County of San Benito 2023-2031 Housing Element

Public Review Initial Study and Mitigated Negative Declaration

September 2025

Lead Agency:

County of San Benito 2301 Technology Parkway Hollister, CA 95023





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1.0 INTRODUCTION AND PURPOSE

1.1 Project Overview

The Housing Element is a mandatory component of every city and county General Plan under California Government Code §65580 et seq. It must be updated every eight years to demonstrate how the jurisdiction will accommodate its share of the State's projected housing need. On May 8, 2025, the County of San Benito ("County") adopted its 6th Cycle Housing Element for the 2023–2031 planning period ("HEU"). The Housing Element identifies programs and zoning strategies to accommodate the County's assigned Regional Housing Needs Allocation (RHNA) of 754 dwelling units (DUs).

To implement the Housing Element and ensure continued compliance with State Housing Element Law, the County proposes amendments to the County's General Plan and Zoning Code to redesignate/rezone 12 candidate housing sites. These sites were selected based on infrastructure capacity, development feasibility, and consistency with fair housing obligations under Government Code §65583.2. The proposed amendments would redesignate land use, change the zoning, and adjust zoning standards to allow residential uses at appropriate densities, particularly for lower-income households.

This Initial Study evaluates the potential environmental impacts associated with implementation of the Housing Element Program ("Project" or "proposed Project"). While no specific development projects are proposed at this time, this document provides a program-level CEQA analysis based on the maximum potential buildout of 4,497 DUs across the 12 candidate housing sites. This buildout scenario represents a conservative worst-case assumption for environmental review purposes.

1.2 Statutory Authority and Requirements

This Initial Study has been prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq.). As required by State CEQA Guidelines §15063, the purpose of this Initial Study is to determine whether the proposed Project may result in significant environmental effects and to inform the decision of whether to prepare an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND).

Lead Agency

Pursuant to State CEQA Guidelines §15367, the Lead Agency is the public agency with principal responsibility for carrying out or approving a project. San Benito County is the Lead Agency for this Project, as it holds the primary authority over General Plan and zoning amendments within its jurisdiction.

Responsible and Trustee Agencies

Responsible Agencies are public agencies, other than the Lead Agency, which have discretionary approval authority over some aspect of the Project (State CEQA Guidelines §15381). Trustee Agencies are State agencies with jurisdiction over natural resources affected by the Project (State CEQA Guidelines §15386). This Initial Study and proposed MND have been submitted to the State Clearinghouse for circulation to applicable agencies. Responsible and Trustee Agencies may rely on this document for any subsequent discretionary approvals.

Determination to Prepare a Negative or Mitigated Negative Declaration

In accordance with State CEQA Guidelines §15070, a public agency shall prepare an MND when:

- a) The Initial Study shows no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or
- b) The Initial Study identifies potentially significant effects, but:
 - Revisions in the project plans or proposals made by, or agreed to by, the applicant before
 the proposed mitigated negative declaration and initial study are released for public
 review would avoid the effects or mitigate the effects to a point where clearly no
 significant effects would occur, and
 - 2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

Mitigation Measures

Under State CEQA Guidelines §15041, a Lead Agency may require feasible changes to a project to substantially lessen or avoid significant environmental effects. "Feasible" is defined in State CEQA Guidelines §15364 as capable of being accomplished in a successful manner within a reasonable period of time, considering economic, environmental, legal, social, and technological factors. State CEQA Guidelines §15126.4 requires mitigation measures to meet applicable constitutional requirements, including:

- A clear nexus between the mitigation measure and a legitimate governmental interest; and
- A roughly proportional relationship between the mitigation required and the project's impact.

Mitigation measures may take various forms, as defined in State CEQA Guidelines §15370:

- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
- Compensating for the impact by replacing or providing substitute resources or environment, including through permanent protection of such resources in the form of conservation easements.

Mitigation Monitoring and Reporting Program (MMRP)

Pursuant to State CEQA Guidelines §15097, a Mitigation Monitoring and Reporting Program (MMRP) will be adopted to ensure implementation of all mitigation measures identified in this IS/MND. The MMRP will specify the mitigation measures, the timing of implementation, the responsible party, and the method of verification.

For future housing projects developed consistent with the Housing Element and within the scope of this IS/MND, compliance with all applicable mitigation measures would be required as a condition of project approval. Project applicants would be responsible for incorporating relevant measures into project plans and for funding or conducting the necessary monitoring, subject to County oversight. The County would

verify compliance with the MMRP during the entitlement, permitting, and construction phases, and would impose conditions of approval, permit requirements, or mitigation agreements as necessary to ensure implementation.

1.3 Background and Regulatory Framework

Housing Element Law

California Housing Element Law, established in 1969 under Government Code Article 10.6 (§65580–§65589.11), requires every city and county to adopt a Housing Element as part of its General Plan. The Housing Element must demonstrate how the jurisdiction will accommodate its fair share of the State's projected housing need and adopt policies and zoning strategies to facilitate housing production, improvement, and preservation for all income levels. It is one of the eight mandatory General Plan elements and is subject to statutory review and certification by the California Department of Housing and Community Development (HCD).

Pursuant to Government Code §65583 and §65588, Housing Elements must be updated every eight years in alignment with each jurisdiction's RHNA. At the start of each planning cycle, HCD determines the statewide housing need and distributes this need to each region. The Council of San Benito County Governments (SBCOG), a state-designated Regional Transportation Planning Agency, is responsible for developing the RHNA methodology and allocating housing targets to local jurisdictions within San Benito County.

San Benito County's 5th Cycle Housing Element, adopted in 2016, covered the 2014–2023 planning period. The County's 6th Cycle Housing Element, adopted on May 8, 2025, covers the 2023–2031 planning period. While HCD found that the 6th Cycle Housing Element meets statutory requirements upon adoption, HCD's final determination of substantial compliance is contingent upon completion of Housing Element Program 3-2: Residential High Rezone and General Plan Amendment, which requires rezoning and associated General Plan amendments to provide adequate sites for the County's RHNA. For the 6th Cycle, HCD assigned the unincorporated County a RHNA of 754 DUs, distributed across income categories as required by law.

To meet this obligation, the 6th Cycle Housing Element identifies 12 candidate housing sites with sufficient capacity and feasibility to accommodate the County's RHNA. Where existing zoning does not allow residential uses or sufficient density, the Housing Element includes rezoning programs to ensure compliance with Government Code §65583.2(c), which governs site inventory adequacy, minimum density standards, and housing opportunity requirements, particularly for lower-income households.

The candidate sites were selected based on development feasibility, proximity to infrastructure and services, and consistency with Affirmatively Furthering Fair Housing (AFFH) requirements. Implementation of the Housing Element, therefore, requires targeted General Plan amendments and rezones to permit residential uses and increase allowable densities on selected sites.

This Initial Study evaluates the potential environmental impacts associated with implementation of the County's proposed Housing Element, including amendments to the County's General Plan and Zoning Code. These legislative actions are necessary to implement the Housing Element and maintain compliance with State Housing Element Law. Failure to comply may result in significant consequences, including exposure to "Builder's Remedy" projects under Government Code §65589.5(d), ineligibility for State housing or infrastructure funding, and potential enforcement actions by HCD or the California Attorney General.

Household Income

California law requires that local jurisdictions plan for the housing needs of all income levels, as defined by HCD. HCD establishes standard income categories based on a percentage of the County's Median Family Income (MFI), which are used for RHNA allocations and Housing Element planning. These categories are:

- Very Low-Income: 31 through 50 percent of MFI
- Low-Income: 51 percent through 80 percent of MFI
- Moderate Income: 81 percent through 120 percent of MFI
- Above-Moderate Income: Greater than 120 percent of MFI

In addition, State law separately defines extremely low-income households as those earning less than 30 percent of the MFI. Together, the extremely low-, very low-, and low-income groups are referred to as lower-income households.¹

The Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) estimates, based on the 2017-2021 American Community Survey (ACS), indicate that approximately 35 percent of households earned extremely low-, very low-, or low-incomes, while approximately 65 percent of households earned incomes in the moderate to above-moderate range; see Table 1: Households by Income Category in San Benito County.

Table 1: Households by Income Category in San Benito County

Income Category (Percent of County MFI)	Households	Percent
Extremely Low (30% MFI or less)	1,590	8%
Very Low (30% to 50% MFI)	1,785	9%
Low (50% to 80% MFI)	3,415	18%
Moderate or Above (Over 80% MFI)	12,350	65%
Total	19,145	100%

Source: U.S. Department of Housing and Urban Development (HUD). (n.d.). Comprehensive Housing Affordability Strategy (CHAS) Data (2006–2021). Retrieved July 7, 2025, from https://www.huduser.gov/portal/datasets/cp.html#query 2006-2021.

Regional Housing Needs Assessment

Government Code §65583 requires that every city and county plan for its fair share of the region's housing need through the Housing Element of its General Plan. This fair share is determined through the RHNA process, which distributes housing unit targets across income levels based on population projections, employment trends, and equity-based planning criteria.

In San Benito County, SBCOG, the County's state-designated Regional Transportation Planning Agency, administers the RHNA process. At the beginning of each Housing Element planning cycle, HCD determines the region's total housing need and works with SBCOG to allocate that need among local jurisdictions, including unincorporated San Benito County.

Federal housing and community development programs typically assist households with incomes up to 80 percent of the AMI and use different terminology. For example, the Federal Community Development Block Grant (CDBG) program refers households with incomes between 51 and 80 percent AMI as moderate income (compared to low-income based on State definition).

For the 6th Cycle RHNA (2023-2031), HCD assigned San Benito County a housing target of 754 units, distributed across four income categories:

- 246 units affordable to very low-income households
- 198 units affordable to low-income households
- 103 units affordable to moderate-income households
- 207 units affordable to above-moderate income households

While SBCOG is not a federally designated Metropolitan Planning Organization (MPO) and is therefore not subject to Senate Bill (SB) 375's Sustainable Communities Strategy (SCS) framework, the RHNA process in San Benito County still incorporates State planning objectives such as promoting infill development, protecting environmental resources, reducing vehicle miles traveled (VMT), and AFFH requirements.

Under State Housing Law, local governments must maintain sufficient appropriately zoned residential capacity at all times during the planning period to accommodate their RHNA, including for lower-income households. This Initial Study evaluates the environmental impacts associated with implementation Housing Element Program 3-2, which requires rezoning and associated General Plan amendments to provide adequate sites to meet the County's RHNA obligations.

Table 2: Summary of RHNA Status and Sites Inventory (2023-2031) summarizes the County's RHNA by income category and the strategies used to demonstrate adequate development capacity. These strategies include accessory dwelling unit (ADU) production, pipeline projects, and proposed rezoning of candidate housing sites.

As indicated in **Table 2**, the proposed rezoning of the 12 candidate housing sites would add an estimated 2,044 units of realistic development capacity, based on an assumed net density of 25 dwelling units per acre (du/ac). Overall, the Housing Element demonstrates a realistic capacity of 4,428 units, which exceeds the County's total RHNA of 754 units by a buffer of 3,674 units.

This surplus provides an adequate margin to address potential constraints to full buildout—such as infrastructure limitations, market feasibility, or site-specific challenges—and serves as a contingency for future compliance with the No Net Loss requirement under Government Code §65863. That statute requires jurisdictions to ensure that sufficient site capacity remains throughout the planning period, especially for lower- and moderate-income households.

Based on this analysis, implementation of Housing Element Program 3-2—including the proposed rezones—would enable the County to meet its 6th Cycle RHNA obligation while ensuring compliance with Housing Element Law and supporting ongoing housing production opportunities consistent with the County's General Plan and State mandates.

Table 2: Summary of RHNA Status and Sites Inventory (2023-2031)

	Extremely Low/Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	
RHNA (2023-2031)	246	198	103	207	754	
Projected ADU Construction	13	31	66	22	219	
Pipeline Projects	12	11	132	1,824	2,077	
Units that have received Certificates of Occupancy (Beginning July 1, 2023)	2	24		64	88	
Remaining Unmet RHNA	16	168			168	
Strat	egies to Increas	se Developmer	nt Capacity			
Multi-family Residential Rezones on 12 Candidate Housing Sites	40	9	611	1,024	2,044	
Vacant Sites	20)4	305	512	1,021	
Nonvacant Sites	20)5	306	512	1,023	
	Total U	nit Capacity				
Total Potential Development 685 809 2,934 4,428 Capacity						
Site Surplus/Shortfall	24	1	706	2,727	3,674	
Source: County of San Benito. (20205) County of Inventory.	San Benito 2023-20	31 Housing Eleme	nt, Table B-2: Sumn	nary of RHNA Status	and Sites	

1.4 Incorporation by Reference

To reduce redundancy and improve clarity, the following documents are incorporated by reference pursuant to State CEQA Guidelines §15150 and are available for public review during normal business hours at the County of San Benito Resource Management Agency Planning and Land Use Division, at 2301 Technology Parkway, 1st Floor, Hollister, CA 95023:

San Benito County General Plan (adopted July 2015)

2035 San Benito County General Plan Update Environmental Impact Report (certified July 2015)

County of San Benito Code of Ordinances, Title 25 (Zoning)

County of San Benito 2023-2031 Housing Element (adopted May 2025)

1.5 Environmental Resource Topics

This Initial Study evaluates potential environmental impacts associated with the Project in the following topic areas:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources

- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality

- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation

- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

1.6 Summary of Findings

Based on the environmental analysis in Section 4.0 and the Checklist in Section 3.0, this Initial Study finds that Project implementation would not result in any significant effects that cannot be mitigated. All potentially significant effects can be mitigated to less than significant levels. Therefore, an MND is appropriate.

1.7 Public Review Process

In compliance with State CEQA Guidelines §15073 and Assembly Bill 819 (AB 819), the Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration and Notice of Availability for Public Review has been filed with the State Clearinghouse and the County of San Benito Clerk and distributed to Responsible and Trustee Agencies, other affected agencies, and interested parties. Pursuant to State CEQA Guidelines §15206, this IS/MND has been submitted to the State Clearinghouse for a 30-day public review period because the HEU constitutes a project of statewide, regional, or area-wide significance. Specifically, the Housing Element is required by State law (Government Code §65580 et seq.) and implements the County's assigned share of the 6th Cycle RHNA.

