



County of San Benito

RESOURCE MANAGEMENT AGENCY

2301 Technology Parkway, Hollister, CA 95023

(831) 637-5313 • FAX: (831) 637-5334

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

The San Benito County Resource Management Agency has reviewed the project described below and has determined that it is exempt from the provisions of CEQA as specified in Sections 15061 - 15332 of CEQA for the reason(s) which have been specified in this document.

Application Number: PLN250014

Cannabis Permit Number: 35-2025-0002

Assessor Parcel Number: 018-010-012 and 018-010-013

Project Location: 0 Brookhollow Road, Hollister, CA 95023 (see attached map)

Project Title: PLN250014 Commercial Cultivation

Project Description: Outdoor cannabis cultivation. Project encompasses a maximum of 46.30 acres of cannabis canopy (see attached "Project Description Preparation Form_0 Brookhollow Road" and "Site Diagram_0 Brookhollow Road").

Person or Agency Proposing Project: Jake Brooks (Brookhollow Ranch, LLC.)

Contact Email: jake@ladybugfarms.org

Contact Phone Number: (831) 713-3064

- A. The proposed activity is not a project under CEQA Guidelines Section 15378.
- B. The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c).
- C. **Ministerial Project** involving only the use of fixed standards or objective measurements without personal judgment.
- D. **Statutory Exemption** other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).
- E. **Categorical Exemption**

Specify type: 15301 Class 1: Use of existing facilities; 15304 Class 4: Minor Alterations to Land; 15311 Class 11: Accessory Structures.

Class	Category	Description
Class 1	Existing Facilities	Consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. (Cal. Code Regs., tit. 14, §15301.)
Class 4	Minor Alterations to Land	Consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. (Cal. Code Regs., tit. 14, § 15304.)
Class 11	Accessory Structures	Consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities (Cal. Code Regs., tit. 14, § 15311.)

F. Reasons why the project is exempt:

Cultivation on an existing commercially-farmed property.

In addition, none of the conditions described in Section 15300.2 apply to this project.

Signed by: Stephanie Reck Date: 7/7/2025
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 Stephanie Reck, Senior Planner

Email: sreck@sanbenitocountyca.gov

Area Code/Telephone/Extension: (831) 718-7960

ATTACHMENTS:

- “Project Description Preparation Form_0 Brookhollow Road”;
- “Site Diagram_0 Brookhollow Road”;
- “BMOP_0 Brookhollow Road”;
- “San Benito County CBRP Permit 35-2025-0002”.



Project Description Preparation Form

Lead Agency: County of San Benito Resource Management Agency

Applicant Entity/Business Name: Brookhollow Ranch LLC

License Type(s): Cultivation

Date: July 07, 2025

1. Source(s) of Information:

Identify Sources: San Benito County License Application Submission.

2. Project Location:

Describe Project Location: 0 Brookhollow Road, Hollister, CA 95023. -13,520,330.430699272, 4,424,725.906731394 for 46.30 acres of cultivation on APNs: 018-010-012, and 013.

Maps Included: Property and Premises Diagram included

3. Description of Project Site:

General Topographic Features (slopes and other features): Large agricultural parcels consisting of flat lands with open fields on two adjacent parcels located on land traditionally used for row crops. The property is currently vacant and has no existing structures. The parcels total 71.44 acres in size.

Natural Features (general vegetation types, presence of streams and wetlands, forested areas): The site is currently an open dirt field, flat and vacant, and has been used for commercial row crops in the past. The site is not within a floodplain, near any streams or wetlands, and does not have any geophysical landslide data mapped in the area.

Existing Land Uses/Zoning: These parcels have a General Plan designation of Agriculture (A) and a zoning designation of Agricultural Productive (AP). The intent of the AP zoning district is to provide for areas within the county to be used for agricultural production of any type as set forth in the general plan, including agriculture support uses, vineyards, wineries and winery supporting land uses. Low-density residential uses, and the preservation of prime farmland. Low-density and farmworker housing are also permitted. Cannabis cultivation is defined as agricultural and is a principally-permitted use with the AP zone.

