



# AGENDA

Special Meeting of the  
**Scotts Valley Planning Commission**  
**In-Person and Remote Access**  
**Date: December 4, 2025**  
**Time: 7:30 PM**

| CONTACT INFORMATION                                                                                                                                                                                                                                                                                                                                                                                                                                             | MEETING LOCATION                                                                                                                                                                                   | POSTING                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| City of Scotts Valley<br>1 Civic Center Drive<br>Scotts Valley, CA 95066<br>(831) 440-5600                                                                                                                                                                                                                                                                                                                                                                      | City Council Chambers<br>1 Civic Center Drive<br>Scotts Valley, CA 95066<br>OR Zoom Video Conference:<br><a href="https://us02web.zoom.us/j/88671741298">https://us02web.zoom.us/j/88671741298</a> | The agenda was posted on 11-26-2025 at City Hall, SV Public Works, SV Senior Center and online at <a href="http://www.scottsvalley.org">www.scottsvalley.org</a> . |
| COMMISSIONERS                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                    | CITY STAFF MEMBERS                                                                                                                                                 |
| Lori Gentile, Chair<br>Chuck Maffia, Vice Chair<br>David Hodgins, Commissioner<br>Shawn Mosley, Commissioner<br>Steve Simonovich, Commissioner                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                    | Taylor Bateman, Community Development Director<br>Jordan Taylor, Administrative Analyst II                                                                         |
| MEETING NOTICE AND AGENDA PACKET MATERIALS                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                    |                                                                                                                                                                    |
| <b>Notice regarding Planning Commission Meetings:</b><br>The Planning Commission meets regularly on the 2nd Thursday of each month (unless otherwise noticed) at 6pm in the City Hall Council Chambers located at 1 Civic Center Drive, Scotts Valley, CA 95066.                                                                                                                                                                                                |                                                                                                                                                                                                    |                                                                                                                                                                    |
| <b>Agenda and Agenda Packet Materials:</b><br>The Planning Commission agenda and the complete agenda packet are available for review by 5pm the Friday before the Thursday meeting on the Internet at the City's website: <a href="https://www.scottsvalley.gov/129/Agendas-Minutes">https://www.scottsvalley.gov/129/Agendas-Minutes</a>                                                                                                                       |                                                                                                                                                                                                    |                                                                                                                                                                    |
| <b>Public Participation:</b><br>The meeting will be available in person and on Zoom. For those wishing to participate via Zoom, you can join from a PC, Mac, iPad, iPhone or Android device by entering or clicking on the following URL: <a href="https://us02web.zoom.us/j/88671741298">https://us02web.zoom.us/j/88671741298</a><br><br>You will be given an opportunity to provide public comment at the appropriate times throughout the meeting via Zoom. |                                                                                                                                                                                                    |                                                                                                                                                                    |
| <b>How to comment via Zoom:</b><br><br>1. At the appropriate times during the meeting for public comment on items not on the agenda and on specific agenda items, the Planning Commission Chair will announce that public comment will be accepted. Our usual time limits of three minutes per individual, or five minutes for an individual who is representing a group of three or more,                                                                      |                                                                                                                                                                                                    |                                                                                                                                                                    |

will apply. Please note that per our standard practice, this is not a question and answer time, but simply a time for you to provide comments to the Planning Commission.

2. There is an option on Zoom to raise your hand. Please click on this option when the Chair announces that public comments will be taken. If you are participating via dial-up only, use \*9 to raise your hand at the requested time. Zoom places people in line automatically. When it is your turn, you will be un-muted and you will be able to make your comments based on the above time frames. Once your time is up, you will once again be muted and the next person in line will be given their opportunity to speak.

### **CALL TO ORDER 7:30 PM**

(The Planning Commission Chair calls the meeting to order.)

### **PLEDGE OF ALLEGIANCE**

### **ROLL CALL**

(Planning Department staff conduct roll call of the Planning Commission.)

### **PUBLIC COMMENT TIME**

This is the opportunity for individuals to make and/or submit written or oral comments to the Commission on any items within the purview of the Commission, which are NOT part of the Agenda. No action on the item may be taken, but the Commission may request the matter be placed on a future agenda.

### **ALTERATIONS TO PUBLIC HEARING AGENDA**

(Commission can remove or add items to the Regular Agenda.)

### **PUBLIC HEARING AGENDA**

(Persons wishing to speak on any item may do so by raising their hand to be recognized by the Chair.)

1. Public hearing to approve a resolution recommending that Council certify the Final Environmental Impact Report (FEIR) and adopt the 2025 Scotts Valley Town Center Specific Plan (2025 Plan)

### **ADJOURNMENT**

(Adjournment shall be no later than 11pm unless extended by a four-fifths vote of all Planning Commission members or a unanimous vote of the members present per City Municipal Code Section 2.21.010.)

The City of Scotts Valley does not discriminate against persons with disabilities. The City Council Chambers is an accessible facility. If you wish to attend a Planning Commission meeting and require assistance such as sign language, a translator, or other special assistance or devices in order to attend and participate at the meeting, please call the Community Development Department at 831-440-5630 five to seven days in advance of the meeting to make arrangements for assistance. If you require the agenda of a Planning Commission meeting be available in an alternative format consistent with a specific disability,

please call the Community Development Department. The California State Relay Service (TTY/VCO/HCO to Voice: English 1-800-735-2929, Spanish 1-800-855-3000; or, Voice to TTY/VCO/HCO: English 1-800-735-2922, Spanish 1-800-855-3000), provides Telecommunications Devices for the Deaf and Disabled and will provide a link between the TDD caller and users of telephone equipment.

**City of Scotts Valley  
PLANNING COMMISSION  
STAFF REPORT**

**Date:** December 4, 2025

**Location:** Town Center Specific Plan

**Request:** Hold public hearing to approve a resolution recommending that Council certify the Final Environmental Impact Report (FEIR) and adopt the 2025 Scotts Valley Town Center Specific Plan (2025 Plan)

**Staff Planner:** Troy Reinhalter and Akoni Danielsen, Consultants

**STAFF RECOMMENDATION**

Staff recommends that the Planning Commission:

1. Approve a resolution recommending that the Council certify the Final EIR and adopt the 2025 Town Center Specific Plan.

**BACKGROUND**

On November 20, 2025, the Planning Commission held a study session to receive public comments on the Draft 2025 Specific Plan and Draft EIR. Tonight's public hearing follows upon this earlier study session, where comments were received from members of the Commission and members of the public. In response to comments received before the study session, at the study session, and after the study session (before this evening's hearing), the City staff recommends a series of changes to the Final Plan and FEIR. These comments and changes are summarized in Table 1 and 3 below.

**Summary of 2025 Specific Plan**

The purpose of the 2025 Plan is to create a vision, policies, and objective design standards to guide new development within the Plan Area in a way that supports existing and new businesses, residents, and the overall community. The 2025 Plan would manage and direct changes in development patterns within the Plan Area through 2045 and guide present and future land uses, development intensity and scale, urban design, economic development, circulation management and mobility, infrastructure and public services, and community benefits/amenities. To this end, the 2025 Plan includes land use and zoning standards, and comprehensive utility, transportation, and landscaping/plaza/public realm improvements for

the Town Center Plan Area. Following the process laid out in the 2025 Plan (in the Implementation chapter), the City will partner with a developer (or developers) to negotiate a Development Agreement for the Town Center Core parcels that will guide the construction of the buildings, plazas, roads, and other infrastructure necessary to support a walkable Town Center.

Project Description

The 2025 Plan covers a 58-acre area bounded by Mt. Hermon Road, Skypark Drive, Blue Bonnet Lane, and includes commercial areas east of Kings Village Road. The Town Center Core comprises approximately 12 acres of mostly vacant land from the former Skypark Airport.

The 2025 Plan anticipates new development and changes over an approximate 20-year period through 2045. The goal is to create a community-oriented Downtown, with new streets, retail areas, mixed-use and residential developments, and community gathering places. To do so, it would allow for up to 657 residential units as specified in the Housing Element, as well as up to 82,000 square feet of commercial uses and up to 35,000 square feet of public/civic uses. The 2025 Plan distinguishes between the City-owned and controlled lands that make up the “Town Center Core” (where a minimum of 300 housing units will be developed in order to satisfy Surplus Lands Act requirements), and the other surrounding parcels within the 2025 Plan boundary. Differing land use and development standards apply to lands within the Core versus outside of the Core, as well as different review and permitting procedures. Adoption of the 2025 Plan will be followed by adoption of amendments to the City’s General Plan and Zoning Ordinance, which will include changing certain existing land use designations in the Plan Area, creating new zoning district(s), and updating existing or establishing new development standards to replace some of the current zoning provisions applicable to the Plan Area.

**DISCUSSION**

Comments Received and Changes Made to the Final 2025 Specific Plan

Before, during, and after the November 20, 2025 study session, public comments were received by the City. These comments focused on four topics: allowed land uses as described in Chapter 3 and Appendix A of the Draft Plan, development and objective design standards, minimum parking requirements and associated standards, and the overall land use concept and public circulation network. Comments which resulted in changes to the Final Plan are summarized below, accompanied by the City’s detailed response or change:

**Table 1: Draft Plan Comments and Changes**

| <b>ALLOWED LAND USES, Chapter 3</b>                                             |                                                                                                                             |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| <b>Comment</b>                                                                  | <b>Response/Change</b>                                                                                                      |
| Bars, Tasting Rooms, Taphouses, and Taverns should be allowed by right in MU-N. | Bars, Tasting Rooms, Taphouses, and Taverns will be P (permitted by right) in MU-N, unless operational hours after 10pm are |

|                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                | proposed, in which case these uses will require a CUP.                                                                                                                                                                                                                                                                                  |
| Boutique Alcohol Sales Store should be allowed by right in MU-N.                                                                               | This use will be permitted by right in MU-N.                                                                                                                                                                                                                                                                                            |
| Medical and Dental Office uses should be more tightly regulated in MU-TC since they may not create the desired ground floor activation.        | Change to CUP for medical/dental offices proposed to be located on the ground floor, keep as P (permitted by right) in upper floors in MU-TC.                                                                                                                                                                                           |
| Ensure that fitness studio use is allowed.                                                                                                     | Clarified that yoga/fitness studio is allowed under Commercial Recreation, Small Scale (under 2,500 sq ft). Health and Wellness will be deleted from the use table as it is covered under Commercial Rec, Small.                                                                                                                        |
| For laboratories (Restricted R&D), distinguish between small and large labs and allow small labs with a CUP in MU-N.                           | Clarified that R&D office use is regulated under Office – Research and Development, and the land use table will distinguish between small (less than 5,000 sq ft) and large laboratories. Small labs will be allowed with a CUP in MU-N.                                                                                                |
| Automobile dealerships should be permitted or CUP in MU-N.                                                                                     | Increase size of permitted vehicle showroom use from 3,000 sq ft to 5,000 sq ft. Dealerships (defined in the use table as “auto and light truck vehicle sales”) will continue to be prohibited.                                                                                                                                         |
| Concern that existing, legal non-conforming drive-throughs would become illegal non-conforming if operation ceased for longer than six months. | New drive-through uses remain prohibited. New standard to be added to the Plan to clarify that the current zoning limitations on cessation of use will not apply to existing, legal non-conforming drive-throughs; a legal non-conforming drive-through use may be extended for an additional year of non-operation with P.C. approval. |
| Concern raised about how to proceed with permitting for uses not specifically listed in Chapter 3 table or Appendix A.                         | Language contained in Appendix A (“The definition or classification of a land use not defined by this Appendix or the Municipal Code is subject to a determination at the discretion of the Director”) shall be copied over to Chapter 3 of the Plan.                                                                                   |

Additionally, public comments were submitted requesting changes to the following land uses: restaurants, SROs, hostels, car rental, movie theater, live theater, massage, banks, night clubs, warehousing/logistics, commercial cannabis, outdoor donation box, catering/food prep, and bulk retail sales. No changes are recommended pertaining to these land uses in the 2025 Plan.

| <b>DEVELOPMENT AND DESIGN STANDARDS, Chapter 3</b>                                             |                                                                                                                                                  |
|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Comment</b>                                                                                 | <b>Response/Change</b>                                                                                                                           |
| Proposed maximum building height of 50' seems too high along Mt Hermon Road in MU-TC district. | Added a new setback standard for MU-TC which sets a maximum building height of 40' for 120' deep along Mt Hermon Rd, measured from back of curb. |
| Proposed maximum Commercial FAR is too low in MU-N.                                            | Maximum Commercial FAR adjusted upwards from 0.85 to 1.25 in MU-N.                                                                               |
| Concerns raised that maximum density of 50 du/acre may inhibit desired residential “wrap”      | Clarified that density can be moved (aggregated) amongst multiple parcels within                                                                 |

|                                                                                                                             |                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| typology in MU-TC.                                                                                                          | the same development project in the Plan Area. This aggregation of density does not permit additional building height beyond the maximum limit.                                    |
| The maximum setback from Kings Village Road in MU-N is too low at 20 feet.                                                  | Raised the maximum setback from 20 to 40 feet on Kings Village Road in MU-N.                                                                                                       |
| All minimum setbacks should be 15'-20'. Allowing Future Internal Connections with only an 8' setback is not appropriate.    | Clarified that this standard applies to future internal connections within the interior of a parcel, <i>not</i> along an exterior edge.                                            |
| Garbage Enclosures should be integrated into the individual building design as opposed to freestanding in a parking lot.    | Standard to be added to address this comment. Also, a proximity standard will be added for both minimum and maximum distances for exterior garbage bins/enclosures from buildings. |
| Under Section 3.5.1 Standard #3, reduce the required percentage of storefronts with frontage depth greater than 40' to 40%. | Required percentage of storefronts deeper than 40' will be reduced to 40%, for frontages identified in Figure 3.2.                                                                 |

| <b>PARKING REQUIREMENTS AND RELATED STANDARDS, Chapter 3</b>                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Comment</b>                                                                                                                                                                                                 | <b>Response/Change</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Proposed minimum parking ratios are too low.                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• Minimum parking ratio for General Retail increased from 3.5 per 1,000 sq ft to 4.0 per 1,000 sq ft.</li> <li>• New minimum parking ratio for Commercial Recreation, Small Scale added at 4.5 per 1,000 sq ft. Lowered the threshold for Commercial Recreation, Small Scale to 2,500 sq ft (from 3,500 sq ft), compared to Commercial Recreation, Large Scale which requires a CUP.</li> <li>• Minimum parking ratio for Restaurants increased to 10 per 1,000 sq ft for all gross indoor area (not just dining area).</li> <li>• Minimum parking ratio for second-story office use increased to 2.5 from 2 per 1,000 sq ft.</li> </ul> |
| Modifications / tenant improvements to existing buildings without increase in square footage should not be exempt from new Plan standards, if this involves a change of use (to a more intensive parking use). | Clarified that a change in use to a use that has a higher parking requirement will trigger a review process by Planning Department & Planning Commission. In order to provide less parking than required by the minimum ratio for the new use, the applicant would be required to demonstrate that the shared parking district in the Core (or other future shared parking district) contains enough parking for all other existing uses plus the proposed amount of parking for the new use (this exception would be approved by the Planning Commission, based on the above analysis).                                                                                        |
| Minimum parking requirements should not be counted ("shared") across both off-street lots/garages and on-street spaces.                                                                                        | Clarified that, for the purposes of meeting minimum parking requirements, the shared parking district boundary only applies within/throughout the Core (not outside).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                       | Shared parking districts may be established elsewhere in the Plan Area, in the future.                                                                                                                                                                                                                                                                                                             |
| Concerns about the parking not functioning adequately for needs of the retailers/tenants in the future Town Center.                                                                                                                                                                                                                   | Add policy that in the Development Agreement for the Town Center Core, a Master Parking Management Plan will be required to be submitted & approved that includes a semi-regular monitoring program (presented to Council every 2 years). Clarified that the City will ensure that the Core Development Agreement requires Reciprocal Easement Agreements (REA) for Town Center Core parking lots. |
| There is not enough on-street parking for major Skypark events.                                                                                                                                                                                                                                                                       | The intent of the Plan is to provide parking for normal uses/activities. Clarified that an angled on-street parking configuration would be permitted on Park Street, if accompanied by regular street trees, distinct paving treatment, and removal of the cycletrack.                                                                                                                             |
| Minor exceptions to standards should not include a reduction to minimum parking ratios.                                                                                                                                                                                                                                               | Clarified that a minor exception does not include reduced parking ratios. Reduction of minimum parking ratios will require P.C. approval as per current Zoning Code process.                                                                                                                                                                                                                       |
| For Perimeter Parking Lot Landscaping, reduce the required height of mature street trees from 20' down to 15' to improve retail visibility.                                                                                                                                                                                           | The minimum required height of mature street trees in perimeter surface parking lots will be reduced to 15'.                                                                                                                                                                                                                                                                                       |
| Section 3.6.3 C Item #4 under commercial guidelines should be required instead of voluntary; "where there are multiple adjacent parking lots, they should be designed to have vehicular connectivity, both entries and exits, to adjacent parking lots. At the time of development, the developing property shall offer an easement." | Converted this guideline into a standard, to ensure appropriate connections between adjacent parking lots (new and existing).                                                                                                                                                                                                                                                                      |

| <b>LAND USE PROGRAM / CIRCULATION NETWORK, Chapters 2 and 4</b>                                                                                                                                          |                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Comment</b>                                                                                                                                                                                           | <b>Response/Change</b>                                                                                                                                                                                                                                                                                                        |
| Questions received about whether and how the Senior Center will be included in the future Town Center development.                                                                                       | Clarified that the City may declare the Senior Center parcel as 'surplus land,' and may be included in the Town Center Core Development Agreement, and/or the City may retain ownership of this parcel (and will likely require that any future housing built here include senior housing and a Senior Center-like facility). |
| Concerns raised that the slender block between Dollar Tree and Park Street (labeled as "townhomes" on the land use concept diagram Figure 2.3) would be better used for non-residential or parking uses. | Removed this label from the diagram to convey that the land use of this block is flexible (could be retail, mixed-use, shophouse, townhouse, and/or surface parking).                                                                                                                                                         |
| Concerns raised that the future connection shown connecting Park Street to the rear of Dollar Tree should be flexible in its location.                                                                   | Clarified that the public circulation and land use concept maps are conceptual and the precise alignment of the future                                                                                                                                                                                                        |



|                                                                                                                   |                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                   | roadways/pathways may vary to some degree from those shown in the Plan, subject to approval by City Planning Department.                                                                                                                                              |
| Concern that minimum density standard in new mixed-use districts would require construction of residential units. | Clarified that <i>if</i> a property owner builds residential, a minimum density applies, but residential development is not required for development projects in the mixed-use zones (aside from the Surplus Lands Act requirement that applies in the Core).         |
| Comments were made regarding the adequacy of parking for residential uses.                                        | The expectation is that parking for residential uses will be contained within residential lots/garages and will not be shared with commercial uses. The exact design, quantity, and disposition of residential parking will be reviewed during project-level reviews. |

Additional comments were received on the Specific Plan that the City will address and consider at the time of project-level review, as the Town Center Development Agreement or other developments in the Plan Area move forward.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW (CEQA)**

### **Key Findings**

The DEIR identified significant or potentially significant effects associated with the Plan's implementation in the following environmental topics: air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, greenhouse gas emissions, noise and vibration, and transportation. The DEIR analyzed 20 environmental subjects, responding to the checklist questions from Appendix G of the CEQA Guidelines to assess impacts for each environmental subject. The impact conclusions are summarized below:

- The DEIR finds no impacts or less than significant impacts through required policies, standards and programs to the following environmental subjects: Aesthetics, Agriculture and Forestry Resources, Energy, Hydrology, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.
- The DEIR finds less than significant impacts with mitigation incorporated into the following environmental subjects: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, and Noise.
- The DEIR finds that the 2025 Plan would produce significant and unavoidable impacts to Greenhouse Gases, even with mitigation incorporated. The DEIR also finds the 2025 Plan would produce significant and unavoidable cumulative impacts to Transportation.
- The City Council would need to reject the environmentally superior alternative and adopt a statement of overriding considerations, supported by substantial evidence in the record to move forward with the 2025 Plan. These are impacts that are commonly generated by major developments of scale in the Bay Area and the impacts are not related to the Plan's location within the City, i.e., this amount of development occurring elsewhere in the City would result in similar impacts due to the magnitude of development, and it is not unusual for city councils to find that specific economic, legal, social, technological, or other benefits, of a proposed project outweigh the unavoidable

adverse environmental effects.

