



# Watsonville Wetlands Watch

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[www.watsonvillewetlandswatch.org](http://www.watsonvillewetlandswatch.org)

“Dedicated to protecting, restoring and appreciating the wetlands of the Pajaro Valley”

November 2, 2022

Robert Salisbury, Senior Planner  
County of Santa Clara Department of Planning & Development  
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[sgtquarry.comments@pln.sccgov.org](mailto:sgtquarry.comments@pln.sccgov.org)

## **Re: Sargent Ranch Quarry, Environmental Impact Report, SCH # 2016072058**

Dear Mr. Salisbury,

Watsonville Wetlands Watch (WWW) is a non-profit organization established in 1991 to protect and enhance the wetland areas of the Pajaro Valley. The Watsonville Slough System is a highly valued and unique environmental resource as the largest remaining freshwater coastal wetland along the central coast of California. These sloughs all connect to the Pajaro River, a waterway that will be impacted by the proposed Sargent Quarry project. WWW is dedicated to the advocacy for the wetlands, public education, and public participation with wetlands restoration, including pro-active climate-based restoration projects like urban tree planting. We conduct all our programs with the support and celebration of the local Watsonville/Pajaro Valley Community. Our values very much include supporting and celebrating cultural diversity because that is whom the Watsonville/Pajaro Valley Community is, similar to the Greater Bay Area.

The Draft Environmental Impact Report (DEIR) states that the proposed project will have impacts on the Pajaro River tributaries (Tar and Sargent Creeks), but most of the potential impacts would occur “downstream” with flow reductions to the Pajaro River. We are the downstream Pajaro River Community.

In addition, the proposed Sargent Quarry/Sargent Ranch Quarry is located on significant sacred land of the Amah Mutsun Tribal Band, is within the Pajaro River Watershed.

The DEIR has identified multiple unavoidable adverse impacts that will occur if the proposal is approved and implemented. In other words, all of these identified unavoidable impacts cannot be mitigated to a level of insignificance. On balance, the irreputable harm generated by this project overshadows any potential economic or social benefit from quarrying the property. We ask you to take leadership by rejecting both the proposed Sargent Ranch Quarry, as well as all the proposed alternatives, except for the “No Project Alternative.” We feel the “No Project Alternative” is the only acceptable course of action-for the following reasons:

1. ***The unmitigable impacts to flow reductions of the Pajaro River, even if small, is unacceptable in an era of less precipitation. In addition, the DEIR did not evaluate the proposed flow reductions in response to climate change, nor did the DEIR evaluate the potential cumulative effects for saltwater intrusion.*** The proposed Sargent Ranch Quarry would lessen the downstream flows to the Pajaro River. The Pajaro River is already stressed with the long term “megadrought,” and the DEIR does not address flow loss in relation to these current climate change stressors. The DEIR dismisses this concern for low reduction as “less than significant,” but even minor changes under already stressed conditions could have negative impacts. This is a major error in the DEIR’s analysis.

The DEIR states “*Water users most likely to be affected would be downstream in the Pajaro Valley near Watsonville. Groundwater pumping in that area averaged 52,000 AFY during 2009-2013 (Carollo Engineers, 2014). If all consumptive use at the project site became a reduction in river percolation in the Pajaro Valley (rather than a decrease in outflow to the ocean), it would amount to approximately 0.1 percent of total Pajaro Valley pumping.*”

Further, the DEIR does not address how this would affect saltwater intrusion. The DEIR is incomplete in that it should have addressed the cumulative impact to the current efforts by the Pajaro Valley Water Management Agency’s efforts to combat climate-based saltwater intrusion.

2. ***Social, cultural, and emotional trauma to the Amah Mutsun Tribal Band.*** Any mining operation developed at the proposed Sargent Ranch Quarry (locally known as Juristac) would alter the landscape to such a degree to cause irrevocable ecological, cultural, and spiritual harm to this sacred landscape that is of great significance to the Amah Mutsun Tribal Band and to the concerned public.

California Public Resource Code Section 21074 defines “tribal cultural resources” as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe.” Indigenous people’s rights and voices have had a long history of being abused and not listened to. Approval of this type of project will perpetuate this injustice.

3. ***The carbon impact from this proposed project is counterproductive to both our values and to our climate-based restoration efforts.*** This proposed open-pit, sand and gravel quarry would permanently destroy the land and remove part of the forested and understory vegetation of the Santa Cruz Mountain Range within the Pajaro River Watershed. The DEIR states 400 plus acres consisting of California annual grasslands, coast live oak woodlands and forest, coyote brush scrub, mixed riparian woodlands and forest, stock ponds, seasonal wetlands, wetland seeps, and oak woodlands would be removed. It takes time for trees to mature, and therefore will have an immediate negative impact to climate. This would result in net carbon loss, which cannot be mitigated without large gaps in time, and therefore will have a significant impact, contrary to the statements in the DEIR which erroneously state this as a less than significant impact.
  