Existing Constructed Features (buildings, facilities, and other improvements): The project site consists of two adjacent parcels which are vacant and have no buildings, facilities, or other improvements other than an existing four-foot fence surrounding the perimeter.

Surrounding Land Uses (including sensitive uses): Commercial agriculture/rangeland (zoned Agricultural Productive and Agricultural Rangeland) with some residences.

4. Required Site Improvements and Construction Activities:

Site Improvements: The project consists of cannabis cultivation outdoors and 18 parking stalls on the southwest corner of the site plan for employees and distribution vehicles. Site improvements include motion-activated lighting, security cameras, and lockable gates.

Construction Activities: Installation gates, no tree removal, grading or excavation.

5. Operation and Maintenance Activities:

Hours of Operation/Work Shifts: 7:00am to 3:30pm

Number of employees (total and by shift): Four full-time staff, three of which would split their time between this site and another site located in Watsonville.

Estimated Daily Trip Generation: 8 or fewer round trips per day on average with potentially 14-15 deliveries of seedlings per full year and around 20-30 pickups per year from distributors.

Source(s) of Water: Agricultural well located on adjacent parcel (APN: 018-030-012) accessible by easement.

Wastewater Treatment Facilities: Portable toilet facility. Contour farming and berms will be used to reduce runoff and increase filtration from cultivation operations, and coverage from the Regional Water Quality Control Board is on-going.

Source(s) of Power: PG&E Service

6. Environmental Commitments: “Best Management and Operational Practices” (BMOP) requirements apply to all non-retail commercial cannabis businesses to reduce the environmental impacts of cannabis operations. A BMOP plan for this project was reviewed by the County of San Benito Cannabis Coordinator and is kept on file with the license application. BMOP requirements for this project are noted below:

The applicant’s BMOP includes “Siting Criteria” and “Site Design” measures including: avoiding and minimizing the impact to land and biotic resources including avoidance of excessive grading due to site design, minimizing site disturbance due to existing features, maintenance and implementation of fencing and security, emergency response plan, waste management plan, and water storage.

The applicants BMOP includes “Operational Requirements” as adopted by GFC and approved by the San Benito County Cannabis Coordinator including: storage of pesticides, fuel, hazardous materials, water supply and quality, waste, and access control.

Exceptions to categorical exemptions cited for the proposed non-retail cannabis project include: Class 1 “Existing Facilities”, Class 4 “Minor Alterations to Land”, Class 11 “Accessory Structures”. The County of San Benito Resource Management Agency has determined that the proposed project 1) is not visible from scenic highways and/or impactful to scenic resources, 2) is not located on a “Cortese List” site, 3) does not substantially change a historic resource, 4) is likely to not contribute to a significant cumulative environmental impact, 5) is not subject (by location and/or design) to unusual circumstances that would reasonably contribute to a significant environmental impact.

7. Environmental Permits Required (List all required federal, state, and local permits required):

Agency	Permit	Status
Department of Cannabis Control	Annual Cultivation License	Pending Approval
California Department of Fish and Wildlife	Section 1602 Lake or Streambed Alteration Agreement	N/A
State Water Resources Control Board / Regional Water Quality Control Board	Water quality protection program	WDID 3_35CC461329
San Benito County Resource Management Agency	Zoning Clearance	Approved July 02, 2025
San Benito County Resource Management Agency	Annual Cannabis Business Permit	CBRP Permit 35-2025-0002

San Benito County Parcel Report

06/30/2025

APN: **0180100120** Current Document: **2022R0008473** Jurisdiction: **San Benito County**

Owner: **MCCAHERN TRUST** Owner Address: **1400 SAN JUAN RD** Owner CSZ: **WATSONVILLE
CA 95076**

Site Address: **0 BROOKHOLLOW RD** Site CSZ: **HOLLISTER CA
95023** Acres: **23.08**

Land Value: **573228** Recorded Map: Use Code: **WRGX**

Fault Zone: **NO** Flood Zone: **Not in Floodplain** Fire Hazard: **NON-WILDLAND/NON-
URBAN/MODERATE**

