissioners,

As a lifetime resident of Watsonville and registered voter, I **strongly urge** all commissioners to **DENY** the proposal to place 170,000 gallons of propane in our **BACK YARD!** I live at 1228 San Gabriel Ct, Watsonville, CA about 1,000 yards from the proposed placement of multiple 50,000/30,000 propane tanks.



THE QUESTIONS I POSSE TO YOU OUR PLANNING COMMISSIONERS;

1. Would you approve this project if it was to be located in **YOUR Backyard?**
2. Would you raise **your children or grandchildren** in a dangerous and hazardous environment as the one that you are about to consider tonight?

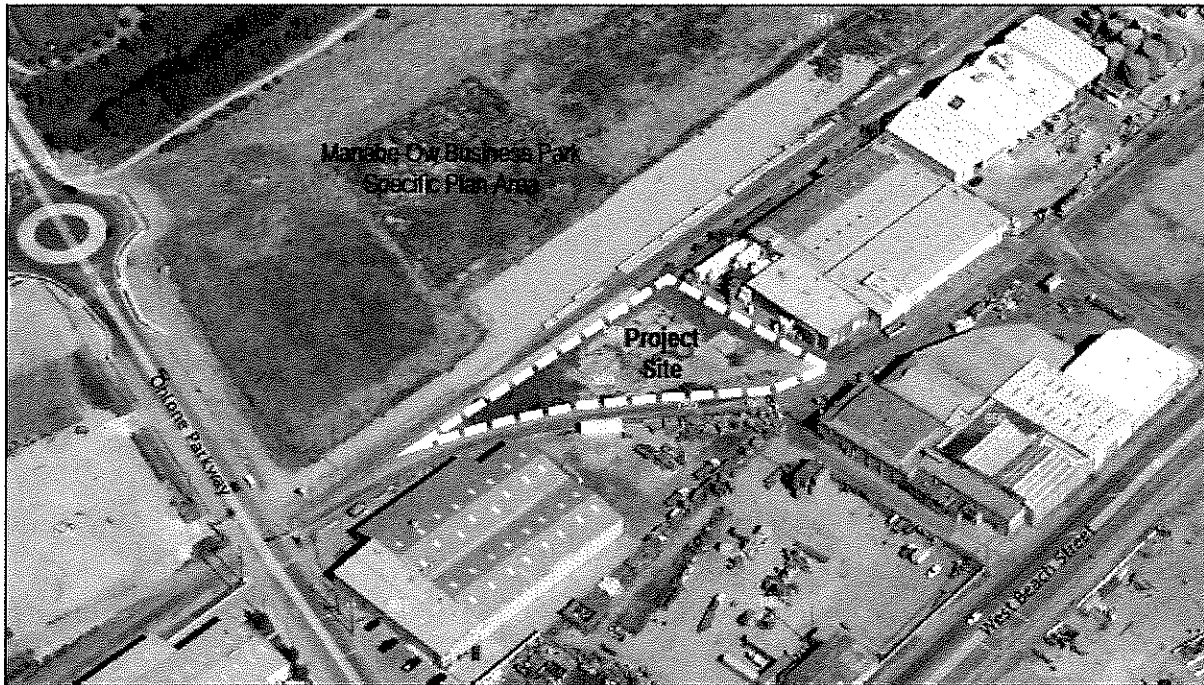


FIGURE 2 Aerial view of the project site and surrounding area

As per Zuzi Merrian, your Community Development Director's Memorandum date 8/12/2020

CONCLUSION

Approval of the Special Use Permit with Design Review and Environmental Review (PP2019-18), subject to the recommended conditions would allow the establishment of a propane storage and transfer facility (aka bulk propane plant) on a 0.7± acre property located at 950 W Beach Street (APN 018-331-28; formerly APNs 018-331-05 and -06). The project is consistent with certain General Plan goals and policies regarding industrial land uses, and a *petroleum bulk station and terminal* type use is a conditionally permitted use in the IG Zoning District. However, the project may be considered incompatible with existing nearby industrial uses that involve the production, storage and/or wholesaling of hazardous materials (e.g., biodiesel). While the project may not be subject to further environmental review per CEQA, the Planning Commission [REDACTED]

I also perceive this as an example of environmental racism because other cities and Santa Cruz County have rejected this project and the developer is bringing it to Watsonville specifically to the west side because he believes no one will protest against his proposed project.

Thank you in advance for your attention and your **NO VOTE** on the Special Use Permit request.

Please do not hesitate to contact me should you have any questions or if you would like to visit our home and our neighborhood to experience what may be a very "**EXPLOSIVE**" and dangerous one.

Letica Magana Ornelas



Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] matt.huffaker@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org, justin.meek@cityofwatsonville.org, andrew.m.ow@outlook.com, georgeowjr@aol.com, williamgeorgeow@gmail.com

3 messages

georgeowjr via CDD <cdd@cityofwatsonville.org>

Mon, Aug 31, 2020 at 1:02 PM

Reply-To: georgeowjr@aol.com

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

George Ow, Jr.
Ow Family Properties
203 Highland Avenue
Santa Cruz, CA, 95060
georgeowjr@aol.com

August 31, 2020 (Sent Via Email)

Watsonville Planning Commission

Dear Watsonville Planning Commission,

I am writing this letter as a local businessman and concerned member of the community as an addendum to the letter I wrote to you dated July 13, 2020. I am asking you to please recommend that the City Council deny the request for a special use permit for the proposed bulk propane plant at 950 W Beach Street. I have lived in Santa Cruz County for almost all of my 78 years. I have been doing business in Santa Cruz County for over five decades and have been working in and with the Watsonville community for the past 25 years. My family and I are heavily invested in the Watsonville community and we care deeply about the long term health and well-being of the community. I know that you too care greatly about the Watsonville community and as such I ask you to please stand up for the people of Watsonville, listen to the community (and over 100 letters requesting that the proposed propane plant be denied), and protect the best interests of the Watsonville residents by recommending denial of the proposed special use permit to allow a bulk propane plant without environmental review.

Please protect the great people and City of Watsonville from environmental degradation and economic despair. If you take a look at the most successful, vibrant communities you will see a pattern: education, agglomeration, technology, and respect for the environment. If you take a look at the communities with the direst conditions you will also see a pattern: reliance on fossil fuel extraction and production or other old, dirty technologies, under investment in education, population loss due to out migration, and environmental hazards and a disrespect for the environment. The people and businesses that power vibrant economies and healthy communities do not want to work or live near environmental hazards, such as bulk propane plants.

The recent wildfires that burn all around the state are a scary reminder of the precarious situation in which we find ourselves. The climate is changing. The oceans are rising. Summers are getting hotter. Fire season is getting longer. How much more of a hazard does that make a bulk propane plant? How much will a bulk propane plant speed up climate change that is already causing damage to our lungs, our children's and grandchildren's health, our crops? We do not know because there has been no environmental review done on the project and the owner of the project, who, as far as I know has never lived or done business in Watsonville, contends none should be done.

You have a stark choice: protect the people of Watsonville or protect fossil fuel profits. You can protect the people of Watsonville by recommending that the City Council deny the requested special use permit. You can protect fossil fuel profits by fast-tracking this project without environmental review. Please do right by the people of Watsonville and this wonderful community by recommending denial of the special use permit to allow a bulk propane plant without environmental review.

Sincerely,

George Ow, Jr.

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 2:33 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 5:07 PM

To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

----- Forwarded message -----

From: **georgeowjr via CDD** <cdd@cityofwatsonville.org>

Date: Mon, Aug 31, 2020 at 1:02 PM

Subject: [CDD] matt.huffaker@cityofwatsonville.org, suzi.merriam@cityofwatsonville.org, justin.meek@cityofwatsonville.org, andrew.m.ow@outlook.com, georgeowjr@aol.com, williamgeorgeow@gmail.com

To: cdd@cityofwatsonville.org <cdd@cityofwatsonville.org>

[Quoted text hidden]

[Quoted text hidden]

Attachment 1

Attachment 8 (b)

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Fwd: Letter Re: Propane Development for Planning Commission

3 messages

Suzi Merriam <suzi.merriam@cityofwatsonville.org>

Mon, Aug 31, 2020 at 12:47 PM

To: Justin Meek <justin.meek@cityofwatsonville.org>, Elena Ortiz <elena.ortiz@cityofwatsonville.org>, Deborah Muniz <deborah.muniz@cityofwatsonville.org>

please add this to the record- thanks!

----- Forwarded message -----

From: **Jonathan Pilch** <jonathan@watsonvillewetlandswatch.org>

Date: Mon, Aug 31, 2020 at 11:02 AM

Subject: Letter Re: Propane Development for Planning Commission

To: Suzi Merriam <suzi.merriam@cityofwatsonville.org>

Hi Suzi,

I hope this email finds you well. The WWW planning committee has prepared a letter related to the propane plant project that will go to the planning commission tomorrow evening. Please find this attached. Please let me know if there is another way that this should be submitted in order for it to be part of the planning commission review process.

Thanks,
Jonathan

Jonathan Pilch

Executive Director

Watsonville Wetlands Watch

831-728-1156 x4

www.watsonvillewetlandswatch.org

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**Proposed Propane Gas Facility.pdf**

1157K

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 2:31 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones"

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Watsonville Wetlands Watch

P.O. Box 1239 • Freedom, CA 95019

www.watsonvillewetlandswatch.org

"Dedicated to protecting, restoring and appreciating the wetlands of the Pajaro Valley"

August 28, 2020

Planning Commission
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: Proposed 170,000 Gallon Propane Gas Facility near Watsonville Slough; 950 West Beach Street

Dear Commissioners,

We understand your Commission will be considering this item in public hearing on Tuesday September 2, 2020. Watsonville Wetlands Watch believes that the City of Watsonville's staff determination that the above project is Categorically Exempt from Environmental Review is not the correct determination and is not supported by their own staff report and does not comply with the regulations of the California Environmental Quality Act (CEQA).

When a project needs to be analyzed, CEQA requires it is done first by an Initial Study, according to legislatively adopted CEQA statutes and Guidelines. While we agree there are instances in which an Exemption from the normal CEQA process is appropriate; staff's issuance of a Categorical Exemption is inappropriate for this project which will store and handle a hazardous material adjacent to a rail line and is located near a sensitive biological resource area -- Watsonville Slough.

Section 15300 of the CEQA Guidelines lists those classes of projects where Categorical Exemptions are allowed. This same Section recognizes that a project which ordinarily would be considered to have insignificant effects on the environment, may have significant effects if there are sensitive environmental resources on or near the project site; located on a hazardous waste site; or where there is a reasonable possibility that the project may have a significant effect due to unusual circumstances.¹ Clearly, these circumstances exist for the proposed propane storage facility. Therefore, the project cannot be exempted from Environmental Review.

The fact that City staff hired an environmental consultant to conduct a *partial* analysis of environmental effects of this project shows that there is an understanding that the project may

¹ CEQA Guidelines Subsection 15300.2 "Exceptions to Exemptions"

generate actual or potential environmental impacts. However, the correct process as required by CEQA has not been followed. Sections 15063 and 15070 of the CEQA Guidelines require preparation of an Initial Study when a project is not exempt. Careful preparation of an Initial Study provides an analysis of all factors pertaining to environmental impacts and allows greater public input and awareness for a project.

Watsonville Wetlands Watch requests that the City conduct a full Environmental Review of this project by preparing an Initial Study that explains to decision-makers and the public if there are impacts/potential impact that need to be mitigated and what mitigations are recommend. In addition, the Initial Study should include an explanation of why any impacts identified as "less than significant" are not significant.

Sincerely,

A handwritten signature in cursive script that reads "Donna Bradford".

Donna Bradford

President of the Board, Watsonville Wetlands Watch

cc: Councilmember Felipe Hernandez



Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] AN APPLICATION FOR SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

4 messages

Robert Ornelas <ornelasrobert64@gmail.com>

Mon, Aug 31, 2020 at 12:43 PM

To: cdd@cityofwatsonville.org, citycouncil@cityofwatsonville.org, cityclerk@cityofwatsonville.org, Leticia Magana <letym1228@gmail.com>

Dear Planning Commissioners,

As a lifetime resident of Watsonville and registered voter, I **strongly urge** all commissioners to **DENY** the proposal to place 170,000 gallons of propane in our **BACK YARD!** I live at 1228 San Gabriel Ct, Watsonville, CA about 1,000 yards from the proposed placement of multiple 50,000/30,000 propane tanks.

Please see the attached complete letter.

Robert Ornelas

 **Propane Tank RO.pdf**
2389K


Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 2:28 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

—
Deborah Muniz, Executive Assistant
City of Watsonville/Community Development Dept.
250 Main St., Watsonville, CA 95076
Phone: 831-768-3079/ FAX: 831-728-6154
E-mail: deborah.muniz@cityofwatsonville.org

 **Propane Tank RO.pdf**
2389K

Beatriz Flores <beatriz.flores@cityofwatsonville.org>

Mon, Aug 31, 2020 at 4:27 PM

To: Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>

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8/31/2020

RE:

AN APPLICATION FOR SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

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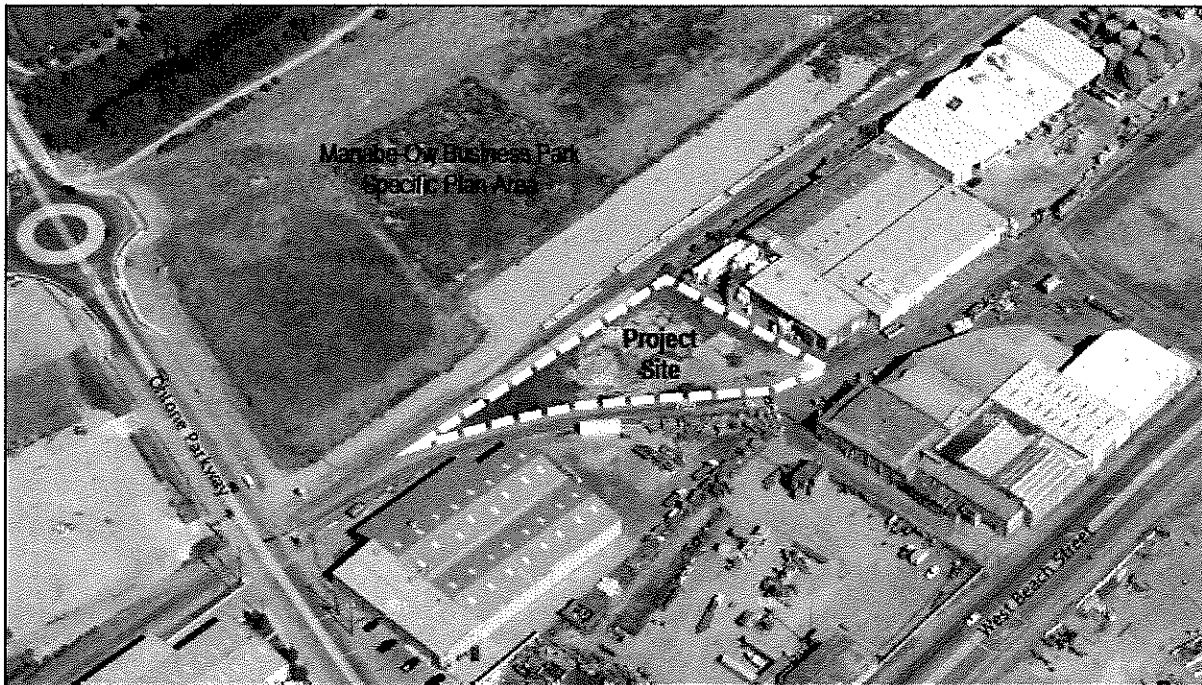


FIGURE 2 Aerial view of the project site and surrounding area

As per Zuzi Merrian, your Community Development Director's Memorandum date 8/12/2020

CONCLUSION

Approval of the Special Use Permit with Design Review and Environmental Review (PP2019-18), subject to the recommended conditions would allow the establishment of a propane storage and transfer facility (aka bulk propane plant) on a 0.7± acre property located at 950 W Beach Street (APN 018-331-28; formerly APNs 018-331-05 and -06). The project is consistent with certain General Plan goals and policies regarding industrial land uses, and a *petroleum bulk station and terminal* type use is a conditionally permitted use in the IG Zoning District. However, the project may be considered incompatible with existing nearby industrial uses that involve the production, storage and/or wholesaling of hazardous materials (e.g., biodiesel). While the project may not be subject to further environmental review per CEQA, the Planning Commission [REDACTED]

I also perceive this as an example of environmental racism because other cities and Santa Cruz County have rejected this project and the developer is bringing it to Watsonville specifically to the west side because he believes no one will protest against his proposed project.