The FEIR makes no changes to the key impact findings of the DEIR.

### Comments Received and Changes Made to Final EIR (FEIR)

The City received 11 written public comments on the Draft Environmental Impact Report, listed in Table 2 below:

**Table 2: Written Comments Received on DEIR**

| <b>Town Center Draft EIR Comments</b> | <b>Agency/Source</b>                      |
|---------------------------------------|-------------------------------------------|
| Renee Inlow                           | Public                                    |
| Byron de Arakal (amended)             | Public, TRC (Adjacent Property Owner)     |
| Jessica Sierra, CDFW                  | Agency – CA Dept. of Fish & Wildlife      |
| Kate Halper                           | Public                                    |
| Benjamin Ow and family                | Public (Adjacent Property Owner)          |
| Juliana Maggio                        | Public                                    |
| Nesh Dhillon, SCCFM                   | Public, Santa Cruz County Farmer's Market |
| Ingrid McRoberts                      | Agency - Caltrans                         |
| Santa Cruz YIMBY                      | Public, SC YIMBY                          |
| Corbett Wright                        | Public (Adjacent Property Owner)          |
| Sue Draper                            | Public                                    |

Comments were also received in person at the Planning Commission study session held on November 20, 2025. Table 3 below summarizes the topics raised through public comments, and the response and/or change (if any) that has been made in Final EIR:

**Table 3: Summary of Response to Comments Received on DEIR**

| <b>Comment Topic</b>                                                                                                                                    | <b>Response in FEIR</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Concerns were raised by members of the public around traffic congestion impacts in terms of increased intersection delays (decreased Level of Service). | Noted – CEQA no longer requires LOS impacts to be mitigated per SB 743. Nonetheless, the Plan includes a number of required and optional intersection improvements including lengthened left turn pockets and a new signal on Mt Hermon Road to address potential congestion impacts.                                                                                                                                                                                                 |
| Caltrans asked for mitigations to be identified at SR-17 highway interchange where La Madrona and Mt Hermon Road intersect with the state highway.      | Noted - Caltrans may recommend improvements to state highways related to LOS, but they do not have approval authority over local land use projects. Traffic analysis described in Appendix C demonstrates that LOS remains acceptable (C or above) at this intersection and queuing at the southbound SR-17 ramp will not impact highway safety or traffic operations under future cumulative growth conditions. This analysis is attached to the 2025 Plan and not to the DEIR/FEIR. |

|                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CDFW requested that additional, updated biological surveys be conducted for the project area and that additional mitigation measures be required of future development projects (with a focus on four local species of concern). | The City confirms that typical biological mitigation measures will be included in the FEIR. The DEIR anticipated that more detailed project-level biological surveys would be completed by future development projects who tier off the programmatic Specific Plan EIR.                                                                                                                                                                                                                                                                                                                                                                 |
| Members of the public questioned the adequacy of the potable water system, stormwater system, and public services (such as police and fire) to serve the residential and commercial growth analyzed under the DEIR.              | The DEIR determined there are adequate facilities, programs, and/or mitigations in place for Public Services. The DEIR was reviewed closely by the Scotts Valley Water District (SVWD), as well as the state-required Water Supply Assessment (WSA), which was formally adopted by the District's Board.                                                                                                                                                                                                                                                                                                                                |
| Santa Cruz YIMBY disputed the number of residential units that should be studied for the 2025 Plan and associated EIR, and suggested that the project should be exempt from CEQA per AB 130/SB 131.                              | Noted – The Specific Plan and FEIR are legally compliant and consistent with the adopted Housing Element which provides for the development of 657 housing units in the Town Center Specific Plan Area, 300 of which shall be in the Town Center Core. The City affirms that the 2025 Plan and FEIR were completed according to CEQA law pertaining to programmatic efforts. When specific projects are proposed, they will be subject to the applicable CEQA requirements. Furthermore, the DEIR concluded that an alternative with more housing than the 657 units that were studied would not be an environmentally superior option. |
| Members of the public raised concerns about parking requirements and functionality in the future Town Center.                                                                                                                    | Noted - Parking is not a CEQA topic. Comments on parking have been addressed above in proposed revisions to the Specific Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

## **PUBLIC NOTICE AND COMMENT**

Public hearing notices were sent via email and regular mail to interested parties and posted at City Hall (Planning Department), Scotts Valley Branch Library, and the Senior Center. The FEIR will be circulated publicly for the CEQA-required ten-day review period beginning on December 4, 2025.

## **NEXT STEPS**

The following list describes the intended timeline and upcoming meetings to adopt the 2025 Plan and certify the accompanying EIR:

- A City Council meeting to certify the EIR and adopt the 2025 Plan is scheduled for December 17; and
- Follow-up meetings with the Planning Commission and City Council will be held in early 2026 to consider associated ordinances amending the City's General Plan and updating the Zoning Code to align with the 2025 Plan.

The 2025 Plan and EIR can be accessed on the City's website here: (<https://www.scottsvally.gov/TownCenter>)

## **TABLE OF CONTENTS**

1. Attachment 1: Resolution for Planning Commission Recommending Certification of FEIR and Adoption of 2025 Town Center Specific Plan
2. Attachment 2: Staff Report for November 20, 2025 P.C. Study Session
3. Attachment 3: Public Comments received on the Draft Specific Plan and Draft EIR

## RESOLUTION NO. 1809

### RESOLUTION OF THE PLANNING COMMISSION RECOMMENDING TO THE CITY COUNCIL CERTIFICATION OF A FINAL ENVIROMENTAL IMPACT REPORT, ADOPTION OF A STATEMENT OF OVERRIDING CONSIDERATIONS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS, AND ADOPTION OF THE 2025 TOWN CENTER SPECIFIC PLAN

**WHEREAS**, Government Code Section 65300 requires that the City of Scotts Valley ("City") adopt and maintain a General Plan that contains certain mandated elements, describes the City's long-term goals for growth and development, and identifies policies and programs to achieve those goals; and

**WHEREAS**, pursuant to Government Code Section 65450 et seq., a city may also adopt one or more specific plans to facilitate the implementation of its General Plan; and

**WHEREAS**, on November 19, 2008, the City Council adopted the Town Center Specific Plan in order to implement the goal of the community to have a Scotts Valley Town Center ("2008 Town Center Specific Plan"); and

**WHEREAS**, the 2008 Town Center Specific Plan envisioned the development of 275,000 square feet of commercial space, 35,000 square feet of civic space, and 300 residential units;

**WHEREAS**, on November 16, 2023, the City Council adopted the updated General Plan ("General Plan") to guide future growth in the City's Planning Area which included Action ED-1.1 which called for the 2008 Scotts Valley Town Center Specific Plan to be updated with an appropriate mix of land uses that are supported by a new market and financial feasibility analysis that is economically attractive to investors and developers; and

**WHEREAS**, on December 7, 2023, the City Council adopted the 2023-2031 Housing Element ("Housing Element") as part of the General Plan; and

**WHEREAS**, Program H-1.1 of the Housing Element identified the need to update the 2008 Scotts Valley Town Center Specific Plan to allow for residential densities sufficient to accommodate 657 new residential units within the Specific Plan Area; and

**WHEREAS**, the City hired Good City Company, Urban Field Studio, and David J. Powers and Associates to assist with the development an updated Town Center Specific Plan which met the requirements of Action ED-1.1 of the General Plan, Program H-1.1 of the Housing Element and to meet the market demands in Scotts Valley ("2025 Town Center Specific Plan"); and

**WHEREAS**, the 2025 Town Center Specific Plan is a document that creates a vision, policies, and objective design standards to guide new development within the Plan Area in a way that supports existing and new businesses, residents, and the overall community and provides land use regulations, development standards, and design guidelines for new development in the area; and

**WHEREAS**, the 2025 Town Center Specific Plan will facilitate implementation of the City's General Plan and the Housing Element by providing for up to 657 residential units as specified in the Housing Element, as well as up to 82,000 square feet of commercial uses and up to 35,000 square feet of public/civic uses; and

**WHEREAS**, under State law and the Municipal Code, the Planning Commission is charged with reviewing specific plans, and making recommendations to the City Council; and

**WHEREAS**, pursuant to the California Environmental Quality Act ("CEQA"), the City prepared a Draft Environmental Impact Report ("Draft EIR") (SCH No. 2025050499) for the 2025 Town Center Specific Plan. The Draft EIR was circulated for public review from October 10, 2025 to November 24, 2025. The City has considered and evaluated the comments received on the Draft EIR during the period of public review; and

**WHEREAS**, the City has prepared and released on December 4, 2025 the Final Environmental Impact Report ("Final EIR") for the 2025 Town Center Specific Plan which incorporates the Draft EIR, contains the City's responses to written comments received on the Draft EIR, and identifies revisions to the Draft EIR; and

**WHEREAS**, on November 20, 2025, the Planning Commission held a public meeting to accept comments on the Draft EIR and comments and questions on the 2025 Town Center Specific Plan; and

**WHEREAS**, on December 4, 2025, the Planning Commission held a duly noticed public hearing on the 2025 Town Center Specific Plan and the Final EIR, considered all written and oral reports of City staff, provided opportunities for the public to speak, and considered all comments on the matter as reflected in the record.

**NOW, THEREFORE, BE IT RESOLVED** by the Planning Commission as follows:

SECTION 1: The Final EIR has been completed in compliance with the requirements of CEQA and the Planning Commission has reviewed and considered the information within the Final EIR.

SECTION 2: The Final EIR represents the independent judgement and analysis of the City.

SECTION 3: The Planning Commission recommends that the City Council certify the Final EIR attached hereto and incorporated herein by this reference based on the findings pursuant to CEQA and the CEQA Guidelines Section 15091, Findings, as described in the Findings of Fact attached hereto as Exhibit A.

SECTION 4: The Planning Commission hereby finds that the 2025 Town Center Specific Plan is consistent with the objectives, policies, general land uses, programs, and actions of all elements of the General Plan based on the following:

The 2025 Town Center Specific Plan is consistent with General Plan Action ED-1.1 which called for the 2008 Scotts Valley Town Center Specific Plan to be updated with an appropriate mix of land uses that are supported by a new market and financial feasibility analysis that is economically attractive to investors and developers. It is also consistent with Housing Element Program H-1.1 which requires the City to update the 2008 Scotts Valley Town Center Specific Plan to allow for residential densities sufficient to accommodate 657 new residential units within the Specific Plan Area.

SECTION 5: The 2025 Town Center Specific Plan is necessary and desirable in order to implement the General Plan as the Specific Plan implements City goals and policies of the General Plan and specifically the Housing Element. The 2025 Town Center Specific Plan plans for housing consistent with Housing Element Program H-1.1 and updates the 2008 Town Center Specific Plan as identified by General Plan Action ED-1.1.

SECTION 6: The Planning Commission hereby finds the 2025 Town Center Specific Plan will promote the public health, safety, and welfare of the City's residents by establishing goals, policies, and actions to guide the development of the Town Center.

**BE IT FURTHER RESOLVED** that the Planning Commission recommends that the City Council: (1) Certify the Final EIR, (2) Adopt a Statement of Overriding Considerations, and (3) Adopt the 2025 Town Center Specific Plan.

The above and foregoing resolution was duly and regularly adopted and passed by the Planning Commission of the City of Scotts Valley at a special meeting held on the 4<sup>th</sup> day of December 2025, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

---

Chuck Maffia, Vice Chair

---

Taylor Bateman, Community Development Director

## **EXHIBIT A**

### **City of Scotts Valley Draft Findings Required Under the California Environmental Quality Act (Public Resources Code Section 21000 et seq.) For the 2025 Scotts Valley Town Center Specific Plan**

#### **1. Introduction**

A public agency may not approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects, unless the public agency makes one or more written findings for each of those significant effects. Each finding must be accompanied by a brief explanation of the rationale for each finding (CEQA Guidelines Section 15091).

The City of Scotts Valley (City) prepared a Final Environmental Impact Report (EIR) for the proposed 2025 Scotts Valley Town Center Specific Plan (Plan) in December 2025.

The Plan envisions the Town Center as the “Heart of the City,” consistent with the broader community goal of establishing a vibrant town center. To fulfill this vision, the Plan is proposed to allow a blend of commercial and residential spaces, which would be complemented by existing amenities, including a library, community theater, movie theater, Senior Center, and Community Center, and future amenities including outdoor dining and public open spaces that encourage community gathering. The Plan includes land use, zoning, and comprehensive utility, transportation, and landscaping/public realm improvements.

The Plan anticipates new development and changes in land use over an approximate 20-year period through 2045, and would allow for up to 657 residential units (consistent with the City’s Housing Element), up to 82,000 square feet of commercial uses, and up to 35,000 square feet of public/civic uses.

The Plan will establish land use designations and zoning for the Plan area as described in the Final EIR Project Description. Therefore, the Plan will require adoption of various amendments to the City’s General Plan and Zoning Ordinance, changing certain existing land use designations in the Plan area, creating new zoning districts, and updating existing or establishing new development standards to replace some of the current zoning provisions applicable to the Plan area. These amendments would be completed to ensure consistency between the Plan, the General Plan, and the Zoning Ordinance.

The Plan may be implemented over time and in a phased approach. Due to the unique characteristics of this project, specific details regarding phasing boundaries, timing, and specific details will be determined by the Project Applicant(s) or their designee(s) in response to market demand, rapidly changing mobility technology, availability of financing, and other factors as part of the development review process for individual development projects.

If phased development occurs, development of the future phases could occur in one phase or could be in multiple future phases. Development of the future phases would include construction of the remaining square footage of development as allowed under this Plan, in addition to any associated infrastructure, parking, and landscaping and open space, subject to subsequent development approval and adherence to Plan development standards and design guidelines.



The Findings and Statement of Overriding Considerations set forth below (Findings) are presented for consideration by the Planning Commission and adoption by the City Council as the City's independent findings under the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

The Findings provide the written explanation, evidence, reasoning and conclusions of the City regarding the project's environmental impacts, mitigation measures, alternatives, and the overriding considerations, which in the City's judgement, justify approval of 2025 Scotts Valley Town Center Specific Plan despite residual environmental effects.

## 2. Record of Proceedings and Custodian of Record

For purposes of CEQA and the findings set forth herein, the record of proceedings for the City of Scotts Valley's findings and determinations consist of the following documents and testimony as compiled for the project:

- The Notice of Preparation (NOP), comments received on the NOP, comments received at the public scoping meeting, and all other public notices issued by the City.
- Draft EIR, associated appendices to the Draft EIR, and technical materials cited in the Draft EIR.
- Final EIR, including comment letters, responses to comments, errata and technical materials cited in the Final EIR.
- Staff reports associated with Planning Commission and City Council hearings on the project.
- Those categories of materials identified in Public Resources Code Section 21167.6, which establishes the contents for the record of proceedings.

The City is the custodian of the administrative record. The documents and materials that constitute the administrative record are available for review at the City of Scotts Valley Planning Department, 1 Civic Center Drive, Scotts Valley, CA 95066.

## 3. Severability

If any term, provision, or portion of these Findings or the application of these Findings to a particular situation is held by a court to be invalid, void, or unenforceable, the remaining provisions of these Findings, or their application to other actions related to the project, shall continue in full force and effect unless amended or modified by the City.

## 4. Findings for Significant Impacts that Can Be Avoided or Reduced to a Less Than Significant Level with Implementation of Mitigation Measures

**Impact AQ-1:** Without application of appropriate control measures to reduce construction dust and exhaust, construction period impacts at the program level would be considered a significant impact.