County GP: **Agriculture** County Zoning: **Agricultural Productive**

Note: **This parcel is located in an Airport Influence Area. A portion of this parcel is located in an Airport Safety Zone. Development on this parcel requires review by ALUC staff.**



San Benito County Parcel Report

06/30/2025

APN: **0180100130** Current Document: **2022R0008473** Jurisdiction: **San Benito County**

Owner: **MCCAHERN TRUST** Owner Address: **1400 SAN JUAN RD** Owner CSZ: **WATSONVILLE CA 95076**

Site Address: **0 BROOKHOLLOW RD** Site CSZ: **HOLLISTER CA 95023** Acres: **48.36**

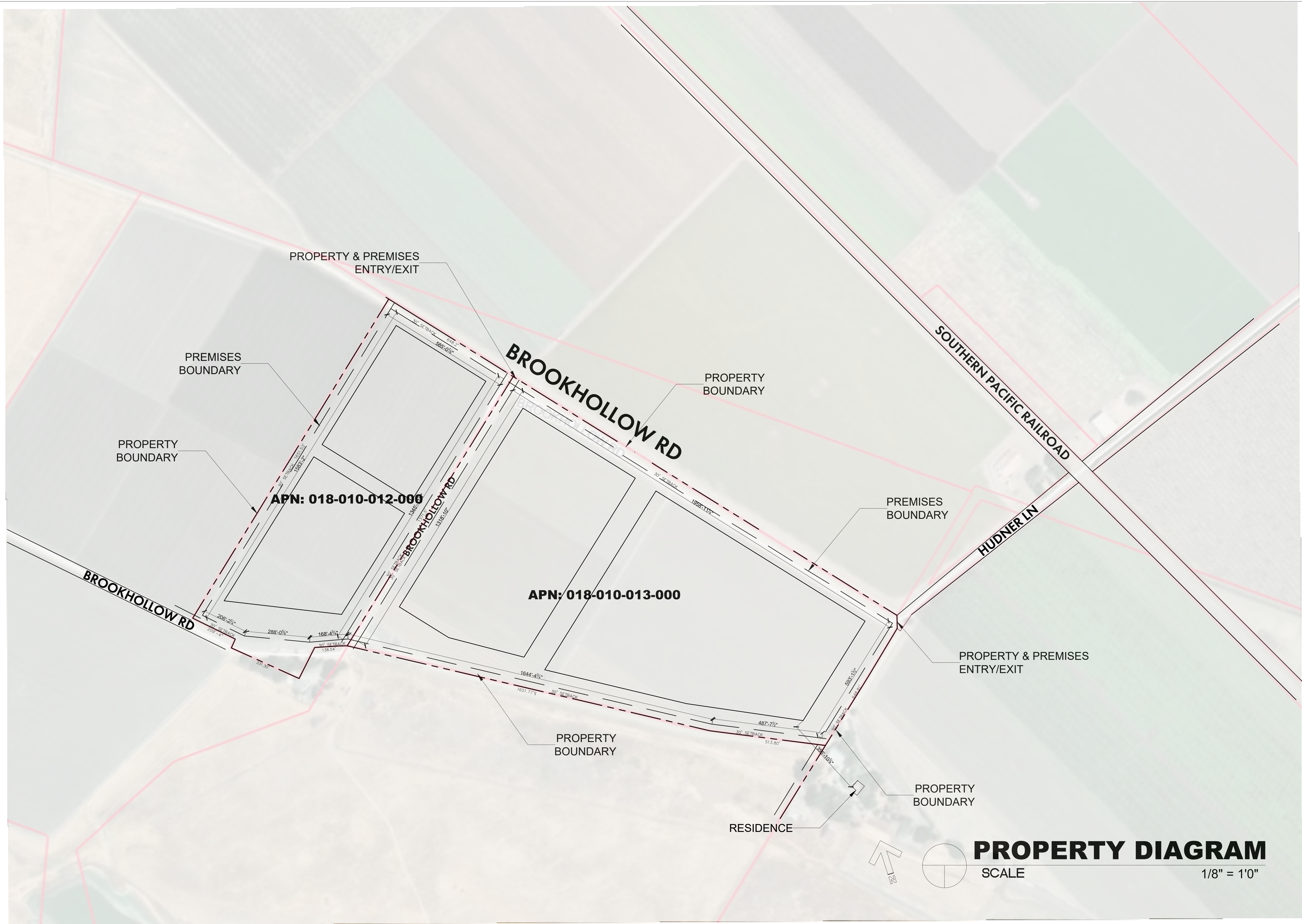
Land Value: **558213** Recorded Map: Use Code: **WRGX**