Thank you in advance for your attention and your **NO VOTE** on the Special Use Permit request.

Please do not hesitate to contact me should you have any questions or if you would like to visit our home and our neighborhood to experience what may be a very "**EXPLOSIVE**" and dangerous one.

Robert Ornelas



Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] Letter to Planning Commission - Please Recommend Denial of the Proposed Propane Plant at 950 W Beach St

3 messages

Benjamin Ow <benjaminmow@gmail.com>

Mon, Aug 31, 2020 at 10:35 AM

To: cdd@cityofwatsonville.org

Cc: Matt Huffaker <matt.huffaker@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Andrew Ow <andrew.m.ow@outlook.com>, "Ow, George, Jr." <georgeowjr@aol.com>, William Ow <williamgeorgeow@gmail.com>

August 31, 2020

Dear Watsonville Planning Commission,

This letter respectfully requests that you recommend denying the proposal for a Special Use Permit to allow a bulk propane plant without any environmental review at 950 W Beach Street, Application No. PP2019-18. The Planning Commission should recommend denying a special use permit for the bulk propane plant as proposed because it would not serve the City of Watsonville or its residents. The proposed project is not consistent with Watsonville's General Plan, would generate hazardous vehicular traffic, does not comply with the special use standards required of structures that store liquid petroleum products in Watsonville, and would be materially detrimental to the public health, safety, convenience and welfare of the people of Watsonville, and would result in material damage and prejudice to neighboring properties in the vicinity. Furthermore, it is likely that approving the proposed project would lead to litigation against the City of Watsonville because allowing massive fossil fuel facilities without environmental review is contrary to California law. Additionally, the proposed project is not in the interests of the residents of Watsonville because the project would be detrimental to public health, the environment, and the economy, including surrounding property values.

The Proposed Bulk Propane Plant Is Subject To CEQA And The Proposed Approval Is Contrary to Law

The Planning Commission should reject the proposed bulk propane project because no environmental review has been done, which is contrary to the California Environmental Quality Act ("CEQA"). The proposed bulk propane project is a "project" within the meaning of CEQA, is not exempt, and thus approval as proposed would be inappropriate.

The Proposed Plant Is Subject To CEQA

The project applicant requests approval of the construction of a permanent 170,000 gallon propane storage facility; this request should be denied. There are multiple levels of analysis to determine whether an approval is subject to environmental review. First, one must determine if a "project" is at issue. The application for a permit to construct a bulk propane plant is clearly a "project" within the meaning of CEQA and neither the project applicant nor city staff claims otherwise. "It is state policy in California that 'the long-term protection of the environment ... shall be the guiding criterion in public decisions.'" *Davidon Homes v. City of San Jose*, 54 Cal. App. 4th 106, 112 (Cal. Ct. App. 1997) (quoting Cal. Pub. Resources Code § 21001, subd. (d)). "'With narrow exceptions, CEQA requires an EIR [environmental impact report] whenever a public agency proposes to approve or to carry out a project that may have a significant effect on the environment.'" *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394, 401 (Cal. Ct. App. 2012) (quoting *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 390-91 (1988)). Accordingly, CEQA clearly applies to the proposed project.

The Proposed Plant Is Not Exempt From CEQA Because There Is The Possibility That The Project Could Have A Significant Effect On The Environment

The second level of CEQA review requires a determination of whether a project is exempt from CEQA. The proposal attempts to avoid environmental review by claiming that it is "common sense" that the CEQA does not apply to the proposed bulk propane facility because "there is no possibility that the project would have a significant effect on the environment." This claim fails because there is the possibility of a significant effect on the environment. "The required burden of a party challenging [the common sense] exemption is slight." *Chung*, 210 Cal. App. 4th at 400. This slight burden is met here where there is evidence that the proposed project could have a significant effect on the

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environment. In fact, the factual record already establishes that the project could have a significant effect on the environment.

We know that approving the project would lead to construction that would affect the built environment. That is enough to render the common sense exemption inapplicable. California cases that allow use of the common sense exemption do not allow for new buildings of structures, but rather allow for governmental changes that do not affect the built environment and/or will improve the environment by engaging in native plant restoration. Planning

documents are consistent with this case law.^[1] Attempts to use the common sense exemption to apply to governmental actions that would or could affect the built environment are rejected by California courts.

It is instructive to compare *Paulek v. Western Riverside County*, 238 Cal. App. 4th 583 (Cal. Ct. App. 2015) and *California Farm Bureau Federation v. California Wildlife Conservation Board*, 143 Cal. App. 173 (Cal. Ct. App. 2006) with *CREED-21 v. City of San Diego*, 234 Cal. App. 4th 488 (Cal. Ct. App. 2015) and *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394 (Cal. Ct. App. 2012). In *Paulek*, at issue was whether the common sense exemption applied to the removal of a conservation overlay from a portion of real property. 238 Cal. App. 4th at 611. The court held that the common sense exemption was inapplicable to the removal of the conservation overlay **even though development was not planned on the property** because the "change in designation embodies a fundamental land use decision that has the potential for causing ultimate physical changes in the environment." *Id.* At 614 (citations omitted). *Paulek* shows that if a governmental action could possibly lead to physical changes that could have an adverse impact on the environment, the common sense exemption does not apply.^[2]

In *California Farm Bureau Federation*, the issue was whether the conversion of agricultural land into a protected wildlife habitat was exempt from environmental review under CEQA. 143 Cal. App. at 173. When analyzing whether the common sense exemption applied, the Court of Appeal noted that the "common sense exemption is reserved for those obviously exempt projects where its absolute and precise language clearly applies" and that the "lead agency has the burden to show the project comes within the common sense exemption." *Id.* at 185 (internal quotations and citation omitted). Despite arguments that "a mere change in use of land from agriculture to wildlife habitat is not of itself an adverse environmental impact" and that there would be "environmental benefits of changing the use of agricultural land to habitat," "the project involve[d] the physical reshaping of the land to create wetlands and uplands for habitat." *Id.* at 185-86. And that physical changing of the land would require heavy machinery. *Id.* at 186. The Court of Appeal noted that even environmentally beneficial projects may have environmental costs, "which must be considered and assessed." *Id.* Because the lead agency had not adequately shown that there was no possibility that the project, considered as a whole, would not cause significant environmental impacts, the common sense exemption to CEQA did not apply and environmental review was required. *Id.* at 187.

In *CREED-21*, the Court of Appeal analyzed whether CEQA's common sense exemption applied to approving the planting of native vegetation on an approximately 2,385-square foot area that was mostly bare dirt with a few nonnative plants. 234 Cal. App. 4th at 511-12. The opinion notes:

Although the revegetation plan would change or alter the site's 2011 physical conditions, it is only "a substantial, or potentially substantial, adverse change in any of the physical conditions" that constitutes a "significant effect on the environment" within the meaning of CEQA. (Guidelines, § 15382, italics added; see § 21068.) Because the revegetation plan indisputably would improve the site's physical conditions compared to its 2011 physical conditions, that plan would not result in any adverse change in its physical conditions. Therefore, the revegetation plan could have no significant effect on the environment within the meaning of CEQA.

Id. at 512. The Court of Appeal accordingly held that there was no possibility that the activity in question would have a significant negative effect on the environment, and therefore the common sense exemption to CEQA applied.

In *Chung*, a city held a ballot measure that would require the city to seek competitive bids for trash service, but there was no anticipated change to the actual levels of service or transportation trips from trash servicers. 210 Cal. App. 4th at 396-97. A resident sued arguing, among other things, that the ballot measure was illegal because it did not go through environmental review. *Id.* at 397-98. At trial, the court held that the ballot measure was not a "project" within the meaning of CEQA and, alternatively, even if it were a project the common sense exemption would apply because the plaintiff had not "raised a reasonable argument to suggest a possibility of an adverse impact. There is no fair argument that the proposed measure alone would reasonably result in a foreseeable increase in trucks servicing the City." *Id.* at 400. On appeal, the Court of Appeal upheld the trial court's finding that the ballot measure was not a "project" subject to CEQA. *Id.* at 406.

Paulek, *California Farm Bureau Federation*, *CREED-21*, and *Chung* illustrate that CEQA's common sense exemption does not apply to any governmental approval that could potentially result in a change to the built

environment or a negative effect on the environment. In order for the common sense exemption to apply, there must not be any possible change to the built environment and no foreseeable change to other activities, such as truck trips or heavy machinery use, that could negatively affect the environment. The approval of a Special Use Permit for a bulk propane would result in a change to the built environment; increase the use and storage of hazardous materials, which has a negative effect on the environment; and increase activities that have a negative effect on the environment, such as truck and train trips. Accordingly, a bulk propane plant fails each element of the test for whether CEQA's common sense exemption applies. In fact, it is common sense that a bulk propane facility could, and likely would, have a significant negative impact on the environment. Accordingly, the attempt here to approve a permit to allow the construction of a bulk propane plant while avoiding environmental review by relying on CEQA's common sense exemption should be rejected and the Planning Commission should recommend denial of the requested special use permit.

The project applicant attempts to use an Environmental Memorandum and Technical Memorandum dated June 4, 2020 (the "Environmental Memo") to claim that the project is exempt from CEQA as common sense. Notably, the Environmental Memo does not list a single similar project in all of California that has been found to be exempt from CEQA. Nor does the Environmental Memo list any regulations or cases that support its assertion that it is common sense that CEQA does not apply to the approval and construction of a bulk propane facility. There is absolutely no factual record of any bulk propane projects in the entire state of California that have been found to have no significant environmental impacts, let alone no possibility of a significant environmental impact. Indeed, the only projects cited by the Environmental Memo are a storage facility in Schuyler County, New York and a refinery in Detroit Michigan. And it's not clear that those projects should be used as a basis of comparison for the current project because as the Environmental Memo concedes "[d]etailed specifications of project equipment are unknown as this time." Environmental Memo page 10 of 170. To rely on the calculations for out-of-state projects whose similarities to the current project are unknown would be arbitrary and capricious. The proposed project should be rejected because it could have a significant environmental impact and it would not be proper to use CEQA's common sense exemption to approve the project.

California Law And The Current Site Shows That Propane Plants Can Have A Significant Effect On The Environment

The common sense exception to CEQA only applies "[w]here it can be seen with **certainty** that there is **no possibility** that the activity in question may have a significant effect on the environment." *Davidon Homes*, 54 Cal. App. 4th at 112 (emphasis added) (holding that the City of San Jose failed to comply with CEQA in determining that an ordinance was exempt from CEQA as common sense because it was not supported by the record). California law, however, has long recognized the significant effect that bulk propane facilities can have on the environment. For example, in *Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70 (Cal. Ct. App. 2010), the California Court of Appeal reviewed a full EIR for a proposed petroleum facility and found the environmental review lacking.

The Environmental Memo also notes that the proposed facility would be serviced by trains and trucks but fails to recognize the significant environmental effects that trains and trucks carrying propane can have. In fact, incredibly, the Environmental Memo does not even evaluate the possibility of a train derailment, truck or car crash, or other catastrophic event. Compare that to the extensive modeling and risk assessment done in evaluating the EIR for a proposed petroleum project in *Rodeo Citizens Assn. v. County of Contra Costa*, 22 Cal. App. 5th 214 (Cal. Ct. App. 2018). Here's how the EIR at issue in *Rodeo Citizens Assn.* describes the risks inherent in rail transport of propane:

Rail transport of [liquid propane gas], either propane or butane, entails risk. With an unregulated release, a liquid pool may rapidly form and a flammable vapor cloud may begin to spread over the surrounding area. If such a vapor cloud finds an ignition source, the cloud can flash back and even explode if a portion of the flammable gas is in a congested area. This may result in damage to persons and property within the vicinity of the vapor cloud. It is also possible for a sustained torch fire (caused by burning [liquid propane gas] released through a puncture in the tank car) to develop a torch fire emitting a radiant heat flux ... which could lead to injury or fatality depending on how close people are to the fire. In addition to the typical consequences of a hydrocarbon release, [liquid propane gas] in a closed vessel such as a tank car has the potential to undergo a BLEVE [boiling liquid expanding vapor explosion] if the vessel fails catastrophically.

Id. At 229. The proposed project would put the people and businesses of Watsonville at risk of injury or death (and significant environmental impacts!) and it should not be approved without an actual assessment of the real risks involved and whether those risks are worth it.

The application claims that it is common sense that a bulk propane facility would have no possibility of having a significant environmental impact yet the current site shows that this is incorrect. The June 25, 2020 Planning Commission Memorandum notes that the site previously held four fuel storage tanks and that those tanks eventually leaked, causing the site to be listed as a LUST Cleanup Site by the State Water Resources Board. Fossil fuel facilities often fail, leading to massive costs to the surrounding community.

Attachment 1

Attachment 8 (b)

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One of the worst industrial disasters in history is the San Juanico disaster, where a liquid petroleum gas storage plant exploded, triggering fires that killed between 500 and 600 people and left as many as 7,000 others with severe burns. In 1989, faulty propane and butane facility leaked gas near a railroad in the Soviet Union, leading to an explosion that killed 575 people. In 2013, a Blue Rhino propane plant in Florida exploded, injuring eight workers. The list of propane facility disasters is long and tragic. It is the furthest thing from common sense to approve a bulk propane facility adjacent to a railway in a floodplain in an area known for powerful earthquakes without environmental review.