In accordance with AB 819, this IS/MND has also been made available on the County's website for the full 30-day public review period. The document is accessible at:

https://www.sanbenitocountyca.gov/departments/resource-management-agency/planning-and-land-use-division/current-major-planning-projects

Hard copies of this IS/MND are also available for public review at the following location during normal business hours:

County of San Benito
Planning, Building, Inspections, and Code Enforcement Services
2301 Technology Parkway
Hollister, CA, 95023

Email: sreck@sanbenitocountyca.gov

During the public review period, affected public agencies and interested members of the public should review and comment on the adequacy of the IS/MND's environmental analysis and proposed mitigation measures. Written comments may be submitted to:

Stephanie Rack, Senior Planner County of San Benito Planning, Building, Inspection, and Code Enforcement Services 2301 Technology Parkway Hollister, CA 95023

Email comments should include the Project title ("6th Cycle Housing Element Update Project") in the subject line and provide a valid mailing address. All comments received during the public review period will be considered prior to adoption of the MND.

1.8 Report Organization

This document has been organized into the following sections:

Section 1.0 – Introduction. This section provides an introduction and overview describing the conclusions of the Initial Study.

Section 2.0 – Project Description. This section identifies key project characteristics and includes a list of anticipated discretionary actions.

Section 3.0 – Initial Study Checklist. The Environmental Checklist Form provides an overview of the potential impacts that may or may not result from project implementation.

Section 4.0 – Environmental Evaluation. This section contains an analysis of environmental impacts identified in the environmental checklist.

Section 5.0 – References. The section identifies resources used to prepare the Initial Study.

2.0 PROJECT DESCRIPTION

2.1 Project Overview

The proposed Project involves the implementation of a Housing Element Program to accommodate the County of San Benito's 6th Cycle Regional Housing Needs Allocation (RHNA). The Project includes 12 candidate housing sites totaling approximately 100 acres located entirely within the County's unincorporated area and identified in the County's adopted 2023-2031 Housing Element. To facilitate residential development on these sites, the Project would involve amendments to the General Plan and Zoning Code to allow residential uses at densities consistent with Housing Element capacity assumptions and HCD requirements.

2.2 Project Location

San Benito County is located in the Coast Range foothills of west-central California. It is bordered by Santa Clara County to the north, Santa Cruz County to the north-west, Monterey County to the south and west, and Fresno and Merced counties to the east. Major regional transportation corridors that serve the County include U.S. Highway 101 (US 101), State Route 25 (SR-25), and State Route 156 (SR-156), which connect the County to the greater San Francisco Bay Area and Central Coast.

The candidate housing sites encompass parcels generally located within unincorporated County lands along the boundary of the City of Hollister, within the City's Sphere of Influence, but under the County's jurisdiction. These parcels are generally rural in character but are located near or directly abutting existing development and are identified in the Housing Element as appropriate for future residential growth due to proximity to existing infrastructure and services. Focusing new housing opportunities in these areas helps accommodate the County's housing needs while preserving more agricultural and rural lands elsewhere in the County. The ADUs would be distributed across approximately 219 residential properties, which have not yet been specifically identified throughout the County's unincorporated areas.

Exhibit 2-1: Regional Vicinity Map provides a regional map showing the County's location within the State. **Exhibit 2-2: Map of Candidate Housing Sites** identifies the location of the candidate housing sites. For analysis purposes, each candidate housing site has been assigned a numeric label, which corresponds to the exhibits and tables throughout this Initial Study. **Exhibits 2-3** through **2-6** depict each candidate housing site on an aerial map. **Appendix A** includes a summary table of the candidate housing sites with the following information: site numeric label, Assessor's Parcel Number (APN), acreage, existing and proposed General Plan land use designations, existing and proposed zoning, and current site conditions (e.g., vacant, agricultural use, developed). These existing conditions are further discussed in **Section 2.2: Environmental Setting** for use as the CEQA baseline conditions.

2.3 Environmental Setting

Physical Setting

San Benito County's unincorporated lands include a mix of agricultural operations, rolling rangelands, and mountain foothills. The County's elevation ranges from approximately 100 feet in the northwest valley to over 5,000 feet in the southern Diablo Range. All 12 candidate housing sites are located in relatively flat areas and are located within and surrounding the City of Hollister's sphere of influence. The climate is Mediterranean, with hot, dry summers and cool, wet winters. Candidate housing sites are accessible by County roadways and major regional highways (SR-25 and SR-156). Of the 12 candidate sites totaling

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approximately 100 acres, six are vacant (approximately 41 acres), and six are currently used for rural residential or agricultural purposes (approximately 59 acres).

Population

As of January 1, 2025, the California Department of Finance estimates San Benito County's population totaled 66,822 persons. Approximately 32 percent (21,252 persons) of the County's total population reside within unincorporated County areas where the 12 candidate housing sites are located, while approximately 68 percent (45,570 persons) reside within the incorporated cities of Hollister and San Juan Bautista.

Table 3: County Population (2020-2025)

Jurisdiction	2020 Population	2025 Population	Change (2020-2025)
Hollister	41,675	43,492 (65%)	+1,817 (4.4%)
San Juan Bautista	2,084	2,078 (3%)	+18 (0.9%)
Unincorporated County	20,450	21,252 (32%)	+802 (3.9%)
Total	64,209	66,822 (100%)	+2,613 (4.1%)

Source: California Department of Finance, Demographic Research Unit. (2025, May 1). Report E-4: Population estimates for cities, counties, and the State, 2021–2025, with 2020 benchmark. Retrieved July 7, 2025, from https://dof.ca.gov/forecasting/demographics/estimates/.

Housing

As of January 2025, the County's total housing stock was estimated to total 22,261 DUs, with approximately 36 percent (7,960 units) located in unincorporated County areas. Approximately 80 percent of the units in unincorporated areas are single-family detached homes. From 2020 to 2025, the unincorporated County area added 680 units, an increase of approximately 9.3 percent.

Table 4: County Housing Units (2020-2025)

Jurisdiction	2020 Housing Units	2025 Housing Units	Change (2020-2025)
Hollister	12,182	13,385	+1,203 (9.9%)
San Juan Bautista	903	916	+13 (1.4%)
Unincorporated County	7,280	7,960	+680 (9.3%)
Total	20,365	22,261	+1,896 (9.3%)

Source: California Department of Finance, Demographic Research Unit. (2025, May 1). Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2025, with 2020 Benchmark. Retrieved July 7, 2025, from https://dof.ca.gov/forecasting/demographics/estimates/.

General Plan

The San Benito County 2035 General Plan ("General Plan"), adopted in 2015, outlines the County's vision for how the County will grow and change in the future. The General Plan contains the County's official policies on land use, economic development, transportation, community design, housing, resource protection, public services, and health and safety. It describes the County's long-range goals for the community's future and guides day-to-day decision making. The General Plan and its maps, diagrams, and development standards form the basis for the County's zoning, subdivision, and public works decisions.

The General Plan includes goals, policies, and programs for development and environmental protection of unincorporated County lands excluding the cities of Hollister and San Juan Bautista, which have adopted their own general plans.

Of the 12 candidate housing sites, 10 sites are currently designated Residential Mixed, which allows up to 20 du/ac. The remaining two candidate housing sites are designated Agriculture, which allows agricultural support uses.

Zoning

The County's Zoning Code is found in the San Benito County Code of Ordinances ("County Code") Title 25: Zoning. The Zoning Code's purpose is to guide, control, and regulate the future growth of the County by establishing permitted land uses and development standards for each zone. It was also adopted to protect the character and the social and economic stability of agricultural, residential, commercial, industrial, and other areas within the County to assure the orderly and beneficial development of the areas; facilitate the appropriate location of community facilities, institutions, transportation, and parks and recreational areas; allow for public participation in government decision-making regarding land use and development; and define duties and powers of administrative bodies and officers responsible for implementation of the Zoning Code.

Of the 12 candidate housing sites, ten sites are currently zoned Rural Residential (RR) and two sites are zoned Agricultural Productive (AP). The RR zoning district is intended to provide areas of mixtures of housing and limited agricultural uses, and allows housing at a density of one du/ac. The Agricultural Productive zoning district is intended to provide for areas to be used for agricultural production, including agricultural support uses, vineyards, and wineries and winery supporting land uses. Low-density residential uses are permitted in these zoning districts.

2.4 Project Characteristics

The County adopted its 6th Cycle Housing Element (2023-2031) in May 2025 as a comprehensive update to the 5th Cycle Housing Element (2014–2023). The HEU includes the County's Housing Plan, which addresses the County's identified housing needs. It also outlines goals, policies, and programs related to housing and housing-related services, as well as the County's approach to addressing its share of the regional housing need.

The HEU contains the following Chapters:

- **Chapter 1: Introduction** contains a summary of the Housing Element's content, organization, and statutory considerations.
- Chapter 2: Community Profile contains an analysis of the County's population, households and employment base, and the existing housing stock's characteristics.
- **Chapter 3: Housing Constraints** evaluates governmental and non-governmental constraints on housing production, maintenance, and affordability.
- **Chapter 4: Housing Resources** summarizes the housing resources currently offered in the County and region.
- Chapter 5: Affirmatively Furthering Fair Housing (AFFH) evaluates fair housing resources, existing patterns of segregation/integration, identified conditions or patterns of areas accommodating proposed candidate housing sites, and policies or programs to advance fair housing.
- Chapter 6: Policy Plan identifies the County's housing goals, policies, and programs.

Additionally, the following three appendices provide various supplementary background resources:

- **Appendix A: Review of Past Performance** summarizes 5th Cycle Housing Element program accomplishments and evaluates their effectiveness.
- Appendix B: Candidate Housing Sites Analysis provides a detailed inventory and evaluation of housing sites that the County has identified as suitable for accommodating its RHNA across all income levels, as required by Government Code §65583.2.
- **Appendix C: Community Engagement** summarizes the community outreach during the 6th Cycle HEU process.

Key Housing Goals

As required by State Housing Element Law, the HEU's Policy Plan facilitates and encourages the provision of housing and identifies sites to accommodate RHNA growth needs. The Policy Plan addresses the need to plan for additional housing opportunities, remove constraints to affordable housing, improve the existing housing stock, and provide equal opportunities for all current and future County residents. The following describes the goals and policies the County intends to implement to meet its RHNA and address its housing needs.

- Goal 1: Expand housing choice opportunities for existing and future San Benito County residents.
- Goal 2: Expand housing opportunities for all economic segments of San Benito County's population.
- Goal 3: Use public and private resources to maintain and enhance existing residential neighborhood character.
- Goal 4: Provide housing opportunities for all San Benito County residents, regardless of race, color, ancestry, national origin, religion, age, gender, gender identity and expression, marital status, familial status, medical condition or disability, military or veteran status, source of income, sexual orientation, or any other protected characteristics.
- Goal 5: Promote energy efficiency and conservation throughout San Benito County.

Housing Programs

- Housing Production
- Housing Conservation and Preservation
- Adequate Housing Sites
- Removal of Governmental Constraints
- · Promote Equal Housing Opportunity
- Energy Efficiency and Conservation

Housing Element Implementation Program – CEQA Project

State CEQA Guidelines §15378(a) defines a "project" as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." The HEU does not propose specific housing projects or physical development at this time; instead, it establishes the regulatory framework and zoning capacity necessary to accommodate the County's RHNA obligations.

The County would meet its RHNA allocation through implementation programs described in the Policy Plan. As discussed above, Program 3-2: Residential High Rezone and General Plan Amendment involves zoning and General Plan actions that could result in future physical changes to the environment and therefore constitute part of the CEQA "project" evaluated in this Initial Study. All other goals, policies, and program actions included in the Housing Element Update (HEU) were previously evaluated for environmental impacts in the County of San Benito 2023-2031 Housing Element CEQA Determination, completed at the time of HEU adoption. The Project proposes to implement Housing Element Program 3-2, which requires rezoning and associated General Plan amendments to provide adequate sites to meet the County's RHNA obligations. Program 3-2 includes amending the Zoning Code to include a new Residential High (RH) zoning district permitting residential density of 20 to 45 du/ac. As discussed above, the County has identified 12 candidate housing sites to accommodate future residential development, as shown in HEU Appendix B. The 12 candidate housing sites total approximately 100 acres, of which 81.8 acres are assumed to be developable. The Project would rezone the 12 candidate housing sites from Rural Residential (RR) and Agricultural Productive (AP) to the new proposed Residential High (RH) zoning district. This proposed rezoning would increase allowable residential densities and establish new development standards to increase housing opportunities in the County. This increase in the allowable residential densities would significantly improve the County's ability to achieve its RHNA.

To ensure consistency between the County's Zoning Code and the General Plan, Program 3-2 also includes amending the General Plan Land Use Element to establish a new land use designation — Residential High (RH) — allowing development ranging from 20-45 du/ac that would be applied to the 12 candidate housing sites. The proposed General Plan Amendment is also intended to ensure land use policies remain consistent and practical, support logical development patterns, and balance the need for additional housing with the importance of preserving the County's rural and agricultural character and resources.

Table 5: Planned/Maximum Development Capacity by Candidate Housing Site summarizes the upper limit of development capacity for each candidate housing site, assuming full buildout at the planned maximum density of 45 du/ac. In total, the proposed rezoning would allow up to 4,497 DUs on the 12 candidate housing sites if all 100 acres were developed at the maximum densities. This increase in housing capacity is forecast to result in a population growth of approximately 13,402 additional persons; see Response 4.14a.

Table 5: Planned/Maximum Development Capacity by Candidate Housing Site

Candidate Housing Site ID	Gross Acres	Maximum Allowable Dwelling Units
R-1	0.95	43
R-2	7.25	326
R-3	0.72	32
R-4	4.69	211
R-5	20.97	944
R-6	6.30	284
R-7	3.92	176
R-8	4.67	210
R-9	10.00	450
R-10	19.41	873
R-11	14.72	662
R-12	6.34	285
Total	99.94	4,497

Source: County of San Benito. (2025) County of San Benito 2023-2031 Housing Element, Table B-10: County of San Benito 6th Cycle Housing Element Sites Inventory.

Future Development 2.5

Ministerial Review

For candidate housing sites included in the County's Housing Element sites inventory, Government Code §65583.2 provides that certain projects may qualify for ministerial approval. Where a project meets the requirements of Government Code §65583.2, including the provision of at least 20 percent of its units being affordable to lower-income households and not involving a subdivision, it would not be subject to discretionary approval and would be exempt from CEQA review. Notwithstanding, the project would still be required to comply with all applicable zoning and design standards, including the requirements of County Code Chapter 25.02: Permits and Other Planning Actions, and must implement all applicable mitigation measures identified in this Initial Study.

