

**DOCKETED**

<b>Docket Number:</b>	26-OPT-02
<b>Project Title:</b>	Seahawk Battery Energy Storage System
<b>TN #:</b>	271109
<b>Document Title:</b>	Jonathan Pilch Comments - Watsonville Wetlands Watch Comment Letter
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Jonathan Pilch
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/30/2026 12:28:41 PM
<b>Docketed Date:</b>	6/30/2026

*Comment Received From: Jonathan Pilch  
Submitted On: 6/30/2026  
Docket Number: 26-OPT-02*

## **Watsonville Wetlands Watch Comment Letter**

*Additional submitted attachment is included below.*



# Watsonville Wetlands Watch

P.O. Box 1239 • Freedom, CA 95019

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

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

June 30, 2026

Eric Veerkamp, Project Director  
California Energy Commission  
715 P Street, MS-40  
Sacramento, California 95814

**Subject: EIR Scoping Comments for the Seahawk Battery Energy Storage System (BESS) Project; CEC Docket #26-OPT-02**

Dear Mr. Veerkamp:

## **Introduction and Background**

We are pleased to have the opportunity to provide scoping comments for the Environmental Impact Report (EIR) your agency will be preparing for the Seahawk BESS project proposed by New Leaf Energy. While we understand the scoping process has not formally commenced, we are providing these comments at this time to assist the California Energy Commission in identifying environmental issues to be analyzed at the front end of the EIR process.

Watsonville Wetlands Watch, incorporated as a 501(c)(3) non-profit organization in 1991, focuses on environmental protection, restoration, public education and related job training in the Pajaro Valley. Our education and volunteer programs serve thousands of youths and students, making sure the next generation of leaders is equipped to take on the complex environmental challenges our community faces. Our habitat restoration programs strengthen the natural resources of our region, restoring the habitat and water quality of sloughs, streams and other water bodies, improving trails near these resources, and laying the foundation of the return of wildlife species whose future survival depends on thoughtful actions taken today.

WWW is supportive of the development and implementation of renewable energy to assist in combating problems stemming from climate change. We also support the careful and comprehensive analysis of development projects that have the potential to impact natural resources.

## **Project Site and Vicinity**

The project site, located at 90 Minto Road, Watsonville, is a 37-acre parcel zoned “CA” (Commercial Agriculture) and designated by the County of Santa Cruz General Plan as “Agriculture” land use with an “Agricultural Resource” overlay. An intermittent stream corridor, named stream 489, traverses the southern edge of the property and flows directly to Salsipuedes Creek during the rainy season. In addition, a drainage swale traverses

the length of the subject parcel closer to the middle of the site. The swale conveys water towards College Lake which is located east of the project parcel (See Attachment 1). The Pajaro Valley Water Management Agency (PVWMA) recently completed an important water reclamation project at College Lake to reduce groundwater use and thereby benefit local agricultural uses. WWWW is completing habitat restoration work for PVWMA at College Lake as part of this project.

## Scoping Comments

### a) Impacts to the Intermittent Stream, Drainage Swale and downstream Water Bodies

The EIR should determine to what extent the stream channel and the swale that traverse property will be affected. For example, is the project designed to remove or otherwise impact either corridor? In that case, can the project be redesigned to mitigate these deleterious effects? The County General Plan and the Riparian and Wetland Protection Ordinance (County Code Chapter 16.30) contain policies and regulations protecting the integrity of riparian and wetland habitats. Section 1601 of the California Fish and Game Code, administered by the Department of Fish and Wildlife, also contains regulations protecting intermittent stream corridors. The EIR should discuss if the BESS project would conflict with the policies and regulations in these governing land use documents.

The EIR should also evaluate the project's potential impacts to downstream Salsipuedes Creek and College Lake during accidental liquid or smoke discharges from the BESS facility or from clean-up operations after such an accident. The probability of toxic discharges in liquid runoff or airborne smoke and ash affecting College Lake (and nearby agricultural lands) should be determined. Mitigations to reduce such impacts should be recommended. However, the EIR should also discuss if such mitigations can effectively reduce identified impacts to levels of insignificance. If they cannot be reduced to such low levels, they must be identified as unavoidable adverse impacts.

### b) Loss of Agricultural Land

The EIR should evaluate the removal of agricultural land generated by the project, both in terms of conversion of arable cropland to non-agricultural use, and the secondary effect of rendering adjoining cropland non-arable due to its proximity to the proposed BESS facility. For example, When non-agricultural uses locate in close proximity to commercial-scale agricultural uses, pressures can occur to curtail normal agricultural operations, including disking, fertilizer spraying and irrigation because they conflict with the non-agricultural uses such as those proposed to occur at the BESS facility.

Both the County General Plan and the County Agricultural Land Preservation and Protection Ordinance (County Code Chapter 16.50) contain strict policies and regulations protecting agricultural land for farm production. While the County recently adopted modifications to the Zoning Ordinance (Chapter 13.10) allowing energy facility uses in certain situations on agricultural zoned parcels, this should not be construed as solving the impact of agricultural land conversion. According to the California Environmental Quality Act (CEQA), the conversion of arable farmland to another land use is a significant impact – the non-replaceable loss of an important natural resource.