Unfortunately, even fossil fuel projects that avoid disaster can have significant negative environmental impacts. The Environmental Memo notes that propane combustion produces particulate matter, sulfur dioxides, nitrogen oxide, carbon monoxide, greenhouse gas, and methane, each of which can have devastating environmental impacts. Accordingly, even the best case scenario for the environment if this project is built is far from good. The proposed bulk propane plant should be denied.

CEQA's Infill Exemption Cannot Be Used For This Project Because Of The Project's Likely Significant Environmental Effects and Incompatibility with Watsonville's General Plan

The City of Watsonville Memorandum dated August 12, 2020 attempts to exempt the proposed propane plant from environmental review pursuant to CEQA by relying on the infill exemption. This is a change from the previous City of Watsonville Memorandum dated June 25, 2020. Despite this new attempt to use a different CEQA exemption, the August 12 Memorandum relies on the earlier environmental memorandum that does not mention the infill exemption. In order for a project to properly use CEQA's infill exemption, the project must be consistent with the applicable general plan designation and *all* applicable general plan policies as well as with the applicable zoning designation and regulations. In addition, approval of the project must not result in any significant effects relation to traffic, noise, air quality, or water quality.

As discussed below, the project is not consistent with Watsonville's General Plan, EIR, and zoning designation and regulations. As discussed above and below, the project could and likely would result in significant effects relating to traffic, noise, air quality, and water quality. Accordingly, the attempted use of CEQA's infill development is entirely inappropriate for this project. The Planning Commission should recommend that the application for a special use permit should be denied.

The Proposed Bulk Propane Project Is Not Consistent With Watsonville's General Plan and EIR

Watsonville's General Plan and associated EIR indicate how inappropriate approval of this facility without environmental review would be. The General Plan's discussion of Industrial zoning notes the general categories of allowed uses, which do not include petroleum refining or storage, and that "[t]he intent of the district is to serve the industrial needs of the community." General Plan page 52. Nothing in the record indicates how or why this bulk propane plant would serve the industrial needs of the community. Further, the General Plan's EIR notes that its goals include ensuring "that future development is consistent with the General Plan through use of the City's zoning ordinance, development standards, capital improvement program, and environmental review process;" "support[ing] public and private beautification, and promote pride in community appearance;" "protect[ing] surface and groundwater resources;" "protect[ing] air, water, soil, biotic resources from damage by exposure to hazardous materials;" and "reduc[ing] the potential danger related to the use, storage, transport, and disposal of hazardous materials to an acceptable level of risk." General Plan EIR at 1-15, 1-18, & 1-20. Approval of a bulk propane plant without any environmental review is not consistent with the goals and purposes of Watsonville's General Plan and EIR. This project should be denied.

A Special Use Permit Is Inappropriate For The Proposed Project And Cannot Be Issued Without Certain Findings Being Made By The City Council And A Vote By The People Of Watsonville

Watsonville's Municipal Code mandates that a Special Use Permit for a liquefied propane storage facility cannot become effective the City Council makes particular findings and the people of Watsonville approve the Special Use Permit by a referendum vote.

Watsonville Municipal Code Section 14-16.603 sets forth the uses that require a Special Use Permit in areas of Watsonville zoned IG – General Industrial District, which is the zoning for 950 West Beach Street. Watsonville Municipal Code § 14-16.603. Petroleum product refining and storage requires a Special Use Permit. *Id.* For most Special Use Permits, the proper procedure for obtaining one is set forth in Watsonville Municipal Code Sections 14-12.508 – 14-12.512, and requires approval by the Planning Commission. *Id.* at §§ 14-12.508 – 14-12.512. For "onshore oil facilities," however, the Watsonville Municipal Code sets forth a different approval process. *Id.* at §§ 14-44.010 – 14-44.070. An "onshore oil facility" is defined as "any structure or development created for the purpose of storing, transporting, or processing liquid petroleum products, excluding the transportation, storage or retail sale of gasoline or motor oil." § 14-44.020. The "proposed project [at 950 West Beach Street] would serve as a liquid propane storage and distribution facility." Technical Memorandum p. 162 of 170. Propane is a petroleum product. *E.g.*, Technical Memorandum p. 167 of 170; *Honolulu Oil Corp. v. Franchise Tax Board*, 60 Cal.2d 417, 422 (1963).

Therefore, the proposed bulk propane project at 950 West Beach Street is an onshore oil facility because it is a facility for the storage of a liquefied petroleum product and is not for the storage of gasoline or motor oil.

Watsonville's Municipal Code sets forth strict requirements for the approval of a Special Use Permit for an onshore oil facility:

Whenever an [applicant] seeks a Special Use Permit issued by the City Council as required by Section 14-16.603 of this Code, to permit the development and operation within the City of any onshore oil facility, in addition to the findings required for approval by Section 14-10.607 of this Code, **the City Council shall** determine whether [it] is in conformity with the coastal policies, if applicable, and General Plan and whether [it] furthers the health, safety, and welfare of the people of the City of Watsonville. **If the City Council makes the findings required** by Section 14-10.607 of this Code and finds that [it] is consistent with the coastal policies, if applicable, and the General Plan and is not injurious to the health, safety and welfare of the people of the City, **it**

[3]
shall submit the proposed Special Use Permit to a referendum vote of the people at either a special election or the then-upcoming general election in accordance with the State Elections Code or Article XIII of the City Charter. **The proposed Special Use Permit shall not become effective unless approved by a majority of the Watsonville electors voting in the election.**

Id. at § 14-44.010(b) (emphasis added). Watsonville's Municipal Code clearly states that a Special Use Permit for a bulk liquefied propane facility shall not become effective unless the City Council makes certain findings and it is approved by a majority of Watsonville electors voting in a referendum election. Accordingly, the Planning Commission cannot decide whether or not to issue a Special Use Permit for the proposed bulk liquefied propane plant at 950 West Beach Street and before any Special Use Permit for the project can become effective the City Council must find that the project would improve the health, safety, and welfare of the people of Watsonville and it must be approved by a majority of Watsonville electors voting in a referendum election.

The Required Findings For An Approval Of A Bulk Propane Plant Cannot Be Made

In order to approve a bulk propane plant such as the one proposed, which is an onshore oil facility for purposes of Watsonville's Municipal Code, the project must comply with all of the regular requirements of a special use permit as well as heightened requirements. Neither the regular requirements nor the heightened requirements are met for the proposed project.

The Proposed Project Does Not Satisfy The Regular Special Use Permit Requirements

The Planning Commission should recommend denial of the application for a special use permit because the findings required for approval of a special use permit cannot be made. When considering a Special Use Permit, Watsonville's Municipal Code instructs the Planning Commission to make, among others, the following findings:

- (a) The proposed use at the specified location is consistent with the policies of the General Plan and the general purpose and intent of the applicable district regulations...
- (c) The proposed use will not generate pedestrian or vehicular traffic which will be hazardous or conflict with the existing and anticipated traffic in the neighborhood...
- (f) The proposed special use complies with all additional standards imposed on it by the particular provisions of this chapter and all other requirements of this title applicable to the proposed special use and uses within the applicable base zoning district; and
- (g) The proposed special use will not be materially detrimental to the public health, safety, convenience and welfare, and will not result in material damage or prejudice to other property in the vicinity.

Watsonville Municipal Code § 14-12.513. Here, none of those required findings can be made.

As noted above, the proposed facility is not compatible with the General Plan or with the purpose and intent of the applicable district regulations.

Furthermore, the proposed project will increase vehicular traffic that will be hazardous to the neighborhood. Propane is a hazardous substance. When the previous propane plant on the site leaked, it caused significant environmental damage and necessitated significant remediation. When there was a propane explosion at the property owner's home it caused a serious injury and a significant fire. <https://www.santacruzsentinel.com/2014/02/22/boulder-creek-propane-blast-prompts-company-owner-to-move-tank/>

Finally, the proposed project would be detrimental to the public health, safety, convenience, and welfare of Watsonville, and will result in material damage or prejudice to other property in the vicinity.

The more we study about air pollution, the more we learn how horrible its effects on public health are. See e.g., <https://www.vox.com/future-perfect/2019/12/11/20996968/air-pollution-cognitive-impact>

propane increases air pollution, as do diesel trucks that transport propane. Air pollution has massive negative effects on cognition, on respiratory issues, and on quality of life. We should be doing all we can to decrease air pollution, not increase it.

California recognizes how bad diesel and propane are for public health. For example, as part of its mission to reduce air pollution, the California Air Resources Board recently approved regulations to require electric truck manufacturing to speed up the transition from fossil fuel-based vehicles. In announcing the regulations, CARB Chair Mary D. Nichols noted that, "Diesel vehicles are the workhorses of the economy, and we need them to be part of the solution to persistent pockets of dirty air in some of our most disadvantaged communities. Now is the time – the technology is here and so is the need for investment." Studies also indicate that living near oil and gas facilities increase the risk of disease. <https://www.sciencedaily.com/releases/2018/04/180409103920.htm>

According to the Environmental Memo, diesel trucks would be used often to transport the propane from the proposed bulk propane facility. The construction of permanent infrastructure that relies on pollution-spewing trucks transporting a fossil fuel that would eventually be burned either locally (bad) or transported far away (also bad!) is terrible for public health. It should not be allowed.

The proposed project also would be detrimental to the safety and welfare of Watsonville. Massive fuel facilities are essentially massive bombs. They can, and with tragic regularity, do explode. Allowing so much new propane infrastructure in Watsonville makes it more likely there will be a fire or explosion or leak. It reduces the safety and welfare of the community. Accordingly, the Planning Commission should recommend that the proposed project should be rejected.

The Proposed Project Does Not Satisfy the Heightened Requirements of Onshore Oil Facilities

Watsonville Municipal Code § 14-44.010(b) requires that an onshore oil facility, like the proposed bulk propane plant, further the health, safety, and welfare of the people of Watsonville. As shown above, the proposed project would be detrimental to the health, safety, and welfare of the people of Watsonville. It certainly would not further the health, safety, and welfare of the people of Watsonville. There is absolutely nothing in the record that would support such a finding. Accordingly, this project should not be approved or be recommended for approval.

The Proposed Bulk Propane Plant Is Not In The Interest Of Watsonville's Residents

The project should not be approved because it is not in the best interest of the residents of Watsonville. The community and the world is moving away from fossil fuels. We know that time is running out to make meaningful progress on climate change. We know that fossil fuel pollution has devastating health consequences, consequences that all too often are perpetrated against marginalized communities. We know that the future is electrification and renewable energy. Supporting permanent massive fossil fuel infrastructure is bad for Watsonville's health and economic wellbeing, and should be avoided.

Building Massive Fossil Fuel Infrastructure Is Bad for the Environment

California recognizes that fossil fuels and, accordingly, fossil fuel infrastructure are bad for the environment. Governor Newsom has been particularly vocal about the need to abandon fossil fuels. Last May, his budget noted that California "recognizes the need for careful study and planning to decrease demand and supply of fossil fuels...." Last October, Governor Newsom signed six bills to move California away from fossil fuels. At the time, he noted that, "California is a leader in the fight to transition away from fossil fuels. These bills put intentions into action." The vast majority of scientists and governments agree that massive reductions in greenhouse gas emissions are needed by 2030. One of the only ways to massively reduce greenhouse gas emissions is to reduce our use of fossil fuels. See, e.g. <https://www.vox.com/2016/9/19/12938086/electrify-everything>. We can move away from fossil fuels without a massive hit to the economy or our quality of life if we engage in a massive push for electrification (e.g. many cities requiring electric appliances rather than natural gas ones) and cleaning up the electric grid (e.g. by shutting down coal and natural gas power plants and replacing them with solar and wind power plants and battery storage). We cannot do it by continuing to build fossil fuel infrastructure.

The terrible and tragic wild fires that are plaguing are county and our state or only the most recent reminder of the terrible effects that climate change is having on our community. Across the country, multiple hurricanes are forming in the Gulf of Mexico. We are living in unprecedented times and we must do all that we can to reduce greenhouse gas emissions to slow the rate of climate change. Building fossil fuel infrastructure is the last thing we need.

The science and public policy are clear: fossil fuels and infrastructure that promotes and enables fossil fuel use are bad for the environment. The proposed bulk propane facility would be bad for the environment and should not be approved.

The Proposed Plant Should Be Rejected To Avoid Perpetuating Environmental Racism

There is a long history of environmental racism in the United States and abroad. Historically, people put polluting facilities in marginalized communities, particularly communities of color, because those communities had

less power. There is now a growing movement to prevent new fossil fuel facilities in communities of color. Watsonville, a predominantly Latinx city, should be part of the future, not part of the past, and reject the proposed bulk propane plant. Furthermore, there is a school located a mile away from the proposed plant. How can we be confident that the school is outside of the blast radius of the plant if no calculations have been done regarding potential catastrophic events? The Planning Commission should recommend denying the special use permit that applicant seeks.

Building Massive Fossil Fuel Infrastructure Would Be Bad For Watsonville's Economy

There is abundant evidence that future economic growth will be in sectors like clean energy, electric vehicles, computer science, and life and biosciences and that there will not be economic growth in fossil fuel-related industries. In fact, many predict a carbon bubble that will burst as the world moves away from massively polluting fossil-fuel based infrastructure to clean, renewable sources of energy. See, e.g., <https://www.theguardian.com/environment/2018/jun/04/what-is-the-carbon-bubble-and-what-will-happen-if-it-bursts>. Perhaps more importantly, oil and gas infrastructure has been found to depress nearby property values, including residential property values over 2 miles away. <https://core.ac.uk/reader/6960284>. A two-mile radius of the proposed facility incorporates scores of Watsonville homes. Further decreasing their property values during a recession bordering on a depression is not a wise choice. Straddling Watsonville with a large permanent fossil fuel tank will not only fail to help Watsonville's economy, it will almost surely severely hinder it.

The proposed site is adjacent to some of the last large parcels of developable land in the City of Watsonville. Those parcels could become a corporate headquarters or clean-tech research and development facility or local manufacturing plant or, if changes are made to the relevant specific plan, a large mixed-use or residential project. Placing a massive, imposing propane facility could scare off potential users or future residents. Would Tesla want to locate next to a massive propane facility? Would Driscoll's? Would anyone? Unlikely. Accordingly, the project should not be approved.

The Proposed Project Is Incompatible With The Adjacent Rail Trail And Nearby Slough

The proposed project would be adjacent to the rail trail project that is currently under construction. One of the main goals of the rail trail project is to allow pedestrian and bike travel, which are environmentally friendly ways to traverse our beautiful community. Putting a gigantic propane tank above the rail trail would make the rail trail much less inviting and much more likely to lead to a catastrophic event. Biker, joggers, walkers, and birders should not need to worry about a potential explosion when exploring the area.

The beautiful Watsonville slough system is also quite near the proposed site. Many species of birds, fish, and plants call the area home. Any development should be sensitive to their local habitats. It is not in their interest to put a bulk propane plant nearby, especially one that has not gone through environmental review. The massive opposition to the proposed project from local wildlife, environmental groups, and concerned residents illustrates how inappropriate this project is for the proposed site. Therefore, the Planning Commission should recommend that the proposed project should be denied.