Discretionary Review

Future residential development that does not qualify for ministerial review would be subject to discretionary review and permitting under the County's standard entitlement procedures. This includes, but is not limited to, subdivision map approvals, use permits, and design review actions. These projects would also be subject to CEQA review, unless otherwise exempt. Where appropriate, subsequent review may tier from this IS/MND in accordance with State CEQA Guidelines §15152, provided that future residential project is consistent with the assumptions and findings of this analysis.

Precise Plan of Design

Before issuance of a building permit for residential development, a Development Plan Review must be approved in accordance with County Code Chapter 25.02: Permits and Other Planning Actions. Minor Development Plan Reviews may be approved by the Planning Director, while Major Development Plan Reviews would be reviewed by the Planning Commission.

Subdivision

Residential projects that propose a subdivision would be subject to County Code Title 23: Subdivisions, and may trigger discretionary and CEQA review. Subdivision review procedures would depend on the project type, location, and applicable State housing law.

2.6 Project Phasing

The Housing Element is a policy document that outlines the County's goals, policies, and programs to accommodate projected housing needs during the 6th Cycle planning period (2023-2031). State law requires that the County demonstrate that it has sufficient zoned capacity (at appropriate densities and by-right allowances) at the time of Housing Element adoption to meet its RHNA. This means that the necessary land use designations and zoning must be in place now, rather than being gradually implemented by 2031.

The forecast growth analyzed in this Initial Study reflects the maximum theoretical development capacity that could result from full buildout of all candidate housing sites identified in the Housing Element sites inventory, totaling up to 4,497 DUs throughout the County, which reflects the upper limit of development potential based on zoning and land use designations, including proposed changes, and is used to provide a conservative environmental analysis under CEQA.

Although the zoning capacity must be established now, the actual rate and pattern of housing construction would occur incrementally over time, influenced by market demand, developer interest, infrastructure capacity, financing availability, and other external factors beyond the County's control. While this Initial Study assumes full buildout by the end of the planning period (i.e., by 2031) to evaluate a worst-case scenario for environmental impacts, actual development may occur at a slower pace or extend beyond the 6th Cycle planning period.

To support long-term growth, the County may need to plan for future infrastructure improvements (e.g., water, sewer, transportation) to serve the total potential housing development accommodated by the Housing Element. However, this Initial Study focuses on the environmental impacts associated with the theoretical full buildout housing development capacity established by the proposed land use and zoning changes, not on a forecast of what will be built by 2031.

2.7 Discretionary Actions, Permits, and Other Project Approvals

This Initial Study analyzes and discloses the Project's potential environmental impacts, in accordance with CEQA. Under State CEQA Guidelines §§15050 and 15367, San Benito County serves as the Lead Agency and holds primary responsibility for CEQA compliance and project approvals.

Responsible agencies may exercise discretionary approval over certain aspects of the Project (e.g., utility connections, regional transportation improvements). Trustee Agencies are State entities with jurisdiction over natural resources that may be affected by the Project.

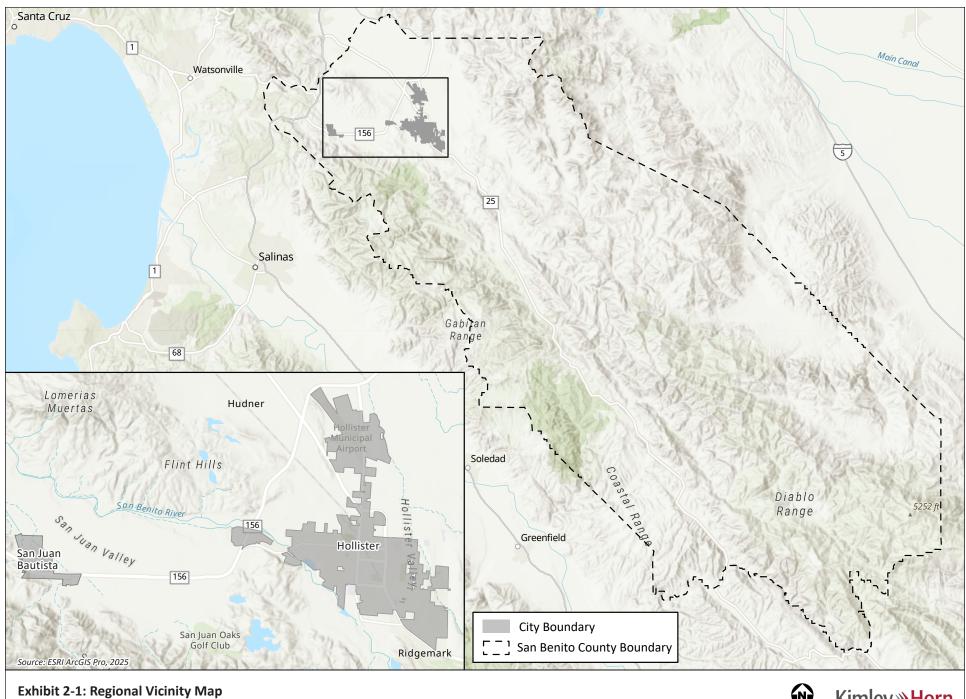
As the Lead Agency, the County would take the following legislative and discretionary actions to implement the HEU:

1. **General Plan Amendment:** Amend the General Plan Land Use Element to redesignate the candidate housing sites to Residential High, a new land use designation allowing development ranging from 20 to 45 du/ac, for consistency with the Housing Element's proposed rezones.

- 2. **Zoning Code Amendment:** Amend the Zoning Code to include a new Residential High District permitting residential density of 20 to 45 du/ac.
- 3. **Zoning Map Amendment:** Update the Zoning Map to apply the new Residential High District to the 12 candidate housing sites identified in the Housing Element.

Additional Agency Oversight

HCD oversees and certifies the County's Housing Element under Government Code §65585. HCD evaluates whether the Housing Element and its implementation programs, including the required rezoning actions, comply with State housing law and fulfill the RHNA assigned to the County by SBCOG for the 2023-2031 planning period.



County of San Benito 2023-2031 Housing Element Initial Study/Mitigated Negative Declaration



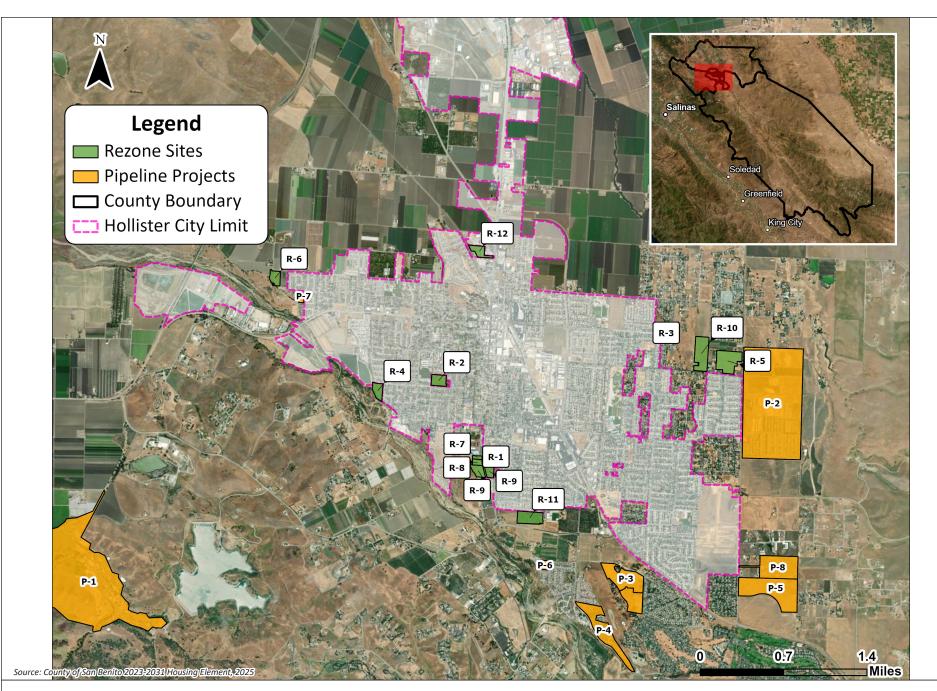


Exhibit 2-2: Candidate Housing Sites Inventory Map

County of San Benito 2023-2031 Housing Element Initial Study/Mitigated Negative Declaration



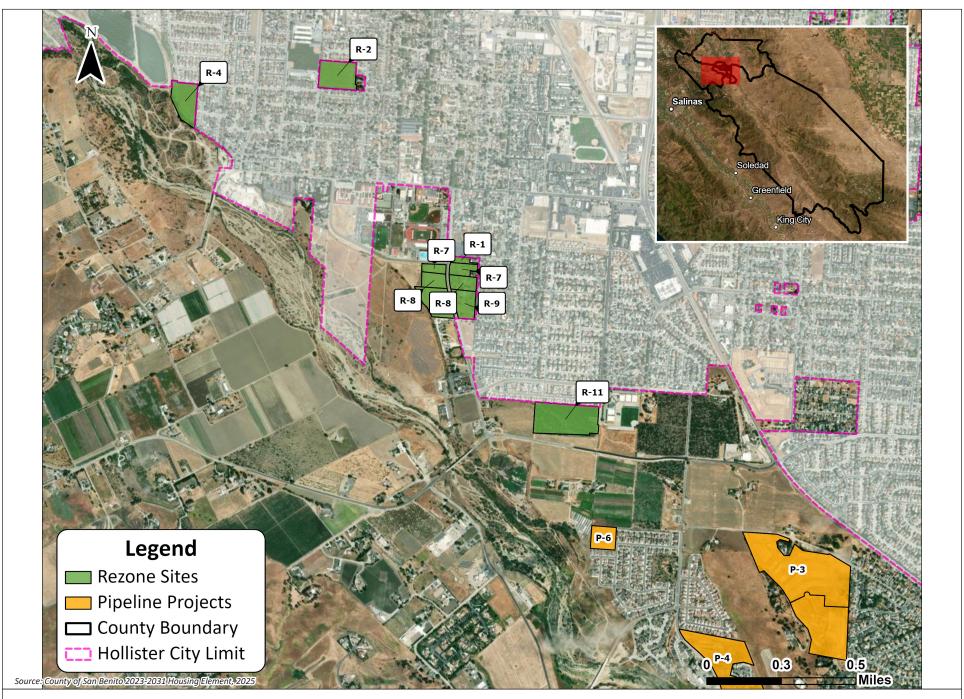


Exhibit 2-3: Candidate Housing Sites Inventory Map (Southwest)

County of San Benito 2023-2031 Housing Element Initial Study/Mitigated Negative Declaration



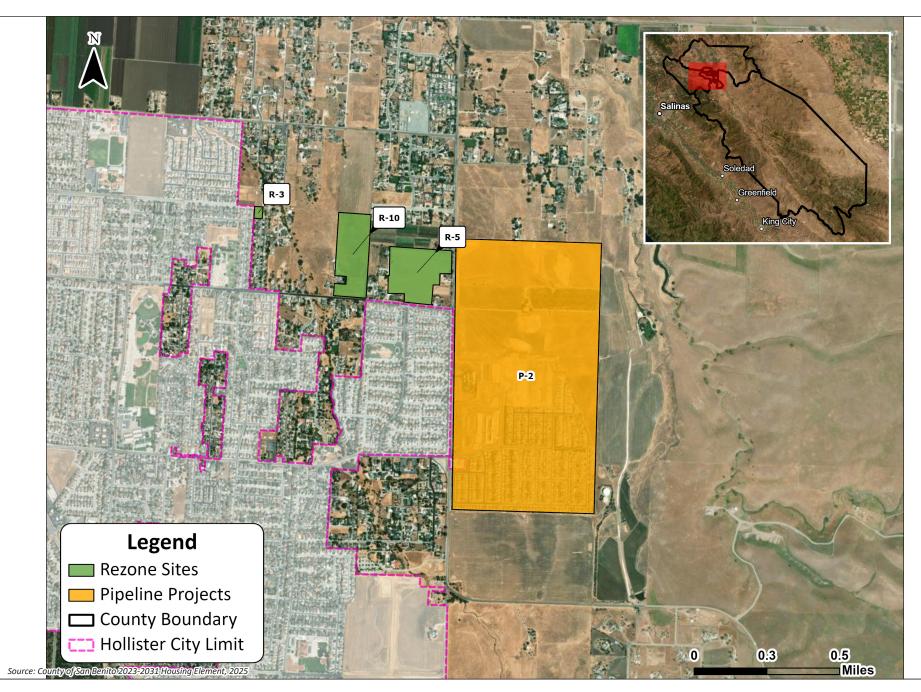


Exhibit 2-4: Candidate Housing Sites Inventory Map (East)

Not to scale. Kimley » Horn

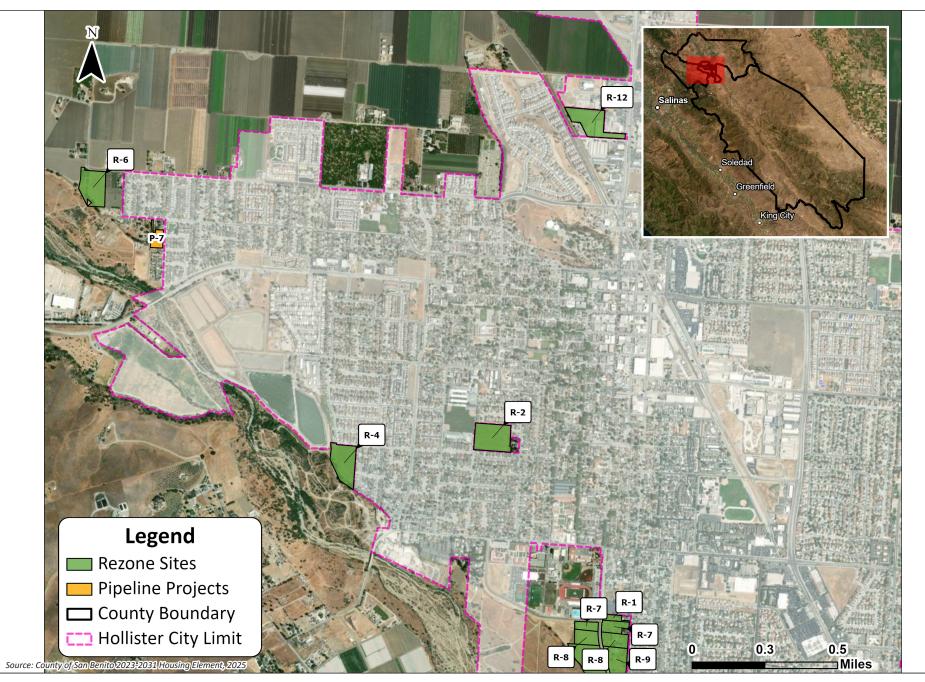


Exhibit 2-5: Candidate Housing Sites Inventory Map (Northwest)