In addition, the Important Farmland Map administered by the California Department of Conservation designates the subject property as an important natural and economic resource. Approximately 40% of the parcel is designated as “prime farmland” with the remaining 60% (approx.) designated as “farmland of statewide importance”.

c) Seismic Hazards and Fire Hazards

The project site will be subject to seismic shaking in the event of an earthquake. Two active earthquake faults are located near the project site. The well-known San Andreas fault occurs locally at the summit of the Santa Cruz Mountains. It is located about 10 miles from the project site. The less-active Corralitos Complex (AKA Zayante fault) occurs a few feet north of the site. The EIR should include a geological study to determine the probability of the site being affected by a significant earthquake. In the event of substantial seismic activity, the EIR should assess how project facilities could be affected and potentially generate any form of toxic releases beyond the site.

The 2025 fire at the Vistra BESS facility Moss Landing in Monterey County has highlighted the potential for accidental hazards to occur at BESS facilities and impact surrounding lands. The EIR should clearly describe the type of BESS technology proposed and discuss how it is similar or different from the technology used at the Vistra facility in Moss Landing. In any case, the EIR should determine if existing fire protection services provided by Pajaro Valley Fire Protection District are adequate to quickly respond to any mishap that could occur at the project site. If the District cannot guarantee adequate response, mitigations measures should be recommended to ensure the project applicant can fund needed services.

**Conclusion**

We request to be included in all public notifications regarding EIR preparation and the permitting process for the Seahawk BESS project. Please contact me at 831-728-1156 if you need further clarification about anything in the content of this letter.

Best Regards,

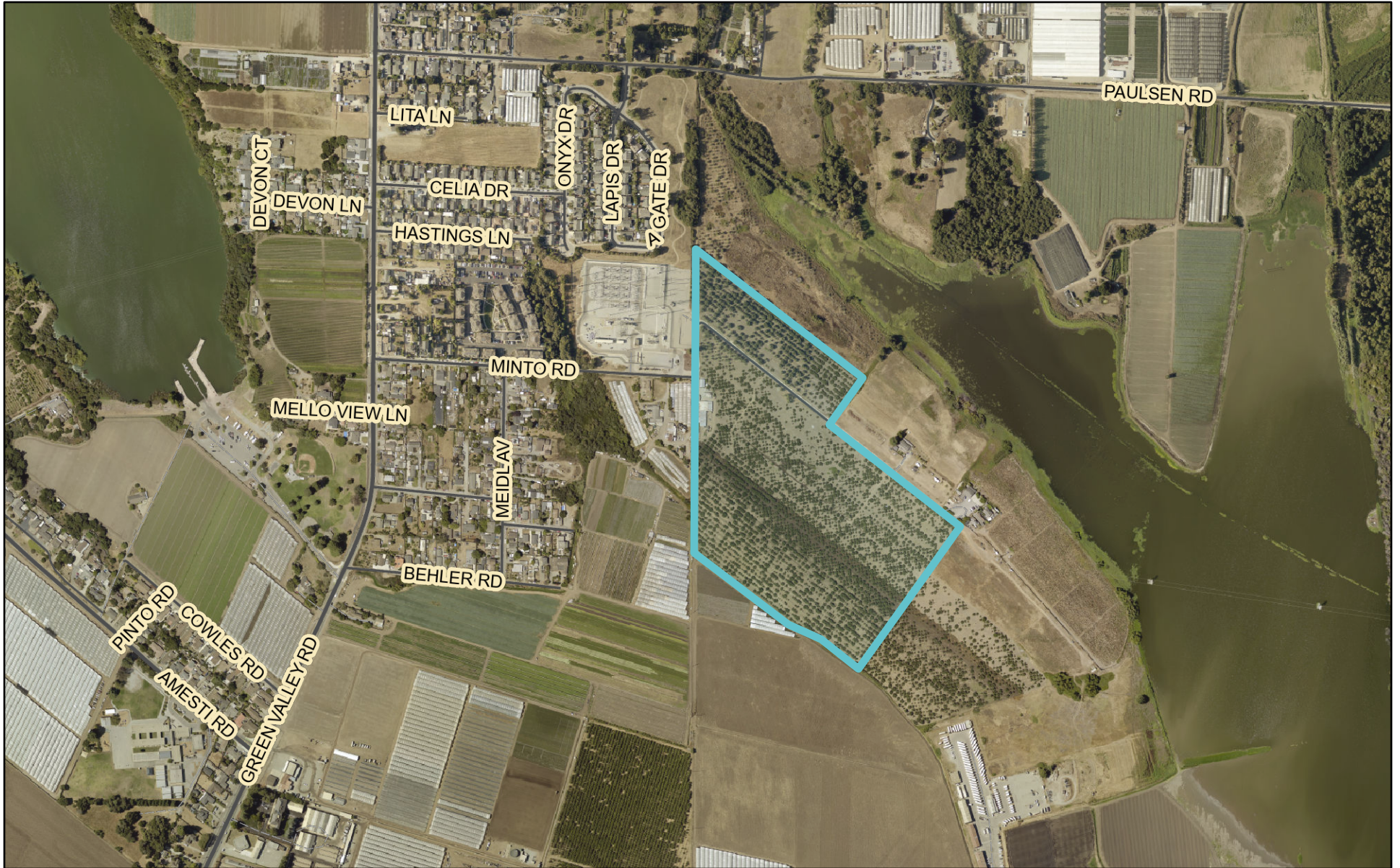


Jonathan Pilch  
Executive Director

Attachment 1: Vicinity Map of the Project Site

cc: WWW Planning and Conservation Committee

# Vicinity Map of 90 Minto Road, Watsonville Area



June 19, 2026