Approving Massive Fossil Fuel Infrastructure During A Respiratory Pandemic And Historic Wild Fires Would Be Particularly Inappropriate

The COVID-19 pandemic is hitting the United States hard, and California in particular right now. Sadly, the local outbreak is concentrated in Watsonville. Despite Watsonville having fewer people than the City of Santa Cruz, it has nearly triple the number of confirmed COVID-19 cases. We also know that COVID-19 is a disease that can wreak havoc on respiratory systems and that air pollution is linked with increased vulnerability to COVID-19. See, e.g., <https://news.stanford.edu/2020/06/30/links-covid-19-air-pollution/>. It would be particularly egregious to approve a massive fossil fuel facility without environmental review while COVID-19 is causing devastating impacts on the City. Please do not do it.

Similarly, the pollution levels and air quality in Watsonville and around the county have been terrible recently due to the local wildfires. The smoke and particulate matter are a public health hazard. Such pollution is terrible on its own and even worse when combined with the COVID-19 pandemic. We need better air quality, not worse. We also need fewer hazards in the City of Watsonville if wildfires strike nearby. We respectfully request that you reject the project as proposed.

The Proposed Project Should Be Rejected Because It Does Not Comply With CEQA, Does Not Fulfill Watsonville Municipal Code Requirements, And Would Be Bad For The Community

As shown above, the application for a special use permit to construct a bulk propane plant at 950 W Beach Street in Watsonville should be rejected. The application should be rejected because it inappropriately seeks to exempt itself from environmental review using inapplicable exemptions in a manner incompatible with California law. It should also be rejected because the application does not and cannot comply with the requirements for bulk liquified propane plants found in Watsonville's Municipal Code. Finally, it should be rejected because it would harm public health, be bad for the environment, decrease property values, and put the community at risk. **Attachment 1**
Attachment 2 (b)
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Watsonville in danger. For the foregoing reasons, we respectfully request that the Planning Commission recommend denial of the proposed special use permit for a bulk propane plant.

Sincerely,

Benjamin Ow, Manager

Andrew Ow, Esq.

East Ohlone Watsonville, LLC

Ow Family – Ohlone Parkway, LLC

Ow Family – Lee Road, LLC

[1] An example is this Elk Grove Planning Commission staff report for the acquisition of an existing building by the city, which notes that the common sense exemption applies because the "subject property is occupied by an existing commercial building ... and there are no plans to modify the existing use" and the "acquisition ... does not approve any development project, nor does it disturb the physical environment." https://elkgrove.granicus.com/MetaViewer.php?view_id=13&clip_id=1743&meta_id=142276

[2] See also *Rominger v. County of Colusa*, 229 Cal. App. 4th 690 (Cal. Ct. App. 2014) (holding that CEQA's common sense exemption did not apply because the lead agency failed to show "that there is no possibility that the approval of the [proposed] subdivision may result in a significant effect on the environment" because "it remains an eminently reasonable possibility that the creation of smaller parcels that are easier to finance *will* lead to development that might not occur, and to attendant significant effects on the environment.") (emphasis in original).

[3] The applicant seeking the Special Use Permit for an onshore oil facility shall pay, to the extent permitted by law, any and all costs associated with the special or general election required herein. *Id.* at § 14-44.030.



Letter to Watsonville Planning Commission re Proposed Propane Facility for 2020-9-1 Meeting.pdf
242K

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 10:44 AM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

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Letter to Watsonville Planning Commission re Proposed Propane Facility for 2020-9-1 Meeting.pdf
242K

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 5:09 PM

To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

----- Forwarded message -----

From: **Benjamin Ow** <benjaminmow@gmail.com>

Date: Mon, Aug 31, 2020 at 10:35 AM

Attachment 1

Attachment 8 (b)

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Subject: [CDD] Letter to Planning Commission - Please Recommend Denial of the Proposed Propane Plant at 950 W Beach St

To: <cdd@cityofwatsonville.org>

Cc: Matt Huffaker <matt.huffaker@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>, Andrew Ow <andrew.m.ow@outlook.com>, Ow, George, Jr. <georgeowjr@aol.com>, William Ow <williamgeorgeow@gmail.com>

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Letter to Watsonville Planning Commission re Proposed Propane Facility for 2020-9-1 Meeting.pdf
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East Ohlone Watsonville, LLC
Ow Family – Ohlone Parkway, LLC
Ow Family – Lee Road, LLC
1601 41st Ave #202
Capitola, CA 95010

August 31, 2020

Dear Watsonville Planning Commission,

This letter respectfully requests that you recommend denying the proposal for a Special Use Permit to allow a bulk propane plant without any environmental review at 950 W Beach Street, Application No. PP2019-18. The Planning Commission should recommend denying a special use permit for the bulk propane plant as proposed because it would not serve the City of Watsonville or its residents. The proposed project is not consistent with Watsonville's General Plan, would generate hazardous vehicular traffic, does not comply with the special use standards required of structures that store liquid petroleum products in Watsonville, and would be materially detrimental to the public health, safety, convenience and welfare of the people of Watsonville, and would result in material damage and prejudice to neighboring properties in the vicinity. Furthermore, it is likely that approving the proposed project would lead to litigation against the City of Watsonville because allowing massive fossil fuel facilities without environmental review is contrary to California law. Additionally, the proposed project is not in the interests of the residents of Watsonville because the project would be detrimental to public health, the environment, and the economy, including surrounding property values.

The Proposed Bulk Propane Plant Is Subject To CEQA And The Proposed Approval Is Contrary to Law

The Planning Commission should reject the proposed bulk propane project because no environmental review has been done, which is contrary to the California Environmental Quality Act ("CEQA"). The proposed bulk propane project is a "project" within the meaning of CEQA, is not exempt, and thus approval as proposed would be inappropriate.

The Proposed Plant Is Subject To CEQA

The project applicant requests approval of the construction of a permanent 170,000 gallon propane storage facility; this request should be denied. There are multiple levels of analysis to determine whether an approval is subject to environmental review. First, one must determine if a "project" is at issue. The application for a permit to construct a bulk propane plant is clearly a "project" within the meaning of CEQA and neither the project applicant nor city staff claims otherwise. "It is state policy in California that 'the long-term protection of the environment ... shall be the guiding criterion in public decisions.'" *Davidon Homes v. City of San Jose*, 54 Cal. App. 4th 106, 112 (Cal. Ct. App. 1997) (quoting Cal. Pub. Resources Code § 21001, subd. (d)). "'With narrow exceptions, CEQA requires an EIR [environmental impact report] whenever a public agency proposes to approve or to carry out a project that may have a significant effect on the environment.'" *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394, 401 (Cal. Ct. App. 2012) (quoting *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 390-91 (1988)). Accordingly, CEQA clearly applies to the proposed project.

The Proposed Plant Is Not Exempt From CEQA Because There Is The Possibility That The Project Could Have A Significant Effect On The Environment

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The second level of CEQA review requires a determination of whether a project is exempt from CEQA. The proposal attempts to avoid environmental review by claiming that it is “common sense” that the CEQA does not apply to the proposed bulk propane facility because “there is no possibility that the project would have a significant effect on the environment.” This claim fails because there is the possibility of a significant effect on the environment. “The required burden of a party challenging [the common sense] exemption is slight.” *Chung*, 210 Cal. App. 4th at 400. This slight burden is met here where there is evidence that the proposed project could have a significant effect on the environment. In fact, the factual record already establishes that the project could have a significant effect on the environment.

We know that approving the project would lead to construction that would affect the built environment. That is enough to render the common sense exemption inapplicable. California cases that allow use of the common sense exemption do not allow for new buildings of structures, but rather allow for governmental changes that do not affect the built environment and/or will improve the environment by engaging in native plant restoration. Planning documents are consistent with this case law.¹ Attempts to use the common sense exemption to apply to governmental actions that would or could affect the built environment are rejected by California courts.

It is instructive to compare *Paulek v. Western Riverside County*, 238 Cal. App. 4th 583 (Cal. Ct. App. 2015) and *California Farm Bureau Federation v. California Wildlife Conservation Board*, 143 Cal. App. 173 (Cal. Ct. App. 2006) with *CREED-21 v. City of San Diego*, 234 Cal. App. 4th 488 (Cal. Ct. App. 2015) and *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394 (Cal. Ct. App. 2012). In *Paulek*, at issue was whether the common sense exemption applied to the removal of a conservation overlay from a portion of real property. 238 Cal. App. 4th at 611. The court held that the common sense exemption was inapplicable to the removal of the conservation overlay **even though development was not planned on the property** because the “change in designation embodies a fundamental land use decision that has the potential for causing ultimate physical changes in the environment.” *Id.* At 614 (citations omitted). *Paulek* shows that if a governmental action could possibly lead to physical changes that could have an adverse impact on the environment, the common sense exemption does not apply.²

In *California Farm Bureau Federation*, the issue was whether the conversion of agricultural land into a protected wildlife habitat was exempt from environmental review under CEQA. 143 Cal.

¹ An example is this Elk Grove Planning Commission staff report for the acquisition of an existing building by the city, which notes that the common sense exemption applies because the “subject property is occupied by an existing commercial building ... and there are no plans to modify the existing use” and the “acquisition ... does not approve any development project, nor does it disturb the physical environment.”

https://elkgrove.granicus.com/MetaViewer.php?view_id=13&clip_id=1743&meta_id=142276

² See also *Rominger v. County of Colusa*, 229 Cal. App. 4th 690 (Cal. Ct. App. 2014) (holding that CEQA’s common sense exemption did not apply because the lead agency failed to show “that there is no possibility that the approval of the [proposed] subdivision may result in a significant effect on the environment” because “it remains an eminently reasonable possibility that the creation of smaller parcels that are easier to finance **will** lead to development that might not occur, and to attendant significant effects on the environment.”) (emphasis in original).

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App. at 173. When analyzing whether the common sense exemption applied, the Court of Appeal noted that the “common sense exemption is reserved for those obviously exempt projects where its absolute and precise language clearly applies” and that the “lead agency has the burden to show the project comes within the common sense exemption.” *Id.* at 185 (internal quotations and citation omitted). Despite arguments that “a mere change in use of land from agriculture to wildlife habitat is not of itself an adverse environmental impact” and that there would be “environmental benefits of changing the use of agricultural land to habitat,” “the project involve[d] the physical reshaping of the land to create wetlands and uplands for habitat.” *Id.* at 185-86. And that physical changing of the land would require heavy machinery. *Id.* at 186. The Court of Appeal noted that even environmentally beneficial projects may have environmental costs, “which must be considered and assessed.” *Id.* Because the lead agency had not adequately shown that there was no possibility that the project, considered as a whole, would not cause significant environmental impacts, the common sense exemption to CEQA did not apply and environmental review was required. *Id.* at 187.

In *CREED-21*, the Court of Appeal analyzed whether CEQA’s common sense exemption applied to approving the planting of native vegetation on an approximately 2,385-square foot area that was mostly bare dirt with a few nonnative plants. 234 Cal. App. 4th at 511-12. The opinion notes:

Although the revegetation plan would change or alter the site's 2011 physical conditions, it is only "a substantial, or potentially substantial, adverse change in any of the physical conditions" that constitutes a "significant effect on the environment" within the meaning of CEQA. (Guidelines, § 15382, italics added; see § 21068.) Because the revegetation plan indisputably would improve the site's physical conditions compared to its 2011 physical conditions, that plan would not result in any adverse change in its physical conditions. Therefore, the revegetation plan could have no significant effect on the environment within the meaning of CEQA.

Id. at 512. The Court of Appeal accordingly held that there was no possibility that the activity in question would have a significant negative effect on the environment, and therefore the common sense exemption to CEQA applied.

In *Chung*, a city held a ballot measure that would require the city to seek competitive bids for trash service, but there was no anticipated change to the actual levels of service or transportation trips from trash servicers. 210 Cal. App. 4th at 396-97. A resident sued arguing, among other things, that the ballot measure was illegal because it did not go through environmental review. *Id.* at 397-98. At trial, the court held that the ballot measure was not a “project” within the meaning of CEQA and, alternatively, even if it were a project the common sense exemption would apply because the plaintiff had not “raised a reasonable argument to suggest a possibility of an adverse impact. There is no fair argument that the proposed measure alone would reasonably result in a foreseeable increase in trucks servicing the City.” *Id.* at 400. On appeal, the Court of Appeal upheld the trial court’s finding that the ballot measure was not a “project” subject to CEQA. *Id.* at 406.

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Paulek, California Farm Bureau Federation, CREED-21, and Chung illustrate that CEQA's common sense exemption does not apply to any governmental approval that could potentially result in a change to the built environment or a negative effect on the environment. In order for the common sense exemption to apply, there must not be any possible change to the built environment and no foreseeable change to other activities, such as truck trips or heavy machinery use, that could negatively affect the environment. The approval of a Special Use Permit for a bulk propane would result in a change to the built environment; increase the use and storage of hazardous materials, which has a negative effect on the environment; and increase activities that have a negative effect on the environment, such as truck and train trips. Accordingly, a bulk propane plant fails each element of the test for whether CEQA's common sense exemption applies. In fact, it is common sense that a bulk propane facility could, and likely would, have a significant negative impact on the environment. Accordingly, the attempt here to approve a permit to allow the construction of a bulk propane plant while avoiding environmental review by relying on CEQA's common sense exemption should be rejected and the Planning Commission should recommend denial of the requested special use permit.

The project applicant attempts to use an Environmental Memorandum and Technical Memorandum dated June 4, 2020 (the "Environmental Memo") to claim that the project is exempt from CEQA as common sense. Notably, the Environmental Memo does not list a single similar project in all of California that has been found to be exempt from CEQA. Nor does the Environmental Memo list any regulations or cases that support its assertion that it is common sense that CEQA does not apply to the approval and construction of a bulk propane facility. There is absolutely no factual record of any bulk propane projects in the entire state of California that have been found to have no significant environmental impacts, let alone no possibility of a significant environmental impact. Indeed, the only projects cited by the Environmental Memo are a storage facility in Schuyler County, New York and a refinery in Detroit Michigan. And it's not clear that those projects should be used as a basis of comparison for the current project because as the Environmental Memo concedes "[d]etailed specifications of project equipment are unknown as this time." Environmental Memo page 10 of 170. To rely on the calculations for out-of-state projects whose similarities to the current project are unknown would be arbitrary and capricious. The proposed project should be rejected because it could have a significant environmental impact and it would not be proper to use CEQA's common sense exemption to approve the project.

California Law And The Current Site Shows That Propane Plants Can Have A Significant Effect On The Environment

The common sense exception to CEQA only applies "[w]here it can be seen with **certainty** that there is **no possibility** that the activity in question may have a significant effect on the environment." *Davidon Homes*, 54 Cal. App. 4th at 112 (emphasis added) (holding that the City of San Jose failed to comply with CEQA in determining that an ordinance was exempt from CEQA as common sense because it was not supported by the record). California law, however, has long recognized the significant effect that bulk propane facilities can have on the environment. For example, in *Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70 (Cal. Ct. App. 2010), the California Court of Appeal reviewed a full EIR for a proposed petroleum facility and found the environmental review lacking.