County of San Benito 2023-2031 Housing Element Initial Study/Mitigated Negative Declaration



3.0 INITIAL STUDY CHECKLIST

1. Project title:

County of San Benito 2023-2031 Housing Element Implementation Project

2. Lead agency name and address:

County of San Benito

Planning and Land Use Division

2301 Technology Parkway, 1st Floor

Hollister, CA 95023

3. Contact person and phone number:

Stephanie Reck, Senior Planner

(831) 902-2289

4. Project location:

Unincorporated areas of San Benito County, primarily within or adjacent to the City of Hollister's Sphere of Influence

5. Project sponsor's name and address:

County of San Benito

Planning and Building Department

2301 Technology Parkway, 1st Floor, Hollister, CA 95023

6. General plan designation:

Existing designations: Residential Mixed (10 sites), Agriculture (2 sites)

Proposed designation: Residential High (20–45 dwelling units per acre) on all 12 candidate housing

sites

7. Zoning:

Existing zoning: Rural Residential (RR) for 10 sites, Agricultural Productive (AP) for 2 sites

Proposed zoning: Residential High for all 12 candidate housing sites

8. Description of project:

The proposed Project involves implementation of the County's 6th Cycle Housing Element Program 3-2, which includes amending the General Plan and Zoning Code to allow higher-density residential development (20–45 du/ac) on 12 candidate housing sites in the unincorporated County. The

Project would create a new General Plan Residential High land use designation and a new Residential High zoning district, apply it to the 12 sites (totaling approximately 100 acres), and establish zoning capacity to accommodate 4,497 new housing units. The Project is programmatic in nature and does not approve or entitle any site-specific development. Future housing projects would occur incrementally over time and may be subject to ministerial or discretionary review depending on applicable State housing laws. This IS/MND analyzes the full development capacity of all 12 candidate sites for purposes of CEQA.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The candidate housing sites are located in the unincorporated area surrounding the City of Hollister, within and surrounding the City's Sphere of Influence. The land uses surrounding the sites generally consist of rural residential, agricultural, vacant, and transitional uses, with access to existing transportation infrastructure and proximity to urban services.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

California Department of Housing and Community Development (HCD) – Housing Element certification oversight.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

See Section 4.18: Tribal Cultural Resources.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Greenhouse Gas Emissions	S		Public Services		
	Air Quality	\boxtimes	Hazards & Hazardous			Recreation		
	Agricultural and Forestry		Materials		\boxtimes	Transportation		
	Resources		Hydrology/Water Quality		\boxtimes	Tribal Cultural Resources		
\boxtimes	Biological Resources		Land Use/Planning			Utilities/Service Systems		
	Cultural Resources		Mineral Resources			Wildfire		
	Energy	\boxtimes	Noise			Mandatory Findings of		
	Geology/Soils		Population/Housing			Significance		
DETE	ERMINATION:							
On th	ne basis of this initial evaluatio	n (ch	eck one):					
	I find that the proposed pro NEGATIVE DECLARATION will		_	ant e	ffect	on the environment, and a		
	I find that although the prop- will not be a significant effec- agreed to by the project prop-	ct in t	his case because revisions	in th	e pro	ject have been made by or		
	I find that the proposed p ENVIRONMENTAL IMPACT RI	-	~	effec	t on	the environment, and an		
	I find that although the probecause all potentially signiful NEGATIVE DECLARATION purpursuant to that earlier EIR of that are imposed upon the probecause of the probability of the probecause of the probability of the probecause of the probability of t	ficant suant r NEC	effects (a) have been ana to applicable standards, ar GATIVE DECLARATION, inclu	lyzed nd (b) iding	ade have revisi	quately in an earlier EIR or e been avoided or mitigated ions or mitigation measures		
CER1	TIFICATION:							
A	Lephenie Rock							
	pure		<u>September</u>	11, 20	025			
Signa	ture		Date					

4.0 ENVIRONMENTAL ANALYSIS

This section presents the environmental analysis of the Project, structured in accordance with State CEQA Guidelines Appendix G. The analysis evaluates potential environmental effects across the full range of environmental resource topics, incorporating both qualitative and quantitative assessments to determine whether the Project would result in significant environmental impacts.

Each topic includes an evaluation of potential direct, indirect, short-term (construction), and long-term (operational) impacts, as well as cumulative impacts where applicable. The analysis considers the whole of the Project, including on-site and off-site components and related foreseeable development resulting from the Project's implementation. For each environmental resource topic, the analysis:

- Identifies the applicable significance thresholds or criteria used to evaluate impacts;
- Describes the environmental setting and relevant regulatory context;
- Evaluates the nature and extent of potential environmental impacts;
- Identifies mitigation measures, if needed, to reduce impacts to a less-than-significant level in compliance with State CEQA Guidelines §15126.4.

Responses are provided for each checklist question, using the following standard CEQA impact determination categories:

- **No Impact.** The Project would not result in any measurable environmental impact, or the impact would clearly fall below any threshold of significance.
- Less Than Significant Impact. The Project may result in impacts on the environment, but those impacts would not exceed applicable significance thresholds and would not require mitigation.
- Less Than Significant With Mitigation Incorporated. The Project has the potential to result in impacts that, without mitigation, would exceed applicable significance thresholds. However, implementation of the identified mitigation measures would reduce those impacts to a level less than significant.
- **Potentially Significant Impact.** The Project could result in impacts that may exceed applicable thresholds and may cause a significant effect on the environment. Additional environmental analysis or mitigation is necessary to fully evaluate and address these impacts.

For responses identified as "No Impact," this Initial Study provides appropriate justification based on site conditions, regulatory protections, or supporting technical information. For all other determinations, a rationale and discussion are provided. Where feasible and appropriate, the analysis uses applicable quantitative data, modeling results, or adopted thresholds from the County of San Benito or other responsible or trustee agencies.

4.1 AESTHETICS

	/IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	AESTHETICS. Except as provided in Public Resources	Loue Section 2	z 1099, would th	e project:	
a)	Have a substantial adverse effect on a scenic vista?			Х	
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?			Х	
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			Х	
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			Х	

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Scenic vistas are generally defined as expansive public views of prominent natural features, such as mountain ranges and open agricultural landscapes. The General Plan Natural and Cultural Resources Element identifies scenic vistas as including views of the Diablo and Gabilan mountain ranges, undeveloped rangelands, annual grasslands, and large agricultural fields and croplands. A substantial adverse effect would occur if new development were to obstruct or substantially degrade public views of these scenic vistas, particularly from designated scenic roadways or view corridors.

Although the Project does not authorize specific construction, future residential development on the rezoned candidate sites could modify scenic vistas depending on site-specific characteristics such as location, elevation, and design. However, future development would be subject to the County's development review process, including design and site plan review, which ensures compliance with General Plan goals that protect scenic resources. For example, General Plan Goal LU-1 calls for the

protection of the County's rural character, natural beauty, and scenic vistas. Goal LU-4 encourages the use of clustered residential site plans to preserve valuable natural resources. Goal LU-7 directs the County to require screening of visual impacts from new development, particularly when visible from scenic highways or other public vantage points. Goal LU-8 promotes development patterns that preserve and enhance the County's visual character, including its viewsheds and scenic vistas. Additionally, Goal NCR-8 establishes the County's intent to enhance and preserve scenic vistas and corridors through measures such as architectural review, height and setback regulations, and scenic corridor protection standards.

Because future development would be reviewed for consistency with these General Plan goals, and would be required to incorporate design features that avoid or minimize adverse visual impacts, future housing development facilitated by the Project would not result in a substantial adverse effect on a scenic vista. Impacts would be less than significant, and no mitigation is required.

b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Scenic highways are defined in Streets and Highways Code §260 et seq. and officially designated by the California Department of Transportation (Caltrans). According to the County's General Plan EIR (Figure 5-1), several roadways in San Benito County (i.e., US 101, SR 129, SR 146, SR 156, and SR 25), are either eligible for designation or are locally identified as scenic routes. However, none are currently designated as official State Scenic Highways by Caltrans. Therefore, none of the 12 candidate housing sites are located within a State scenic highway.

Future residential development on the following candidate housing sites would be located within a highway either eligible for designation or locally identified as a scenic route. However, future residential development would be subject to the County's development review and permitting process, which includes requirements to protect scenic resources in accordance with the General Plan and County Code. General Plan Goal NCR-8 and its supporting policies (NCR-8.1 through NCR-8.12) require the protection of scenic corridors by regulating building height, massing, grading, setbacks, landscaping, and utility infrastructure. Goal LU-7 further supports these protections by requiring visual screening of development visible from scenic corridors.

Because no officially designated State Scenic Highways traverse the Project area, and because future development would be reviewed for consistency with scenic resource protection policies, future housing development facilitated by the Project would not substantially damage scenic resources within a State Scenic Highway. Impacts would be less than significant, and no mitigation is required.

c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly

accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

The candidate sites are located in unincorporated areas of the County near the City of Hollister, where infrastructure and services are available. Of the 12 sites, six are fully vacant and the remaining six are either mostly undeveloped (i.e., more than 80 percent vacant) or functionally vacant, even if they do not meet HCD's strict definition of a vacant site. Future housing development would introduce new structures and alter the existing visual character of these sites, which are generally non-urbanized.

However, future residential development would occur in areas identified for residential growth in the General Plan and would be subject to the County's development standards and review process. Several General Plan policies are specifically intended to preserve the visual character of public views. Policy NCR-8.9 prohibits development within 100 vertical feet of a ridgeline unless no feasible alternatives exist. Policy NCR-8.11 requires that new development be screened or designed to appear similar in character to surrounding agricultural or rural uses. Policy LU-7.7 requires visual screening of elements such as storage areas, trash enclosures, and loading docks to reduce visual impacts from public areas. Policy LU-7.10 encourages new development to be designed in a manner that complements its surroundings, including nearby development, open landscapes, and key gateways into developed areas. This policy also emphasizes internal coherence in building design, scale, and layout.

These policies, implemented through the County's permitting process, would ensure that future residential development would avoid substantial degradation of public views. Therefore, future housing development facilitated by the Project would not substantially degrade the existing visual character or quality of the area. Impacts would be less than significant, and no mitigation is required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Future residential development would introduce new sources of light and glare (e.g., building lighting, street and security lighting, or reflective building materials). However, these impacts would be minimized through mandatory compliance with existing regulatory standards. The California Energy Code (Title 24) establishes energy efficiency standards for lighting and limits excessive outdoor illumination. County Code Chapter 19.31: Development Lighting sets standards to minimize light pollution, glare, and light trespass and is consistent with "dark sky" principles. In addition, the County's Building Regulations (County Code Chapter 21.01: Building and Engineering) adopts the California Building Code, including provisions that limit the use of reflective materials to reduce glare.

These standards regulate lighting design, fixture type and orientation, and building materials. Compliance would be verified during the County's development review and permitting process. As a result, future housing development facilitated by the Project would not create new sources of substantial light or glare that would adversely affect day or nighttime views. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

ENV	/IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
2.	AGRICULTURE AND FORESTRY RESOURCES. In determinin significant environmental effects, lead agencies may refer Assessment Model (1997) prepared by the California Depassessing impacts on agriculture and farmland. In determ timberland, are significant environmental effects, lead ag California Department of Forestry and Fire Protection reg Forest and Range Assessment Project and the Forest Legamethodology provided in Forest Protocols adopted by the	r to the Californ artment of Con- ining whether in the con- encies may refearding the state of the con- cy Assessment	ia Agricultural La servation as an op mpacts to forest operation or to information of forest project; and forest	nd Evaluation a ptional model t resources, inclu compiled by th prest land, inclu st carbon meas	and Site to use in tiding e ding the urement
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			Х	
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?			х	
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?			х	
d)	Result in the loss of forest land or conversion of forest land to non-forest use?			х	
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			Х	

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future

development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), 11 of the 12 candidate housing sites are designated as Urban and Built-Up Land and are not considered Farmland under CEQA.² One candidate housing site (Site R-12) is designated as Prime Farmland. While the Project does not authorize construction, the Project would facilitate future housing development, which could result in the conversion of land mapped as Prime Farmland at Site R-12 to non-agricultural use.

Although Site R-12 is designated as Prime Farmland, it is not currently in active agricultural production. Approximately 80 percent of the site is vacant, and the developed portion contains structures used for equipment storage. Under CEQA, farmland significance is based on FMMP mapping rather than current use. However, the site's partial disturbance, adjacency to urban development, and lack of active farming reduce its long-term viability for agriculture use.

The County's General Plan includes policies that discourage unnecessary conversion of farmland and encourage efficient land use patterns. Goal LU-1 promotes preservation of rural character and natural beauty while accommodating future growth. Policy LU-1.2 encourages compact development patterns that reduce VMT and minimize the consumption of open land. Policy LU-1.5 supports infill development and discourages conversion of agricultural or open space land unless necessary. Additionally, Policy LU-3.10 encourages preservation of an equivalent number of acres on- or off-site when Prime Farmland (Class I soils) is permanently converted to non-agricultural use.

These policies provide a strong framework for minimizing or offsetting farmland conversion. Given that only Site R-12 is mapped as Prime Farmland and it is not actively farmed, and given the General Plan contains policies to guide and mitigate farmland loss, the Project would not result in a significant impact concerning the conversion of Prime Farmland to non-agricultural use. Impacts would be less than significant, and no mitigation is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

None of the candidate housing sites are under Williamson Act contract.³ Two sites are currently zoned Agricultural Productive District. The Project proposes to rezone these sites to Residential High District to meet the County's RHNA allocation. Upon rezoning, these sites would no longer be zoned for agricultural use, and subsequent development would not conflict with existing

² California Department of Conservation. California Important Farmland Finder (CIFF). Published n.d. Accessed July 28, 2025. Available: https://maps.conservation.ca.gov/DLRP/CIFF/.

³ California Department of Conservation. California Williamson Act Portal. Published n.d. Accessed July 28, 2025. Available: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html.

agricultural zoning or Williamson Act contracts. Therefore, impacts would be less than significant, and no mitigation is required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. None of the 12 candidate housing sites are zoned as forest land, timberland, or Timberland Production Zone. As such, the Project would not rezone or otherwise conflict with zoning related to forest or timberland resources. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No forest land is present on or adjacent to the 12 candidate housing sites. Therefore, the Project would not result in direct or indirect conversion of forest land to non-forest use. No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

As noted under Threshold 4.2(a), only one site (R-12) is designated as Prime Farmland. While the site is not actively farmed, future residential development enabled by the Project could result in the conversion of land designated as Prime Farmland to non-agricultural use. However, this potential impact would be limited to a single site that is partially developed and disturbed. The County's General Plan provides policy direction to reduce or offset farmland conversion, including Policy LU-3.10, which encourages compensatory preservation when farmland is permanently lost.