Fault Zone: **NO** Flood Zone: **Not in Floodplain** Fire Hazard: **NON-WILDLAND/NON-URBAN/HIGH/MODERATE**

County GP: **Agriculture** County Zoning: **Agricultural Productive**

Note: **This parcel is located in an Airport Influence Area. A portion of this parcel is located in an Airport Safety Zone. Development on this parcel requires review by ALUC staff.**





PROPERTY DIAGRAM
SCALE 1/8" = 1'0"

BROOKHOLLOW RANCH LLC
00 BROOKHOLLOW RD

BROOKHOLLOW RANCH LLC
00 BROOKHOLLOW RD
HOLLISTER, CA 95023

APN: 018-010-012-000
018-010-013-000

JOB NO.:
250212
PRINT DATE:
PLOT DATE: 2.13.2025
DRAWN BY:
CHECKED BY:
NOTES:
*No Water Crossings
SHEET NAME:

PROPERTY DIAGRAM
SHEET NO.:

A101

FILE NAME:

Best Management Operational Practices (BMOP)

Security Plan for Brookhollow Ranch LLC

1. Site Description: The cultivation site, which consists of two adjacent parcels (APN: 018-010-012 & 018-010-013) located in the Agricultural Productive zoning district, is an open field designated for outdoor cannabis cultivation. It complies with San Benito County cannabis regulations and security requirements.

2. Perimeter Security (San Benito County Code Section 19.43.070(C)):

- The existing 4-foot fence will be maintained as required by county regulations.
- Warning signs will be posted regularly along the perimeter indicating restricted access.
- Motion-activated lighting will be installed at all entry and exit points as required by San Benito County Code Section 19.43.070(C)(3).

3. Access Control (San Benito County Code Section 19.43.070(C)):

- Entry to the site will be limited to authorized personnel only.
- Lockable gates will be installed at all entry and exit points, with lock and key access control.
- A visitor log will be maintained to track all non-employee entries and exits.

4. Surveillance System (San Benito County Code Section 19.43.070(C)):

- Security cameras will be installed at all entry and exit points.
- All footage will be recorded and stored for a minimum of 30 days as per San Benito County Code Section 19.43.070(C)(8).

5. Storage and Transport Security (San Benito County Code Section 19.43.070(C)):

- All harvested cannabis will be loaded into trucks and hauled away by a licensed distributor immediately.
- There will be no storage of cannabis material onsite. All of the harvested cannabis will be shipped out fresh to a licensed processing facility.
- A chain-of-custody log will be maintained for all product movements.

6. Emergency Response Plan (San Benito County Code Section 19.43.070(C)):

- Emergency contacts, including law enforcement and fire departments, will be clearly posted on-site.
- Staff will be trained on basic emergency response procedures.

7. Compliance and Reporting (San Benito County Code Section 19.43.070(C)):

- The security plan will be reviewed annually and updated as needed to comply with county regulations.
- Any security breaches or incidents will be documented and reported to the appropriate regulatory authorities.
- Staff will undergo regular training on security protocols and compliance measures.

Waste Management Plan for Brookhollow Ranch LLC

1. Introduction

Brookhollow Ranch is committed to implementing a sustainable and compliant Waste Management Plan (WMP) in accordance with San Benito County Code §19.43.050 and Department of Cannabis Control (DCC) regulations. This plan outlines the standard operating procedures for handling, storing, composting, and hauling both cannabis and non-cannabis waste while ensuring compliance with environmental regulations.