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The Environmental Memo also notes that the proposed facility would be serviced by trains and trucks but fails to recognize the significant environmental effects that trains and trucks carrying propane can have. In fact, incredibly, the Environmental Memo does not even evaluate the possibility of a train derailment, truck or car crash, or other catastrophic event. Compare that to the extensive modeling and risk assessment done in evaluating the EIR for a proposed petroleum project in *Rodeo Citizens Assn. v. County of Contra Costa*, 22 Cal. App. 5th 214 (Cal. Ct. App. 2018). Here's how the EIR at issue in *Rodeo Citizens Assn.* describes the risks inherent in rail transport of propane:

Rail transport of [liquid propane gas], either propane or butane, entails risk. With an unregulated release, a liquid pool may rapidly form and a flammable vapor cloud may begin to spread over the surrounding area. If such a vapor cloud finds an ignition source, the cloud can flash back and even explode if a portion of the flammable gas is in a congested area. This may result in damage to persons and property within the vicinity of the vapor cloud. It is also possible for a sustained torch fire (caused by burning [liquid propane gas] released through a puncture in the tank car) to develop a torch fire emitting a radiant heat flux ... which could lead to injury or fatality depending on how close people are to the fire. In addition to the typical consequences of a hydrocarbon release, [liquid propane gas] in a closed vessel such as a tank car has the potential to undergo a BLEVE [boiling liquid expanding vapor explosion] if the vessel fails catastrophically.

Id. At 229. The proposed project would put the people and businesses of Watsonville at risk of injury or death (and significant environmental impacts!) and it should not be approved without an actual assessment of the real risks involved and whether those risks are worth it.

The application claims that it is common sense that a bulk propane facility would have no possibility of having a significant environmental impact yet the current site shows that this is incorrect. The June 25, 2020 Planning Commission Memorandum notes that the site previously held four fuel storage tanks and that those tanks eventually leaked, causing the site to be listed as a LUST Cleanup Site by the State Water Resources Board. Fossil fuel facilities often fail, leading to massive costs to the surrounding communities. One of the worst industrial disasters in history is the San Juanico disaster, where a liquid petroleum gas storage plant exploded, triggering fires that killed between 500 and 600 people and left as many as 7,000 others with severe burns. In 1989, faulty propane and butane facility leaked gas near a railroad in the Soviet Union, leading to an explosion that killed 575 people. In 2013, a Blue Rhino propane plant in Florida exploded, injuring eight workers. The list of propane facility disasters is long and tragic. It is the furthest thing from common sense to approve a bulk propane facility adjacent to a railway in a floodplain in an area known for powerful earthquakes without environmental review.

Unfortunately, even fossil fuel projects that avoid disaster can have significant negative environmental impacts. The Environmental Memo notes that propane combustion produces particulate matter, sulfur dioxides, nitrogen oxide, carbon monoxide, greenhouse gas, and

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methane, each of which can have devastating environmental impacts. Accordingly, even the best case scenario for the environment if this project is built is far from good. The proposed bulk propane plant should be denied.

CEQA's Infill Exemption Cannot Be Used For This Project Because Of The Project's Likely Significant Environmental Effects and Incompatibility with Watsonville's General Plan

The City of Watsonville Memorandum dated August 12, 2020 attempts to exempt the proposed propane plant from environmental review pursuant to CEQA by relying on the infill exemption. This is a change from the previous City of Watsonville Memorandum dated June 25, 2020. Despite this new attempt to use a different CEQA exemption, the August 12 Memorandum relies on the earlier environmental memorandum that does not mention the infill exemption. In order for a project to properly use CEQA's infill exemption, the project must be consistent with the applicable general plan designation and **all** applicable general plan policies as well as with the applicable zoning designation and regulations. In addition, approval of the project must not result in any significant effects relation to traffic, noise, air quality, or water quality.

As discussed below, the project is not consistent with Watsonville's General Plan, EIR, and zoning designation and regulations. As discussed above and below, the project could and likely would result in significant effects relating to traffic, noise, air quality, and water quality. Accordingly, the attempted use of CEQA's infill development is entirely inappropriate for this project. The Planning Commission should recommend that the application for a special use permit should be denied.

The Proposed Bulk Propane Project Is Not Consistent With Watsonville's General Plan and EIR

Watsonville's General Plan and associated EIR indicate how inappropriate approval of this facility without environmental review would be. The General Plan's discussion of Industrial zoning notes the general categories of allowed uses, which do not include petroleum refining or storage, and that "[t]he intent of the district is to serve the industrial needs of the community." General Plan page 52. Nothing in the record indicates how or why this bulk propane plant would serve the industrial needs of the community. Further, the General Plan's EIR notes that its goals include ensuring "that future development is consistent with the General Plan through use of the City's zoning ordinance, development standards, capital improvement program, and environmental review process;" "support[ing] public and private beautification, and promote pride in community appearance;" "protect[ing] surface and groundwater resources;" "protect[ing] air, water, soil, biotic resources from damage by exposure to hazardous materials;" and "reduc[ing] the potential danger related to the use, storage, transport, and disposal of hazardous materials to an acceptable level of risk." General Plan EIR at 1-15, 1-18, & 1-20. Approval of a bulk propane plant without any environmental review is not consistent with the goals and purposes of Watsonville's General Plan and EIR. This project should be denied.

A Special Use Permit Is Inappropriate For The Proposed Project And Cannot Be Issued Without Certain Findings Being Made By The City Council And A Vote By The People Of Watsonville

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Watsonville's Municipal Code mandates that a Special Use Permit for a liquefied propane storage facility cannot become effective the City Council makes particular findings and the people of Watsonville approve the Special Use Permit by a referendum vote.

Watsonville Municipal Code Section 14-16.603 sets forth the uses that require a Special Use Permit in areas of Watsonville zoned IG – General Industrial District, which is the zoning for 950 West Beach Street. Watsonville Municipal Code § 14-16.603. Petroleum product refining and storage requires a Special Use Permit. *Id.* For most Special Use Permits, the proper procedure for obtaining one is set forth in Watsonville Municipal Code Sections 14-12.508 – 14-12.512, and requires approval by the Planning Commission. *Id.* at §§ 14-12.508 – 14-12.512. For “onshore oil facilities,” however, the Watsonville Municipal Code sets forth a different approval process. *Id.* at §§ 14-44.010 – 14.44.070. An “onshore oil facility” is defined as “any structure or development created for the purpose of storing, transporting, or processing liquid petroleum products, excluding the transportation, storage or retail sale of gasoline or motor oil.” § 14-44.020. The “proposed project [at 950 West Beach Street] would serve as a liquid propane storage and distribution facility.” Technical Memorandum p. 162 of 170. Propane is a petroleum product. *E.g.*, Technical Memorandum p. 167 of 170; *Honolulu Oil Corp. v. Franchise Tax Board*, 60 Cal.2d 417, 422 (1963). Therefore, the proposed bulk propane project at 950 West Beach Street is an onshore oil facility because it is a facility for the storage of a liquefied petroleum product and is not for the storage of gasoline or motor oil.

Watsonville's Municipal Code sets forth strict requirements for the approval of a Special Use Permit for an onshore oil facility:

Whenever an [applicant] seeks a Special Use Permit issued by the City Council as required by Section 14-16.603 of this Code, to permit the development and operation within the City of any onshore oil facility, in addition to the findings required for approval by Section 14-10.607 of this Code, ***the City Council shall*** determine whether [it] is in conformity with the coastal policies, if applicable, and General Plan and whether [it] furthers the health, safety, and welfare of the people of the City of Watsonville. ***If the City Council makes the findings required by*** Section 14-10.607 of this Code and finds that [it] is consistent with the coastal policies, if applicable, and the General Plan and is not injurious to the health, safety and welfare of the people of the City, ***it shall submit the proposed Special Use Permit to a referendum vote of the people***³ at either a special election or the then-upcoming general election in accordance with the State Elections Code or Article XIII of the City Charter. ***The proposed Special Use Permit shall not become effective unless approved by a majority of the Watsonville electors voting in the election.***

Id. at § 14-44.010(b) (emphasis added). Watsonville's Municipal Code clearly states that a Special Use Permit for a bulk liquefied propane facility shall not become effective unless the City Council makes

³ The applicant seeking the Special Use Permit for an onshore oil facility shall pay, to the extent permitted by law, any and all costs associated with the special or general election required herein. *Id.* at § 14-44.030.

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certain findings and it is approved by a majority of Watsonville electors voting in a referendum election. Accordingly, the Planning Commission cannot decide whether or not to issue a Special Use Permit for the proposed bulk liquefied propane plant at 950 West Beach Street and before any Special Use Permit for the project can become effective the City Council must find that the project would improve the health, safety, and welfare of the people of Watsonville and it must be approved by a majority of Watsonville electors voting in a referendum election.

The Required Findings For An Approval Of A Bulk Propane Plant Cannot Be Made

In order to approve a bulk propane plant such as the one proposed, which is an onshore oil facility for purposes of Watsonville's Municipal Code, the project must comply with all of the regular requirements of a special use permit as well as heightened requirements. Neither the regular requirements nor the heightened requirements are met for the proposed project.

The Proposed Project Does Not Satisfy The Regular Special Use Permit Requirements

The Planning Commission should recommend denial of the application for a special use permit because the findings required for approval of a special use permit cannot be made. When considering a Special Use Permit, Watsonville's Municipal Code instructs the Planning Commission to make, among others, the following findings:

- (a) The proposed use at the specified location is consistent with the policies of the General Plan and the general purpose and intent of the applicable district regulations...
- (c) The proposed use will not generate pedestrian or vehicular traffic which will be hazardous or conflict with the existing and anticipated traffic in the neighborhood...
- (f) The proposed special use complies with all additional standards imposed on it by the particular provisions of this chapter and all other requirements of this title applicable to the proposed special use and uses within the applicable base zoning district; and
- (g) The proposed special use will not be materially detrimental to the public health, safety, convenience and welfare, and will not result in material damage or prejudice to other property in the vicinity.

Watsonville Municipal Code § 14-12.513. Here, none of those required findings can be made.

As noted above, the proposed facility is not compatible with the General Plan or with the purpose and intent of the applicable district regulations.

Furthermore, the proposed project will increase vehicular traffic that will be hazardous to the neighborhood. Propane is a hazardous substance. When the previous propane plant on the site leaked, it caused significant environmental damage and necessitated significant remediation. When there was a propane explosion at the property owner's home it caused a serious injury and a significant fire.

<https://www.santacruzsentinel.com/2014/02/22/boulder-creek-propane-blast-prompts-company-owner-to-move-tank/>

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Finally, the proposed project would be detrimental to the public health, safety, convenience, and welfare of Watsonville, and will result in material damage or prejudice to other property in the vicinity.

The more we study about air pollution, the more we learn how horrible its effects on public health are. *See, e.g.,* <https://www.vox.com/future-perfect/2019/12/11/20996968/air-pollution-cognitive-impact>. Burning propane increases air pollution, as do diesel trucks that transport propane. Air pollution has massive negative effects on cognition, on respiratory issues, and on quality of life. We should be doing all we can to decrease air pollution, not increase it.

California recognizes how bad diesel and propane are for public health. For example, as part of its mission to reduce air pollution, the California Air Resources Board recently approved regulations to require electric truck manufacturing to speed up the transition from fossil fuel-based vehicles. In announcing the regulations, CARB Chair Mary D. Nichols noted that, “Diesel vehicles are the workhorses of the economy, and we need them to be part of the solution to persistent pockets of dirty air in some of our most disadvantaged communities. Now is the time – the technology is here and so is the need for investment.” Studies also indicate that living near oil and gas facilities increase the risk of disease. <https://www.sciencedaily.com/releases/2018/04/180409103920.htm>

According to the Environmental Memo, diesel trucks would be used often to transport the propane from the proposed bulk propane facility. The construction of permanent infrastructure that relies on pollution-spewing trucks transporting a fossil fuel that would eventually be burned either locally (bad) or transported far away (also bad!) is terrible for public health. It should not be allowed.

The proposed project also would be detrimental to the safety and welfare of Watsonville. Massive fuel facilities are essentially massive bombs. They can, and with tragic regularity, do explode. Allowing so much new propane infrastructure in Watsonville makes it more likely there will be a fire or explosion or leak. It reduces the safety and welfare of the community. Accordingly, the Planning Commission should recommend that the proposed project should be rejected.

The Proposed Project Does Not Satisfy the Heightened Requirements of Onshore Oil Facilities

Watsonville Municipal Code § 14-44.010(b) requires that an onshore oil facility, like the proposed bulk propane plant, further the health, safety, and welfare of the people of Watsonville. As shown above, the proposed project would be detrimental to the health, safety, and welfare of the people of Watsonville. It certainly would not further the health, safety, and welfare of the people of Watsonville. There is absolutely nothing in the record that would support such a finding. Accordingly, this project should not be approved or be recommended for approval.

The Proposed Bulk Propane Plant Is Not In The Interest Of Watsonville’s Residents

The project should not be approved because it is not in the best interest of the residents of Watsonville. The community and the world is moving away from fossil fuels. We know that time is running out to make meaningful progress on climate change. We know that fossil fuel pollution has devastating health consequences, consequences that all too often are perpetrated against marginalized

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communities. We know that the future is electrification and renewable energy. Supporting permanent massive fossil fuel infrastructure is bad for Watsonville's health and economic wellbeing, and should be avoided.

Building Massive Fossil Fuel Infrastructure Is Bad for the Environment

California recognizes that fossil fuels and, accordingly, fossil fuel infrastructure are bad for the environment. Governor Newsom has been particularly vocal about the need to abandon fossil fuels. Last May, his budget noted that California "recognizes the need for careful study and planning to decrease demand and supply of fossil fuels...." Last October, Governor Newsom signed six bills to move California away from fossil fuels. At the time, he noted that, "California is a leader in the fight to transition away from fossil fuels. These bills put intentions into action." The vast majority of scientists and governments agree that massive reductions in greenhouse gas emissions are needed by 2030. One of the only ways to massively reduce greenhouse gas emissions is to reduce our use of fossil fuels. See, e.g. <https://www.vox.com/2016/9/19/12938086/electrify-everything>. We can move away from fossil fuels without a massive hit to the economy or our quality of life if we engage in a massive push for electrification (e.g. many cities requiring electric appliances rather than natural gas ones) and cleaning up the electric grid (e.g. by shutting down coal and natural gas power plants and replacing them with solar and wind power plants and battery storage). We cannot do it by continuing to build fossil fuel infrastructure.

The terrible and tragic wild fires that are plaguing are county and our state or only the most recent reminder of the terrible effects that climate change is having on our community. Across the country, multiple hurricanes are forming in the Gulf of Mexico. We are living in unprecedented times and we must do all that we can to reduce greenhouse gas emissions to slow the rate of climate change. Building fossil fuel infrastructure is the last thing we need.