The Project does not include or facilitate infrastructure expansion or other indirect changes likely to induce broader conversion of agricultural or forest resources. No forest land occurs on or near the candidate sites, and there are no foreseeable secondary effects of the Project that would contribute to forest land conversion. Therefore, the Project would not involve other changes in the environment that could result in substantial conversion of farmland or forest land. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.3 AIR QUALITY

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.	AIR QUALITY. Where available, the significance criter management district or air pollution control district or determinations. Would the project:		• • •	•	
a)	Conflict with or obstruct implementation of the applicable air quality plan?			Х	
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			Х	
c)	Expose sensitive receptors to substantial pollutant concentrations?			Х	
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			Х	

Air Quality Background

MBARD CEQA Significance Thresholds

The Monterey Bay Air Resource District (MBARD) 2008 CEQA Air Quality Guidelines establish significance thresholds for evaluating short-term construction and long-term operational air quality impacts under CEQA. For construction, the Guidelines identify activity levels that could cause significant temporary air quality impacts if not mitigated.

As shown in **Table 6: MBARD Construction Air Emissions Thresholds**, construction activities such as excavation, grading, and on-site equipment use that generate 82 pounds or more of particulate matter less than 10 microns in diameter (PM₁₀) per day would result in a significant impact on local air quality.

MBARD applies CEQA significance criteria that incorporates applicable United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB). These criteria include the determination that exceedance of any National Ambient Air Quality Standard (NAAQS) constitutes a significant impact; the use of federal offset thresholds for PM₁₀ and carbon monoxide (CO), set at 82 and 550 lbs./day, respectively, as criteria for significance; and the application of conformity requirements for certain general development and transportation projects under the State Implementation Plan (SIP) as part of the cumulative significance analysis. In addition, MBARD considers project emissions that are not

included in the regional Air Quality Management Plan (AQMP) emissions inventory to be a cumulatively considerable contribution to regional air quality impacts.

The MBARD's thresholds of significance for operational impacts are specific to the North Central Coast Air Basin and are presented in **Table 7: MBARD Operational Air Emissions Thresholds**. For fugitive PM₁₀ emissions during operations, the 82-pund-per-day threshold applies only to onsite sources and project-related travel on unpaved roads. Because most future residential development facilitated by the Project would occur near paved infrastructure, exceedance of this threshold is generally unlikely. However, for larger development projects, MBARD allows the use of dispersion modeling to evaluate whether emissions would cause or contribute to exceedance of the NAAQS or California Ambient Air Quality Standards (CAAQS).

Table 6: MBARD Construction Air Emissions Thresholds

Pollutant of Concern	Daily Threshold	Comments			
PM ₁₀ (fugitive dust)	82 lbs./day	Example thresholds: (1) Construction site with minimal earthmoving exceeding 8.1 acres per day; (2) Construction site with earthmoving (grading, excavation) exceeding 2.2 acres per day.			
Source: Monterey Bay Unified Air Pollution Control District (now MBARD). CEQA Air Quality Guidelines. Published 2008.					

Source: Monterey Bay Unified Air Pollution Control District (now MBARD). CEQA Air Quality Guidelines. Published 2008. Accessed July 28, 2025. Available: https://www.mbard.org/files/58b2d6f4c/CEQA Air Quality Guidelines 2008.pdf.

Table 7: MBARD Operational Air Emissions Thresholds

Pollutant of Concern	Daily Threshold	Comments
Ozone Precursors (NO _X as NO ₂)	137 lbs./day (direct + indirect)	
Fugitive Particulate Matter (PM ₁₀), Dust	82 lbs./day (on-site) AAQS exceeded along unpaved roads (off-site)	The District's 82 lb./day operational phase threshold of significance applies only to on-site emissions and project-related exceedances along unpaved roads. These impacts are generally less than significant. On large development projects, almost all travel is on paved roads (0%) unpaved), and entrained road dust from vehicular travel can exceed the significance threshold. District approved dispersion modeling can be used to refute (or validate) a determination of significance if modeling shows that emissions would not cause or substantially contribute to an exceedance of State and national AAQS.
со	LOS at intersection/road segment degrades from D or better to E or F or V/C ratio at intersection/road segment at LOS E or F increases by 0.05 or more or delay at intersection at LOS E or F increases by 10 seconds or more or reserve capacity at unsignalized intersection at LOS E or F decreases by 50 or more.	Modeling should be undertaken to determine if the project would cause or substantially contribute (550 lbs./day) to exceedance of CO AAQS. If not, the project would not have a significant impact;
SO _X or SO ₂	150 lbs./day (direct)	

Source: Monterey Bay Unified Air Pollution Control District (now MBARD). CEQA Air Quality Guidelines. Published 2008. Accessed July 28, 2025. Available: https://www.mbard.org/files/58b2d6f4c/CEQA Air Quality Guidelines 2008.pdf.

Impact Analysis

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

The Project is located within the North Central Coast Air Basin, which is under the jurisdiction of the MBARD. MBARD is responsible for preparing and implementing the region's AQMP in compliance with the California Clean Air Act. The 2012-2015 AQMP, adopted in March 2017, is the most recent plan and identifies emissions inventories and control strategies to achieve compliance with the State 8-hour ozone standard. The AQMP is based on regional growth projections developed by the Association of Monterey Bay Area Governments (AMBAG) and focuses on reducing emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x), which are precursors to ozone formation.

A project is considered consistent with the AQMP if it would not conflict with any of its adopted control measures and if its population or employment growth does not exceed the projections used in the AQMP's emissions inventory. The Project includes General Plan and Zoning Code amendments to implement the County's 6th Cycle HEU, which would accommodate up to 4,497 new DU. This housing capacity includes a buffer to comply with State Housing Element law and ensure adequate residential sites remain available to meet the County's RHNA throughout the planning period.

Although the HEU is intended to fulfill the County's statutory housing obligation, the Project's full residential capacity would exceed the population growth assumptions used in MBARD's 2012-2015 AQMP and AMBAG's 2022 regional growth forecast. This discrepancy could be viewed as a potential inconsistency with the AQMP's population-based emissions projections. However, the AQMP explicitly acknowledges that it will be updated periodically to reflect new data and evolving State mandates. The current plan, adopted in 2017, does not account for more recent housing laws or the County's 6th Cycle RHNA.

The proposed Project would implement State housing priorities that support infill development, efficient land use, and reductions in VMT. These priorities are broadly consistent with the AQMP's objectives. Moreover, the Project would not authorize site-specific construction. Future residential development would be subject to the County's development review process and required to comply with all applicable MBARD rules and regulations, including Rule 402 (Nuisance), Rule 426 (Architectural Coatings), Rule 425 (Use of Cutback Asphalt), Rule 439 (Building Removals), and Rule 1000 (Permit Guidelines and Requirements for Sources Emitting Toxic Air Contaminants). These rules function as enforceable emissions control strategies for both construction and operation.

Although Project implementation would cause exceedances of the AQMP's population assumptions, it would not interfere with implementation of the AQMP's control measures. It would facilitate infill housing consistent with evolving State and regional planning policies, and all future residential development would be subject to MBARD regulations. Therefore, the Project would not

obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. The North Central Coast Air Basin is designated as non-attainment for the State 8-hour ozone standard and the State 24-hour PM₁₀ standard. These designations represent an existing cumulatively significant condition under CEQA. A project's emissions are considered cumulatively considerable if they would exceed MBARD's CEQA thresholds of significance or conflict with the region's AQMP.

The Project would implement the County's 6th Cycle HEU through policy-level General Plan and Zoning Code amendments that facilitate future residential development on 12 candidate sites. The HEU accommodates up to 4,497 new DU, which would exceed the growth assumptions used in the 2012-2015 AQMP. As a result, emissions associated with future housing development could incrementally contribute to regional pollutant levels that are already cumulatively significant.

However, the Project does not propose or authorize physical development. Future construction would occur incrementally over time through separate approvals and would be subject to the County's development review process and project-specific environmental evaluation, as applicable. Construction emissions from future residential development could include ozone precursors (NO_x and ROG), diesel particulate matter (DPM), and fugitive dust from grading and earthmoving. MBARD's 2008 CEQA Air Quality Guidelines identify a daily threshold of 82 pounds of PM₁₀ for construction activities occurring onsite.

Although the full residential capacity of the HEU could result in emissions that approach or exceed this threshold cumulatively, the Project itself would not directly generate emissions. It serves as a policy framework to guide future housing, which would be implemented through individual projects subject to CEQA review and emissions mitigation, as necessary.

All future development would be required to comply with MBARD rules and CARB regulations that reduce emissions from construction, materials, and mobile sources. These include Rule 402 (Nuisance), Rule 426 (Architectural Coatings), Rule 425 (Use of Cutback Asphalt), Rule 439 (Building Removals), and Rule 1000 (Permit Guidelines and Requirements for Sources Emitting Toxic Air Contaminants), the California Green Building Standards Code (CALGreen), the Title 24 Energy Code, and CARB's Advanced Clean Cars program.

Because the Project would not directly emit pollutants, relies on future development approvals, and ensures compliance with applicable air quality regulations, its contribution to criteria pollutant emissions would not be cumulatively considerable. Impacts would be less than significant, and no mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors include residences, schools, hospitals, daycare centers, and other locations where children, the elderly, or individuals with health conditions may

be exposed to air pollution. Exposure to localized concentrations of DPM, CO, and other toxic air contaminants (TACs) can result in adverse health effects.

The Project does not propose or authorize site-specific development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Construction of future residential development could temporarily generate localized emissions of DPM from diesel-powered equipment near sensitive receptors. However, such equipment is regulated under CARB's In-Use Off-Road Diesel Vehicle Regulation (Title 13, CCR Section 2449) and Heavy-Duty Vehicle Idling Restrictions (13 CCR Section 2485), which limit fleet emissions and restrict idling to five minutes. These standards reduce the potential for construction-related health risks near sensitive receptors.

With respect to operational impacts, CARB's Air Quality and Land Use Handbook: A Community Health Perspective (2005) recommends avoiding the placement of sensitive receptors within 500 feet of freeways and high-volume roadways due to long-term exposure to mobile-source TACs. Because the Project does not identify specific development or building footprints, the proximity of future housing to major highways cannot be determined at this time. However, future projects would be evaluated on a case-by-case basis through the County's development review process and may be subject to health risk screening if located near known emission sources.

Localized CO "hotspots" formation is no longer a major concern in California due to improved vehicle emissions technology and declining background levels. The 2012-2015 AQMP indicates that no violations of CO standards have been recorded within the Air Basin in recent years. MBARD recommends CO modeling only for large development projects that would cause intersections to operate at levels of service E or F. Because the Project is programmatic and does not propose traffic-generating development, it would not result in CO hotspots.

All future development would be subject to MBARD Rule 402 (Nuisance) and Rule 1000 (Permit Guidelines and Requirements for Sources Emitting Toxic Air Contaminants), which prohibit emissions that cause a nuisance or contribute to increased health risks. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation is required.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Land uses typically associated with odor complaints include wastewater treatment plants, landfills, composting operations, food processing plants, refineries, and chemical manufacturing plants. The Project does not include any of these odor-generating land uses.

Construction of future residential development could generate short-term odors from heavy-duty diesel equipment, asphalt paving, and architectural coatings. However, these emissions would be

temporary, limited in intensity and duration, and generally not considered offensive at levels that would affect adjacent land uses. Upon completion of construction, odor emissions would cease.

MBARD Rule 402 prohibits the discharge of air contaminants that cause injury, detriment, nuisance, or annoyance to a considerable number of people. Residential development is not typically associated with objectionable odors and future residential development would be similar to surrounding land uses. Therefore, the Project would not result in odor impacts affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.4 BIOLOGICAL RESOURCES

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
4.	BIOLOGICAL RESOURCES. Would the project:				
a)	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 the California Department of Fish and Game or U.S. Fish and Wildlife Service?			Х	
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			X	
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological			Х	
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			х	
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			Х	

a) 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 the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Although the Project would not directly affect biological resources, future housing development could affect species identified as candidate, sensitive, or special-status by the California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS), or local or regional plans and policies. Much of the land in unincorporated San Benito County consists of rangeland, pasture, and annual grasslands, with some areas supporting tree-dominated habitat. Portions of the eastern County, such as the Panoche Valley, provide habitat for sensitive species including the San Joaquin kit fox, giant kangaroo rat, blunt-nosed leopard lizard, and San Joaquin wooly-threads, all of which are listed under the federal and/or California Endangered Species Acts.

Development on candidate housing sites that contain or are adjacent to suitable habitat for these or other special-status species could result in habitat modification, disturbance, or direct take, which would constitute a potentially significant impact. However, future housing development would be subject to federal, State, and County regulations and policies that protect biological resources. These include the California Endangered Species Act and federal Endangered Species Act, which require avoidance or mitigation for any take of listed species. At the local level, General Plan Policy NCR-2.2 requires major subdivisions located in potential habitat for listed species to provide mitigation. Policy NCR-2.8 requires site-specific biological resource assessments for new development proposals, including focused surveys for special-status species and appropriate avoidance or mitigation measures. Policy NCR-2.9 further requires applicants to demonstrate that adequate funding is available to implement biological mitigation and monitoring requirements.

These policies and regulations apply regardless of whether a future housing project is discretionary or ministerial. With adherence to existing federal, State, and County requirements, the Project would not result in a substantial adverse effect on candidate, sensitive, or special-status species. Impacts would be less than significant, and no mitigation is required.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time depending on market conditions, economic factors, and individual property owner decisions.

Although the Project would not directly impact any riparian habitat or sensitive natural community, future development could result in indirect impacts if such resources are present on or adjacent to candidate sites. Sensitive natural communities in San Benito County include riparian areas, oak woodlands, native grasslands, and seasonal wetlands.

All future development would be subject to County policies and permitting requirements that protect these resources. General Plan Policy NCR-2.8 requires site-specific biological resource assessment that identify sensitive natural communities and recommend appropriate avoidance or mitigation measures. Policy NCR-2.5 encourages conservation of sensitive habitats and requires that development avoid these resources to the extent feasible, with compensatory mitigation required when avoidance is not possible. County Code Chapter 19.17: Grading, Drainage and Erosion Control prohibits grading within 50 feet of streams, creeks, and other water bodies unless authorized through permit conditions.