**Finding:** Changes or alterations, as identified in Mitigation Measure (MM) AQ-1.1, have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** Mitigation Measure (MM) AQ-1.1 requires that individual projects built out under the Plan quantify construction criteria pollutants and toxic air contaminants (TACs). Once those details are available, individual projects would undergo modeling to identify impacts and, if necessary, future projects would include measures to reduce emissions below the applicable Monterey Bay Air Resources District construction thresholds. Reduction

measures could include various methods as outlined in the Final EIR and would help to lower construction criteria pollutants and TACs. By reducing construction period emissions, this potentially significant impact would be effectively mitigated. Projects whose construction period emissions exceeded applicable thresholds despite the application of mitigation are not covered by this resolution of findings, would require supplemental environmental review, including the evaluation of alternative(s) that avoided or reduced the project's significant construction emissions, and the adoption of findings specific to that individual project.

**Impact AQ-2:** Significant Toxic Air Contaminants (TAC) emission exposure could occur under Plan buildout.

**Finding:** Changes or alterations have been required in, or incorporated into, the project, i.e. Section 3.5 Performance Standards of the Plan, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** Implementation of Section 3.5 (Performance Standards) of the Plan would reduce on-site diesel exhaust emissions and reduce construction health risk impacts by requiring projects of two acres or greater and lasting more than one year within 1,000 feet of existing sensitive receptors or worker receptors as defined by the Monterey Bay Air Resources District (MBARD) to utilize Tier 4 engines. This performance standard would be applied to development under the Plan as applicable and would effectively mitigate these potential risks below applicable MBARD thresholds.

**Impact BIO-1:** The Plan buildout could impact habitats within the Plan area that may contain special status species.

**Finding:** Changes or alterations have been required in, or incorporated into, the project, i.e. future projects implementing the Plan would implement General Plan Policy OSC-1.16, requiring site-specific surveys and appropriate mitigation when special status species are present, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** General Plan Policy OSC-1.16 requires buildout of the Plan in the following habitat types; vernal moist grassland, mixed woodland, annual grassland, and ruderal to prepare site-specific surveys prior to development. Land mapped as containing turf or developed habitat would not require a survey due to the low possibility of native species or rare/endangered wildlife. This policy would be effective because it requires developments under the Plan to mitigate any potential impacts to such species as recommended by the biologist completing the survey, and as required by the applicable wildlife agency with jurisdiction, thus minimizing any potential impacts to special status species.

**Impact BIO-2:** Build out of the Plan could result in the loss of fertile eggs, nesting raptors or other migratory birds, or nest abandonment.

**Finding:** Changes or alterations have been required in, or incorporated into, the project, in particular Mitigation Measure MM BIO-2.1, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** Mitigation Measure MM BIO-2.1 requires that all on-site tree removal, demolition and grading occur outside the nesting and breeding season to avoid nest disturbance within existing urban trees. As an alternative, if construction during the nesting season cannot be avoided, the applicant may conduct bird surveys and establish buffer zones around nests, if identified on site. These measures would be effective by directly avoiding potential effects on nesting birds or by protecting nesting birds with the oversight of a professional biologist. MM BIO-2.1 has been made a requirement of future individual projects implementing the Plan to provide a rational and enforceable program of impact avoidance.

**Impact BIO 3:** Future demolition activities and tree removal under the Plan could result in direct physical disturbance of any roosting bats that may be present, possibly resulting in injury or mortality, as well as the loss of roosting sites.

**Finding:** Changes or alterations have been required in, or incorporated into, the project, in particular Mitigation Measures MM BIO-3.1 through MM BIO-3.4, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** MM BIO-3.1 requires future development under the plan to conduct a bat habitat survey assessment to identify all trees on-site that could support roosting bats. A preconstruction visual survey of all trees that were determined to provide potential roosting habitat will be conducted as described in the Final EIR.

MM BIO-3.2 requires a two-step removal process for trees identified as currently supporting roosting bats or to remove trees that were determined to provide potential habitat but could not be adequately visually surveyed during the preconstruction survey. MM BIO-3.2 would ensure that these trees are made less attractive for bats via tree trimming, then the following day the tree would be removed. This measure would encourage any roosting bats to vacate the tree. This measure would minimize the risks that tree removal presents to bats.

For trees that cannot be adequately surveyed during the preconstruction survey, MM BIO-3.3 requires that a qualified biologist conduct a nighttime emergence survey during the volant season to determine if bats are present. If bats are present, and it is maternity season, further investigation must determine if a maternity colony is roosting in the tree. If bats are found and it is outside of maternity season, then the process described in MM BIO-3.2 would be followed.

As per MM BIO-3.4, if a maternity colony or overwintering colony is identified on the site, then a construction-free buffer shall be established around the tree(s) until the colony is determined to be no longer active. Tree removal shall occur between March 1 and April 14 or between August 16 and October 15, utilizing the two-step removal method to avoid interfering with an active nursery and/or overwintering bats.

The above measures are enforceable, as determined by the City and a qualified biologist, and would reduce the impacts to roosting bats to a less than significant level.

**Impact BIO 4:** Future development projects under the Plan could place fill into jurisdictional waters.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** General Plan policy OSC-1.18 requires that all future development applications are required to submit a biological study where an initial site inventory indicates the presence of potential for wetland species or indicators. The study shall contain a delineation of all wetland areas. This General Plan policy is enforceable and would effectively ensure that impacts to jurisdictional waters are offset by requiring development applicants to identify wetland areas and obtain permits from regulatory agencies and those regulatory permits would include adequate mitigation to reduce impacts to wetlands to less than significant levels.

**Impact CUL-1:** Future development projects under the Plan could indirectly or directly impact known and unknown historic buildings and structures by removing historic buildings and structures, or altering the setting for historic properties.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** General Plan Policy OSC-4.7 ensures other options are taken into account before resources are destroyed as it prohibits the destruction of designated historical resources without prior public hearing and consideration of alternatives. MM CUL-1.1 and MM CUL-1.2 provide specific directions to prepare a historic resources evaluation for structures over 50 years old and to make sure that a qualified architectural historian documents the building if a significant historic building or structure is proposed for major renovation or alteration. These mitigation measures would effectively ensure that structures are evaluated and a historical structure would be recorded if it were to be renovated or altered. In the event a future individual project implementing the Plan would propose demolition or otherwise represents a substantial adverse change in the significance of a historic resource, supplemental environmental review would be required, including the evaluation of preservation alternatives, and would not be covered by these findings.

**Impact CUL-2:** Future development projects under the Plan could inadvertently discover unknown archaeological resources during construction.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** MM CUL 2.1 directs applicants to have a qualified archaeologist prepare a Worker Environmental Awareness Program (WEAP) prior to demolition and grading. MM CUL 2.2 and MM CUL 2.3 provide specific direction to the archaeological monitor and property owner in the event that archaeological resources are discovered during the construction process. These measures would be effective because they require halting construction, establishing setbacks, avoiding resources and contacting a qualified archaeologist to assess the find, and, if determined significant, preparation of a treatment plan including data recovery. Data recovery will include excavation and exposure of features, field documentation, and recordation. These measures ensure the appropriate treatment of buried cultural resources encountered during construction.

**Impact GEO-1:** Future construction activities could disturb paleontological resources, if present.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** Mitigation Measure MM GEO-1.1 requires that if a fossil is found during construction, then excavation shall halt until the find can be examined by a qualified paleontologist. The measure directs applicants to include a standard inadvertent discovery clause on the construction plans. This measure would ensure that any finds are assessed by a qualified paleontologist and, if necessary, a paleontological treatment plan will be prepared. Treatment may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. MM GEO-1.1 would ensure appropriate documentation and treatment of any uncovered paleontological resources.

**Impact HAZ-1:** Future development within the Plan could encounter and disturb contaminated soil, soil vapor, and groundwater, and result in adverse effects on construction workers, existing residents and employees, and nearby sensitive receptors.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** General Plan Policy SN-4.9 ensures that the City will continue to administer through the County Comprehensive Hazardous Materials Program, pursuant to Chapter 6.95 of the California Health and Safety Code. General Plan policy SN-4.11 requires the mitigation of hazard exposure from new development projects through the environmental review process, design criteria, and standards development, and SN-4.12 requires that site assessments for hazardous and toxic soil contamination be conducted prior to approving development applications as necessary.

Mitigation Measure MM HAZ-1.1 ensures that General Plan Policy SN-4.12 is implemented for all developments under the Plan. Under MM HAZ 1.1, all developments under the Plan would be required to have a qualified environmental consultant prepare a Phase 1 ESA unless the Community Development Director determined the site had been adequately evaluated in a prior Phase I ESA. If determined necessary based on the findings of the Phase 1 ESA, future development would be required to complete additional testing and/or reports. Mitigation for future projects will be implemented as deemed necessary by the required ESAs to mitigate the risk of hazardous materials being released into the environment. MM HAZ-1.1 would ensure that future development under the Plan does not create a significant hazard to the public or the environment through the disturbance of contaminated soil, soil vapor, and groundwater.

**Impact NOI-1:** Future construction associated with development under the Plan could result in temporary construction noise impacts.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** General Plan Policies SN-7.15 and SN-7.16 would reduce noise during the construction process by managing construction noise, including requiring preparation of a Noise Reduction Plan when construction activity occurs near sensitive land uses. MM NOI-1.1 requires the applicant to include various noise reduction measures as part of all grading and building construction plans that range from limiting the time each day and days of the week of construction activity to locating staging areas and construction material areas as far away as possible from adjacent land uses, prohibiting all unnecessary idling of internal combustion engines, and designating a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. Construction noise can be effectively addressed through construction timing, equipment maintenance, and placement of equipment. The above mitigation measures are enforceable, as determined by the City and the City’s noise consultant, and would be included in future projects’ construction documents. Temporary construction noise impacts of future development under the Plan would be reduced to a less than significant level with the implementation of these General Plan policies and MM NOI-1.1.

**Impact NOI-2:** Future development under the Plan could result in a significant permanent noise level increase.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** General Plan Policies SN-7.5, SN-7.7, SN-7.9, and SN-7.17 would all help to minimize potential operational noise. Policy SN-7.5 requires preparation of noise studies for projects with the potential to generate substantial noise. Per the Policies SN-7.7 and SN-7.9, a qualified acoustical consultant would be retained to review mechanical equipment systems and project-specific operations during final design of all proposed development under the Plan. Policy SN-7.17 limits truck traffic in residential and commercial areas to designated truck routes. These measures are effective because they would help to

minimize operational noise under the Plan via noise studies, the use of truck routes, noise attenuation techniques, and acoustical engineering analysis.

**Impact NOI-3:** Ground-borne vibration levels generated by construction activities for development under the Plan exceeding the conservative 0.3 in/sec PPV limit for conventional offsite buildings would have the potential to result in a significant vibration impact.

**Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale/Evidence:** Mitigation Measure MM NOI-3.1 requires that a construction vibration control plan be prepared when construction vibration has the potential to damage nearby structures. The plan shall identify necessary construction vibration controls to reduce the potential of cosmetic damage to buildings and to minimize annoyance. This measure would be effective because it gives developments under the Plan various ways to reduce construction vibration levels to a less than significant level.

## 5. Findings for Significant Impacts that Cannot Be Avoided or Reduced to a Less Than Significant Level (Significant and Unavoidable Effects)

**Impact GHG-1:** Buildout under the Plan would result in approximately 15,533 MT of CO<sub>2</sub>e annually and would not meet the State's goal of carbon neutrality by 2045.

**Finding:** Specific economic, legal, social, technological or other considerations make additional mitigation measures or alternatives infeasible.

**Rationale/Evidence:** Mitigation Measure MM GHG-1.1 would require that future development 1) avoid the construction of natural gas connections for residential buildings as feasible, 2) meet CALGreen Building Standards Code requirements and include electric vehicle charging infrastructure that meets current Building Code CALGreen Tier 2 compliance, and 3) Reduce VMT per service population by 15 percent over regional average or screen out based on the *Analyzing Vehicle Miles Traveled for CEQA Compliance SB 743 Implementation Guidelines for the City of Scotts Valley*. Implementation of these measures would help reduce GHG emissions, however not to the point of carbon neutrality.

MM GHG-1.2 requires projects that include natural gas to enter an agreement with the City to offset their project's GHG emissions.

The Plan would allow for growth within the region that would generate net new GHG emissions, such as vehicles on roadways which consume gasoline. Both the implementation of Mitigation Measures MM GHG-1.1 and MM GHG-1.2 would reduce GHG emissions resulting from buildout under the Plan, however, not to the point of carbon neutrality. No feasible policies or measures within the City's control as lead agency would reduce the Plan GHG emissions sufficiently to achieve carbon neutrality by 2045. As described in the Final EIR, there is no current pathway for the Plan, based on the mechanisms currently available to the City, to achieve carbon neutrality by 2045. In order to achieve carbon neutrality by 2045, policies must be implemented at the state and federal level, which is outside of the City's control.

Therefore, even with implementation of the mitigation measures described above, buildout under the Plan would not achieve carbon neutrality by 2045, in conflict with state GHG reductions goals, and result in a significant and unavoidable GHG impact. Please see Statement of Overriding Considerations below.

**Impact TRAN-1:** Buildout of the Plan would contribute to a significant cumulative VMT impact for commercial land uses.

**Finding:** Specific economic, legal, social, technological or other considerations make additional mitigation measures or alternatives infeasible.

**Rationale/Evidence:** While the General Plan includes policies and programs designed to reduce VMT to a reasonable extent, such as Policy M-3.1, M-3.18, and M-3.19, impacts associated with implementation of the General Plan would not be reduced to less than significant due to the increased development, new roadways, and increased use of the City's and regional transportation system and therefore the General Plan EIR concluded a significant and unavoidable cumulative impact. All land use components under Plan buildout would meet the City's screening criteria so future development projects implementing the Plan would result in a less than significant VMT impact on an individual project level.

However, the Plan as a whole when considered within the cumulative environment of General Plan buildout within the City would contribute to the VMT impact disclosed in the General Plan EIR due to its incorporation of commercial land uses. Therefore, the buildout of the Plan would contribute to a significant cumulative VMT impact.

Please see Statement of Overriding Considerations below.

## 6. Findings for Significant Cumulative Effects

The Final EIR discusses the project's potential cumulative effects consistent with CEQA Guidelines Section 15130. This discussion considers the project's incremental contribution to potentially significant impacts when combined with other past, present and/or probably future projects within relevant geographic limits. Impact TRAN-1 discloses that the plan would contribute to a significant VMT impact. However, on an individual project level development under the Plan would result in a less than significant VMT impact. The Plan would also contribute to cumulative GHG impacts in 2045 by not achieving carbon neutrality.

## 7. Findings Regarding Significant Irreversible Environmental Changes Which Would be Caused by the Project Should it be Implemented

Section 15126.2(d) of the State CEQA Guidelines requires an EIR for certain projects to discuss the significant irreversible environmental changes that would result from implementation of a proposed project. This discussion focuses on the commitment or use of nonrenewable resources during project construction and operation.

Construction of the proposed project would require the commitment of a variety of non-renewable or slowly renewable natural resources such as lumber and other forest products, sand and gravel, asphalt, petrochemicals, and metals. The City of Scotts Valley finds such commitments insignificant for the following reasons:

1. The project is located in a developed urban area and will not convert prime agricultural land, preclude access to mineral resources, or otherwise commit ongoing or large quantities of nonrenewable resources (through removal or nonuse).
2. None of the resources required for construction are unique, rare or in danger of being depleted by the project.
3. Use of defined water resources would not deplete or threaten existing supplies of surface or groundwater resources.
4. The project does not include components (such as a highway that provides access to a previously inaccessible area) that would lead to associated secondary impacts or commit future generations to such irreversible changes.

5. The project would not lead to irreversible damage from environmental accidents because the proposed residential, commercial, mixed-use, public, and quasi-public land uses do not present such risks.

## **8. Findings Regarding Potential Growth Inducing Effects**

CEQA defines a project as growth inducing if it “could foster economic or population growth, or the construction of additional housing either directly or indirectly, in the surrounding environment”. Similarly, under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Increases in population could tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

The City of Scotts Valley finds the following regarding the project’s potential growth inducing effects:

The Plan is an “infill” project, meaning that the Plan area is within the City’s existing boundaries, already served by existing infrastructure, and planned for urban uses. The City adopted the General Plan on November 29, 2023. The development projections in the General Plan included buildout capacity for the Plan area, with the exception of the amount of housing proposed in the Plan. The purpose of the Plan is to create a vision, policies, and objectives standards to guide new development within the Plan area in a way that supports existing and new businesses, residents, and the overall community. The Plan anticipates new development and change over an approximate 20-year period through 2045. Specifically, the Plan would allow for 657 residential units, 82,000 square feet of commercial land uses, 35,000 square feet of public/quasi-public land use, and 88,663 square feet of park improvements. The 657 residential units in the Plan were accounted for in the Housing Element and their environmental impacts, in combination with the implementation of the other Plan land uses, are analyzed in this document.

There are no undeveloped areas adjacent or in the immediate vicinity of the Plan area and the Plan would not remove any obstacles that would help facilitate additional growth that could significantly affect the physical environment. The Plan would add local serving roadways to enhance circulation in the Plan area. The Plan does not include the expansion of existing infrastructure that would facilitate growth in the Plan area beyond what is accounted for in this analysis or other areas of the City. Therefore, the Plan would not result in growth-inducing impacts beyond what was envisioned in the City’s General Plan.

## **9. Findings Regarding Project Alternatives**

Consistent with CEQA Guidelines Section 15091 (c), the City of Scotts Valley makes the following findings regarding the alternatives considered in the Final EIR:

1. No Project, No New Development Alternative. The No Project, No New Development alternative would be environmentally superior but meets none of the stated objectives of the project. The No Project, No New Development Alternative would avoid all the environmental impacts of the Plan, although future GHG emissions resulting from existing development within the Town Center would likely also exceed the threshold of carbon neutrality in 2045. However, under this alternative no new housing would be constructed, and the City would not be in compliance with the 2023-2031 RHNA targets contained in the currently adopted Housing Element for the 2023 – 2031 cycle. This



alternative would not accomplish any of the Plan's community benefits. For this reason, the alternative has been rejected.