The science and public policy are clear: fossil fuels and infrastructure that promotes and enables fossil fuel use are bad for the environment. The proposed bulk propane facility would be bad for the environment and should not be approved.

The Proposed Plant Should Be Rejected To Avoid Perpetuating Environmental Racism

There is a long history of environmental racism in the United States and abroad. Historically, people put polluting facilities in marginalized communities, particularly communities of color, because those communities had less power. There is now a growing movement to prevent new fossil fuel facilities in communities of color. Watsonville, a predominantly Latinx city, should be part of the future, not part of the past, and reject the proposed bulk propane plant. Furthermore, there is a school located a mile away from the proposed plant. How can we be confident that the school is outside of the blast radius of the plant if no calculations have been done regarding potential catastrophic events? The Planning Commission should recommend denying the special use permit that applicant seeks.

Building Massive Fossil Fuel Infrastructure Would Be Bad For Watsonville's Economy

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There is abundant evidence that future economic growth will be in sectors like clean energy, electric vehicles, computer science, and life and biosciences and that there will not be economic growth in fossil fuel-related industries. In fact, many predict a carbon bubble that will burst as the world moves away from massively polluting fossil-fuel based infrastructure to clean, renewable sources of energy. *See, e.g.,* <https://www.theguardian.com/environment/2018/jun/04/what-is-the-carbon-bubble-and-what-will-happen-if-it-bursts>. Perhaps more importantly, oil and gas infrastructure has been found to depress nearby property values, including residential property values over 2 miles away. <https://core.ac.uk/reader/6960284>. A two-mile radius of the proposed facility incorporates scores of Watsonville homes. Further decreasing their property values during a recession bordering on a depression is not a wise choice. Straddling Watsonville with a large permanent fossil fuel tank will not only fail to help Watsonville's economy, it will almost surely severely hinder it.

The proposed site is adjacent to some of the last large parcels of developable land in the City of Watsonville. Those parcels could become a corporate headquarters or clean-tech research and development facility or local manufacturing plant or, if changes are made to the relevant specific plan, a large mixed-use or residential project. Placing a massive, imposing propane facility could scare off potential users or future residents. Would Tesla want to locate next to a massive propane facility? Would Driscoll's? Would anyone? Unlikely. Accordingly, the project should not be approved.

The Proposed Project Is Incompatible With The Adjacent Rail Trail And Nearby Slough

The proposed project would be adjacent to the rail trail project that is currently under construction. One of the main goals of the rail trail project is to allow pedestrian and bike travel, which are environmentally friendly ways to traverse our beautiful community. Putting a gigantic propane tank above the rail trail would make the rail trail much less inviting and much more likely to lead to a catastrophic event. Biker, joggers, walkers, and birders should not need to worry about a potential explosion when exploring the area.

The beautiful Watsonville slough system is also quite near the proposed site. Many species of birds, fish, and plants call the area home. Any development should be sensitive to their local habitats. It is not in their interest to put a bulk propane plant nearby, especially one that has not gone through environmental review. The massive opposition to the proposed project from local wildlife, environmental groups, and concerned residents illustrates how inappropriate this project is for the proposed site. Therefore, the Planning Commission should recommend that the proposed project should be denied.

Approving Massive Fossil Fuel Infrastructure During A Respiratory Pandemic And Historic Wild Fires Would Be Particularly Inappropriate

The COVID-19 pandemic is hitting the United States hard, and California in particular right now. Sadly, the local outbreak is concentrated in Watsonville. Despite Watsonville having fewer people than the City of Santa Cruz, it has nearly triple the number of confirmed COVID-19 cases. We also know that COVID-19 is a disease that can wreak havoc on respiratory systems and that air pollution is linked with increased vulnerability to COVID-19. *See, e.g.,* <https://news.stanford.edu/2020/06/30/links-covid-19->

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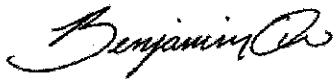
air-pollution/. It would be particularly egregious to approve a massive fossil fuel facility without environmental review while COVID-19 is causing devastating impacts on the City. Please do not do it.

Similarly, the pollution levels and air quality in Watsonville and around the county have been terrible recently due to the local wildfires. The smoke and particulate matter are a public health hazard. Such pollution is terrible on its own and even worse when combined with the COVID-19 pandemic. We need better air quality, not worse. We also need fewer hazards in the City of Watsonville if wildfires strike nearby. We respectfully request that you reject the project as proposed.

The Proposed Project Should Be Rejected Because It Does Not Comply With CEQA, Does Not Fulfill Watsonville Municipal Code Requirements, And Would Be Bad For The Community

As shown above, the application for a special use permit to construct a bulk propane plant at 950 W Beach Street in Watsonville should be rejected. The application should be rejected because it inappropriately seeks to exempt itself from environmental review using inapplicable exemptions in a manner incompatible with California law. It should also be rejected because the application does not and cannot comply with the requirements for bulk liquified propane plants found in Watsonville 's Municipal Code. Finally, it should be rejected because it is a project that would harm public health, be bad for the environment, decrease property values, and put the people of Watsonville in danger. For the foregoing reasons, we respectfully request that the Planning Commission recommend denial of the proposed special use permit for a bulk propane plant.

Sincerely,



Benjamin Ow, Manager

Andrew Ow, Esq.

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] No to the Propane Facility

4 messages

Alejandro Santana Jr <asantana451@gmail.com>

Mon, Aug 31, 2020 at 10:32 AM

To: cdd@cityofwatsonville.org

Hello,

My name is Alex Santana Jr and I'd like to voice my dissent for the proposed propane tank facility in Watsonville. It is highly irresponsible of the City, and its Council Members, to consider expediting an approval process without an in-depth environmental audit. Our brandishes the value of being eco-friendly, and promotes green business practices, however, the decision to fully grant access to the facility demonstrates total hypocrisy.

Additionally, the safety of the propane facility can't be guaranteed. Facilities fail, it's never if but a matter of when. As we saw with the port explosion in Beirut, a facility fire quickly turned into a disaster. The size and location of the facility poses a great risk to our community if there is ever an explosion, or even a release of gasses.

I do not support this idea at all.

-Alex

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 10:42 AM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Mon, Aug 31, 2020 at 5:09 PM

To: Elena Ortiz <elena.ortiz@cityofwatsonville.org>

----- Forwarded message -----

From: Alejandro Santana Jr <asantana451@gmail.com>

Date: Mon, Aug 31, 2020 at 10:32 AM

Subject: [CDD] No to the Propane Facility

To: <cdd@cityofwatsonville.org>

[Quoted text hidden]

[Quoted text hidden]

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 10:56 AM

To: Justin Meek <justin.meek@cityofwatsonville.org>

Attachment 1

Attachment 8 (b)

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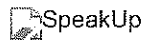
Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

4 messages

noreply@granicusideas.com <noreply@granicusideas.com>
To: cdd@cityofwatsonville.org

Mon, Aug 31, 2020 at 8:40 AM



New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Jacob Martinez submitted a new eComment.

Meeting: Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Item: C. 20-446 AN APPLICATION FOR A SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, WATSONVILLE, CALIFORNIA (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

eComment: My name is Jacob Martinez and I am a community leader, non-profit executive, and advocate for youth in our community. I oppose the application to bring a propane facility to Watsonville. The community is moving forward with a vision to bring better jobs into our community, build space for people to come together, and encourage businesses that will drive visitors into our community. This vision is one that many of you sitting on this commission have helped shape and move forward. The propane facility does nothing to move us in a direction that is towards the shared vision of a strong and healthy community. In fact, it does the complete opposite. It doesn't create jobs or careers that our youth can grow into. It doesn't bring the community together. It will deter people from visiting our city. In addition, it is a health and safety concern for our residents. I recommend reviewing a blast radius report and include this in your decision making. We know that these aren't the type of businesses you were hoping to be presented to you. Let's not settle but continue to drive new forward thinking businesses into our community. Thank you, Jacob

[View and Analyze eComments](#)

Attachment 1

Attachment 8 (b)
Page 53 of 79



Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Online Form Submittal: Contact the Boards and Commissions

7 messages

noreply@civicplus.com <noreply@civicplus.com>

Mon, Aug 31, 2020 at 5:15 PM

To: deborah.muniz@cityofwatsonville.org

Contact the Boards and Commissions

Who Would You Like to
Contact? Planning Commission

Your Contact Information

First Name Barry

Last Name Scott

Email Address bscott@need.org

Subject Propane Facility

Message Dear Commission,
Movement of propane by rail is many times safer than
movement by truck, and prevents congestion on the highway.
The facility is already industrial, is nowhere near a wildfire-
prone area, and construction of this will actually reduce carbon
emissions as rail is more efficient than truck shipments.

Please do your best to address these facts to concerned
citizens, and please don't let the actions of anti-rail transit
groups influence your decisions to permit rail shipment of this
and other products.

Please keep up the good work and keep the rail line as active
as possible for use for freight and passenger service.

Many thanks,
Barry Scott, Board Member
Friends of the Rail and Trail

File Upload *Field not completed.*

Phone 2094825663

Address 260 Rio Del Mar Blvd.

City Aptos

State California

Zip Code 95003

Staff Directory

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Email not displaying correctly? View it in your browser.

noreply@civicplus.com <noreply@civicplus.com>
To: deborah.muniz@cityofwatsonville.org

Mon, Aug 31, 2020 at 8:55 PM

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name George
Last Name Ow
Email Address georgeowjr@gmail.com
Subject Letter Opposing the Proposed Propane Plant at 950 W Beach Street
Message August 31, 2020 (Sent Via Email)

Watsonville Planning Commission

Dear Watsonville Planning Commission,

I am writing this letter as a local businessman and concerned member of the community as an addendum to the letter I wrote to you dated July 13, 2020. I am asking you to please recommend that the City Council deny the request for a special use permit for the proposed bulk propane plant at 950 W Beach Street. I have lived in Santa Cruz County for almost all of my 78 years. I have been doing business in Santa Cruz County for over five decades and have been working in and with the Watsonville community for the past 25 years. My family and I are heavily invested in the Watsonville community and we care deeply about the long term health and well-being of the community. I know that you too care greatly about the Watsonville community and as such I ask you to please stand up for the people of Watsonville, listen to the community (and over 100 letters requesting that the proposed propane plant be denied), and protect the best interests of the Watsonville residents by recommending denial of the proposed special use permit to allow a bulk propane plant without environmental review.

Please protect the great people and City of Watsonville from environmental degradation and economic despair. If you take a look at the most successful, vibrant communities you will see a pattern: education, agglomeration, technology, and respect for

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the environment. If you take a look at the communities with the direst conditions you will also see a pattern: reliance on fossil fuel extraction and production or other old, dirty technologies, under investment in education, population loss due to out migration, and environmental hazards and a disrespect for the environment. The people and businesses that power vibrant economies and healthy communities do not want to work or live near environmental hazards, such as bulk propane plants.

The recent wildfires that burn all around the state are a scary reminder of the precarious situation in which we find ourselves. The climate is changing. The oceans are rising. Summers are getting hotter. Fire season is getting longer. How much more of a hazard does that make a bulk propane plant? How much will a bulk propane plant speed up climate change that is already causing damage to our lungs, our children's and grandchildren's health, our crops? We do not know because there has been no environmental review done on the project and the owner of the project, who, as far as I know has never lived or done business in Watsonville, contends none should be done.

You have a stark choice: protect the people of Watsonville or protect fossil fuel profits. You can protect the people of Watsonville by recommending that the City Council deny the requested special use permit. You can protect fossil fuel profits by fast-tracking this project without environmental review. Please do right by the people of Watsonville and this wonderful community by recommending denial of the special use permit to allow a bulk propane plant without environmental review.

Sincerely,

George Ow, Jr.

File Upload *Field not completed.*

Phone 8312474748

Address 203 Highland Ave

City Santa Cruz

State CA

Zip Code 95060

Staff Directory

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[Quoted text hidden]

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name John
Last Name Speyer
Email Address spyguy@cruzio.com
Subject NO to the Propane Facility Special Permit
Message Dear Planning Commissioners,

My name is John Speyer, and I have been a resident of downtown Watsonville for more than 20 years.

I strongly urge you to vote NO to granting a special use permit for the proposed propane plant facility currently target for 950 W Beach St.

The site at 950 E. Beach St is located in busy zone, with business, residences and schools located nearby. Landmark and Ceiba schools are both located within .75 mi. from the proposed location (not one mile as erroneously stated in the Harris & Associates report). The busy and essential Second Harvest Food Bank is located less than .25 mi. away. Downtown businesses, government offices and Watsonville Plaza are located only 1 mile away, a very dangerous situation for such a large facility.

A research report from the city of Montpelier, VT, a summarizes an analysis of a 10,000 gallon propane tank explosion:

- Thermal radiation: Direct exposure to the fireball could result in second degree burns up to approximately 600 feet....
- Container fragment travel: 80-90% of fragments should fall within 1,800 feet. However maximum travel under extreme conditions could be up to 6,740 feet [1.2 miles]....
- The U.S. Department of Transportation... 2000 Emergency Response Guidebook recommends "if tank, rail car or tank truck is involved in a fire, ISOLATE for 1600 meters (1 mile) in all directions."

(<https://pdfs.semanticscholar.org/d74d/d65cc50dac6818ac666fbd96ee3ca7a313a5.pdf>)

Note that the blast radius report above was projected for a tank of 10,000 gallons. The Watsonville proposal is for 30,000 to 50,000 gallon tanks, for a total of 170,000 gallons! Please look at the fireball numbers, keeping in mind that the current biodiesel facility is only 300 feet away from the proposed development.

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Air Quality Issues: You cannot separate the physical plant with the diesel transport trucks - one cannot exist without the other. Harris & Assoc. estimates 10 roundtrip bobtail diesel trucks trips daily. That's 50 truckloads per week, 2600 per year. Diesel is one of the worst sources of air pollution in our state. The CA Air Resources Board just passed new rules to limit diesel transport pollution. The article reads: "The measures can't come soon enough for people living near ports, warehouses and other freight-clogged areas, largely lower-income communities of color that have long suffered disproportionately from dirty air and higher rates of cancer and asthma." (<https://www.msn.com/en-us/news/us/california-targets-diesel-trucks-ships-with-biggest-pollution-cuts-in-years/ar-BB18qi1t?li=BBnb7Kz>).

Mr. Kojak and Mountain Propane Services want us to believe in a world without accidents. But ask yourself: Do you trust giving a permit to a CEO who had an illegally-sized propane tank on his own property that blew up? (<https://www.santacruzsentinel.com/2014/02/22/boulder-creek-propane-blast-prompts-company-owner-to-move-tank/>)

In conclusion, I believe this propane facility proposal is extremely risky and unhealthy for our community.

Do not take Watsonville a step backward and become a link in the chain of dirty & dangerous fuels from the 20th century.

Vote NO on the special use permit for the propane facility.