These requirements apply regardless of whether a future housing project is discretionary or ministerial, and would ensure that sensitive natural communities are identified and addressed during project-level review. As a result, Project implementation would not result in a substantial adverse effect on riparian habitat or other sensitive natural communities. Impacts would be less than significant, and no mitigation is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time depending on market conditions, economic factors, and individual property owner decisions.

Although the Project would not directly affect wetlands, some candidate housing sites may contain or be adjacent to federally or State-protected wetlands such as vernal pools, marshes, or seasonal drainage features. Improper siting or construction could result in removal, filling, or alteration of such features.

Future development must comply with applicable wetland protection regulations, including Section 404 of the Clean Water Act (administered by the U.S. Army Corps of Engineers), Section 401 (water quality certification through the Regional Water Quality Control Board), and California Fish and Game Code Section 1600 et seq. (Lake or Streambed Alteration Agreements). Locally, County Code Chapter 19.17 prohibits grading within 50 feet of wetlands unless authorized. General Plan Policy NCR-2.8 requires biological assessments that identify jurisdictional wetlands and recommend avoidance or mitigation.

These requirements apply regardless of whether a future housing project is discretionary or ministerial, and would ensure that wetland impacts are avoided or mitigated through standard permitting procedures. Therefore, the Project would not result in a substantial adverse effect on

State or federally protected wetlands. Impacts would be less than significant, and no mitigation is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact With Mitigation Incorporated. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Although the Project would not directly interfere with wildlife movement, future development could disturb vegetation or habitat used by wildlife for nesting, foraging, or migration. The 12 candidate sites are generally vacant or underutilized and may support vegetation that provides habitat for birds protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3513. Vegetation removal during the nesting season could result in destruction of active nests.

MM BIO-1 requires pre-construction nesting bird surveys and the establishment of no-disturbance buffers if active nests are present. This requirement applies to all future development, regardless of whether it is discretionary or ministerial, and may be enforced through permitting conditions for grading or site disturbance. In addition, General Plan Policy NCR-2.8 requires biological assessments that identify potential wildlife corridors or nursery sites and recommend avoidance or mitigation strategies as appropriate.

With implementation of MM BIO-1 and adherence to General Plan Policy NCR-2.8, the Project would avoid or minimize impacts on wildlife movement and nesting habitat. Impacts would be less than significant with mitigation incorporated.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time depending on market conditions, economic factors, and individual property owner decisions.

Future development would be subject to the County's biological resource policies and ordinances regardless of whether a future housing project is discretionary or ministerial. Policy NCR-2.8 requires biological assessments for new development proposals to identify sensitive resources and recommend mitigation. County Code Chapter 19.19: Habitat Conservation Plan Study Area requires payment of impact fees in the Habitat Conservation Plan Study Area. County Code Chapter 19.17 limits grading near streams and wetlands. County Code §25.07.018: Tree Protection and Chapter 19.33: Management and Conservation of Woodlands establish tree protection standards and woodland conservation requirements. General Plan Policies NCR-2.6 and NCR-2.7 support oak woodland conservation and mitigation. These policies and regulations apply broadly and ensure

that future housing development complies with local biological protection standards. Therefore, the Project would not conflict with applicable local policies or ordinances. Impacts would be less than significant, and no mitigation is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project area is not located within the boundaries of any adopted Habitat Conservation Plan or a Natural Community Conservation Plan.⁴ Therefore, the Project would not conflict with any approved local, regional, or State conservation plans, and no impact would occur.

Mitigation Measures

MM BIO-1 Pre-0

Pre-Construction Nesting Bird Survey. To avoid direct impacts on nesting birds protected under the MBTA and California Fish and Game Code, all future residential development projects facilitated by the Project must implement the following measures prior to any vegetation removal, demolition, grading, or construction during the nesting season (generally January 15 through August 31, or as determined by a qualified biologist):

A qualified biologist shall conduct a nesting bird survey within three days prior to ground disturbance. The survey area shall include the disturbance footprint and a 300-foot buffer (or 500 feet for raptors), as feasible. If active nests are found, the biologist shall establish appropriate no-disturbance buffers and confirm nest inactivity before work proceeds. If avoidance is not feasible, the applicant must consult with CDFW and implement compensatory measures. The applicant shall submit documentation of the survey and any required protection measures to the County prior to issuance of permits.

⁴ California Department of Fish and Wildlife (CDFW). Conservation Plan Boundaries (HCP and NCCP) – DS760. Published May 30, 2024. Accessed July 16, 2025. Available: https://data-cdfw.opendata.arcgis.com/datasets/CDFW::conservation-plan-boundaries-hcp-and-nccp-ds760/explore.

4.5 CULTURAL RESOURCES

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
5.	CULTURAL RESOURCES. Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?			Х	
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		Х		
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?		Х		

a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Under CEQA, a historical resource is defined in State CEQA Guidelines §15064.5 as any resource that is: (1) listed or determined eligible for listing in the California Register of Historical Resources (CRHR); (2) listed in a local register of historical resources; or (3) determined by the lead agency to be historically significant using criteria consistent with the CRHR (Pub. Res. Code §5024.1). A resource need not be formally listed to qualify as a historical resource under CEQA. CEQA defines a substantial adverse change in the significance of a historical resource as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the resource's historical significance would be materially impaired (State CEQA Guidelines §15064.5(b)).

According to the County's General Plan EIR, several known historical resources are present in unincorporated San Benito County, including the Ben Bacon Ranch Historic District, Pinnacles East Entrance District, Bear Gulch Cave Trail, New Idria Mine, and Fremont Peak. None of these are located on or adjacent to the 12 candidate housing sites. However, over the course of Project implementation, structures present on some candidate sites may reach or exceed 50 years of age, a common preliminary threshold for potential historical significance. Six of the 12 sites are

currently developed and may contain structures that could qualify as historical resources under the CRHR if they retain sufficient integrity of location, design, setting, materials, workmanship, feeling, and association.

Although the Project does not directly authorize demolition or development, future housing construction could result in the alteration or removal of potentially significant structures. To prevent such impacts, future development would be subject to federal, State, and local historic preservation requirements. These include the National Historic Preservation Act (NHPA) and Section 106 review where federal permits or funding are involved; State CEQA Guidelines §15064.5, which require identification and protection of historical resources; and San Benito County General Plan policies, including Policy NCR-7.4, which requires architectural compatibility of new development near historic structures; Policy NCR-7.5, which mandates justification for removal of structures 100 years or older; Policy NCR-7.6, which requires evaluation by a qualified historic consultant at the developer's expense; and Policy NCR-7.8, which encourages adaptive reuse of historic buildings when feasible.

Compliance with these requirements would ensure that future residential development projects would undergo appropriate historical review and that adverse effects would be identified and addressed. Therefore, the Project would not result in a substantial adverse change in the significance of a historical resource. Impacts would be less than significant, and no mitigation is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Although no known archaeological resources have been recorded on the candidate sites, future grading or excavation associated with housing development could expose previously undiscovered archaeological materials. Undeveloped sites have a higher likelihood of containing intact resources, while previously developed areas are less likely due to prior disturbance. If such materials meet the definition of a significant archaeological resource under State CEQA Guidelines §15064.5(a)(3), their disturbance could result in a substantial adverse change.

To address this potential, future development would be subject to General Plan Policy NCR-7.11, which prohibits unauthorized grading or collection of archaeological or tribal cultural resources; Policy NCR-7.12, which requires archaeological reports prepared by qualified specialists in areas likely to contain significant artifacts; and County Code Chapter 19.05: Archaeological Site Review, which mandates site surveys and evaluations for development on sensitive lands. Compliance with these requirements would ensure archaeological resources are appropriately evaluated and preserved.

Additionally, given the locations of the candidate housing sites, the Amah Mutsun Tribal Band of Costanoan/Ohlone Indians ("AMTB") recommends various mitigation measures; see in **Section 4.18: Tribal Cultural Resources**. As such, future housing development facilitated by the Project would incorporate **MM TCR-1**, which requires a Preliminary Archaeological Survey, **MM TCR-2**, which requires monitoring of all subsurface excavation by a Tribal Monitor, **MM TCR-3**, which specifies the procedures in the event there is discovery of human remains, and **MM TCR-4**, which specifies the disposition of ceremonial items and other tribal cultural resources. Therefore, compliance with the existing regulatory framework and incorporation of **MM TCR-1** through **MM TCR-4** would ensure the Project would not result in a substantial adverse change to archaeological resources. Impacts would be less than significant with mitigation incorporated.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant With Mitigation Incorporated. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Although there are no known cemeteries or burial sites on the candidate housing sites, future ground-disturbing activities could inadvertently uncover human remains. Such discoveries must be treated with legal and cultural sensitivity. All future development would be required to comply with California Health and Safety Code §§7050.5, 7051, and 7054, which mandate cessation of work and notification of the County Coroner upon discovery of human remains. If the remains are determined to be of Native American origin, the Coroner must contact the Native American Heritage Commission (NAHC), which will appoint a Most Likely Descendant (MLD) to oversee treatment and potential reinterment, pursuant to Public Resources Code §5097.98. These procedures apply regardless of whether the development is ministerial or discretionary and would be enforced through the County's standard permitting processes.

As previously noted, the AMTB recommend various mitigation measures. As such, future housing development facilitated by the Project would incorporate **MM TCR-1** through **MM TCR-4**. Therefore, compliance with the existing regulatory framework and incorporation of **MM TCR-1** through **MM TCR-4** would ensure appropriate handling of any discovered human remains. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

See MM TCR-1 through MM TCR-4 in Section 4.18.

4.6 ENERGY

ENV	IRONMENTAL IMPACTS ENERGY. Would the project:	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			Х	
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			Х	

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development through implementation of the HEU, including rezoning of 12 candidate housing sites. Actual development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

During future housing construction, energy use would primarily occur through diesel consumption in off-road construction equipment, gasoline used by construction worker vehicles, and embedded energy in materials such as steel, concrete, and asphalt. Construction-related energy consumption would be temporary and limited to the duration of construction activities, including site preparation, grading, and building. All future residential development would be subject to California's off-road diesel vehicle regulations (Title 13, CCR §2449), which limit engine idling and require emission standards that indirectly improve fuel efficiency. Construction would also be subject to CALGreen (Title 24, Part 11), which mandates that at least 65 percent of construction and demolition waste be diverted from landfills, reducing energy associated with raw material production and disposal. No unusual materials, processes, or equipment are anticipated that would result in excessive or inefficient energy consumption. Moreover, fuel costs and contractor scheduling constraints naturally discourage inefficient construction practices.

During operation, future residential development would consume electricity and natural gas for lighting, appliances, water and space heating, cooling, and other building energy uses, as well as gasoline or electricity for vehicle travel. All future buildings would be required to comply with California's Building Energy Efficiency Standards (Title 24, Part 6) and CALGreen, which are updated

every three years to improve energy efficiency, promote building electrification, and reduce energy-related greenhouse gas emissions. State policies such as Senate Bill (SB) 32 and the California Air Resources Board's Scoping Plan promote widespread electrification, decarbonization of the grid, adoption of zero-emission vehicles, and reduction of petroleum consumption.

Because the Project does not authorize site-specific development and because all future implementing projects would be required to comply with applicable energy regulations, it would not result in wasteful, inefficient, or unnecessary energy consumption during construction or operation. Impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The Project consists of General Plan and Zoning Code amendments that implement the HEU in accordance with State Housing Element Law. While the Project facilitates future housing development, it does not authorize or approve specific development projects. Future development would proceed incrementally and would be subject to the energy-related standards and permitting requirements in place at the time of construction.

All future residential development would be required to comply with the California Building Energy Efficiency Standards (Title 24, Part 6), the CALGreen Code (Title 24, Part 11), and applicable provisions of the County's General Plan. In addition, future residential development would align with statewide energy and climate policies, including SB 32 and CARB's 2022 Scoping Plan, which promote energy efficiency, electrification, renewable energy use, and transportation energy reduction.

The Project supports compact, infill development patterns, and implementation of the County's long-range planning and sustainability goals. It does not propose any features that would conflict with state or local energy policies. Therefore, the Project would not conflict with or obstruct implementation of a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.7 GEOLOGY AND SOILS

EN	/IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
7.	GEOLOGY AND SOILS. Would the project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
	ii) Strong seismic ground shaking?			Х	
	iii) Seismic-related ground failure, including liquefaction?			Х	
	iv) Landslides?			Х	
b)	Result in substantial soil erosion or the loss of topsoil?			х	
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			Х	
d)	Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			Х	
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			Х	

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

The Alquist-Priolo Earthquake Fault Zoning Act (Pub. Res. Code §§ 2621-2630) prohibits the siting of most structures for human occupancy across traces of active faults and requires site-specific geologic studies within designated fault zones. The intent is to mitigate the hazard of surface fault rupture by ensuring adequate setbacks and fault investigations prior to construction. The most recent Alquist-Priolo Earthquake Fault Zoning Maps identify multiple active fault zones in the County, including the San Andreas Fault Zone, which traverses the County north to south, and the Calaveras Fault Zone, which runs through the northern portion of the County and the City of Hollister.⁵

Some candidate housing sites may lie on or near active faults, and therefore, future development could pose a risk of fault rupture if not properly sited or engineered. However, any future development facilitated by the Project would be required to comply with the following:

- Alquist-Priolo Act, which mandates fault investigations and setbacks for projects within earthquake fault zones;
- California Building Standards Code (Title 24 of the California Code of Regulations), which prescribes structural design standards to withstand ground movement and rupture;
- San Benito County General Plan Seismic Safety Policies, including:
 - Policy HS-3.1 requiring earthquake-resistant designs for all critical structures;

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⁵ California Geological Survey (CGS). *Earthquake Zones of Required Investigation*. Published 2024. Accessed July 16, 2025 Available: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data-s=id%3AdataSource-4-191d8e93088-layer-27%3A13680.

- Policy HS-3.7 requiring geologic setback distances from active fault traces based on site-specific surface rupture investigations;
- Policy HS-3.9 requiring seismic hazard evaluations for multi-story or multi-family developments to identify and mitigate ground shaking and surface rupture risks.

In addition, the adopted 2021 San Benito County Multi-Jurisdictional Hazard Mitigation Plan (HMP) was prepared to reduce the County's vulnerability to natural and manmade disasters and increase community resilience, and addresses geologic hazards (e.g., earthquakes) and guides local agencies in minimizing risks from fault rupture and other seismic hazards.