4. ***The loss of an existing, irreplaceable, significant wildlife corridor is unacceptable.*** The proposed Sargent Ranch Quarry at Juristac has been identified by wildlife experts as an existing significant movement corridor. Wildlife including badgers, mountain lions, and tule elk, are known to use this area to cross over to the Gabilan Mountains. This linkage is also critical for genetic flow for many other species of wildlife. The DEIR states that the loss of this wildlife movement corridor is not replaceable, and we agree. Future generations of both common, threatened, and endangered species need the County's leadership with the denial of the proposed project and selection of the No-project Alternative.

***The DEIR identified multiple significant unavoidable impacts from the proposed mine, including those affecting wildlife movement, wetlands, tribal cultural resources, geology, air quality, greenhouse gas emissions, aesthetics, emergency transportation access, hydrology, and water quality. These significant and unavoidable impacts will occur even with attempts at mitigation: This is not acceptable.***

These significant unavoidable adverse impacts include:

- a. Impacts on the following special-status species and/or their habitat:
  - 1) special-status plant species
  - 2) special-status fish
  - 3) California red-legged frogs
  - 4) California tiger salamanders
  - 5) western pond turtles
  - 6) burrowing owls
  - 7) tricolored blackbirds
  - 8) raptors and other protected birds
  - 9) special-status bats
  - 10) mountain lions
  - 11) San Francisco dusky-footed woodrats
  - 12) American badgers

- b. Adverse effects on jurisdictional wetlands and other waters: Conflicts with County ordinances and policies intended to protect biological resources, including oak woodlands.
  
  - c. Cultural and Tribal Cultural Resources: Adverse impacts on known historical or archaeological resources, damage to unrecorded subsurface prehistoric and historic archaeological resources, and disturbance of human remains.
  
  - d. Geology, Soils, and Paleontology: Increased potential for slope instability and slope failure.
  
  - e. Greenhouse Gas Emissions: Generate additional greenhouse gas (GHG) emissions thereby conflicting with applicable GHG plans, policies, or regulations.
  
  - f. Hazards and Hazardous Materials: Accidental release of existing soil contaminants, such as historic pesticide residues.
  
  - g. Transportation: Roadway hazards due to the presence of large construction trucks, temporary lane closures and detours; inadequate emergency access.
  
  - h. Hydrology and Water Quality: Substantially degrade surface or groundwater quality.
5. ***In addition, there are several other potential significant negative impacts that are falsely represented as “mitigatable,” and therefore stated as “not significant.” This is an issue and needs to be addressed.*** Specifically, the DEIR states that although there is existing habitat for federally and state protected species such as California red-legged frogs and California tiger salamanders within the proposed disturbance area, the impacts to both species are erroneously stated as less than significant because of the “higher value” areas adjacent to the site on properties managed by the Santa Clara Valley Habitat Agency. This conclusion stating there is “no significant impact” is faulty for the following reasons:
- a. The existing areas, despite their inferior quality, are still utilized by California tiger salamanders (CTS) for breeding attempts. This is a clear indication that the CTS are present, and therefore, CTS habitat will be lost. The higher quality habitat for CTS located adjacent to, but off site, of the impact areas are already existing. ***This is not a mitigation measure. It is a statement that wrongly claims the loss of lesser-quality***

- habitat areas is NOT significant.*** The right thing to do as a true mitigation measure is to enhance these known areas for species breeding and foraging and/or create new additional areas.
- b. Additionally, upland use of CTS at the project site was not studied. Instead, assumptions were made based on the consultant's evaluation of the pond, which was too ephemeral for CTS larva to complete development. It is prudent and essential to find out where the adults are coming from. Are the CTS traveling from farther than expected areas to the site, or are they present in the upland areas but not able to breed during these megadrought years? Good studies are lacking and need to be addressed before reaching the conclusion of "no significant impact".
  - c. Likewise, there will be a loss to upland areas for California red-legged frogs (CRLF). ***Stating that there are better CRLF ponds and upland habitat areas adjacent to the disturbance zone is not a mitigation: it is a justification of upland habitat loss.***

The Sargent Ranch Quarry's destructive impact is far too great to justify approving this project. The DEIR understates the significance of several impacts which support the need to revise the biotic and hydrological chapters of the DEIR. However, the fact that the DEIR does identify a large number of unmitigated unavoidable adverse impacts supports the County's adoption of only one of the alternatives - the No-project Alternative.

Thank you for the opportunity to provide comments on this project. Feel free to contact our Executive Director, Jonathan Pilch with any questions.

Sincerely,



Donna Bradford  
President of the Board of Directors  
Watsonville Wetlands Watch

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