2. No Project, Existing Plans Alternative. The No Project, Existing Plans alternative would not lessen any of the environmental impacts of the Plan. All significant and unavoidable impacts of the Plan would remain under this alternative, as the 2008 Plan would also result in GHG emissions in 2045 that would exceed the carbon neutrality threshold, and the commercial component of the 2008 Plan would lead to increased traffic generation compared to the proposed Plan, and significant project-level VMT impacts, as well as contributing to significant cumulative VMT impacts. Under this alternative, 254 units allowed under the 2008 Plan would be constructed, and therefore the City would not achieve the 657 units identified in the currently adopted Housing Element for the 2023 – 2031 cycle to be in compliance with the City's 2023-2031 RHNA targets. This alternative would meet a portion of the City's objectives; however, it is not environmentally superior. Therefore, the alternative has been rejected.
3. Residential Land Use Only Alternative. The Residential Land Use Only Alternative would provide the residential development included in the Plan, but it would be implemented such that it would only allow for residential development, and preclude the mixed-use development, commercial development, and civic land uses. Infrastructure improvements, such as roadways, pedestrian and bicycle facilities, and utility improvements would remain as essential elements of the Plan. This alternative would ensure the Plan meets the City's RHNA goals for the 2023 – 2031 housing cycle. Because this alternative would not include commercial development, it would not contribute to a cumulative commercial VMT impact, however, all other environmental impacts under this alternative would be similar to the proposed Plan. This alternative would not meet any of the critical Plan objectives that relate to commercial development or public/quasi-public land uses in the Plan (Objectives 1, 2, 3, 6, and 8). The commercial (and mixed-use) aspects of the Plan are vital to the original purpose of undertaking this planning and environmental review effort; eliminating commercial uses from the Plan results in a Plan that falls short of creating a Town Center and a gathering place. Failing to accomplish Objectives 1, 2, and 3 would represent an ineffective Plan, and therefore this alternative has been rejected, as it is undesirable from a policy perspective as the intent of the Plan is to achieve a balance of land uses and not solely to allow for sufficient housing to help achieve the City's RHNA target for the 2023-2031 housing cycle.

## **10. Statement of Overriding Considerations**

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR

and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record (CEQA Guidelines Section 15093).

The City of Scotts Valley concludes that the project's relative benefits outweigh its residual environmental effects for the following reasons:

1. Compliance with Housing Element. The currently adopted Housing Element for the 2023 – 2031 cycle RHNA for the City is 1,220 units. The Housing Element discloses that 657 of the total 1,220 units will be built within the Plan Area. The Plan update would ensure that the City complies with the City's 2023-2031 Housing Element.
2. Economic Benefits to the City of Scotts Valley. The residential and commercial uses anticipated to be developed within the Plan Area would generate significant annual property taxes, and the commercial uses, to a lesser degree, sales tax. These direct economic benefits to the City's annual budget would provide greater opportunity for enhanced City services, programs, and capital improvements. The project would also generate construction jobs and permanent jobs once the commercial uses are developed, providing employment opportunities. The scale of these economic benefits would outweigh the residual environmental effects related to significant GHG emissions in 2045 and contributing to cumulative VMT and GHG impacts.
3. Affordable Housing and Community Benefits. The project as proposed would result in a significant net increase in affordable housing and provide a range of housing opportunities within the City. Per Policy 3-1.2 of the Plan, residential buildout under the Plan would include "a range of new housing, including market-rate and affordable rental and ownership opportunities consistent with the City's 2023-2031 Housing Element and Surplus Lands Act requirements."

**City of Scotts Valley  
PLANNING COMMISSION  
STAFF REPORT**

**Date:** November 20, 2025

**Location:** Town Center Specific Plan

**Request:** Hold study session to provide input and comments on the Public Draft 2025 Scotts Valley Town Center Specific Plan (2025 Plan) and Draft Environmental Impact Report (DEIR)

**Staff Planner:** Troy Reinhalter and Akoni Danielsen, Consultants

**STAFF RECOMMENDATION**

Staff recommends that the Planning Commission:

1. Receive public comments on the 2025 Plan and the DEIR; and,
2. Provide comments and questions on the 2025 Plan and DEIR.

**BACKGROUND**

For decades, the City of Scotts Valley has pursued a dream to build a Town Center on the vacant land formerly occupied by the Skypark Airport. During this time, several developers have looked at the site, conducted charrette exercises, and ultimately walked away from the project. In 2008, the City adopted the original Town Center Specific Plan based around a vision dominated by new commercial and civic uses. In the almost two decades that have passed since that original Plan was adopted, several changes have necessitated that a new Plan be developed. This Draft 2025 Town Center Specific Plan ("2025 Plan") is responsive to these factors, including:

- Market forces favoring housing over commercial development.
- Changes in retail markets to favor small format, experiential restaurants and shops.
- The Surplus Lands Act requiring mixed-use projects on government owned 'surplus' land to include a minimum of 300 housing units.
- The City's adoption of its 2023-2031 Housing Element which requires the City to update its zoning to accommodate 657 housing units in the Town Center Specific Plan Area.
- The growing need for more diverse and affordable housing opportunities in the area.
- Surrounding development of Skypark, the Hangar, library and community theater, and the desire for a Plan that ties these elements together.

In addition, since 2022, the City has taken a proactive approach to removing barriers that prevented the Town Center from being developed in the past. These efforts include:

- Acquiring eight acres of vacant land from the City of Santa Cruz to assemble the full, contiguous 12+ acres of the “Town Center Core” area under City of Scotts Valley ownership.
- Surface level environmental clean-up on these vacant Core parcels resulting in a closed case with County Environmental Health.
- Conducting an updated retail analysis and engagement with a consultant to identify potential commercial tenants.
- Securing \$1,000,000 in Federal funding to assist with the acquisition of the Santa Cruz-owned land (the former airport).
- Conducting extensive community and stakeholder outreach to develop a modern preferred vision that emphasizes human scale connectivity and a walkable retail-supportive environment.
- Hiring consultants specialized in architecture, planning, and real estate development with a background working for private developers to ensure the updated vision is buildable in today’s market and economy.

The purpose of the 2025 Plan is to create a vision, policies, and objective design standards to guide new development within the Plan Area in a way that supports existing and new businesses, residents, and the overall community. The 2025 Plan would manage and direct changes in development patterns within the Plan Area through 2045 and guide present and future land uses, development intensity and scale, urban design, economic development, circulation management and mobility, infrastructure and public services, and community benefits/amenities. Following the process laid out in the 2025 Plan (in the Implementation chapter), the City will partner with a developer (or developers) to negotiate a Development Agreement for the Town Center Core parcels that will guide the construction of the buildings, plazas, roads, and other infrastructure necessary to support a walkable Town Center.

#### General Plan and Housing Element Context

In November 2023, the City adopted the updated Scotts Valley General Plan, which will guide development within the City through 2045. The General Plan included Action ED-1.1 which called for the 2008 Scotts Valley Town Center Specific Plan to be updated with an appropriate mix of land uses that are supported by a new market and financial feasibility analysis that is economically attractive to investors and developers.

In December 2023, the City adopted the Scotts Valley 6th Cycle Housing Element, covering years 2023 – 2031. Program H-1.1 of the Housing Element identified the need to update the 2008 Scotts Valley Town Center Specific Plan to allow for residential densities sufficient to accommodate 657 new residential units within the Plan Area. These units would satisfy a significant portion of the 1,220 total housing units allocated to the City through the Regional Housing Needs Allocation (RHNA) process. The Housing Element requires that the 2008 Scotts Valley Town Center Specific Plan be updated by December 2025 to allow densities that enable development of the number of residential units specified through RHNA.

## Project Description

The 2025 Plan covers a 58-acre area bounded by Mt. Hermon Road, Skypark Drive, Blue Bonnet Lane, and includes commercial areas east of Kings Village Road. The Town Center Core comprises mostly vacant land from the former Skypark Airport.

The project (the 2025 Plan) anticipates new development and changes over an approximate 20-year period through 2045. The goal is to create a community-oriented Downtown, with new streets, retail areas, residential developments, and community gathering places. To do so, it would allow for up to 657 residential units as specified in the Housing Element, as well as up to 82,000 square feet of commercial uses and up to 35,000 square feet of public/civic uses. The 2025 Plan distinguishes between the City-owned and controlled lands that make up the “Town Center Core” (where a minimum of 300 housing units will be developed in order to satisfy Surplus Lands Act requirements), and the other surrounding parcels within the 2025 Plan boundary. Differing land use and development standards apply to lands within the Core versus outside of the Core, as well as different review and permitting procedures. The 2025 Plan will be followed by adoption of amendments to the City’s General Plan and Zoning Ordinance, which will include changing certain existing land use designations in the Plan Area, creating new zoning district(s), and updating existing or establishing new development standards to replace some of the current zoning provisions applicable to the Plan Area.

The 2025 Plan includes land use and zoning standards, and comprehensive utility, transportation, and landscaping/plaza/public realm improvements for the Town Center. The 2025 Plan includes:

- Land use definitions which have been updated and expanded to reflect current market conditions and contemporary zoning approaches;
- Updated design and development standards to reflect the new Preferred Vision, including Objective Development Standards (ODS) applicable to new residential development as prescribed by State Law;
- Streetscape design standards for Complete Streets that accommodate pedestrians, bicyclists, vehicles, and parking;
- Traffic and utilities improvements necessary to implement the Plan supported by technical analyses including a Water Supply Assessment (WSA) as required by State Law; and
- Implementation actions to provide direction towards the development of the Town Center.

## Implementation Process

As described above, the City owns several parcels which collectively comprise the “Town Center Core.” The boundary for the Town Center Core area is shown below and contains five whole parcels (with APNs 022-721-07, 022-721-08, 022-721-09, 022-601-01, 022-212-19), and portions of others (APN 022-721-02 and a public right-of-way). In accordance with the Surplus Lands Act, after adoption of the 2025 Plan, the City will declare these parcels

exempt surplus land, prepare an RFP for these City-owned parcels and select a developer to partner with on the construction of the Town Center Core horizontal development (roads, utilities, streetscape amenities, and parks/open spaces) and vertical development (commercial, mixed-use, and residential buildings). The RFP will lay out the City's requirements for land use (including ground-floor retail, public open space, and at least 300 residential units including a minimum percentage of affordable units), public streets, streetscape and public plaza improvements, provisions related to parking, and civil utility improvements. The City shall specify an allowed amount of time for responses, and upon close of RFP, shall select a preferred developer. After initial selection, according to Surplus Lands Act policies, the City will negotiate with the selected developer for at least 90 days to negotiate the lease or sale of the Town Center Core parcels with the selected developer. This process will ensure a timely implementation of new development in the Core area.

Figure 6-1 in Chapter 6 of the 2025 Plan identifies the parcels that constitute the Town Center Core (outlined in red), as well as several others that could be added depending on the interest of the property owners and/or the developer that will be selected (shown with a red hatch):



## **DISCUSSION**

### **2025 Specific Plan Overview**

The 2025 Plan is organized into the following chapters:

- Chapter 1 (Introduction) contains background on the project setting and details the purpose and authority of the Specific Plan.
- Chapter 2 (Community Vision and Principles) describes and illustrates the community's vision for the Plan Area and the community engagement process that occurred through the planning effort.
- Chapter 3 (Land Use, Development, and Objective Design Standards) outlines the allowable uses in the Plan Area and the development standards and guidelines for future construction.
- Chapter 4 (Circulation and the Public Realm) deals with the circulation pattern throughout the Plan Area for all transportation modes, including walking and biking. The Plan emphasizes pedestrian circulation, consolidated parking, and a connection to surrounding uses. This chapter also includes street sections depicting the required street improvements in the Area, and describes public realm, landscaping, and streetscape policies and standards for the Town Center.
- Chapter 5 – Reserved chapter for Plan updates or additional material if needed in the future.
- Chapter 6 (Implementation) explains the requisite physical and programmatic improvements needed to assist with implementing the Town Center Specific Plan and ensure that its objectives are completed effectively. Provides a blueprint for the necessary transportation, public open space, water, sanitary sewer, storm drain, and dry utility/power infrastructure improvements for the Town Center. Also describes potential funding opportunities and financing strategies for improvements recommended by this Plan.

The 2025 Plan includes three appendices containing further background and underlying analyses:

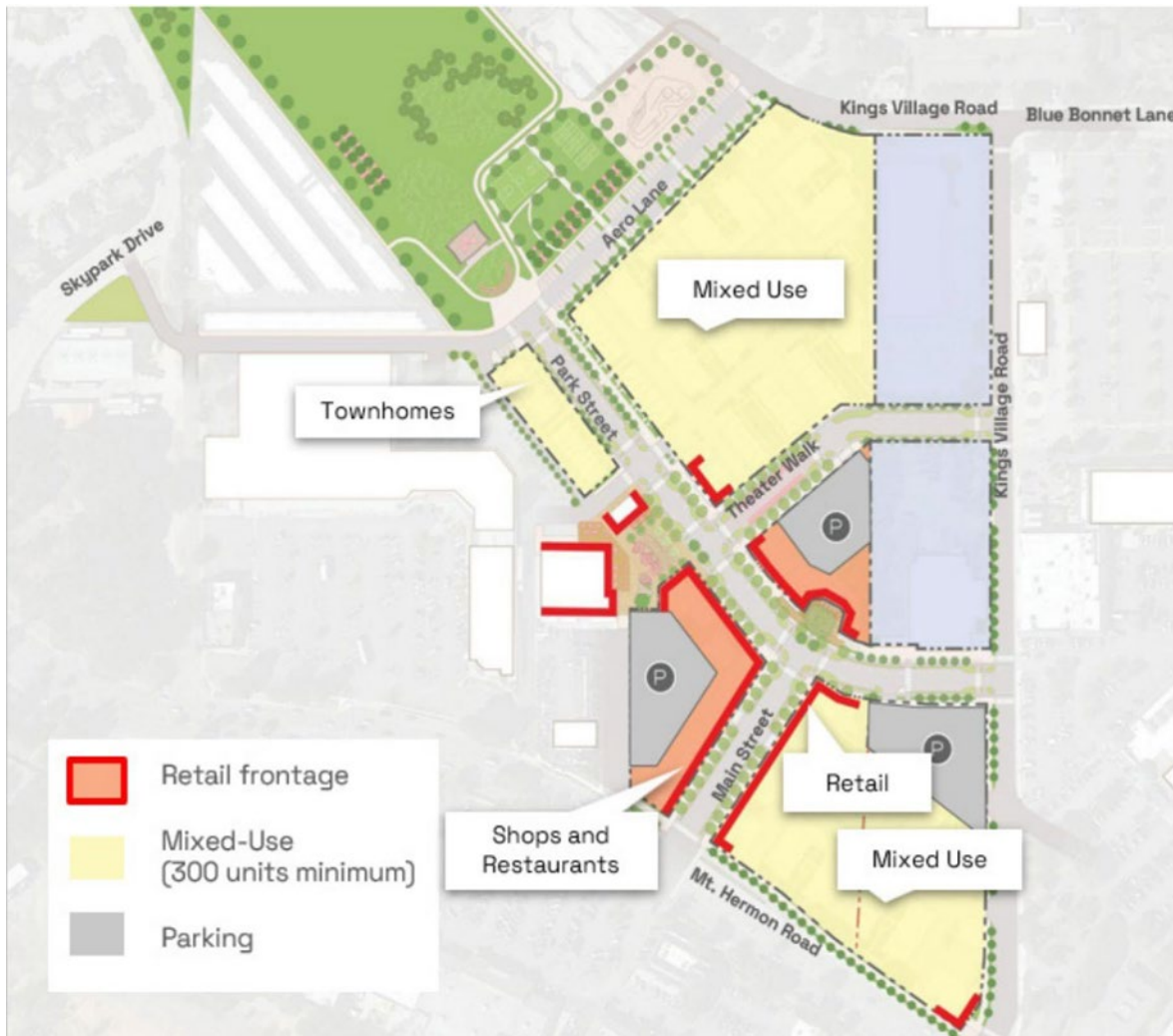
- Appendix A defines each of the allowed land uses in the Specific Plan (per Chapter 3 Table 3-1).
- Appendix B provides a summary of the study of market conditions for future retail development.
- Appendix C analyzes the existing and future traffic operations from a Level of Service (LOS) perspective.

### **Chapter 2: Community Vision & Principles**

Chapter 2 establishes the community's overarching vision and guiding principles for creating a vibrant, pedestrian-oriented downtown that functions as the "Heart of the City." The chapter describes the desired outcome of a mixed-use Town Center that integrates retail, dining, housing, civic uses, and public gathering spaces within a connected and walkable environment. It identifies design objectives and strategies focused on promoting economic vitality, high-quality architecture, diverse housing options, multimodal circulation, and phased, market-feasible implementation. Figure 2.3 in Chapter 2 (shown below) illustrates



the Preferred Conceptual Vision for the Town Center Core:



This chapter also summarizes the public engagement process that informed development of the updated Plan, including community pop-ups, an open house, online surveys, stakeholder interviews, and Council Subcommittee meetings.

### Chapter 3: Land Use and Development Standards

Chapter 3 establishes the regulatory framework to guide development within the Plan Area, providing land use designations, development standards, and objective design standards. The chapter defines land use goals and policies that promote mixed-use development, community connectivity, economic vitality, design quality, and sustainable building practices.