Sincerely,
John Speyer

File Upload *Field not completed.*

Phone 8317612618

Address 209 E. 5th St

City Watsonville

State CA

Zip Code 95076

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[Quoted text hidden]

noreply@civicplus.com <noreply@civicplus.com>
To: deborah.muniz@cityofwatsonville.org

Tue, Sep 1, 2020 at 4:12 AM

Contact the Boards and Commissions

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Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Maria
Last Name Heredia
Email Address xochisol@yahoo.com
Subject Tues Sept. 1, 2020 Agenda Item 5B
Message

Dear Esteemed Planning Commissioner,

This is in reference to Item 5B of Agenda for Tuesday Sept. 2020. I am a member of the Sea View Ranch Neighborhood Association. I have become aware of Agenda item 5B because a friend from out of town saw this on your agenda with Planning Staff recommending approval without an EIR, and a "common sense" exemption from CEQA back in July, 2020. I am a longtime Watsonville resident, PVUSD parent, active community member, essential employee and busy keeping people afloat during this global Covid 19 pandemic. I limited time to spare to become aware of the many proposed agenda items coming before you to the Planning Commission or to the City of Watsonville for consideration and vote that may negatively impact our local community. I am very incredulous that planning staff are asking you to approve Agenda item 5B without a full EIR requirement and a CEQA "common sense" exemption. It is clear that they are asking you to Rubber Stamp

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this agenda item without the proper environmental review a proposed development of this magnitude merits! Many of your constituents, however, and residents in the local area and the greater Watsonville area urge you to vote NO to a Special Use Permit for agenda item 5B. The only environmental review done is through referencing of an "environmental memo", and a reference of "common sense" CEQA exemption. Please consider the following reasons. (Sorry this is long, but important for you to consider.) 1. The Proposed Massive Propane Plant in reality should be Subject to NO CEQA exemptions. The issue at hand is whether or not to approve the construction of a permanent 170,000 gallon propane storage facility. "It is state policy in California that 'the long-term protection of the environment ... shall be the guiding criterion in public decisions.'" *Davidon Homes v. City of San Jose*, 54 Cal. App. 4th 106, 112 (Cal. Ct. App. 1997) (quoting Cal. Pub. Resources Code § 21001, subd. (d)). "With narrow exceptions, CEQA requires an EIR [environmental impact report] whenever a public agency proposes to approve or to carry out a project that may have a significant effect on the environment." *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394, 401 (Cal. Ct. App. 2012) (quoting *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 390-91 (1988)). Accordingly, CEQA clearly applies to the proposed project. 2. In addition, The Proposed Plant Is Not Exempt From CEQA Because There Is The Possibility That The Project Could Have A Significant Effect On The Environment

The proposal attempts to avoid environmental review by claiming that it is "common sense" that the CEQA does not apply to the proposed bulk propane facility because "there is no possibility that the project would have a significant effect on the environment." This claim fails because there is the possibility of a significant effect on the environment. "The required burden of a party challenging [the common sense] exemption is slight." *Chung v. City of Monterey Park*, 210 Cal. App. 4th 394, 400 (Cal. Ct. App. 2012). This slight burden is met here where there is evidence that the proposed project could have a significant effect on the environment. In fact, the factual record already establishes that the project could have a significant effect on the environment.

City staff relies on an Environmental Memorandum and Technical Memorandum dated June 4, 2020 (the "Environmental Memo") to find the project exempt from CEQA as common sense. Notably, the Environmental Memo does not list a single similar project in all of California that has been found to be exempt from CEQA. Nor does the Environmental Memo list any regulations or cases that support its assertion that it is common sense that CEQA does not apply to the approval and construction of a bulk propane facility. There is absolutely no factual record of any bulk propane projects in the entire state of California that have been found to have no significant environmental impacts, let alone no possibility of

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significant environmental impact. Indeed, the only projects cited by the Environmental Memo are a storage facility in Schuylers County, New York and a refinery in Detroit Michigan. And it's not clear that those projects should be used as a basis of comparison for the current project because as the Environmental Memo concedes "[d]etailed specifications of project equipment are unknown as this time." Environmental Memo page 10 of 170. To rely on the calculations for out-of-state projects whose similarities to the current project are unknown would be arbitrary and capricious. The proposed project should be rejected because it could have a significant environmental impact. 3. To conclude, California Law And The Current Site Shows That Propane Plants Can Have A Significant Effect On The Environment

The common sense exception to CEQA only applies "[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment." *Davidon Homes*, 54 Cal. App. 4th at 112 (emphasis added) (holding that the City of San Jose failed to comply with CEQA in determining that an ordinance was exempt from CEQA as common sense because it was not supported by the record). California law, however, has long recognized the significant effect that bulk propane facilities can have on the environment. For example, in *Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70 (Cal. Ct. App. 2010), the California Court of Appeal reviewed a full EIR for a proposed petroleum facility and found the environmental review lacking.

The Environmental Memo also notes that the proposed facility would be serviced by trains and trucks but fails to recognize the significant environmental effects that trains and trucks carrying propane can have. In fact, incredibly, the Environmental Memo does not even evaluate the possibility of a train derailment, truck or car crash, or other catastrophic event. Compare that to the extensive modeling and risk assessment done in evaluating the EIR for a proposed petroleum project in *Rodeo Citizens Assn. v. County of Contra Costa*, 22 Cal. App. 5th 214 (Cal. Ct. App. 2018). Here's how the EIR at issue in *Rodeo Citizens Assn.* describes the risks inherent in rail transport of propane:

Rail transport of [liquid propane gas], either propane or butane, entails risk. With an unregulated release, a liquid pool may rapidly form and a flammable vapor cloud may begin to spread over the surrounding area. If such a vapor cloud finds an ignition source, the cloud can flash back and even explode if a portion of the flammable gas is in a congested area. This may result in damage to persons and property within the vicinity of the vapor cloud. It is also possible for a sustained torch fire (caused by burning [liquid propane gas] released through a puncture in the tank car) to develop a torch fire emitting a radiant heat flux ... which could lead to injury or fatality depending on how close people are to the fire. In addition to the typical consequences of a hydrocarbon release, [liquid propane gas] in a closed vessel such as a tank car has the potential to undergo a BLEVE [boiling liquid expanding vapor explosion]

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the vessel fails catastrophically.

Id. At 229. The proposed project would put the people and businesses of Watsonville at risk of injury or death (and significant environmental impacts!) and it should not be approved without an actual assessment of the real risks involved and whether those risks are worth it.

The application claims that it is common sense that a bulk propane facility would have no possibility of having a significant environmental impact yet the current site shows that this is incorrect. The June 25, 2020 Planning Commission Memorandum notes that the site previously held four fuel storage tanks and that those tanks eventually leaked, causing the site to be listed as a LUST Cleanup Site by the State Water Resources Board. Fossil fuel facilities often fail, leading to massive costs to the surrounding communities. One of the worst industrial disasters in history is the San Juanico disaster, where a liquid petroleum gas storage plant exploded, triggering fires that killed between 500 and 600 people and left as many as 7,000 others with severe burns. In 1989, faulty propane and butane facility leaked gas near a railroad in the Soviet Union, leading to an explosion that killed 575 people. In 2013, a Blue Rhino propane plant in Florida exploded, injuring eight workers. The list of propane facility disasters is long and tragic. It is the furthest thing from common sense to approve a massive propane facility adjacent to a railway in a floodplain in an area known for massive earthquakes without environmental review.

Unfortunately, even fossil fuel projects that avoid disaster can have significant negative environmental impacts including underground water contamination affecting local water supply. In addition, the Environmental Memo notes that propane combustion produces particulate matter, sulfur dioxides, nitrogen oxide, carbon monoxide, greenhouse gas, and methane, each of which can have devastating environmental impacts. Therefore, after full analysis of this proposed project, it is NOT environmentally sound. The proposed bulk propane plant should be denied. Instead clean solar, wind or electric energy sources should be pursued and developed especially in light of the catastrophic CZU lightning complex fires in Santa Cruz County that has destroyed approx 800 homes (not to mention surrounding Dolan, River and Carmel Valley fires and others currently burning across the state requiring enormous resources and displacing thousands of families across the state). Thanks so much for your consideration. I will be viewing the meeting online. Please see the following supporting news articles:

<https://www.youtube.com/watch?v=R4s3uu1qzdo&fbclid=IwAR01NMDHcOw0q6OXfEBoDko4qIT-LGvAlvDCL9FQWv2Lxy1gCtthsimAJM>

massachusetts gas explosion - Yahoo Search Results Video Search Results

San Bruno fire kills one and destroys 50 homes

Residents defended homes from the CZU fires in the Santa Cruz mountains. They defied evacuation orders to do it

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Toronto propane explosion shook Toronto 10 years ago today

Large Explosions Rock Florida Propane Plant

Old racist policies keep hurting these Fresno-area families. Will this make things safer?

Op-Ed: Berkeley banned natural gas. The rest of California should too

Sincerely, Maria Heredia.
34 Quinta Vista St.
Watsonville, CA 95076

Op-Ed: Berkeley banned natural gas. The rest of California should too

Natural gas is the new coal. It's greenhouse emissions have surpassed coal's overall since 2015.

Large Explosions Rock Florida Propane Plant

Toronto propane explosion shook Toronto 10 years ago today

you tube kingman explosion - Yahoo Search Results Video Search Results

The search engine that helps you find exactly what you're looking for. Find the most relevant information, video...

Residents defended homes from the CZU fires in the Santa Cruz mountains....

Some residents in Santa Cruz and other counties are defying evacuation orders, and staying behind to defend thei...

San Bruno fire kills one and destroys 50 homes

Explosion south of San Francisco sends flames roaring through residential area

massachusetts gas explosion - Yahoo Search Results Video Search Results

The search engine that helps you find exactly what you're looking for. Find the most relevant information, video...

Old racist policies keep hurting these Fresno-area families. Will this m...

"Energy is a racial justice issue. It has such a racialized history."

File Upload *Field not completed.*

Phone 8312540352

Address 34 Quinta Vista St, Watsonville, CA 95076

City Watsonville

State California - CA

Zip Code 95076

Staff Directory

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones"

Tue, Sep 1, 2020 at 11:07 AM

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<mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 11:08 AM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson
<jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones"
<mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

----- Forwarded message -----

From: <noreply@civicplus.com>

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 11:17 AM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson
<jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones"
<mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] New eComment for Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

2 messages

noreply@granicusideas.com <noreply@granicusideas.com>
To: cdd@cityofwatsonville.org

Mon, Aug 31, 2020 at 9:35 PM



New eComment for Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

Leah Rodríguez submitted a new eComment.

Meeting: Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

Item: B. 20-523 AN APPLICATION FOR SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

eComment: Esteemed Commissioners, As a Watsonville resident, parent, and educator, I stand in STRONG opposition to granting a special use permit with review design and environmental review to allow for the establishment of a propane and storage facility. A Bulk Propane Plant stands to further endanger a community already vulnerable to chemical hazards from pesticide exposure. Permitting Mountain Propane Service company to build a facility in our community is a sign that our health and safety is not of utmost priority of the commission. If we can learn anything from devastating recent events in Beirut, it is that these chemical storage facilities do not belong in heavily populated areas, near homes, schools and businesses. I urge you to deny this application. Thank you. Leah Sugarman District 7

View and Analyze eComments

This email was sent from <https://granicusideas.com>.

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] Please approve the reasonable application for the Propane Transfer Facility

2 messages

Barry Scott <barry@coastalrail.org>
To: cdd@cityofwatsonville.org

Mon, Aug 31, 2020 at 7:02 PM

Dear Planning Commission,

I urge you to follow the science and common sense around this proposal and permit the expansion of the propane transloading facility at 950 Beach Street.

Rail moves goods with 1/4 the energy, so significant reductions in greenhouse gas production will result from rail shipments instead of trucks.

Trucks are many times more dangerous and our community already suffers from unsafe streets.

The economic viability of our local industry and of our rail line, providing hundreds of jobs related to freight, depend on your wisdom.

Industrial services in an industrial zone which serve to deliver fuel more efficiently and safely to our citizens is decidedly NOT "environmental racism", as has been claimed by some opponents to this project. Moving propane more safely will not increase the amount of it put to use, and many people depend on this fuel for their homes and businesses.

Thank you,

Barry Scott

831-612-6574

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 11:03 AM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Online Form Submittal: Contact the Boards and Commissions

2 messages

noreply@civicplus.com <noreply@civicplus.com>

Tue, Sep 1, 2020 at 12:58 PM

To: deborah.muniz@cityofwatsonville.org

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Alan
Last Name Hicks
Email Address aahicks513@yahoo.com
Subject 950 W, Beach Propane Storage Proposal
Message Dear Planning Commissioners

I live in the Corralitos area just outside Watsonville but have had many years of involvement in Watsonville cultural life from the Watsonville Film Festival, Pajaro Valley Arts Council, Chairperson of the Peace & Unity March, and President of the Springfield Grange

In addition, my family owns properties in Santa Clara Valley which we are in the process of selling with the idea of reinvesting in Watsonville because we believe along with many others that Watsonville has a bright long-term future. One of the areas we have been interested in is precisely the area of W. Beach Street.

I have to say, though, that if this special use permit for propane storage at 950 beach Street was approved and built there is no way we would want to invest in properties anywhere near it. Propane is highly flammable. Placing 170,000 gallons of propane storage is simply too dangerous to locate within city limits. It is within 200 yards of a residential neighborhood and the renowned Watsonville slough, and next to many adjacent businesses including a biodiesel facility. Who will want to invest anywhere near such a facility?

All it would take is an earthquake and a spark, a mechanical malfunction or human error. The Fukushima nuclear plant catastrophe was rated very safe and with no fossil fuel pollution. An earthquake and a tsunami left an entire region in

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Japan uninhabitable for generations. Who will be accountable when large chunks of fiery metal crash into homes just 200 yards away?

Railcars have been cited as more efficient at delivering fossil fuels and compressed gas. They say a picture is worth 1000 words. Here is an example of a similar propane storage facility served by rail that exploded and threw an entire train car nearly a mile. You can watch it fly through the air here:

<https://www.youtube.com/watch?v=NuPVEsQaGB0>

Trains carrying fossil fuels have a long history of derailments and accidents. Even with cars with double reinforcements. I like trains but accidents happen. You can watch one explode here:

<https://video.search.yahoo.com/yhs/search?fr=yhs-Lkry-SF3&hsimp=yhs-SF3&hspart=Lkry&p=oil%20and%20gas%20railway%20disasters%20explosions%20youtube#id=1&vid=77d96d9ca858dd267843778a343fca40&action=click>

And there are many, many more of these videos on You Tube if you have the time.

The propane industry is in long-term decline. According to the industry report by Propane Education & Research Council (PERC), residential use of propane has declined 27% over the last 10 years. The only real growth area has been in vehicles such as school buses and car fleets. But the auto/truck industry is investing \$100's billions into electric vehicles. According to Morgan Stanley by 2030 only 40% of engines will be gasoline powered. As electric vehicles hit a critical mass, propane will not be able to compete with electric vehicles.

And there is already a large glut of propane and natural gas from all the fracking in the last 10- 15 years. Roughly three times as much is being produced than is being consumed domestically. Natural gas prices which were \$16.00 per million BTU in 2005 falling to \$1.54 this last March - a nearly 90% decline. Propane prices correlate very closely since propane is derived from natural gas.