Through compliance with the Alquist-Priolo Act, site-specific geologic investigations, County General Plan policies, and Title 24 construction standards, future residential development would be designed and located to minimize the risk of fault rupture. There are no unusual geologic conditions or Project characteristics that would result in greater risk than comparable development elsewhere in the County. Therefore, future development facilitated by the Project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault. Impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

San Benito County is located in a seismically active region of California and is traversed by several major active faults, including the San Andreas Fault and the Calaveras Fault, both of which are capable of generating large-magnitude earthquakes. As a result, future housing development facilitated by the Project could expose people and structures to strong seismic ground shaking. However, all future housing development facilitated by the Project would be required to comply with applicable federal, State, and local seismic safety regulations and design standards, including the California Building Standards Code (Title 24, CCR), which establishes structural design requirements to withstand region-specific seismic forces; General Plan Policy HS-3.9, which requires geotechnical studies for multi-story buildings and multi-family housing to evaluate ground shaking risks and recommend design mitigation measures; and local plan check and permitting processes, which ensure buildings are designed using appropriate seismic design parameters for the County's geologic setting.

These requirements would ensure that new structures would be adequately engineered to reduce the risk of structural failure, loss, injury, or death associated with strong seismic ground shaking. There are no unusual geologic conditions or Project characteristics that would increase the risk of seismic impacts beyond those experienced by other comparable developments in the region. Therefore, the Project would not directly or indirectly expose people or structures to substantial adverse effects due to strong seismic ground shaking. Impacts would be less than significant.

- iii) Seismic-related ground failure, including liquefaction?
- iv) Landslides?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Liquefaction is a geologic phenomenon in which saturated, loose, granular soils lose strength during strong seismic shaking, resulting in ground failure. According to the San Benito County General Plan EIR, liquefaction has been reported during past earthquakes in areas such as Hollister and San Juan Bautista, particularly near creek corridors and in areas with unconsolidated sediments and shallow groundwater.

However, according to the California Geological Survey's Earthquake Zones of Required Investigation map, no State-designated liquefaction hazard zones have been delineated within the County under the Seismic Hazards Mapping Act (SHMA). This indicates that liquefaction potential in the County has not been formally mapped by the State Geologist as requiring regulatory investigation under the SHMA. Nevertheless, localized liquefaction risk may still exist in areas underlain by Quaternary alluvial deposits or near surface water features where groundwater is shallow. Therefore, individual candidate housing sites may still require evaluation based on site-specific geologic and groundwater conditions.

Future housing development facilitated by the Project would be subject to compliance with applicable seismic hazard design standards, including General Plan Policy HS-3.2, which requires siting and construction of structures, utilities, or public facilities in known liquefaction areas to minimize or eliminate potential damage, and Policy HS-3.8, which requires site-specific liquefaction investigations where liquefaction risk is suspected. Further, future housing development would be subject to the California Building Standards Code (Title 24, CCR), which requires geotechnical analysis and appropriate structural engineering to address seismic hazards, including liquefaction, where applicable. These regulatory mechanisms would ensure that liquefaction potential is assessed and mitigated where site-specific conditions warrant.

Landslides triggered by earthquakes can occur in areas with steep slopes, weak soils, or existing instability. While the candidate housing sites are generally located in relatively low-slope urban and semi-urban areas, some areas in the County contain hilly terrain where seismically induced slope failure could occur. Future development facilitated by the Project in areas with slope instability would be subject to compliance with the California Building Standards Code, which requires geotechnical investigations and landslide mitigation design for projects proposed on unstable slopes, and General Plan Policy LU-1.10, which discourages development in known landslide hazard areas.

⁶ California Geological Survey (CGS). *Earthquake Zones of Required Investigation*. Published 2024. Accessed July 16, 2025. Available: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data-s=id%3AdataSource-4-191d8e93088-layer-27%3A13680.

Through implementation of these site-specific requirements, potential risks related to ground failure, including liquefaction and seismically induced landslides, would be minimized. Therefore, future housing development facilitated by the Project would not directly or indirectly cause substantial adverse effects related to seismic ground failure, including liquefaction or landslides. Impacts would be less than significant and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Future housing development could involve grading, excavation, or vegetation removal, which may temporarily expose soils to wind and water erosion, particularly on sloped terrain or during storm events. If not properly managed, these activities could result in increased sedimentation, loss of topsoil, and downstream impacts. However, all future development would be subject to compliance with applicable federal, State, and local regulations that require erosion control and soil stabilization measures. These include the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which mandates the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and associated best management practices (BMPs) to prevent erosion and sediment discharge during construction. In addition, development would be subject to County Code Chapter 19.17, which requires that an Erosion and Drainage Control Plan be prepared prior to grading permit issuance.

Compliance with these regulatory requirements would ensure that erosion control measures are incorporated into future development and that construction-related soil disturbance is minimized and managed appropriately. Therefore, future housing development facilitated by the Project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation is required.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Future housing development could be located on or near geologic units or soils that are potentially unstable or expansive. These include areas subject to landslides, lateral spreading, subsidence, liquefaction, or soil expansion and contraction. While such geologic hazards exist in portions of San Benito County, all future housing development would be subject to the County's development

review process and required to comply with applicable federal, State, and local regulations and building standards that are specifically designed to minimize seismic and geologic risk.

The San Benito County General Plan contains a comprehensive set of policies under Goal HS-3 to protect life and property from geologic hazards. These include Policy HS-3.2, which requires structures in liquefaction or subsidence-prone areas to be designed to minimize potential damage; HS-3.6, which requires enforcement of the California Building Code and prohibits development on unstable soils unless detailed geotechnical studies demonstrate suitability; and HS-3.8, which requires site-specific liquefaction studies in areas of high liquefaction potential. Policy HS-3.9 requires seismic safety evaluations for multifamily or multi-story housing, and Policy LU-1.6 prohibits development on slopes greater than 30 percent or in known landslide areas without appropriate analysis and mitigation.

In addition to the General Plan, the County enforces the most recent version of the California Building Standards Code (Title 24), which includes specific engineering requirements for structures built on expansive soils and in seismically active areas. Site-specific geotechnical investigations, required during the permitting process, would identify any unstable or expansive soil conditions and ensure that appropriate foundation designs, drainage improvements, and construction techniques are used.

Following compliance with these policies, standards, and regulations, future development facilitated by the Project would be designed and sited to avoid or minimize risks associated with unstable or expansive soils. Therefore, the Project would not result in substantial direct or indirect risks related to geologic instability or expansive soils. Impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Future housing development facilitated by the Project may include the installation and operation of septic tanks or similar individual wastewater disposal systems. Installation and operation of septic tanks and similar individual wastewater disposal systems in unfit soils can lead to the degradation of groundwater quality or nearby waterways, and ultimately impact domestic groundwater and/or surface water sources. Septic systems can also create subsurface erosion and soil pollution problems. Prior to issuing a permit for a septic tank or alternative wastewater disposal system, the County Department of Environmental Health would assess whether soil and site conditions are favorable and whether the system design can meet the operational demand with minimal maintenance.

Further, future development would be required to adhere to General Plan Policies LU-10, PFS-4.3, PFS-5.5, and PFS-5.6, which require septic systems to be properly designed, constructed, and

maintained on development sites suitable for septic systems (i.e., avoid impervious soils, high percolation or high groundwater areas, and provide setbacks from creeks).

Through adherence to these standards, policies, and review procedures, future housing development facilitated by the Project would ensure that septic systems are sited and operated in a manner that avoids adverse impacts related to unsuitable soils. Therefore, impacts would be less than significant, and no mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Future ground-disturbing activities associated with housing construction facilitated by the Project could occur in areas underlain by geologic units with high paleontological sensitivity. These activities, including grading, trenching, and excavation, could damage or destroy scientifically important paleontological resources, including fossilized remains and associated stratigraphic data, particularly where development affects undisturbed sedimentary formations.

To reduce the potential for significant impacts, future development would be subject to compliance with MM GEO-1. MM-GEO-1 requires the preparation of a Paleontological Resources Assessment prior to ground disturbance in high-sensitivity areas and monitoring by a qualified paleontologist during construction, where undisturbed sensitive strata may be impacted. With the implementation of MM GEO-1, the Project would not directly or indirectly destroy a unique paleontological resource or site or a unique geologic feature. Therefore, potential impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM GEO-1 Paleontological Resources Assessment and Monitoring. Prior to ground disturbance at any future housing site located in an area mapped with high paleontological sensitivity (as determined using the County's geologic maps or other qualified sources), the project applicant shall retain a qualified professional paleontologist, meeting the Society of Vertebrate Paleontology (SVP) standards, to prepare a Paleontological Resources Assessment. The assessment shall include:

- 1. A review of published geologic mapping and paleontological literature;
- 2. A records search of known fossil localities;
- 3. A sensitivity determination for the specific site based on underlying geologic units; and
- 4. Site-specific recommendations for monitoring or other measures, if applicable.

If the site is confirmed to have high paleontological sensitivity and has not been previously disturbed, the project applicant shall retain a qualified paleontological monitor to be present during all ground-disturbing activities, including grading, trenching, and excavation, within the geologic unit of concern. The monitor shall have the authority to temporarily halt or divert construction activities to evaluate potential fossil discoveries.

If any potentially significant paleontological resources are encountered, work in the immediate vicinity shall be halted, and the qualified paleontologist shall evaluate the find. If the resource is determined to be significant, it shall be salvaged and recorded in accordance with SVP standards. Recovered specimens shall be curated in an accredited repository or museum with permanent, retrievable storage.

A final Paleontological Monitoring Report shall be prepared upon completion of construction and submitted to the County and the designated repository.

4.8 GREENHOUSE GAS EMISSIONS

	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
8.	GREENHOUSE GAS EMISSIONS. Would the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		Х		
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			Х	

Background

The "greenhouse effect" is the natural process that retains heat in the troposphere, the bottom layer of the atmosphere. Without the greenhouse effect, thermal energy would "leak" into space, resulting in a much colder and inhospitable planet. With the greenhouse effect, the global average temperature is approximately 61°F (16 °C). Greenhouse gases (GHGs) are the atmospheric components responsible for the greenhouse effect. The amount of heat retained is proportional to the concentration of GHGs in the atmosphere. As more GHGs are released into the atmosphere, GHG concentrations increase and the atmosphere retains more heat, increasing the effects of climate change. Six gases were identified by the Kyoto Protocol for emission reduction targets: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF₆). When accounting for GHGs, all types of GHG emissions are expressed in terms of CO₂ equivalents (CO₂e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

Approximately 80 percent of the total heat stored in the atmosphere is caused by CO_2 , CH_4 , and N_2O . Both human activities and natural sources emit these three gases. Each GHG affects climate change at different rates and persists in the atmosphere for varying lengths of time. The relative measure of the potential for a GHG to trap heat in the atmosphere is called global warming potential (GWP). The GWP was developed to allow comparisons of the impacts of different gases on global warming. Specifically, it measures how much energy the emissions of one ton of a gas will absorb over a given period, relative to the emissions of one ton of CO_2 . The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that period. GWPs provide a common unit of measure, which enables analysts to aggregate emissions estimates of different gases (e.g., to compile a national GHG inventory) and allows policymakers to compare emissions reduction opportunities across sectors and gases.

Greenhouse gases, primarily CO_2 , CH_4 , and N_2O , are directly emitted because of the stationary source combustion of natural gas in equipment such as water heaters, boilers, process heaters, and furnaces. GHGs are also emitted from mobile sources, such as on-road vehicles and off-road construction

equipment, which burn fuels like gasoline, diesel, biodiesel, propane, or natural gas (in compressed or liquefied form). Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Included in GHG quantification are electric power, used to pump the water supply (e.g., aqueducts, wells, pipelines), and the disposal and decomposition of municipal waste in landfills.⁷

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant With Mitigation Incorporated. The Project would not directly construct new housing but would facilitate housing development by implementing actions associated with the HEU. As discussed in Section 4.14: Population and Housing, the HEU could accommodate up to 4,497 additional DU resulting in a population increase of approximately 13,402 persons. These increases in residential development would result in indirect GHG emissions from both construction activities and long-term and operational sources, such as building energy use, transportation, water consumption, and solid waste generation.

All future housing development would be subject to the County's development review process and required to comply with applicable General Plan policies, County Code standards, and State building and energy efficiency standards. However, neither San Benito County nor the MBARD has adopted a qualified Climate Action Plan or formal numerical significance thresholds for GHG emissions. In the absence of an adopted threshold, the evaluation of significance follows the criteria in State CEQA Guidelines §15064.4(b), which directs lead agencies to consider whether a project would conflict with applicable plans, policies, or regulations adopted to reduce GHG emissions.

No state or regional agency with jurisdiction over the Project, including MBARD, CARB, the Governor's Office of Planning and Research (OPR), or the California Air Pollution Control Officers Association (CAPCOA), has adopted a CEQA significance threshold for GHG emissions that is formally applicable to the Project. As such, the impact determination is based on consistency with the most directly applicable adopted plans and policies intended to reduce GHG emissions. These include the CARB 2022 Scoping Plan, which lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emission by 85 percent below 1990 levels no later than 2045, the 2040 MTP/SCS adopted by SBCOG, and the General Plan.

GHG emissions from future development would be evaluated on a case-by-case basis, using current emissions methodologies, thresholds, and regulatory standards. MM GHG-1 requires discretionary development projects facilitated by the HEU to prepare a project-level GHG analysis and demonstrate consistency with the most current applicable threshold or emissions reduction target. If a project would exceed that threshold, it must implement all feasible mitigation to reduce its impact. Ministerial (by-right) projects would be required to demonstrate through documentation

⁷ California Air Resources Board. (2022). *Climate Change Scoping Plan*. Retrieved from: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents. Accessed April 14, 2025.

the GHG emissions would be less than significant or otherwise prepare CEQA documentation as needed.

Therefore, although the Project could indirectly result in future GHG emissions, compliance with existing State and local regulatory programs, along with incorporation of MM GHG-1, would ensure that such emissions do not result in a significant environmental impact. Impacts would be less than significant with mitigation incorporated.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

Less Than Significant Impact. The Project would not directly construct new housing but would facilitate housing development by implementing actions associated with the HEU.