#### *Land Use and Zoning Designations*

Two new land use designations/zones would be created to allow mixed-use development:

- Mixed Use – Town Center (MU-TC), shown in dark purple. This land use designation applies to all five of the vacant, City-owned parcels that comprised the former Skypark Airport, as well as two parcels south of the Post Office. This land use designation is intended to support a pedestrian-friendly mixture of shopping, dining, health and wellness, and residential uses that become a destination at the heart of



Scotts Valley. It accommodates standalone retail, standalone residential, or mixed-use configurations. The ground floors of buildings fronting certain key street segments in the Town Center Core (Main Street, portions of Park Street and Mt Hermon Road) would be required to contain and provide visibility, access and active frontages to support retail and commercial uses.

- Mixed Use – Neighborhood (MU-N), shown in light purple. This land use designation applies to the existing shopping centers in the Plan Area (Target and Nob Hill) as well as the properties containing the mini-storage business, the Cavallero Transit Center, and the vacant land at the corner of Skypark Drive and Mt Hermon Road. It is intended to accommodate the ongoing operations of existing shopping centers while also guiding the potential future redevelopment of these uses into a more mixed and walkable built environment. This land use designation allows standalone retail or office, standalone residential, or mixed-use configurations. Compared to the Town Center, MU-N allows larger commercial uses, and development standards in MU-N permit a somewhat more suburban character compared to the Town Center.

Figure 3.1 in Chapter 3 (shown below) shows the proposed land use designations for the parcels within the Plan Area. Land Use tables are attached to this staff report (in Attachment 1) comparing the land uses permitted under current zoning regulations to the proposed land use regulations in the updated Specific Plan. See Table 3.2 in the draft Plan for details on the allowed densities within each zone (50 du/acre in the MU-TC and 32 du/acre in MU-N).



Existing developments (such as the movie theater, the Scotts Village Shopping Center, and the Cavallaro Transit Center) could expand their existing uses and increase development intensity under the 2025 Plan, or be redeveloped with newly allowed uses. The allocation of future development would be determined by project-specific applications and approvals but would not exceed the total land use buildout evaluated in the EIR.

#### *Development and Design Standards*

There are detailed standards governing height, setbacks, floor area ratios, parking, active frontages, and open space. Objective design standards address building form, massing, circulation, landscaping, lighting, and frontage design to ensure high-quality, human-scaled development consistent with State housing laws and local design expectations. Collectively, these provisions provide a predictable and implementable framework for achieving the Town Center's intended character and functionality. Proposed heights are similar to those allowed under the 2008 Specific Plan – see Table 3.3 in the draft Plan for more detail on allowed heights.

#### Chapter 4: Circulation

Chapter 4 establishes the circulation and public realm framework that will guide the design and function of streets, sidewalks, and public spaces throughout the Plan Area. The chapter defines the Town Center's multimodal circulation system, emphasizing safe, walkable, and interconnected streets that accommodate all modes of travel while reinforcing the area's pedestrian-oriented character. It identifies key street types and provides detailed standards for cross-sections, block lengths, connectivity, and access. Figure 4-2 in Chapter 4 (shown below) illustrates the Public Circulation Network:



### *Core Circulation Streets*

At the heart of the Town Center is a compact, interconnected street network designed to attract and prioritize pedestrians, support multimodal access, and promote vibrant public spaces. The three primary “core circulation streets” — Main Street, Park Street, and Theater Walk — work together to structure the district, define its urban character, and connect its key destinations:

- **Main Street.** Main Street is the front door to the Town Center. It should be designed for slower traffic and include wide sidewalks, street trees, and active storefronts. Outdoor dining and public gathering should be supported through generous pedestrian zones and curb extensions. The preferred design for Main Street is 36 feet from curb-to-curb with two travel lanes and two parking lanes, with a total public ROW width of 63 feet including public sidewalks.
- **Park Street.** Intersecting most of the Town Center Streets, Park Street is the primary spine for the Town Center. Park Street links Skypark to Kings Village Road with Hangar Square and Tower Point plazas. These connections, combined with destination public spaces make this street the social center of the City. Park Street

should be designed for occasional street closures and events, with a strong pedestrian orientation. Park Street may be suitable for traffic calming elements. Park Street will be framed by mixed-use buildings and key public plazas. The preferred design for Park Street is 36 feet from curb-to-curb with two travel lanes and two parking lanes, plus a protected bicycle lane or “cycle track” on either side of the landscape zone for a total public ROW width of 76 feet including public sidewalks. An alternative design for Park Street is the section described above for Main Street. Sidewalks on Park Street shall be at least 13 feet wide to offer a pleasant strolling and shopping experience.

- Theater Walk. This narrower corridor should be lined with a mix of retail and residential frontage and provide space for outdoor seating. The preferred design for Theater Walk is a shared-surface or curbless design, where the roadway is at the same grade (elevation) as the landscaping and sidewalks/pedestrian zones, which would be highly adaptable for closures, public events, and civic life. The public right-of-way width for Theater Walk is 57 feet.

Figures 4.3 - 4.5 in Chapter 4 of the Specific Plan provide typical street section diagrams for the three core circulation streets.

Beyond the Core Streets, an additional street, Aero Lane, is a planned new local connector that frames the southern edge of Skypark, offering low-speed, park-adjacent access for residents and trail users. Aero Lane is designed with perpendicular parking spaces to support use of Skypark as well as provide additional overflow parking for the nearby Town Center shops and restaurants.

#### *Required Roadway Improvements*

The 2025 Plan specifies a new signalized intersection at Main Street and Mt. Hermon Road, which serves as the primary gateway into the Town Center from the regional road network. The intersection would align with an existing driveway access to the Safeway/CVS shopping center across Mt. Hermon Road. This intersection will clearly signal arrival into the Town Center, with design strategies such as high-visibility crosswalks, special paving or signage, and landscape treatments that frame the approach. It will be the most visible point of entry for visitors arriving by vehicle, on foot, or bike, and should reflect the Town Center’s identity and quality of place.

#### *Optional Roadway Improvements*

The 2025 Plan also describes optional future roadway improvements at the Kings Village Road / Mt. Hermon Road intersection to incorporate an additional left turn lane along southbound Kings Village Road turning onto Mt. Hermon Road. The decision whether and when to implement this improvement will be made by the City Council as part of the negotiation or approval of the Development Agreement and during the review/approval of the Planned Development permit process for the Town Center Core.

#### *Pedestrian and Bicycle Improvements*

Chapter 3 includes comprehensive pedestrian and bicycle improvement strategies designed to establish an all-ages-and-abilities active transportation network throughout the Town Center. The Plan requires continuous sidewalks on both sides of all streets, pedestrian

paseos on long blocks, and wide sidewalks with shade trees, furnishings, and outdoor seating to encourage walking and social interaction.

Bicycle infrastructure is integrated into every street type, including protected cycle tracks along Park Street, shared Class III routes on Theater Walk, and buffered lanes connecting to Skypark, Kings Village Road, and Mt. Hermon Road. These facilities are coordinated with the City's Active Transportation Plan to ensure connectivity to regional bikeways and transit.

### *Public Open Space Concept*

Chapter 3 establishes a comprehensive framework for publicly accessible open spaces designed to create a vibrant and cohesive public realm that supports community gathering, recreation, and civic identity.

The Plan identifies two key public plazas – Tower Point Plaza and Hangar Square – as signature destinations within the Town Center. Tower Point Plaza serves as a welcoming gateway and visual landmark, featuring a viewing tower inspired by Scotts Valley's aviation history, event space, and shaded seating. Hangar Square, adjacent to "The Hangar" retail development, is envisioned as the City's main public plaza, accommodating outdoor dining, and family-friendly amenities such as interactive art or water features. Both spaces are required to incorporate shade, furnishings, lighting, and active building frontages to ensure year-round usability and safety.

Beyond the two key plazas, the 2025 Plan outlines standards for publicly accessible open space within the Town Center Core (MU-TC zone) and the surrounding parcels within the Plan Area (MU-N zone), requiring minimum plaza sizes (measured by square footage), tree canopy coverage, accessibility, and visibility from public rights-of-way. All public open spaces must include seating, landscaping, and a mix of sun and shade.

The chapter also calls for strong connections to Skypark, encouraging shared programming such as concerts, farmers markets, and outdoor events to reinforce the Town Center's role as the civic heart of Scotts Valley. The Plan also suggests improvements to Skypark, particularly where it interfaces with the town center, though such planning would be done as a separate effort from the Specific Plan.

### Chapter 6: Implementation

Chapter 6 outlines the framework for implementing the City's vision for the Town Center through coordinated public and private actions. It establishes the administrative, permitting, and development review procedures for projects within the Plan Area, including specific processes for both the City-owned Town Center Core parcels and for privately owned sites.

The chapter details the steps for preparing and negotiating a Development Agreement with a master developer, identifies phasing and infrastructure requirements, and provides an Implementation Action Plan with short- and long-term priorities. The chapter further specifies capital improvements related to circulation, utilities, and public spaces, along with associated timing and responsible parties.

Finally, the chapter presents potential funding mechanisms to support infrastructure and public realm investments. These include an Enhanced Infrastructure Financing District (EIFD), development agreements, and state and federal grants. Collectively, these measures ensure the orderly, feasible, and timely realization of the Town Center consistent with the community's adopted goals and policies.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW (CEQA)**

### **CEQA Process**

CEQA is the State's primary environmental protection and disclosure law and requires that public agencies disclose when a project that would have a physical change on the environment will result in significant environmental impacts. CEQA requires the lead public agency to identify ways to avoid or reduce potential impacts through mitigation measures or alternatives. It does not mandate that projects with significant impacts cannot be approved, but rather that environmental impacts be disclosed, avoided or mitigated where possible, and when impacts are unavoidably significant, that they are considered in the decision-making process, and that the decision-makers go on record with their reason(s) for approving the project despite the significant environmental impacts that would result.

### **EIR Process Undertaken**

CEQA's primary mechanism for analyzing the environmental impacts of a project is the preparation of an Environmental Impact Report (EIR), which is the type of document that was prepared for the 2025 Plan. The EIR is the most extensive, thorough level of environmental review available, and the process which provides for the most public review and participation.

The EIR:

- Discloses information about the effects a project could have on the environment, but NOT that the environment could have on the project.
- Identifies mitigation measures to reduce significant impacts.
- Describes feasible alternatives to the proposed project that are designed to reduce any environmental impacts while achieving identified project objectives.
- The EIR must be certified prior to approval of the Town Center Update.

It is important to note that the information contained in the EIR does not approve or deny a project or a plan, its purpose is to provide information regarding the project's impacts.

### **Key Findings**

The DEIR identified significant or potentially significant effects associated with the Plan's implementation in the following environmental topics: air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, greenhouse gas emissions, noise and vibration, and transportation. The DEIR analyzed 20 environmental subjects, responding to the checklist questions from Appendix G of the CEQA Guidelines to assess impacts for each environmental subject. The impact conclusions are summarized below:



- The DEIR finds no impacts or less than significant impacts through required policies, standards and programs to the following environmental subjects: Aesthetics, Agriculture and Forestry Resources, Energy, Hydrology, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.
- The DEIR finds less than significant impacts with mitigation incorporated into the following environmental subjects: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, and Noise.
- The DEIR finds that the 2025 Plan would produce significant and unavoidable impacts to Greenhouse Gases, even with mitigation incorporated. The DEIR also finds the 2025 Plan would produce significant and unavoidable cumulative impacts to Transportation.
- The City Council would need to reject the environmentally superior alternative and adopt a statement of overriding considerations, supported by substantial evidence in the record to move forward with the 2025 Plan. These are impacts that are commonly generated by major developments of scale in the Bay Area and the impacts are not related to the Plan's location within the City, i.e., this amount of development occurring elsewhere in the City would result in similar impacts due to the magnitude of development, and it is not unusual for city councils to find that specific economic, legal, social, technological, or other benefits, of a proposed project outweigh the unavoidable adverse environmental effects.

## **PUBLIC NOTICE AND COMMENT**

Copies of the DEIR and public hearing notices were posted at City Hall (Planning Department), Scotts Valley Branch Library, and the Senior Center. Written comments for this DEIR will be accepted during the public review period from October 10, 2025, to November 24, 2025. Written comments should be submitted to City of Scotts Valley Planning Department, for the attention of Taylor Bateman ([planningdepartment@scottsvally.gov](mailto:planningdepartment@scottsvally.gov)).

## **NEXT STEPS**

The following list describes the intended timeline and upcoming meetings to adopt the 2025 Plan and certify the accompanying DEIR:

- The public comment period for the DEIR closes on November 24;
- A Planning Commission meeting to provide a recommendation on the 2025 Plan and the EIR is tentatively scheduled for December 4;
- A City Council meeting to consider adoption of the 2025 Plan and certification of the EIR is tentatively scheduled for December 17;
- Follow-up meetings with the Planning Commission and City Council will be held in January 2026 to consider associated ordinances amending the City's General Plan and updating the Zoning Code to align with the 2025 Plan.

## **TABLE OF CONTENTS**

1. Attachment 1: Allowed Land Use Comparison Table
2. Attachment 2: Draft 2025 Specific Plan (<https://www.scottsvally.gov/525/The-Town-Center>)

3. Attachment 3: Public Draft EIR (<https://www.scottsvally.gov/525/The-Town-Center>)



## California Department of Transportation

CALTRANS DISTRICT 5  
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415  
(805) 549-3101 | FAX (805) 549-3329 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



November 24, 2025

SCH #2025050499  
SCR-17-4.096

Taylor Bateman, Community Development Director  
City of Scotts Valley  
1 Civic Center Drive  
Scotts Valley, CA 95066

Dear Taylor Bateman:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) dated October 2025, for the 2025 Scotts Valley Town Center Specific Plan (Plan). The Plan area consists of approximately 58-acres within the City and allows for up to 657 residential units (consistent with the City's 2023-2031 Housing Element); up to 82,000 square feet of commercial uses; and up to 35,000 square feet of public/civic uses. Caltrans offers the following comments in response to the DEIR:

### General Comments:

- Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development. Projects supporting smart growth principles, including improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.

### Traffic Operations and Safety:

- The State Route (SR) 17 and Mt. Hermon Road interchange does not appear to have been included in the DEIR. The additional 657 residential units and additional commercial and public uses will most likely impact this interchange.
- Please indicate how the impacts on the regional transportation network will be mitigated to address safety and operational concerns.

- Any mitigation measures and conditions of approval related to the State Highway System (SHS) should be coordinated with Caltrans. Please contact Caltrans for early coordination.

**System Planning:**

- The Scotts Valley Transit Center is located within the Specific Plan area and the proposed improvements should encourage further usage of that facility.
- Mt. Hermon Road interchange at SR 17 would be the primary egress for this facility. Please coordinate with Caltrans on any impacts to the SHS.

**Permits:**

- Please be aware that if any future work is completed in the State's right-of-way it will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditions and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/programs/traffic-operations/ep>.

Thank you for the opportunity to review and comment on the proposed project. We look forward to continued coordination with the City on this effort. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6555 or [Ingrid.Mcroberts@dot.ca.gov](mailto:Ingrid.Mcroberts@dot.ca.gov)

Sincerely,

*Ingrid McRoberts*

Ingrid McRoberts  
Development Review Coordinator  
District 5, LDR North Branch



State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 Bay Delta Region  
 2825 Cordelia Road, Suite 100  
 Fairfield, CA 94534  
 (707) 428-2002  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



November 18, 2025

Taylor Bateman, Community Development Director  
 City of Scotts Valley  
 1 Civic Center Drive  
 Scotts Valley, CA, 95066  
[Planningdepartment@scottsvally.gov](mailto:Planningdepartment@scottsvally.gov)

Subject: 2025 Scotts Valley Town Center Specific Plan, Draft Environmental Impact Report, SCH No. 2025050499, City of Scotts Valley, Santa Cruz County

Dear Taylor Bateman:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (EIR) from the City of Scotts Valley (City) for the 2025 Scotts Valley Town Center Specific Plan (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup> CDFW previously submitted comments in response to the Notice of Preparation of the draft EIR.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

## CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Taylor Bateman  
 City of Scotts Valley  
 November 18, 2025  
 Page 2

proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

## **REGULATORY REQUIREMENTS**

### **California Endangered Species Act**

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86). CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

### **Lake and Streambed Alteration**

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting rivers, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or

Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 3

floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

### **Migratory Birds and Raptors**

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

### **PROJECT DESCRIPTION SUMMARY**

**Proponent:** City of Scotts Valley

**Objective:** The objective of the Project is to create a vision, policies, and objective standards to guide new development within the Scotts Valley Town Center Specific Plan area (Plan area) in a way that supports existing and new businesses, residents, and the overall community. The Project will allow for up to 657 residential units, up to 82,000 square feet of commercial uses, and up to 35,000 square feet of public/civic uses. The Project will include adoption of amendments to the City's General Plan and Zoning Ordinance, changing certain existing land use designations in the Plan Area, creating new zoning districts, and updating existing or establishing new development standards to replace some of the current zoning provisions applicable to the Plan Area. Primary Project activities include demolition of existing commercial buildings and construction of residential and commercial buildings within the Plan area.

**Location:** The Project is located in the City of Scotts Valley in southeast portion of Skypark, which is now a public park and open space. The Plan area is roughly bound by Blue Bonnet Lane and Kings Village Road to the north, an existing residential neighborhood (Hidden Oaks Condominiums) to the east, Mt. Hermon Road to the south, Skypark Drive to the west, and Skypark to the northwest.

**Timeframe:** 2045

### **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 4

Editorial comments or other suggestions may also be included to improve the document.

## **I. Environmental Setting and Related Impact Shortcoming**

**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?**

### **COMMENT 1: Special-Status Plant Species**

#### **Section 3.4.2.1, Page 94**

**Issue:** The draft EIR proposes to implement General Plan Policy OSC-1.16, which requires new development within areas of native plants to prepare a site-specific survey which identifies the location and type of species present. However, the draft EIR does not specify how surveys will be performed or the level of survey effort to ensure special-status plant species will be detected. Additionally, if any rare plants are found, General Policy OSC-1.16 relies on a biologist to recommend mitigation at a later time and relies on agency requirements, if any. Therefore, the Project has potential to result in significant impacts to rare plants because: 1) Rare plant occurrences may be un-detected and 2) If rare plants are detected, biologist recommended mitigation may not be implemented or sufficient if there are no agency requirements.