2. Solid Cannabis Waste Management

The cultivation site will employ an on-site organic composting strategy for cannabis-related waste to support soil health and sustainability. The following procedures will be followed:

1. Storage and Collection

- All cannabis waste will be collected and stored in designated, secure composting areas within the cultivation site.
- Waste will be segregated from non-cannabis waste to ensure compliance with regulatory requirements.

2. On-Site Composting

- Cannabis waste, including stems, leaves, and non-usable plant material, will be organically composted and reincorporated into the cultivation fields.
- Composting will follow best management practices to optimize decomposition and improve soil fertility.
- Regular monitoring will be conducted to ensure proper decomposition and odor control.

3. Compliance Measures

A waste tracking log will be maintained, documenting waste type, disposal method, and date.

3. Non-Cannabis Waste Management

Non-cannabis waste will be collected and self-hauled to the local recycling facility in San Benito County using designated waste boxes. The following measures will be implemented:

1. Waste Storage

- Each parcel will have a 15-foot waste box designated for non-cannabis waste collection.
- Waste bins will be clearly labeled and placed in accessible yet discreet locations to avoid contamination.

2. Hauling and Disposal

- Non-cannabis waste will be transported by on-site personnel to the local recycling and waste management facility.
- Hauling will be conducted on a scheduled basis to prevent waste accumulation and ensure site cleanliness.

3. Recycling Efforts

- All recyclable materials, including plastics, paper, and metals, will be separated and processed according to local recycling guidelines.
- Waste reduction strategies will be reviewed and improved annually to enhance sustainability efforts.

4. Employee Restrooms

Although human waste management is typically not included in a Waste Management Plan, Brookhollow Ranch will ensure proper sanitation measures are in place.

1. Portable Restroom Facilities

- Each parcel will have one portable restroom unit, provided by C&A Portable.
- Facilities will comply with OSHA guidelines for staffing requirements and locations.

2. Servicing and Maintenance

- Portable restrooms will be serviced on a regular basis to maintain hygiene and compliance.
- Waste removal will be handled by a licensed sanitation service in accordance with local health regulations.

5. Monitoring and Record-Keeping

1. Waste Tracking Logs

- Cannabis waste logs will document the type of waste, quantity, disposal method, and date.
- Non-cannabis waste hauling will be recorded to ensure proper disposal and regulatory adherence.

2. Annual Review and Adjustments

- The Waste Management Plan will be reviewed annually to incorporate best practices and regulatory updates.
- Compliance with San Benito County and DCC regulations will be continuously monitored and adjusted as needed.

6. Conclusion

Brookhollow Ranch is dedicated to environmentally responsible waste management. This Waste Management Plan ensures efficient waste handling, regulatory compliance, and sustainable agricultural practices, aligning with DCC and San Benito County requirements.

Water Management Plan for Brookhollow Ranch LLC

1. Introduction

Brookhollow Ranch is located on agricultural land traditionally used for row crops. This history of prior agricultural use supports efficient water management practices and ensures compatibility with existing irrigation infrastructure. Brookhollow Ranch is committed to sustainable and efficient water use practices in compliance with San Benito County Code §19.43.050 and Department of Cannabis Control (DCC) regulations. This plan outlines the current water supply, proposed water supply, water demand estimates, and conservation measures implemented to ensure responsible water management.

2. Water Supply

Given the site's history of row crop farming, the existing water supply infrastructure is well-established for agricultural use, providing a strong foundation for cannabis cultivation.

1. Existing Water Source
 - The site is currently supplied by an existing and tracked water well (No. AGL020004274).
 - The well has been historically used for agricultural irrigation and continues to provide a reliable water source for cultivation.
 - Water is piped to the site through existing infrastructure, which has supplied the property historically.
2. Proposed Water Supply
 - No additional water sources are proposed at this time, as the existing well is sufficient for the site's projected water needs.
 - Water use will be monitored and recorded to ensure compliance with regulatory requirements and sustainable resource management.