Industry reports say the answer is to export all the surplus propane, which would require large investments in infrastructure to store the propane and transport it by rail. Do we want to risk the possibility of train accidents moving highly explosive materials on the Central Coast or through our neighborhoods?

Climate change is now directly affecting us on the Central Coast with 4 straight years of enormous fires in California. Residential propane tanks exposed to fires explode as they overheat making the fires even more dangerous.

I invested in new solar panels last year and am already shifting propane appliances to electric. I save not only on electricity but

also lower my propane bill. A triple win with lower energy costs, safer energy, and lowering my carbon footprint. After all the research I have been doing on the propane project, I will be replacing all my propane to new highly efficient electric appliances with greater urgency.

I strongly hope this project is not approved and the Beach Street industrial area could become a center for installers of solar systems or of the new highly efficient electric appliances that are coming on the market.

Sincerely,
Alan Hicks

File Upload	<i>Field not completed.</i>
Phone	4085120513
Address	2805 Pleasant VALLEY RD
City	Aptos
State	CA
Zip Code	95003

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Email not displaying correctly? View it in your browser.

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 4:12 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

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--
Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.
250 Main St., Watsonville, CA 95076
Phone: 831-768-3079/ FAX: 831-728-6154
E-mail: deborah.muniz@cityofwatsonville.org

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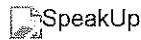
Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

2 messages

noreply@granicusideas.com <noreply@granicusideas.com>
To: cdd@cityofwatsonville.org

Tue, Sep 1, 2020 at 1:40 PM



New eComment for Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Alan Hicks submitted a new eComment.

Meeting: Planning Commission on 2020-07-14 6:00 PM - **Remote Teleconference Meeting**

Item: C. 20-446 AN APPLICATION FOR A SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, WATSONVILLE, CALIFORNIA (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

eComment: Dear Planning Commissioners I strongly hope this special use permit for propane storage at 950 beach Street is denied. Propane is highly flammable. Placing 170,000 gallons of propane storage is simply too dangerous to locate within city limits. It is within 200 yards of a residential neighborhood and the renowned Watsonville slough, and next to many adjacent businesses including a biodiesel facility. Who will want to invest or live anywhere near such a facility? All it would take is an earthquake and a spark, a mechanical malfunction or human error. Trains carrying fossil fuels have a long history of derailments and accidents. Even with cars with double reinforcements. You can watch many such accidents and explosions including one where a rail car is thrown a mile away, fortunately into an empty field. Who would be accountable if an entire train car flew into a residential neighborhood? The Beach Street industrial area should become a center for installers of solar systems or of the new highly efficient electric appliances that are coming on the market. Sincerely, Alan Hicks .

[View and Analyze eComments](#)

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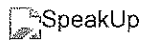
Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] New eComment for Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

3 messages

noreply@granicusideas.com <noreply@granicusideas.com>
To: cdd@cityofwatsonville.org

Tue, Sep 1, 2020 at 1:10 PM



New eComment for Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

Adam Bolaños Scow submitted a new eComment.

Meeting: Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

Item: B. 20-523 AN APPLICATION FOR SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

eComment: Dear Commissioners: I urge you to recommend a full environmental impact report (EIR) of the proposed bulk propane storage facility. The justification for this facility remains unclear and a full review would demand that the applicant demonstrate the need for the facility and that no better alternative exists. Common sense suggests that an application to build and expand new tanks on a site near Watsonville Slough and both Pajaro Valley High School and Radcliff Elementary School should be subject to a public review. We must also consider the long-term impacts of such tanks and if the City should be allowing new fossil fuel infrastructure in the midst of a worsening climate crisis. Thanks for your consideration, Adam Bolaños Scow

View and Analyze eComments

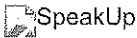
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noreply@granicusideas.com <noreply@granicusideas.com>
To: cdd@cityofwatsonville.org

Tue, Sep 1, 2020 at 2:12 PM



New eComment for Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

Manuel Bersamin submitted a new eComment.

Meeting: Planning Commission on 2020-09-01 6:00 PM - Remote Teleconference Meeting

Item: B. 20-523 AN APPLICATION FOR SPECIAL USE PERMIT WITH DESIGN REVIEW AND ENVIRONMENTAL REVIEW (PP2019-18) TO ALLOW THE ESTABLISHMENT OF A PROPANE STORAGE AND TRANSFER FACILITY (AKA BULK PROPANE PLANT) ON A 0.7± ACRE PROPERTY LOCATED AT 950 WEST BEACH STREET, (APNS 018-331-28; FORMERLY APNS 018-331-05 & -06), FILED BY DAVID DAUPHIN WITH C2G, APPLICANT, ON BEHALF OF RICHARD KOJAK WITH MOUNTAIN PROPANE SERVICE, PROPERTY OWNER

eComment: The City of Watsonville has maps that show how close this proposed propane facility is adjacent existing structures and how close it is to industrial and residential housing in case of a potential railway BLEVEs (Boiling Liquid Expanding Vapor Explosion)

<https://www.youtube.com/watch?v=NuPVEsQaGB0> The developer states in his written remarks that the project is safe because it eliminates the need to transport propane by truck and transporting propane by rail is safe, however, he does not speak about potential railway derailments or faulty equipment causing propane railcar BLEVEs (Boiling Liquid Expanding Vapor Explosion) <https://www.youtube.com/watch?v=NuPVEsQaGB0> Lastly, the Ow family has BETTER plans to develop their properties than to just place fossil fuel industrial related projects on the westside. The people of Watsonville's taxpayers deserve better than the continuation of these fossil fuel projects within the city limits. <https://www.cityofwatsonville.org/DocumentCenter/View/3959/Manabe-Ow-Specific-Plan-12-2010> Now, I ask you, which residents in the adjacent houses and which industrial neighbors would want to take the risk of having the danger of a BLEVE that close to their home and work sites? NO ONE!

https://www.youtube.com/watch?v=UM0jtD_OWLU

View and Analyze eComments



Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] Propane Expansion

2 messages

Sarah Marschall <sarahmarschallstrategy@gmail.com>
To: cdd@cityofwatsonville.org

Tue, Sep 1, 2020 at 2:44 PM

Dear Planning Commission Members,

I am writing to express my concern about the proposed expansion of the propane transfer facility in Watsonville. It is unclear what the risks and potential benefits are without a full, complete environmental impact review.

Provided that Watsonville is an area where people experience many health concerns at disparate rates, a project like this should not be rushed into place. Our community members (and natural environment) are already heavily burdened by chemicals through proximity and employment in conventional farming and other industries.

As a resident in the unincorporated area of Watsonville, business license owner (City of Watsonville), a parent of PVUSD students, I urge you to either stop this development or, at a minimum, use great caution to ensure that a thorough process takes place to understand and mitigate any environmental risks. These include consideration of the existing burden and people who are most vulnerable within our community.

As we are already amid major challenges -- from COVID to county fires, great care needs to be taken to protect the health and well-being of people in our community. Thank you for your consideration of this message!

With Gratitude,
Sarah Marschall

Sarah Marschall, MS

Pronouns | she, her, hers
Phone: 775.741.5384
sarahmarschallstrategy@gmail.com
<https://www.sarahmarschallstrategy.com/>

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 4:08 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

Deborah Muniz, Executive Assistant
City of Watsonville/Community Development Dept.
250 Main St., Watsonville, CA 95076
Phone: 831-768-3079/ FAX: 831-728-6154
E-mail: deborah.muniz@cityofwatsonville.org

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] RE: Propane Facility

2 messages

GARY PLOMP <plomp@sbcglobal.net>

Tue, Sep 1, 2020 at 2:50 PM

To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

To whom it may concern:

I am writing this to the members, asking that after careful consideration, they vote to approve the expansion of the existing propane facility and associated rail spur on W. Beach St.

Unfortunately, there is a few individuals who oppose this stating misguided and erroneous information regarding the facility. These activists and radicals do not realize that this will benefit the economy of Watsonville with very little environmental impact.

Thank you for your attention.

Gary V. Plomp

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 4:08 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

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Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

E-mail: deborah.muniz@cityofwatsonville.org

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

[CDD] Agenda Item 5.B. Public Comment

3 messages

'Daniel Dodge Jr' via CDD <cdd@cityofwatsonville.org>
 Reply-To: Daniel Dodge Jr <danieldodgejr@yahoo.com>
 To: "cdd@cityofwatsonville.org" <cdd@cityofwatsonville.org>

Tue, Sep 1, 2020 at 12:22 PM

Dear Watsonville Planning Commissioners,

My name is Daniel Dodge Jr and I am writing this email to ask to you vote NO on tonight's agenda item regarding the approval to allow the establishment of propane storage facility 950 W. Beach Street.

As a life long resident of Watsonville, a father, a active community member, and as a member on the board of trustee's for our Pajaro Valley Unified School District I urge this planning commission to not approve this project tonight.

As somebody who has been raised here, attended all local schools from K-12, and has children in these local schools, the creation of this facility is a bad decision all the way around. Let me state why I think it is a bad idea.

1. The proposed development which is located 950 W. Beach is located industrial zone, but due to the vast amounts of flammable liquid at this site, if a explosion occurs, we have hundreds of family homes within a radius that would be catastrophic.

2. Air pollution. I am sure gases and other by productions from this facility will released into the air, and possibly blown North to the families which reside in that area, or blown to the East where we have the schools Radcliffe Elementary School and Ceiba College Prep (where my daughter attends school). Do we want to possible have our air polluted drifting into our city?

3. Watsonville Slough. Watsonville Slough is right next to this proposed plant, and intersects with many other sloughs that surround us. Any of us want to take the risk of something leaking or accidently dumped into our fragile Eco-system; which animals rely on?

Even in the City of Watsonville's own report states: (page 17).

"Sensitive wetland habitat and residences are located to the northwest. The project site is located approximately 580 feet away from the Watsonville Slough, an estuarine habitat that supports many federal and state listed threatened and endangered species. The Watsonville Sloughs ecosystem is recognized as the largest and most significant wetland habitat between Pescadero Marsh (San Mateo County) and Elkhorn Slough (Monterey County).⁴ The Las Brisas neighborhood borders the Watsonville Slough and is a little over 700 feet away from the project site (Attachment 2). The site and much of the surrounding area is a FEMA designated 100-year flood zone (Zone AE)."

⁴The Watsonville Sloughs include approximately 800 acres of freshwater marsh, seasonal wetland, and estuarine habitat with six major slough branches, which drain to the Pajaro River. The slough system supports over 249 permanent and migratory bird species, 5 federally listed fish and wildlife species, and 16 species of special concern, including the federally threatened California red-legged frog, California species of special concern tricolored blackbird, and the federally listed endangered Santa Cruz tarplant."

I do not want 50,000 worth of propane storage in that area. Please vote NO. Thank you.

Daniel Dodge Jr. 618 Lincoln St Watsonville Ca 95076.

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 12:28 PM

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Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Online Form Submittal: Contact the Boards and Commissions

3 messages

noreply@civicplus.com <noreply@civicplus.com>

Tue, Sep 1, 2020 at 12:00 PM

To: deborah.muniz@cityofwatsonville.org

Contact the Boards and Commissions

Who Would You Like to Contact? Planning Commission

Your Contact Information

First Name Joe

Last Name Appenrodt

Email Address appenrodt1@aol.com

Subject APNS 018-331-05&06

Message *Field not completed.*

File Upload Proposed Propane Tank Storage.pdf

Phone 8312348554

Address 4375 Capitola Road

City Capitola

State CA

Zip Code 95010

Staff Directory

View the Staff Directory for the City of Watsonville

Email not displaying correctly? View it in your browser.

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 12:25 PM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

Letter attached from Joe Appenrodt

[Quoted text hidden]

Deborah Muniz, Executive Assistant

City of Watsonville/Community Development Dept.

250 Main St., Watsonville, CA 95076

Phone: 831-768-3079/ FAX: 831-728-6154

Attachment 1

Attachment 8 (b)

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August 30, 2020

Dear Planning Commission Members,

As an addendum to my letter written on July 13th, 2020 to the planning commission, I would like to add that we met with the applicant, Mountain Propane and discussed our concerns.

We are opposed to the use of the property as a bulk propane facility with multiple storage tanks. We would always be concerned about safety considering its proximity to properties that have combustible, hazardous materials and many employees. If this service is needed in Watsonville, it should be located in a more remote location.

If the planning commission approves the proposal, we would like to request very clear signage in directing traffic to the site and more landscape screening from the street.

Regards-
Joe Appenrodt

APPENRODT
COMMERCIAL
PROPERTIES

4375 Capitola Road
Capitola, CA 95010

831.234.8554 ○
831.465.9195 F



Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Fwd: NO to Bulk Propane Facility-NO to Planning Commissioners granting a special use permit

2 messages

Beatriz Flores <beatriz.flores@cityofwatsonville.org>

Tue, Sep 1, 2020 at 10:26 AM

To: Deborah Muniz <deborah.muniz@cityofwatsonville.org>, Suzi Merriam <suzi.merriam@cityofwatsonville.org>, Justin Meek <justin.meek@cityofwatsonville.org>


Beatriz Vázquez Flores, MMC

City Clerk - (831)768-3040 or (831)768-3042

275 Main St., Suite 400, Watsonville CA, 95076

beatriz.flores@cityofwatsonville.org

Business Hours: 8:00 am to 5:00 pm Monday - Friday.

----- Forwarded message -----

From: **Leah Sugarman** <leahsugar@gmail.com>

Date: Mon, Aug 31, 2020 at 9:46 PM

Subject: NO to Bulk Propane Facility-NO to Planning Commissioners granting a special use permit

To: <citycouncil@cityofwatsonville.org>, <cityclerk@cityofwatsonville.org>

Esteemed Mayor Garcia, City Council Members and City Clerk,

As a Watsonville resident, parent, and educator, I stand in STRONG opposition to the Planning Commission granting a special use permit with review design and environmental review to allow for the establishment of a propane and storage facility. A Bulk Propane Plant stands to further endanger a community already vulnerable to chemical hazards from pesticide exposure. Permitting Mountain Propane Service to build a facility in our community is a sign that our health and safety is not of utmost priority. If we can learn anything from devastating recent events in Beirut, it is that these chemical storage facilities do not belong in heavily populated areas, near homes, schools and businesses. I urge you to voice opposition to the Planning Commission and urge them to deny this application.

Sincerely,
Leah Sugarman
District 7

Deborah Muniz <deborah.muniz@cityofwatsonville.org>

Tue, Sep 1, 2020 at 11:22 AM

To: Anna Kammer <annakso@att.net>, Ed Acosta <ed.acosta@sbcglobal.net>, Jenni Veitch-Olson <jveitcholson@gmail.com>, Jenny Sarmiento <jtsarmiento831@gmail.com>, "Matthew H. Jones" <mjones91773@gmail.com>, Veronica Dorantes-Pulido <veronicadorantespulido@gmail.com>

[Quoted text hidden]

--

Deborah Muniz, Executive Assistant

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