**Specific impact, why the impact would occur, and evidence the impact would be significant:** CEQA Guidelines §15125(a) requires an EIR to be based on current, accurate, and site-specific data. Without current surveys, it is foreseeable that project buildout could remove, alter, or fragment remaining microhabitat patches that may still support special-status plant species in the Zayante/Santa Cruz Sandhills and/or Ponderosa Pine habitat.

A reconnaissance-level biological field survey was last conducted in July 2014 outside of the bloom season. Additional botanical surveys are necessary because there is insufficient data to determine whether rare or special-status plants are present within the Project area, surveys did not occur at the appropriate times of year, and surveys were not conducted for a sufficient number of years to detect plants that may not be evident and identifiable every year. Surveys over consecutive seasons may be necessary for annual or short-lived special-status plants to increase the likelihood of detection. Variances in weather and other disturbances from year to year may affect presence or accurate identification of special-status plants on-site.

Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 5

**Recommendation:** CDFW recommends revising the draft EIR to require focused botanical surveys consistent with *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities* (CDFW 2018) including at least two consecutive years of appropriately timed blooming-season surveys prior to any site disturbance or grading.

**Recommended Special-Status Plant Survey BIO-Measure:** An experienced botanist, familiar with the native plant communities of Santa Cruz County, including Zayante/Santa Cruz Sandhills and Ponderosa Pine habitat shall conduct a minimum of two focused rare plant surveys over two consecutive seasons. The surveys shall occur throughout the entire Project area and at each construction site, prior to the initiation of construction. Surveys shall be conducted according to: *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities* (CDFW 2018), available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>. In the event rare, threatened or endangered plants are discovered, If rare or special-status plant(s) cannot be avoided, the Project proponent shall submit to CDFW a rare or special-status plant mitigation plan for CDFW review, comment, and written approval prior to construction. Depending on the site-specific details, additional measures may be needed, which may include work stoppage, flagging and avoidance of occurrences, collection of propagation material, site restoration and/or obtaining an ITP (Fish and Game Code section 2081, subd., (b).).

**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any special identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?**

## **COMMENT 2: Nesting Birds**

### **Section 3.4.2.1, Page 95**

**Issue:** The draft EIR proposes to implement mitigation measure MM-BIO 2.1: Avoid Nesting Birds to mitigate for impacts to nesting birds. The measure does not completely consider all life history timing needs of some bird species potentially impacted by the Project.

**Specific impact, why the impact would occur, and evidence the impact would be significant:** The nesting seasons for passerines (*Passeriformes*), owls (*Strigiformes*), and raptors range from February 15 - August 30, January 15 - September 15, and February 15 - September 15, respectively.

Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 6

**Recommendation 2:** To evaluate and avoid potential impacts to nesting bird species, CDFW recommends incorporating the following mitigation measure into the Project's draft EIR existing measure.

**Recommended Nesting Bird Mitigation Measure:** If Project grading or construction is scheduled to take place between January 15 – September 15, a preconstruction survey of the Project vicinity for nesting birds shall be conducted by a qualified biologist experienced with the nesting behavior of bird species of the region. The survey shall determine if active nests are present within the planned area of disturbance or within 250 feet for passerines, 500 feet for accipiters and 1,000 feet for buteos. The survey shall be performed no more than 7 days prior to the commencement of construction activities, and a second focused survey shall be conducted within 48 hours prior to construction activities that would occur during the nesting/breeding season. If ground disturbance activities are delayed following a survey, then an additional preconstruction survey shall be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities. If a lapse of Project-related activities of seven days or longer occurs, another focused survey will be conducted before Project activities can be reinitiated.

If an active bird nest is found within the survey radii, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. A protective buffer distance shall be established by a qualified biologist based on the site conditions such as whether the nest is in a line of sight of the construction and the sensitivity of the birds nesting. Typical protective buffers are as follows: 1) 250 feet for passerines, 2) 500 feet for accipiters, and 3) 1,000 feet for buteos. No Project personnel or equipment shall be allowed to enter the protective buffer until the qualified biologist determines that the young have fully fledged and will no longer be adversely affected by the Project.

The qualified biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings, and the nest site(s) shall be monitored by the biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by the qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a biological monitor during those periods when construction activities occur near active nest areas to



Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 7

ensure that no inadvertent impacts on these nests occur. All buffers shall be shown on all sets of construction drawings.

**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?**

### **COMMENT 3: San Francisco Dusky-Footed Woodrat**

#### **Section 3.4.2.1, Page 93**

**Issue:** The draft EIR identifies San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) to have “reasonable potential to occur within the Project area” but does not identify species specific surveys, time to dismantle San Francisco dusky-footed woodrat midden or include midden relocations as a minimization measure. The Project has potential to result in significant impacts to San Francisco dusky-footed woodrat without revised mitigation measure(s).

**Specific impact, why the impact would occur, and evidence the impact would be significant:** The San Francisco dusky-footed woodrat is listed as a species of special concern found throughout the San Francisco Bay area in grasslands, scrub, and woodland areas (Hall 1981). The Project site includes oak woodland, riparian, and shrub habitats which provide suitable habitat for this species. The draft EIR does not include species-specific mitigation measures for San Francisco dusky-footed woodrat requiring focused preconstruction surveys, avoidance buffers, or relocation (specific timing, methods, or performance standards).

**Recommendation:** CDFW recommends that if San Francisco dusky-footed woodrat middens cannot be avoided, the middens shall be relocated out of the Project area to minimize impacts to San Francisco dusky-footed woodrat. CDFW also recommends that middens are relocated and/or dismantled during the month of July and August to avoid impacts to young and to allow San Francisco dusky-footed woodrat to store food prior to winter, when food sources are limited.

**Recommended San Francisco Dusky-Footed Woodrat Mitigation Measure:** A pre-construction survey for San Francisco dusky-footed woodrat shall be conducted by a qualified biologist within seven days prior to Project activities. If an active San Francisco dusky-footed woodrat midden is found during surveys, the active midden site shall be designated as “Ecologically Sensitive Areas” (ESA) and protected during Project construction with establishment of flagging or a fence barrier surrounding the nest site. CDFW recommends that the minimum distance of 25 feet is used for the protective buffer protecting the nest. If a San Francisco dusky-footed woodrat midden(s) cannot be avoided, the Project proponent shall submit to CDFW

Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 8

a San Francisco dusky-footed woodrat Midden Relocation Plan for CDFW review, comment, and written approval prior to construction.

**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?**

**COMMENT 4: Mount Hermon June Beetle and Zayante Band-Winged Grasshopper**

**Section 3.4.2.1, Page 76**

**Issue:** The Project site includes areas mapped as Zayante/Santa Cruz Sandhills habitat and mixed woodland that may support Mount Hermon June beetle (*Polyphylla barbata*) and Zayante band-winged grasshopper (*Trimerotropis infantilis*), both of which are federally listed as endangered under the Endangered Species Act. These two insect species are known only from the Zayante/Santa Cruz Sandhills, including adjacent transitional soils in Santa Cruz County. The Project has potential to cause significant impacts to Mount Hermon June beetle and Zayante band-winged grasshopper because it would disturb the sandy soils, mixed woodland, and undeveloped areas that support habitat functions for both species. Although some areas are developed and degraded, the soil remains intact and are important for both of these species as they are restricted to sandy soils (USFWS 1998).

**Specific impact, why the impact would occur, and evidence the impact would be significant:** The draft EIR does not include focused surveys for Mount Hermon June beetle and Zayante band-winged grasshopper. It is unclear if the reconnaissance-level biological field survey conducted in July 2014 followed the USFWS protocol survey methods. The EIR acknowledges that portions of the Project area are mapped as Zayante/Santa Cruz Sandhills habitat and currently developed with soil underlying the developed area that could meet the requirements for Zayante/Santa Cruz Sandhills habitat. Mount Hermon June beetles are fossorial, and individuals may be present year-round (USFWS 2009). Both species are vulnerable to habitat disturbance, including grading, vegetation removal, and soil compaction.

**Recommendation:** A focused protocol-level survey should be conducted during the appropriate activity periods to determine presence or absence. If suitable habitat is confirmed, avoidance and mitigation measures should be developed in coordination with the USFWS.

Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 9

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

## CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alexis Harrison, Environmental Scientist, at (707) 815-2779 or [Alexis.Harrison@wildlife.ca.gov](mailto:Alexis.Harrison@wildlife.ca.gov); or Wesley (Wes) Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or [Wesley.Stokes@wildlife.ca.gov](mailto:Wesley.Stokes@wildlife.ca.gov).

Sincerely,

DocuSigned by:

*Erin Chappell*

B77E9A6211EF486

Erin Chappell  
Regional Manager  
Bay Delta Region

ec: Office of Land Use and Climate Innovation (SCH No. 2025050499)  
Craig Weightman, CDFW Bay Delta Region – [Craig.Weightman@wildlife.ca.gov](mailto:Craig.Weightman@wildlife.ca.gov)

Taylor Bateman  
City of Scotts Valley  
November 18, 2025  
Page 10

## REFERENCES

- California Department of Fish and Wildlife (CDFW). 2024. *Special Animals List*. California Natural Diversity Database (CNDDDB).
- Carraway, L. N., and B. J. Verts. 1991. *Neotoma fuscipes*. Mammalian Species 386:1-10.
- Hall, E.R. 1981. Mammals of North America. John Wiley and Sons, 1181 pp.
- [USFWS] U.S. Fish and Wildlife Service. 1997. Determination of Endangered Status for Two Insects from the Santa Cruz Mountains of California. Federal Register 62:3616–3628.
- [USFWS] U.S. Fish and Wildlife Service. 1998. Recovery Plan for Insect and Plant Taxa from the Santa Cruz Mountains of California. Portland, Oregon. 83 pp.
- [USFWS] U.S. Fish and Wildlife Service. 2009. Zayante band-winged grasshopper (*Trimerotropis infantilis*) and Mount Hermon June beetle (*Polyphylla barbata*) 5-Year Review: Summary and Evaluation. 33 pp.
- U.S. Fish and Wildlife Service. 2020. Endangered and Threatened Wildlife and Plants; Initiation of 5-Year Status Reviews of 66 Species in California and Nevada. Federal Register 85:4692–4694.
- [USFWS] U.S. Fish and Wildlife Service. 2021. Zayante band-winged grasshopper (*Trimerotropis infantilis*) and Mount Hermon June beetle (*Polyphylla barbata*) 5-Year Review: Summary and Evaluation.

To: Taylor Bateman, Community Development Director  
planningdepartment@scottsvally.gov  
Date: November 24, 2025  
Re: Scotts Valley Town Center Specific Plan Update – Draft Environmental Impact Report

Dear Director Bateman,

On behalf of Santa Cruz YIMBY, thank you for the opportunity to comment on the City of Scotts Valley's ongoing Housing Element implementation efforts, including the rezonings tied to the Housing Element and the Town Center Specific Plan Update.

**1. The City continues to undercount the amount of housing it must plan for under its certified Housing Element.**

As we described in our prior comments on the Town Center EIR NOP, the City's current Rezone Program and Specific Plan work continue to rely on **unit counts that are substantially below** what the Housing Element itself requires. In the Housing Element, the City clearly committed to both:

1. **Implementing Program H-1.1**, which requires adopting a Specific Plan amendment that supports the full buildout scale in Appendix F; and
2. **Implementing Program H-1.10**, which requires the three City-owned Town Center parcels—APNs 022-721-06, 022-212-19, and 022-601-01—to be declared surplus and developed as a mixed-use project **with a minimum of 300 residential units**, at least 25% affordable, with the City expressing its intent that these parcels be 100% affordable.

Our previous comments explained that the City's use of a "realistic capacity" figure of 188 units on these three parcels is inconsistent with its own Housing Element. Program H-1.10 makes clear that **300 units is the minimum**, not 188. And the 100% density-based capacity in Appendix F yields **235 units**, not 188. When all Town Center parcels are evaluated at 100% capacity—as required for consistency—the total is **898 units**, increasing to **963 units** when the additional Program H-1.10 requirement is applied (the additional 65 units reflects the gap between 300 committed units and the 235 in Appendix F).

Given this statutory and internal inconsistency, we reiterate: **The City must plan, analyze, and zone for the actual level of housing capacity its Housing Element already obligates it to accommodate.** Continuing to plan for sub-capacity figures

would render subsequent rezonings and the Specific Plan non-compliant with state law and expose the City to substantial legal risk.

## **2. The City should treat all Housing Element–related rezonings as CEQA-exempt under the new statewide rezoning exemption enacted in SB 131 (2025).**

The Legislature adopted SB 131 earlier this year to eliminate unnecessary procedural barriers that historically delayed implementation of certified Housing Elements. SB 131 creates a **statutory CEQA exemption for rezonings that jurisdictions are required to adopt to implement their Housing Elements**, provided they meet the statute’s procedural conditions.

Under SB 131:

- Rezoning actions required by a certified Housing Element—including density increases, height increases, mixed-use allowances, and objective standards necessary to make Housing Element sites viable—
- **are categorically exempt from CEQA;**
- No EIR, MND, or addendum is required;
- The exemption applies to rezonings adopted to meet statutory rezoning deadlines or Housing Element implementation programs.

Scotts Valley’s Housing Element explicitly relies on Town Center rezonings, increased densities, and new mixed-use allowances to meet its RHNA allocation. These rezonings are not discretionary “optional” legislative actions—they are **mandated** by Government Code §§ 65583, 65583.2, and the certified Housing Element itself.

Accordingly:**All Housing Element–required rezonings—whether inside the Town Center Specific Plan area or citywide—qualify for the CEQA exemption under SB 131.**

The City should acknowledge this exemption publicly and apply it consistently to expedite timely Housing Element implementation. Conducting unnecessary CEQA review for mandated rezonings is not only unnecessary, but risks delaying compliance with the City’s committed program deadlines. It opens the door for delays if the EIR for the housing component of the rezoning is challenged.

### **3. Scotts Valley should evaluate higher housing capacity broadly across the Town Center.**

Our earlier letter also documented that the Town Center Planning Area is significantly underutilized relative to its development potential. The approximately 15 acres of centrally located vacant land could, on their own, support **600+ units**, and the full 58-acre area could support **well over 1,000 units** at modest urban infill densities.

This is especially critical given that Scotts Valley lies within one of the highest-cost rental markets in the nation. Under-planning in the Town Center would directly undermine Housing Element compliance, future RHNA cycles, and the City's progress toward fulfilling its state-mandated duty to accommodate its share of regional housing needs.

**In conclusion**, we respectfully request that Scotts Valley:

1. **Correct the unit-count methodology** used for Town Center and other Housing Element sites, ensuring that rezoning reflects the actual capacity required by Programs H-1.1 and H-1.10;
2. **Acknowledge and apply the CEQA exemption** for Housing Element-required rezonings under SB 131 to avoid unnecessary environmental review and delays; and
3. **Plan for significantly higher capacity** in the Town Center area, consistent with both state law and the City's own Housing Element commitments.

Thank you for your attention and for the opportunity to provide comments.

Sincerely,

Rafa Sonnenfeld  
Janine Roeth  
Ryan Meckel  
Jocelyn Wolf

Leads, Santa Cruz YIMBY

October 23, 2025,  
Updated November 24<sup>th</sup>, 2025

To: Planning Commission and City Council  
From: Corbett Wright

## **SVTC Specific Plan Comments**

### **Chapter 3. Approved Uses**

The stated goal of the specific plan is to allow the phased construction within the plan build out. This could include multiple developers vs a single developer. Therefore, the City must retain approvals as to the Tenant and use Mix or else the standards as proposed will not provide adequate parking. The concept of making it easier for the development of the specific plan to move forward without additional approvals is fine, with appropriate guardrails.

For example, a max density of 30% percent restaurants would not require a CUP, anything beyond that would require a CUP. This only works with a minimum 4.5/1000 ratio though.

**Case Study of Issue.** 1420, 1430, and 1440, 41<sup>st</sup> Ave. Different owners. Common parking at 3.5/1000. Second generation space; a health and wellness use, (yoga) and an intense Verizon wireless were placed into 1430. The uses take up nearly all of the common parking. The building located at 1420 has had chronic vacancy. The building located at 1440, has been vacant for years. There is no parking.

**Case Study of Issue.** Hangar. Use within the parking lot works, (sort of – there are issues), with 4.5/1000 parking on gross, effective 7.82/1000 on food use on gross, with corresponds to 10/1000 on service area, with restrictions on employee parking, with a dynamic mixture of uses precisely because the lease regulates the hours of operation. For example, Madabolic, a health and wellness use, (which as prosed in the specific plan as an unregulated approved general use) can only be included in the tenant mix because of the restrictions. There was a CUP required for Madabolic.

Without restrictions, the use could easily take a disproportionate amount of the parking, which would damage the interests of the surrounding uses.

Without restrictions of approved uses at the city level, there would be no control over the mix of tenancy within the specific plan. This could be even more acute on second generation space. Therefore, there must be changes, guardrails, put in place or existing



parking will be cannibalized, tenants will be damaged economically, buildings will sit vacant, or simply never be constructed because the design is not financially feasible.