3. Water Demand Estimates

- The site will be farmed throughout the year for cannabis cultivation and cover cropping.
- Cannabis is a water-efficient crop, with demand estimates on the lower end of California's agricultural water use spectrum.
- Water demand is estimated at 1-2 acre-feet per acre per annum, which is significantly lower than many traditional crops grown in the region.

- Water use will be adjusted based on seasonal variations, plant growth cycles, and conservation best practices.

4. Water Conservation Measures

Since the site was previously used for row crops, soil conditions may have high drainage capacity. To optimize water retention and efficiency, additional soil amendments will be incorporated to enhance moisture retention and reduce overall irrigation needs. The following conservation strategies will be implemented: To promote sustainability and efficient water use, the following conservation strategies will be implemented:

1. Irrigation Efficiency
 - Drip irrigation systems will be used to transition from prior row crop irrigation methods, minimizing water waste and maximizing root zone efficiency.
 - Scheduled irrigation cycles will be optimized based on soil moisture monitoring and seasonal evapotranspiration rates.
2. Cover Cropping and Soil Health
 - Cover crops will be planted to reduce evaporation and improve soil water retention.
 - Organic matter amendments will be added to the soil to enhance moisture retention and reduce overall irrigation needs.
3. Runoff and Water Recycling
 - Contour farming and berms will be used to minimize water runoff and increase infiltration.
 - Rainwater catchment and recapture techniques will be evaluated for future water conservation enhancements.

5. Monitoring and Compliance

- Water usage will be tracked and recorded to ensure regulatory compliance.
- Regular well inspections and maintenance will be conducted to sustain long-term water availability.
- The Water Management Plan will be reviewed annually to incorporate new conservation strategies and regulatory updates.

6. Conclusion

Brookhollow Ranch is committed to responsible water management practices that ensure efficient and sustainable water use while complying with DCC and San Benito County regulations. By implementing efficient irrigation methods, conservation

strategies, and monitoring protocols, the site will maintain compliance and minimize environmental impact.

Pest Management Plan for Brookhollow Ranch LLC

1. Introduction

Brookhollow Ranch is committed to deploying a comprehensive Integrated Pest Management (IPM) program that adheres to the Department of Cannabis Control (DCC) regulations, San Benito County Code §19.43.050, and California Department of Pesticide Regulation (DPR) guidelines. The plan utilizes a mixture of pest-preventative strategies that minimize environmental impact while ensuring crop health and compliance with state and local cannabis regulations.

2. Pest Management Approach

The site will implement a multi-layered pest control strategy consisting of the following methods:

A. Cultural Pest Management Control Methods

1. **Companion Planting** – Strategic placement of companion plants to attract and retain beneficial insects:
 - **Marigold (*Tagetes* spp.)** – Repels nematodes and deters harmful insects.
 - **Hollyhock (*Alcea* spp.)** – Supports pollinators and predatory insects.
 - **Alyssum (*Lobularia maritima*)** – Attracts beneficial hoverflies that feed on aphids.
2. **Banker Havens for Beneficial Insects** – Establishing wheatgrass and other habitat plants to provide shelter and food sources for predatory insects.
3. **Canopy and Soil Health Management** – Maintaining optimal plant spacing and airflow to reduce fungal pathogens like botrytis.
4. **Proper Sanitation** – Regular removal of plant debris and infested material to prevent pest breeding grounds.

B. Biological Pest Management Control Methods

1. **Introduction of Beneficial Insects** – Releasing cannabis-approved beneficial insects to naturally control pest populations:
 - **Phytoseiulus persimilis (Predatory Mite)** – Controls spider mite infestations.
 - **Lacewings (*Chrysoperla* spp.)** – Feeds on aphids and other soft-bodied pests.
 - **Ladybugs (*Hippodamia convergens*)** – Effective against aphids, thrips, and whiteflies.