### **Chapter 3.**

#### **1. Pg. 7 Approved Uses**

| <b>Use</b>           | <b>MU-TC</b>              | <b>PU-N</b>               |
|----------------------|---------------------------|---------------------------|
|                      |                           |                           |
| Restaurants*         | Over 30% max density -CUP | Over 30% max density -CUP |
| Banks and Financial  | P                         | P                         |
| Commercial Daycare   | P or CUP                  | P or CUP                  |
| Food Prep/Catering   | P with Related Restaurant | P with related Restaurant |
| Medical/Dental       | CUP                       | CUP                       |
| Massage              | P – with Hotel            | P – with Hotel            |
| Theater Live         | CUP                       | CUP                       |
| Theater Movie        | CUP                       | CUP                       |
| Health and Wellness* | CUP                       | CUP                       |
|                      |                           |                           |

Note:

\*What about entertainment permits? The inclusion of 100% restaurant approval would be a disaster for parking and competition. It is not a sustainable model

\*\*Use not defined on Appendix A

2. Page 13. SFD, Attached, TH Density should be excluded from SVTC. The town center is where density should be approved. The lesser density residential uses should be excluded or severely limited to a max 10% or similar density. This inclusion of higher density would allow for more open space and more parking, both public and servicing the commercial. This is the main design issue for the specific plan model proposed by Good Cities. The plan tries to cut back on parking and open space, so that lesser density housing can use more of the site. This does not serve the interest of the public.
3. Page. 17. All Minimum setbacks should be 15'-20'. Future Internal Connections of 8' is ridiculous. Can you imagine a 8' setback for a town house off of the Laughing Monk Parking area? This is where amplified music is being played at night under the CUP/entertainment permit. The current plan shows a row of townhouses that are 50' +/- from the current live music location.
4. Page 18. No Zero Lot lines permitted at side interior. This could potentially place a TH on the lot line next to the Laughing Monk Parking Lot. This should be prohibited. It prevents adequate landscape.
5. Page 19. Parking

General Comment. A maximum parking within the commercial district should have posted regulation of 2 hour maximum guideline.

- a. 3.5/1000 ratio **should be increased to a minimum of 4.5/1000**
  - b. 10/1000 sf good for seating area
  - c. Office 4/1000 minimum, including 2<sup>nd</sup> story. Office that is not properly parked should not be built. This is designing in a parking problem. The current office vacancy rate is **32.8%** in the scotts valley submarket. Adding office parked at 2/1000 will lead to more vacancy.
  - d. Standard 2. Sharing of Public/Private should be prohibited. On-Street Parking should absolutely not be counted in the commercial parking requirements. If any consideration is given, a max 50% should be allotted as credit, and that is only if the public parking is expanded. There is not enough parking at sky park now. If this standard is allowed, then the public frequenting sky park will take the commercial parking, and the commercial uses will not be successful.
  - e. Standard 3. Ratio. 4.5/1000 minimum. Proximity of Parking to Commercial facility entrance **should be 150' maximum**. **The definition should include all parking spaces attributed to the approved use, not just the entry of the parking lot.**
  - f. Each and every project, every building, ever building permit must be approved by a stand alone parking analysis or a documented shared parking program Agreement.
6. Page 46. Add new Standard. Garbage Enclosures should be integrated into the individual building design vs freestanding in parking lot. Service roads will need to be wide enough to accommodate trash vehicles. Current design does not illustrate wide enough ingress/egress/circulation and can not be constructed as illustrated.
  7. Page 20. 3.5.1. Item #3. Reduce to 40.' Provide flexibility.
  8. Page 22. 3.6.1. MU-N zone Modifications and improvement to and existing building should not be an approval of a change in use.
  9. Page 22. Under no circumstances should minor exceptions to standards include a reduction to parking ratios and proximity.
  10. Page 33. Item 7. B. Please consider reducing the height of tree requirement from 20" down to 15'. This improves retail visibility. Retail that can not be seen is not successful.
  11. Page 34. Item 4. Should be required. Where there are multiple adjacent parking lots, they should be designed to have vehicular connectivity, both entries and exits, to adjacent parking lots. Suggested to redraft language to include all new major roadways, excluding new curb cuts to Mt. Hermon.

Note. Chapter 2. Figure 2.1 illustrates connectivity from hangar parking lot to main street.

#### **Chapter 4.**

1. 4.7.1. Item 2. Strike item, and require a minimum of 15,500 sf. with a minimum of 12,000 sf at Hangar Plaza as currently shown on figure 4.9. and a minimum of 3,500 sf at Tower plaza. These are absolute minimums. There should be more open space on plazas. Why trade townhomes for public open space? Not in the public's interest.
2. Sidewalk - pedestrian friendly design should be encouraged. A minimum of 20' walkway standard should be preserved around the buildings on the Plaza(s).
3. The 3,500 sf tower plaza should not be decreased in size by the public walkway. It should be a **net** minimum. Really it is too small...

4. Page 105. "*Hangar Square is intended to be the main plaza for Scotts Valley.*" It is simply too small as designed. Minimum plaza area 12,000 sf. net of all dining space. Standard 4. Strike. Plaza Space. The restaurants on the plaza should be designed to include seating area for adjacent restaurants, but the Plaza should not be reduced in size by the encroachment of the individual restaurants. Cohesion yes. But inclusion of the patio dining should not reduce the public space minimum requirements.

The actual effective size of the plaza is far less than the proposed is 9,000 sf. With the removal of 15' for dining on both sides of the plaza, 2,900 – 3,000 sf total, the plaza is only 6,000 sf. This is not large enough to accommodate any of the envisioned public gatherings.

NOTE: The hangar building provides it's own private patio space. Why should the new project skimp on open space? To provide for townhomes? SVTC needs more work force housing, apartments, not more single family.

5. Page 105 Guidelines: Use of tree canopy should not impede vision of storefront retail signage.
6. Page 106. Top image. Building to the north boundary. +/- 3,500 sf free standing. Bottom line is that that building can not be parked without the removal of the Town House residential to the north with a parking field installed in it's place. The building as represented has no parking lot. This use as shown is a restaurant with 10/1000 sf for dining and 2.5/1000 sf back of house. Minimum parking would require 28 parking spaces for that building alone. This is excluding the patio dining in front of the building. It is disingenuous to represent to the public a building that can not be

built. **Remove the town Homes and replace with a parking lot. It does no good to design inadequate parking that puts the Hangar tenants out of business.**

Note:

1. The circulation as proposed can not be constructed. There is a private open space patio in front of penny ice cream that is existing. It will not be removed. The illustrated plan should include circulation that is buildable.
2. The design of the square should not negatively impact the east elevation of the Hangar Building. Nearly the entire Hangar building mass is blocked from Park Street. The south building should be moved south, such that the entrance of the massing frames the Hangar Building, with an alignment matching the Hangar Building south façade. Meaning move it back 30' and increase the size of the Hangar Plaza to 12,000 sf minimum.

#### **Appendix C: Traffic: Hexagon Report dated October 1, 2025**

**Improvements to proposed intersections 3 & 4** are critical to avoiding undesired internal (service road and parking lot cross traffic) as well as sending increased traffic up Blue Bonnet/Bean Creek.

1. Figure 14. Intersection: Main St. @ Mt. Hermon. Please consider additional Direction. Exit from Main Street to Mt. Hermon.  
Options:
  - a. Add a lane. Rt, ST/LT, LT
  - b. RT/ST/LT, LT – as discussed. This is probably the best balanced solution.**
2. Figure 15. Great design. Please consider extending stacking lanes north to the entrance of the Post Office/Kings Village intersection.

#### **Figure 8 & 9.**

Intersection 2. The additional of 2 SB Trips onto Mt. Hermon might not be accurate, and should be reconsidered. Related Table 5. This indicates that the traffic will actually be improved by the addition of the town center. Please reconsider.

#### **Internal Circulation Reliance.**

The report and design seems to include the reliance on the service ally located between the Hangar and Target Center. Please note that this ally is frequently impacted by

truck/delivery, and trash pick up, which frequently blocks the traffic flow entirely. Any reliance on this internal parking lot connection without planning for peak flow to Main street and King's village is not accurate. Please reconsider impact assumptions.

Robert Gibbs Analysis in Appendix B is so outdated it is no longer accurate. Not that it was accurate in the first place. The report provides little to no benefit and should be excluded from the TCSP references.

There is currently over 20,000 sf of retail that is vacant in the scotts valley submarket.

There is vacant retail that there are no tenants for because it is underparked.

There is vacant restaurant space that there are no tenants for because it is underparked.

Yes, the town center can support more highly curated, experiential related shopping and dining, but it is not accurate to indicate that the market is deep, and providing an out dated, unrealistic market analysis to the public should not be included because it provides a false sense of lease ability.

The only way that the town center commercial will be built is if it is adequately designed. Parking, Circulation, open space, mix, cross traffic with detailed highly curated intent; design that will not fail because it will generate the sales per foot in order to be successful.

Without exceeding the minimum standards demonstrated in successful project examples, the town center will fail or simply never be built.

## **EIR.**

Hexagon.Figure 2. Existing Public Street Network. Coding in yellow showing internal streets is not accurate. Not all yellow is public.

Page 7. Identified Banks. But it is an excluded use?

Implementation:

Construction Management plan that does not put existing Tenants out of business should be part of all future approvals.

### **Current Conceptual Design Analysis:**

1. New Parking lot near hangar, supports only 42 spaces max vs 60 as shown. No landscape on western boundary, easement not plotted correctly, no handicap, no EV charging, not enough trash enclosure. Acute Radius does not work for truck delivery or trash pickup. *Supports 9,300 sf @ 4.5/1000*
2. Lot near post office. 33 existing spaces are to be shared with post office vs 45, plus 12 on street, as shown. 57 in count but only 24 new. No landscape on western boundary, easement not plotted correctly, no handicap, no EV charging, not enough trash enclosure. Acute Radius does not work for truck delivery or trash pickup. *Supports 5,300 sf @ 4.5/1000.*
3. New lot behind tower supports only 28 spaces vs 36 as shown. No landscape on east, no handicap, no EV charging, no trash closure. Acute Radius Doesn't work for truck delivery or trash pickup. *Supports, 6,200 sf @ 4.5/1000*

**Current Design Parking Totals:** The Current Layout only supports a Total sf. 25,111 sf with 113 spaces vs the actual 28,725 sf as illustrated on the plan which requires 130 minimum. However, that is with the following assumptions:

- zero shared public private, and
- adequate guest parking on residential parcels, and
- at 30% max restaurant density.

### **Minimum Parking Changes Suggested:**

1. **Commercial:** 4.5/1000 minimum commercial parking with maximum restaurant at 30% with all parking in close proximity. (preferably including of the ***Parking Ratio/Mix Schedule***. please see below)

Solution: CUP governance of increase beyond 30% max restaurant space to increase parking ratio.

2. **Guest Parking for Residential:**

Solution: 100% Guest Parking on-site within the residential. Existing City of Scotts Valley Guest Parking standard should be maintained.

3. **Inadequate Public Parking:**

Solution: Add a parking garage at the metro site as a requirement of the specific plan.

4. **Effective Commercial Parking Proximity:** all parking count, per the approved schedule, to be within 150' radius maximum of business entry.

### **Parking Ratio/Mix Schedule**

Please consider regulating the specific plan as the Parking Ratio must match relative intensity of restaurant space as follows:

- At 30% max restaurants 4.5 with Optimal mix
- At 40% max restaurants 5.5 with Optimal mix
- At 50% max restaurants 6.5 with Optimal mix

**Optimal Mix:** a dynamic mixture of food service boutiques, cafes, and restaurants, which have diverse peak parking requirements (Breakfast, Lunch, Dinner) This concept should be used by the PC/CC in the parking study analysis for all future CUPs.

For example: With 113 parking stalls shown on the current plan with current restaurant/café design as shown at 50% max restaurant use, the maximum buildable commercial sf would be 17,380 sf

Or roughly 40% fewer commercial buildings than currently shown.

In other words, there is 40% less parking than needed for the project to be *minimally* successful. Importantly, this is with zero shared public/private parking.

If shared parking is allowed as currently proposed in the specific plan guidelines, then the project as shown is 50% under parked.

### **Existing Parking:**

None of the existing sky park parking should be used to support the new town center commercial. There isn't enough public parking as it is to support existing skypark events.

Please consider adding a parking garage to the metro lot as a specific requirement of the Specific Plan.

### Outdoor Dining Space:

In the restaurant guest dining space, there is no provision for the consideration of the total outdoor dining space in the parking ratio analysis. The specification is 10/1000 for indoor dining only. Meaning, this current plan is further deficient by the outdoor patio space shown at 10/1000.

There is nearly 5,000 sf of patio shown as dining area. That is another 50 parking stalls.

### **Shared Parking Condition of Approval:**

The Hangar development has a condition of approval which was intended “...to assist in the future of an orderly development of the town center specific plan core.”

*“The property owner shall work with the City and future town center developers on a shared parking program when development of the town center core area occurs.”*

This statement does not provide the City of Scotts Valley the right to design a specific plan that has a structural parking deficiency which cannibalizes the Hangar project parking.

The Hangar is parked at 4.66/1000. The Specific Plan should maintain this as an absolute minimum design standard with a 30% restaurant mix.

The City should seek to exceed the design standards so that the commercial within the core can generate the per sf sales required to support the high cost and maintenance of new construction, or else the project will simply yet again, not be built, or worse yet, have the commercial portion of the project be an economic failure because that which was not economically feasible was subsidized by the townhomes, “just to get it built.” This does not serve the Citizens interests.



King's Village Shopping Center  
230 Mt. Hermon Road #200  
Scotts Valley, CA 95066

November 19, 2025

City of Scotts Valley Planning Department  
Attention: Taylor Bateman  
1 Civic Center Drive, Scotts Valley, CA 95066  
Email: [planningdepartment@scottsvally.gov](mailto:planningdepartment@scottsvally.gov)

Re: 2025 Scotts Valley Town Center Specific Plan

Dear Scotts Valley Planning Commission,

We are writing regarding the draft 2025 Scotts Valley Town Center Specific Plan and EIR. We are the owners and operators of King's Village Shopping Center, which is Scotts Valley's longtime retail anchor and within the Specific Plan's boundaries. We are, and have been for decades, greatly supportive of the City's attempts to modernize the City's zoning and planning codes to help get the Town Center developed. With our many decades of commercial real estate experience in Scotts Valley and the local community, we write to respectfully request some edits to the Specific Plan to help improve it. Most of our requests fall within two major categories: please (1) make the Specific Plan sufficiently flexible to be a valuable document for the Town Center for many decades to come and (2) revise provisions that needlessly make development more expensive, making the desired Town Center less likely to be built.

As longtime commercial real estate professionals, we have seen many changes in commercial real estate uses and trends over the years. Commercial uses have changed drastically due to the decline in brick-and-mortar retail, rise of Amazon and e-commerce, ability to work remotely, and increased popularity in fitness and service related uses. One thing we have learned is that change is constant. Please allow the Specific Plan to be nimble enough to accommodate whatever changes come, even (perhaps, especially) the ones we cannot predict. Please change the General Land Use Standards in the Specific Plan to be inclusive instead of exclusive. Please remove "All uses not permitted by right or CUP are prohibited." Please make more uses permitted by right; uses that are not permitted by right should be permitted by CUP. If a future planning department or city council believes that a use is appropriate for the Town Center area, it should be allowed by CUP rather than banned by a document that may be decades old. Specifically, for the Neighborhood Mixed Use district please make Night Clubs allowable by CUP, Bars, Tasting Rooms Tap Houses and Taverns Permitted (not CUP), Boutique Alcohol Sales Store Permitted (not CUP), Commercial Cannabis Business CUP, Auto and Light Truck CUP (like a small Rivian Dealership, not just a tiny showroom), grandfather existing Drive Through facilities so they do not have to be removed even if the tenant changes; it is safer/more healthy for sick patients to pick up prescriptions at Walgreens via the drive through; Laboratories (Restricted R&D) make CUP, Warehousing and Logistics CUP, minor repair and maintenance CUP, vehicle rental (not including onsite fleet) should be permitted, hostels should be CUP, SRO should be P or at minimum CUP, Wireless Telecommunication Facilities should be Permitted.

Many of the "active retail uses" that are required on the ground floor of the Town Center Core (like hot yoga, Pilates, coffee shops, bars, etc.), have real world parking needs that far exceed the required 3.5 spaces per 1,000sf, especially if street parking is allowed to be counted towards the total. Further, the customers of these active retail businesses should have access to parking within close proximity. The real world parking needs and location of the provided parking must be considered or the customers of the active retail businesses will try and poach parking at neighboring properties with more parking.

We also believe that there should be more flexibility in possible residential redevelopment projects within the Neighborhood Mixed Use area. Please allow for more density in the Neighborhood Mixed Use district; the density range of 20-32 units per acre is too narrow and provides little flexibility to adapt to the needs of the community and market conditions. Make density 15-50 units per acre and adjust the commercial floor area maximum to 2.5 accordingly. We

have seen narrow development standards like these stymie projects that communities want because old specific plans were not flexible and didn't foresee what would be wanted and needed in the future. Also, please allow more broad building heights and don't rely on state law to supersede local height limits. Increase the current height limit to 60 feet (this may be desired 20+ years from now). Similarly, allow more flexibility and eliminate the maximum 20 foot setback from Kings Village Road (it may be desired to have buildings farther from the street; especially with 1,000+ new residents making the street busier). Likewise, please make the parking requirements for residential development more flexible; 20+ years from now car ownership could be very different than it is today.

We also respectfully request that any new public art program only apply to the development of new buildings. Any such public art program should be able to be satisfied via a project's own inclusion of art that meets certain basic requirements or by paying a reasonable fee (under .5% of the development cost). Existing buildings, especially those in shopping centers like King's Village, which have numerous large scale murals, should not be forced to deal with significant expenses when making repairs or upgrades for new or existing local businesses.

We also ask that the Specific Plan specify that property owners of existing buildings shall not be charged any fees, taxes, or be forced into a Property and Business Improvement District (or any similar association or improvement districts) for Town Center related improvements; especially infrastructure improvements. Existing property owners have already paid impact fees and constructed the necessary infrastructure for their properties so the responsibility for new infrastructure and improvements should be the sole responsibility of the Town Center core developers.

Please have the Specific Plan specify that any redevelopment of the METRO site will have to honor its agreement with the Ow Family and provide as much accessible parking as is currently provided. We have partnered with the City and other local governmental agencies for many, many years and we would like our cooperative relationship to be respected and upheld.

Thank you all so much for your hard work on this very important document, which has the ability to make or break Town Center development and city prosperity for future generations. Please ensure that the Specific Plan has the requisite flexibility to ensure it's beneficial to the community for many decades. We really appreciate your service to this great City!

Sincerely,

George Ow, Jr.; David Ow; Terry Ow; Karen Ow; William Ow; Jasmine Ow-Hurst; Matthew Turner; Benjamin Ow; Andrew Ow; and Kyle Winterhalder on behalf of  
King's Village Shopping Center

CC: [citycouncil@scottsvally.gov](mailto:citycouncil@scottsvally.gov); [mlagoe@scottsvally.gov](mailto:mlagoe@scottsvally.gov)

19 November 2025

SCOTTS VALLEY PLANNING DEPARTMENT

Attention: Taylor Bateman  
City of Scotts Valley  
1 Civic Center Drive  
Scotts Valley, CA 95066

RE: 11/20 Planning Commission study session to provide input and comments on the Public Draft 2025 Scotts Valley Town Center Specific Plan and Draft Environmental Impact Report (DEIR).

Dear Mr. Bateman:

Scotts Valley Shopping Center, LLC (dba TRC) is the owner of two parcels located at 232 Mt. Hermon Road (APN 022-601-02) and 201 Kings Village Road (APN 022-601-04) in Scotts Valley (see Exhibit A). TRC owns and manages more than 37 retail centers throughout California, as well as in Colorado and Texas. Our portfolio is primarily comprised of grocery-anchored, daily-needs shopping centers.



232 Mt. Hermon Road (APN 022-601-02)



201 Kings Village Road (APN 022-601-04)

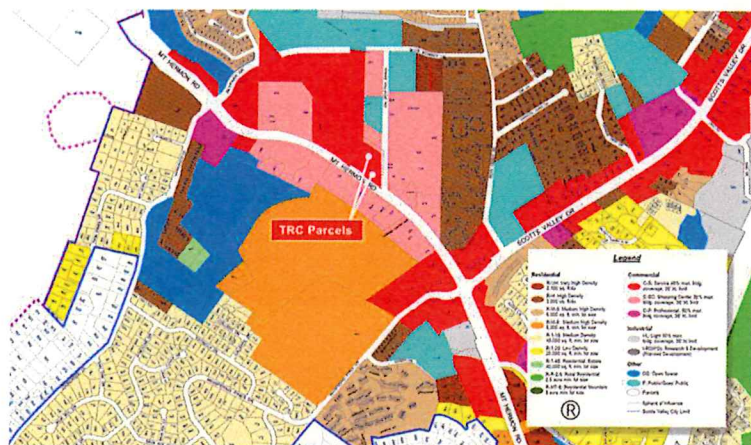
**Exhibit A**

Regarding the Planning Commission's November 20 Study Session of the draft Scotts Valley Town Center Specific Plan, TRC has appreciated the direct outreach of City Manager Mali LaGoe over the last several months concerning the strategic importance of the TRC parcels to the Specific Plan. Our discussions about planning options for the parcels within the context of the Specific Plan have been positive, and we agree that the TRC parcels will play an important role in activating the Town Center as a "mixed-use district that will become the heart of the city."

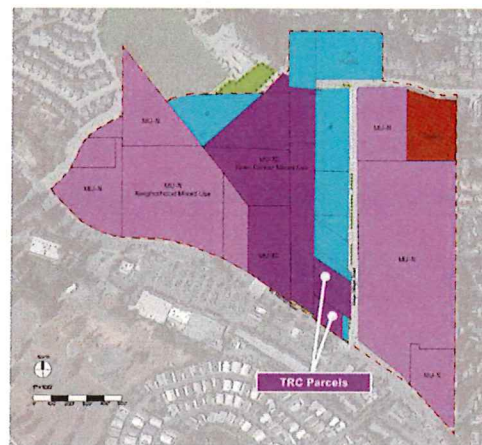
While we continue to carefully evaluate the draft Specific Plan against our long-term objectives for the TRC parcels, it's important we immediately share with the Planning Commission and Staff our concerns related to the proposed Land Use Standards in Section 3.3 of the proposed Specific Plan.



The TRC parcels – approximately 1.81 acres combined - are currently within the C-S Service Commercial Zoning District as designated on the City's Official Zoning Map (SVMC 17.06.030 and 17.08.010). Under the proposed Specific Plan, the TRC parcels would be zoned Mixed Use – Town Center (MU-TC) (See Exhibit B).



Existing C-S Zoning – TRC Parcels



Proposed MU-TC Zoning - TRC Parcels

#### Exhibit B

While we support the MU-TC zoning for the TRC parcels, we are very concerned that certain allowable uses within the existing C-S Zone are proposed to be excluded or eliminated as permitted and/or conditionally permitted uses in the MU-TC Zone. Specifically, if adopted as proposed, Banks/Financial Institutions will be prohibited uses in the MU-TC Zone, while drive-through ATM services will remain prohibited in both the MU-TC and MU-N Zones.

We would suggest that prohibiting such fundamentally important uses from the Town Center core of the Specific Plan undermines several important stated Land use Goals and Policies within the draft Specific Plan, including:

- Policy 3-1.1: Ensure that development within the Town Center supports a balanced mix of community serving commercial uses, new housing, civic/public buildings, and community-serving spaces.
- Policy 3-1.4: Prioritize land uses such as retail, dining, health and wellness entertainment, and civic spaces in the Town Center, in order to create a dynamic environment that fosters community engagement and supports a diverse mix of activities.
- Policy 3-3.1: Implement a market-viable strategy that attracts private sector investment, providing incentives and ensuring the economic sustainability of the Town Center.

Banking and financial services combined with daily-need grocery uses are the primary anchors of successful commercial retail development. When strategically sited on the edges of a large mixed-use planning area with high visibility and easy access, these uses enable resident- and visitor-serving daily commerce more accessible to pedestrian and bicycle traffic.

MR. TAYLOR BATEMAN

Page three

As such, they impose fewer impacts on the lower-intensity, residential core at the center of the mixed-use planning area. Their attendant drive-thru ATM facilities support pass-by trips of residents and workers commuting to or from their residence or place of work.

In the instance of the TRC parcels, their location on the hard corner of Mt. Hermon Road and Kings Village Road will serve as a principal gateway to the Scotts Valley Town Center. As important, the TRC parcels developed to their highest and best use(s) will provide an important transition between the more intensive existing retail uses of the proposed Mixed Use – Neighborhood (MU-N) Zone and the more residential, pedestrian centric character of the MU-TC Zone.

TRC has been working through site planning concepts for a small-format neighborhood grocer as the highest and best primary use for the TRC parcels. But it remains unclear to us that the key players in the small-format grocery space see a primary market in Scotts Valley. Having the option to develop the site with a Bank or other Financial Services w/ ATM drive-through uses represents the best commercial retail alternative for easy pedestrian and bicycle, and pass-by trip access to daily financial services for residents and business owners of the Town Center Core.

Given our comments, we respectfully request the city consider the following options:

- Permit Banks and Financial Institutions w/ ATM drive-throughs in the MU-TC Zone
- Allow conditionally permitted (CUP) Banks and Financial Institution w/ ATM drive-throughs in the MU-TC Zone
- Stipulate by footnote in the Specific Plan that Banks and Financial Institutions with ATM drive-throughs are permitted uses on the TRC parcels
- Stipulate by footnote in the Specific Plan that Banks and Financial Institutions with ATM drive-throughs are conditionally permitted (CUP) uses on the TRC parcels
- Place the TRC parcels in the MU-N Zone and allow permitted or conditionally permitted ATM drive-throughs

The draft Specific Plan offers a vision with many goals and policies to achieve it. Among them is “the intent is to customize the land use requirements to encourage reinvestment and revitalization of the Town Center Plan Area consistent with the Specific Plan vision.”

TRC hopes to be part of that reinvestment and revitalization effort.

Sincerely,



Byron de Arakal

Consulting Director | Entitlement Planning and Special Projects

Cc: Lori Gentile – Planning Commission Chair  
Chuck Maffia – Planning Commission Vice Chair  
Davide Hodgins – Planning Commissioner  
Shawn Mosely – Planning Commissioner  
Steve Simonovich – Planning Commissioner  
Mali LaGoe – City Manager

**From:** [Juliana Maggio](#)  
**To:** [Scotts Valley Planning Department](#)  
**Subject:** Taylor Bateman 1 Civic Center Drive, Scotts Valley, CA 95066  
**Date:** Wednesday, November 19, 2025 9:59:34 PM

---

### CyAs Tech

**Warning:** Sender jumaggio@gmail.com has never sent any emails to your organization. Please be careful before replying.

[Report This Email](#)   [Mark Safe](#)

powered by Graphus®

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

The proposed plan for the town center appears to have an excessive amount of house units and we are concerned about the traffic that this will create in such a small area.

The town center we imagine is a place for gathering where there's outdoor and indoor space to hang out with friends, family and neighbors, outdoor space for sport games, pump track, skate park and space for music events, arts fairs, and food tracks. We do not envision any of those key parts of sky park to disappear! We envision more restaurants, cafes and shops where we can buy clothes, and shoes and gives these town a more cohesive look and feel. Buildings is not a town center. Apartment is not a town center. That is not what residents of this town are looking for.

Many issues with creating a denser population in his small town with such limited roads and resources, and especially limited roads in case of need for evacuations,

Please give this town what it deserves

Juliana



**From:** [Kate Halper](#)  
**To:** [Scotts Valley Planning Department](#); [City Council](#)  
**Subject:** Attention: Taylor Bateman - Public Comments on the Town Center EIR  
**Date:** Wednesday, November 19, 2025 2:43:18 PM

---

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hello -

I am writing in response to the EIR for the new Town Center project, submitting my public comments within the timeframe. I am seeking detailed response to these comments, as I am unable to attend the meeting tomorrow night. I don't see the following items addressed in the available documentation.

- How will the City address current traffic congestion on Mt. Hermon Rd once it's amplified by the addition of new community space and more than 650 new residences? As you are aware, traffic currently backs up onto the 17 off-ramp in the afternoons.
- How do adequate bike lanes and safe bike parking/lockers factor into the Town Center? That doesn't appear to be referenced anywhere
- In the EIR, it appears we will lose several existing community features at Sky Park - mainly the pump track, skate park, and dog parks. Is that accurate? Will those amenities be relocated? As a parent with two kids and a dog raising my family in Scotts Valley, these safe and accessible community features are essential.
- I understand there are plans for a dog park on the other side of town, but what about this current side of town? Surely many of the residents of the new 657 homes, all of whom will not have a yard of their own, will have dogs that need daily exercise. If even 20% of those homes have dogs, that's more than 100 dogs with no place to play
- There does not seem to be adequate parking for the new homes or the retail spaces; what formula is used to calculate how much parking is required to serve retail, gathering, and residential space? There are many mentions of being "pedestrian-friendly", but folks still need to park somewhere to enjoy walking around.
- For those not living in the town center, where will parking be for community events, like the Art & Wine and Food Truck Fridays?

Questions aside, this plan seriously lacks in planning for residents who *already* live in Scotts Valley. Inadequate plans for traffic flow on Mt. Hermon, safe bike access and parking, auto parking, kid-friendly features, and removing the pump track and dog park demonstrate a significant lack of judgment from the planning department. Without updating our infrastructure and adding improved amenities rather than removing them, we can't serve existing community members, let alone those that move into the new units. For a plan that has taken so long to develop, this one is an overall disappointment.

I look forward to understanding the answers to the questions I've posed. And, I hope the planning department and city council will take into account the many community members who are concerned about these issues as well.

Thank you for your time.

-Kate Halper



**From:** [Renee Inlow](#)  
**To:** [Scotts Valley Planning Department](#)  
**Subject:** Town Center - EIR Comments  
**Date:** Wednesday, November 5, 2025 1:50:28 PM

---

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hello SV Planning Department,

I write to you with concerns about the Town Center proposal. After reviewing the documents posted online I found an error in the upload of Appendix E - Water Supply. That link directs you to the transportation analysis. Water supply is a critical component of this project and impacts all current and future Scotts Valley Residents. We depend completely on ground water in our community. Please provide this document to me via email or post to the website correctly.

I was also not able to determine how many housing units are actually proposed. Within various documents, I see numbers ranging from a minimum of 300 units and a maximum of 657 units! This is a massive range and will greatly impact Skypark community use, the existing Skypark neighborhood, and surrounding shopping centers.

Reviewing the transportation study I did not see any mention of parking. How can we propose over 600 homes + new shops without a clear parking proposal? What is the current proposed number of parking spaces? The drawings show 3 tiny parking lots that will be terribly insufficient for even the residents of this new development, little alone the customers of the shops and restaurants.

Already the events held at Skypark are well attended (without an additional 1200 residents added to the mix). Finding parking during the art and wine fest, and even simple soccer games and food truck events is already challenging. Often these events depend on the dirt lot for parking. The dirt lot will soon be developed.

How will the existing residents of Scotts Valley (not living in the new development) access the park and its events? Will all of these fun community gatherings stop?

Thank you for your consideration. I am not against the development of this area, I simply want the proposal to be realistic in size and scope. I do not think that the area can accommodate the current proposal.

Renee Inlow  
831-278-0655

**From:** [Nesh Dhillon](#)  
**To:** [Scotts Valley Planning Department](#)  
**Subject:** Town Center-comments/SCCFM  
**Date:** Friday, November 21, 2025 11:30:22 AM

---

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

City of Scotts Valley Planning Department  
1 Civic Center Drive, Scotts Valley, CA 95066

**PROPOSED PROJECT DESCRIPTION:** 2025 Scott's Valley Town Center Specific Plan  
(State Clearinghouse #2025050499)

Attn: Taylor Bateman

This is an exciting development for both the community and City of Scott's Valley and I look forward to seeing it come to fruition.

After some review, I could not locate any mention of space for a farmers' market which has unique needs. The proposed project has many references to civic activities, events and other community engagement objectives. However, there is no specific designation for a certified farmers market (CFM) or consideration as far as I can tell in this proposal. Santa Cruz Community Farmers' Markets (SCCFM) understanding was the future development would not only include the necessary infrastructure (utilities, weather protection, etc) to operate an effective year round market in the heart of the development but also have the opportunity to participate in those discussions. I think our feedback and experience in the region would be valuable to the discourse. We encourage the planning department to consider the positive impact of a year round farmers' market as both an incubator for new food ideas, access to locally grown produce and a time tested community engagement tool that can be leveraged for a variety of needs to enhance the community cohesion.

Presently, we are looking for another site for the seasonal Scott's Valley FM. The current location is slated for redevelopment (Boys and Girls Club) and the footprint is not going to work to have an event. Additionally, after 16 years, operating at multiple locations in Scott's Valley, we are convinced that Mount Herman Road is where we need to be and ultimately part of the fabric work of the future town center. Space is limited but we are on the search.

Please considering the following in your discussions concerning the Town Center:

1. Specific mention for the need of a "certified farmers' market" in the design plans and permanent site for the Scott's Valley FM.
2. Consultation with SCCFM on "best" design concept/options and infrastructure basics.
3. Efficient and effective layout/design integration of CFM and new retail, civic events and

entertainment.

4. Consideration of Santa Cruz County Agriculture and its regional economic impact and importance.

5. Strong consideration of the relationship between local food production and restaurants (farm to table). A local year round market would be the source for restaurants and cafes that prioritize locally farmed goods, value added products and unique cuisines.

6. CFM's represent a distribution point for CAL FRESH (EBT) and food assistance programs like "Market Match" (<https://santacruzfarmersmarket.org/campaigns/market-match/>). SCCFM distributes over 600K in Cal Fresh through the five markets we operate in the county.

7. CFM's serve as emergency food distribution points (farmed goods, food boxes,etc) and were determined to be an "essential business" during the Covid-19 lock down.

Please let me know how SCCFM can assist in this project and thank you for considering our suggestions.

Thank you-  
Nesh Dhillon  
Executive Director  
Santa Cruz Community Farmers' Markets

**From:** [Sue Draper](#)  
**To:** [Scotts Valley Planning Department](#)  
**Subject:** Town Center question for EIR  
**Date:** Monday, November 24, 2025 4:40:20 PM

---

## CyAs Tech

**Warning:** Sender sue@communityrealestate.biz has never sent any emails to your organization.

Please be careful before replying.

[Report This Email](#)   [Mark Safe](#)

powered by Graphus®

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Regarding the current EIR for the proposed Town Center please address the following questions:

1) Where in the report does it address the recharge of water to our aquifer?

Scotts Valley currently uses its open space to collect and recharge the aquifer. Every additional business and residence has a direct impact on our water usage.

Please explain the measures taken to mitigate the loss of open space (12.5 acres) of recharge down to 2.68 acres of recharge space. This appears to be an Irreversible Use of Nonrenewable Resource

Is that really (Less than Significant Impact? What exactly is the Mitigation Incorporated)

2) Traffic impacts Every resident and business owner using Mt Hermon as an access to Hwy 17, getting children safely to and from school, and day to day operations of vital business for the residents they support. I see several New streets in the Town Center Plan but no alternative routes are proposed. With our current volume of traffic, residential neighborhoods are already experiencing the impact from inadequate flow, Estrella Drive has had to implement speed bumps to try and detour "cut through" traffic. Baja Sol and Whispering Pines are also being negatively affected by additional "cut through" traffic as we speak.

Please explain how the hundreds of additional housing units, all using Mt Hermon as their access to work, schools, and business will have a (Less than Significant Impact? What exactly is the Mitigation Incorporated)

3) Parking for residents and business owners appears to be adequate. ALL of our schools, shopping/ restaurants, and many residential neighborhoods are currently impacted by not planning for necessary parking. Did anyone drafting this report try parking in Victor Sq on an afternoon in order to get groceries, a meal, or a beer. Try finding a space at Nob Hill since the EV conversion of the parking lot during the afternoon. Try parking even remotely close to Chase Bank any time of the day. Honestly the huge missing link in the Town Center for success is inadequate parking. I predict the overflow will end up using existing parking intended and paid for by our current business owners.

These are my biggest concerns.

I look forward to hearing from you,  
Sue