2. **Microbial Biocontrol Agents** – Application of organic and DPR-approved microbial pesticides:
 - **Beauveria bassiana** – A fungus that targets soft-bodied insects.
 - **Bacillus thuringiensis (Bt)** – Controls caterpillar larvae without harming beneficial insects.
 - **Trichoderma spp.** – Supports soil health and prevents root-borne fungal infections.
3. **Soil Enhancements** – Use of compost teas and beneficial mycorrhizal fungi to improve plant immunity and soil health.

C. Chemical Pest Management Control Methods (DPR-Approved Only)

1. **Limited and Targeted Use of Organic Pesticides** – Only DPR-approved, OMRI-certified products will be used when biological and cultural controls are insufficient:
 - Neem Oil (DPR-approved) – Targets soft-bodied insects while maintaining organic compliance.
 - Insecticidal Soaps (DPR-approved) – Non-toxic to beneficial insects and effective for soft-bodied pest suppression.
 - Horticultural Oils (DPR-approved) – Used for smothering pest eggs and larvae.
2. **Fungal Disease Prevention** – Application of natural fungicides to mitigate botrytis and powdery mildew risks:
 - Hydrogen Peroxide Sprays (DPR-approved) – Helps control fungal spores and disinfects plant surfaces.
3. **Strict Application Compliance** – All pesticide applications will be performed in accordance with DPR regulations, ensuring no unapproved chemicals are used.

3. Monitoring and Record-Keeping

1. **Routine Pest Inspections** – Weekly scouting and monitoring for pest activity using:
 - Yellow sticky traps for flying insects.
 - Hand lens inspections for mite and aphid detection.
 - Soil sampling for nematode presence.
2. **Threshold-Based Intervention** – Pests will only be treated when they exceed economic thresholds to minimize environmental impact.
3. **Record Maintenance** – Detailed logs of all pest management activities, including:
 - Date of application.
 - Pest type and threshold level.

- Control method used.
- Product name and application rate (if applicable).
- Confirmation that all products used are DPR-approved.

4. Compliance and Training

1. DCC, DPR & San Benito County Compliance – The IPM plan aligns with §19.43.050, ensuring regulatory adherence.
2. Staff Training – Employees will be trained in IPM principles, pest identification, and proper application techniques.
3. Annual Plan Review & Adjustments – The plan will be updated annually based on pest monitoring data and new best practices.

5. Conclusion

Brookhollow Ranch is committed to implementing sustainable and compliant pest management strategies that protect the crop, environment, and community. This IPM plan ensures effective pest control while adhering to all DCC, DPR, and San Benito County regulations.

CANNABIS BUSINESS PERMIT

Legal Business Name

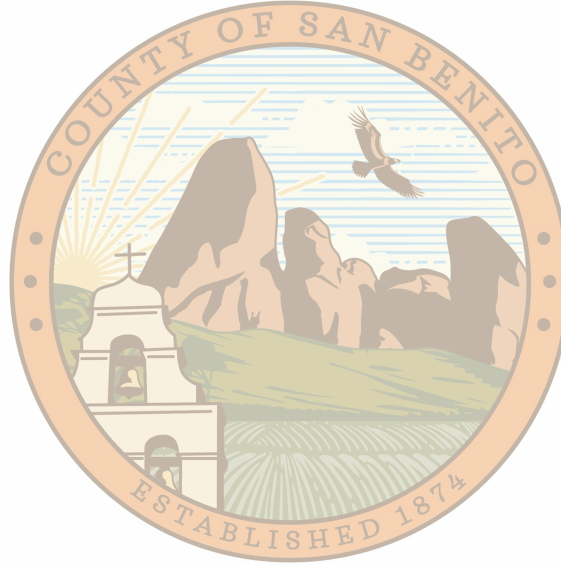
Brookhollow Ranch, LLC.

Premise APNs

018-010-012 and 018-010-013

Premise Address

0 Brookhollow Road, Hollister,
CA 95023



Valid

7/7/2025 – 7/7/2026

Permit ID

35-2025-0002

Permit Type

PLN250014 - Outdoor
Cultivation of 46.30 acres of
canopy

NON-TRANSFERABLE

POST IN PUBLIC VIEW

*Note: this business permit does not grant a San Benito County Business License. A business license will be required as condition of the use permit.