Future housing development facilitated by the Project would be subject to compliance with CALGreen and the California Energy Code in effect at the time of construction. These regulations require that new development incorporate design features to capture energy efficiencies associated with energy-efficient building heating, ventilation, and air conditioning mechanical systems, water heating systems, and lighting. In addition, future housing development would be required to adhere to the goals and policies outlined in State plans, such as the 2015 AQMP, and regional plans, including the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) prepared by SBCOG, and the San Benito County 2035 General Plan (analyzed in Section 4.11: Land Use and Planning).

As addressed in **Section 4.11**, future housing development facilitated by the Project would be subject to compliance with policies outlined in the General Plan's Land Use, Economic Development, Circulation, Public Facilities and Services, Natural and Cultural Resources and Health and Safety Elements that would minimize GHG emissions. Furthermore, future housing development would be required to comply with mandatory energy requirements of CALGreen and the Energy Code in effect at the time of development. Compliance with these regulations would further incorporate design features to capture energy efficiencies associated with building heating, ventilation, and air conditioning mechanical systems, water heating systems, and lighting, which ultimately would reduce GHG emissions. Therefore, future development facilitated by the Project would not conflict with an applicable plan, policy, or regulation adopted to reduce emissions of greenhouse gases. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

MM GHG-1

Project-Level Greenhouse Gas Emissions Analysis and Mitigation. Prior to approval of any discretionary development project facilitated by the Housing Element Update (HEU), the applicant shall prepare a project-level greenhouse gas (GHG) emissions assessment using the most current emissions modeling tools and regulatory guidance available at the time of project application. The GHG analysis shall quantify construction and operational emissions in metric tons of carbon dioxide equivalent (MTCO₂e) per year and evaluate consistency with applicable GHG reduction plans, regulations, or thresholds of

significance adopted by the County of San Benito, the State of California, or other relevant agencies.

If a formally adopted significance threshold exists at the time of project-level review (e.g., a numeric threshold or per capita efficiency metric consistent with the CARB Scoping Plan), the project shall demonstrate that total or per capita GHG emissions would not exceed the threshold. If emissions would exceed the applicable threshold, the applicant shall implement all feasible on-site and off-site mitigation measures necessary to reduce GHG emissions to below the applicable significance threshold. Feasible mitigation may include, but is not limited to:

- Enhanced energy efficiency or electrification beyond Title 24 standards;
- On-site renewable energy installation;
- Transportation demand management (TDM) strategies to reduce vehicle miles traveled;
- Water conservation and wastewater reuse features;
- Participation in a verifiable off-site GHG mitigation program approved by the County or lead agency.

For ministerial (by-right) housing development projects not subject to discretionary CEQA review, applicants shall submit documentation demonstrating that estimated project-level GHG emissions would be less than significant based on the best available thresholds, methodologies, or consistency criteria. If documentation does not demonstrate a less-than-significant impact, the County may require CEQA review and mitigation consistent with this measure.

Implementation of this measure shall be documented to the satisfaction of the County prior to project approval or issuance of building permits, as applicable.

4.9 HAZARDS AND HAZARDOUS MATERIALS

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
9.	HAZARDS AND HAZARDOUS MATERIALS. Would the	project:			
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			х	
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		Х		
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		х		
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				х
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			х	
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			Х	

REGULATORY SETTING

Toxic Substances Control Act / Resource Conservation and Recovery Act / Hazardous and Solid Waste Act

The federal Toxic Substances Control Act of 1976 and Resource Conservation and Recovery Act (RCRA) establish a regulatory framework administered by the U.S. Environmental Protection Agency (EPA) for the generation, transportation, treatment, storage, and disposal of hazardous waste. The Hazardous and Solid Waste Amendments of 1984 strengthened the RCRA program by affirming and expanding the "cradle-to-grave" system of waste tracking and regulation.

Underground Storage Tanks (USTs) are regulated under Subtitle I of RCRA. Federal regulations set standards for UST installation after December 22, 1988, and required all non-conforming tanks to be upgraded or closed by 1998. The regulations cover construction, leak detection, spill and overfill prevention, and corrective action requirements.

Emergency Planning and Community Right-to-Know Act

The federal Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted to increase public access to information about chemical hazards in communities. Businesses that handle hazardous chemicals are required to report the type, quantity, and location of these chemicals to local and state agencies. The U.S. EPA maintains a publicly accessible database known as the Toxics Release Inventory (TRI), which tracks chemical releases and waste management activities from qualifying facilities. EPCRA promotes emergency preparedness and public accountability.

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act (49 U.S.C. § 5101 et seq.) grants authority to the U.S. Department of Transportation (DOT) to regulate the safe transportation of hazardous materials. DOT regulations govern packaging, labeling, placarding, handling procedures, and routing of hazardous materials shipments. The Pipeline and Hazardous Materials Safety Administration (PHMSA) prepares and enforces hazardous materials regulations, codified in Title 49 of the Code of Federal Regulations (CFR), Parts 100-180. These regulations require training for all personnel involved in the transportation of hazardous materials and authorize inspections of shipping records and equipment related to hazardous materials handling.

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) oversees hazardous materials and waste management in California. Within CalEPA, the Department of Toxic Substances Control (DTSC) implements the Hazardous Waste Control Law, which governs hazardous waste handling, permitting, transportation, and disposal. While DTSC regulations are aligned with federal RCRA requirements, California law defines hazardous waste more broadly and regulates additional substances not covered under federal law (i.e., "non-RCRA hazardous waste").

DTSC maintains hazardous waste site listings pursuant to Government Code § 65962.5, commonly known as the Cortese List, which includes:

- Sites with known releases of hazardous substances;
- Sites with leaking underground storage tanks (LUSTs);

- · Contaminated public drinking water wells; and
- Locations under local oversight for hazardous materials releases.

Hazardous materials enforcement at the local level is typically handled by Certified Unified Program Agencies (CUPAs). In this case, the San Benito County Department of Environmental Health (DEH) serves as the local enforcement agency. The Regional Water Quality Control Board (RWQCB) also has regulatory authority over soil and groundwater contamination and cleanup efforts.

Hazardous Waste Control Act

The California Hazardous Waste Control Act (HWCA) establishes a comprehensive hazardous waste management program that is more stringent than the federal RCRA program. Implemented under California Code of Regulations Title 22, Division 4.5, the HWCA regulates the generation, identification, storage, treatment, and disposal of hazardous waste. The law requires proper classification and manifesting of hazardous waste; permitting of treatment, storage, and disposal facilities; compliance with design and operation standards; personnel training and emergency preparedness; and facility closure and liability assurance. Generators of hazardous waste must complete and submit manifests to DTSC to ensure proper documentation and tracking of the waste from its point of origin to its ultimate disposal.

Impact Analysis

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

During future housing operations, small quantities of hazardous materials could be used or stored, such as household cleaning products, paints, solvents, fertilizers, pesticides, or petroleum-based products. These types of materials are commonly associated with residential uses and are not considered acutely hazardous or likely to pose significant risks to human health or the environment under typical conditions. Handling, use, and disposal of these materials would be subject to local, State, and federal regulations including those administered by the California Department of Toxic Substances Control, the U.S. EPA, and the San Benito County Department of Environmental Health. Therefore, the Project would not result in a significant hazard to the public or the environment from routine use or disposal of hazardous materials. Impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact With Mitigation Incorporated. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Construction activities associated with future housing development could include grading or excavation that may disturb subsurface conditions. If any site is contaminated due to past land uses (e.g., former agricultural operations, storage of fuels or chemicals), there could be a risk of accidental release of hazardous materials. To address this potential risk, MM HAZ-1 requires preparation of a Phase I Environmental Site Assessment (ESA) for all candidate housing sites where contamination is known or suspected. If recommended by the Phase I ESA, a Phase II investigation or appropriate remediation would be conducted prior to site disturbance. Incorporation of MM HAZ-1 would ensure that future development does not result in significant hazardous materials exposure. With implementation of MM HAZ-1 and compliance with applicable regulatory requirements, impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact With Mitigation Incorporated. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Candidate housing sites may be located within 0.25 mile of existing or proposed schools. Construction could involve temporary use of fuels, lubricants, and other materials classified as hazardous. However, these substances would be used in accordance with applicable health and safety regulations, and their use would be short-term and localized. As described in Threshold 4.9(b), implementation of MM HAZ-1 would ensure proper investigation and remediation of potentially contaminated sites prior to construction. Furthermore, operational residential land uses are not associated with hazardous emissions or handling of acutely hazardous materials. No industrial or manufacturing uses are proposed. Therefore, impacts related to hazardous materials near schools would be less than significant with mitigation incorporated.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact With Mitigation Incorporated. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Government Code §65962.5, commonly referred to as the "Cortese List," identifies hazardous materials release sites compiled by various regulatory agencies. Development on a listed site may create hazards if contamination has not been properly remediated. To ensure public safety, MM HAZ-1 requires that candidate housing sites with a history of contamination or that appear on the Cortese List undergo appropriate environmental due diligence, including Phase I and Phase II ESAs

and remediation as warranted. With implementation of MM HAZ-1 and adherence to applicable regulatory oversight, impacts related to Cortese-listed sites would be reduced to a less than significant level.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Of the 12 candidate housing sites, only Site R-12 is located within 2.0 miles of a public-use airport, specifically, the Hollister Municipal Airport, which lies approximately 1.4 miles north of Site R-12. The remaining 11 sites are not located within 2.0 miles of a public or private-use airport. According to the Hollister Municipal Airport Land Use Compatibility Plan, Site R-12 is located outside of the airport's designated safety zones and noise impact contours. Site R-12 is also not subject to any development restrictions associated with airport compatibility.

Although Site R-12 is within 2.0 miles of an airport, it would not be exposed to safety hazards or excessive noise due to its location outside of the areas of influence defined in the Airport Land Use Compatibility Plan. Therefore, future housing development facilitated by the Project would not expose people residing or working in the project area to significant airport-related safety hazards or noise levels. Impacts would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

San Benito County's Emergency Operations Plan (EOP) establishes emergency protocols and response coordination procedures. Future housing development would occur in areas already served by the County's transportation network and emergency services. No components of the Project would block or reroute primary evacuation routes or emergency vehicle access. The County's development review and permitting processes would ensure that new development complies with fire and emergency response standards. Therefore, the Project would not interfere with adopted emergency plans, and impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

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⁸ San Benito County Airport Land Use Commission. (2012). Airport Land Use Compatibility Plan – Hollister Municipal Airport. Retrieved from: http://www.sanbenitocog.org/pdf/ADOPTED%20%20ALUCP%20-June%202012.pdf, accessed July 28, 2025.

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

According to the California Department of Forestry and Fire Protection Fire Hazard Severity Zone maps, none of the candidate housing sites are located in a Very High or High Fire Hazard Severity Zone. The sites are generally located within or near the City of Hollister and are surrounded by urban and semi-urban development rather than wildlands. Future residential development would be required to comply with applicable fire codes, including California Building Code requirements for fire-resistant construction and emergency access. Therefore, the Project would not expose people or structures to elevated wildland fire risk, and impacts would be less than significant.

Mitigation Measures

MM HAZ-1 Phase I Environmental Site Assessment. Future housing development facilitated by the Project, on a site where the County has determined potential for risk of upset and accident conditions involving the release of hazardous materials into the environment,

1) Preliminary Site Screening. The project applicant shall conduct a Phase I Environmental Site Assessment (ESA) or an equivalent preliminary environmental assessment to determine whether the project site or immediately adjacent properties have a history of hazardous material use or contamination. If evidence of contamination is found, the report shall characterize the type, location, and potential extent of contamination, and recommend whether additional sampling or remediation is warranted prior to site disturbance.

shall be subject to the following requirements prior to the issuance of grading permits:

- 2) Additional Investigation and Remediation, If Needed. If contamination is identified on the project site, the County, in coordination with the appropriate regulatory agencies (e.g., the San Benito County Department of Environmental Health or the Regional Water Quality Control Board), shall determine whether further site investigation (e.g., Phase II ESA) or remediation is necessary. If required, the project applicant shall be responsible for preparing and implementing an agency-approved investigation or remediation plan prior to initiation of construction activities.
- 3) Completion of Remediation. If the applicable oversight agency requires remediation, it shall be completed in compliance with all applicable regulatory standards and guidance, and to a level that reduces risk to below the applicable thresholds. Remediation shall be completed prior to issuance of any building or occupancy permits for the affected site.

⁹ California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zones – ArcGIS Online Viewer. Published December 2022. Accessed July 24, 2025. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/.

4) Documentation of Completion. Closure reports, no further action (NFA) letters, or other documentation acceptable to the San Benito County Department of Environmental Health Services or other applicable oversight agency shall be submitted to the County for review and approval prior to the issuance of grading permits. No construction shall occur in the affected area until the County accepts such documentation.

4.10 HYDROLOGY AND WATER QUALITY

		Potentially Significant	Potentially Significant Unless Mitigation	Less Than Significant	No
	IRONMENTAL IMPACTS	Issues	Incorporated	Impact	Impact
10.	HYDROLOGY AND WATER QUALITY. Would the proje	ct:			
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			Х	
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			Х	
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) Result in substantial erosion or siltation on- or off-site?			х	
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			Х	
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			Х	
	iv) Impede or redirect flood flows?			Х	
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			Х	
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			Х	

a) Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Construction activities associated with future development, such as grading, trenching, and paving, could result in temporary erosion and discharge of pollutants to surface waters. Projects disturbing one acre or more would be subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit administered by the Central Coast Regional Water Quality Control Board (RWQCB). Compliance with this permit requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) that includes best management practices (BMPs) for erosion control, sediment control, and pollutant source reduction.

Operationally, future residential uses may increase stormwater runoff and associated pollutant loading due to increased impervious surfaces and vehicle use. However, all future development would be subject to the County's development review process and applicable water quality policies regulations. The General Plan includes policies that protect water quality, such as Policy PFS-6.7, which requires compliance with nonpoint source pollutant discharge regulations, and Policy NCR-4.7, which encourages site design and BMPs that protect natural drainage systems and water resources. In addition, County Code Chapter 23.31: Storm Drainage Design Standards requires development to manage runoff and water quality.

Compliance with these General Plan policies and regulatory requirements would ensure that future development does not violate water quality standards or substantially degrade surface or groundwater quality. Impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project would facilitate future housing development by rezoning 12 candidate housing sites, most of which are currently undeveloped. The North San Benito Groundwater Basin, which underlies the Project area, is designated as a medium-priority basin under the Sustainable Groundwater Management Act (SGMA) and is managed by the San Benito County Water District (SBCWD). A Groundwater Sustainability Plan (GSP) for the basin was adopted in 2021.

Future development could reduce pervious surface area and marginally affect groundwater recharge. However, the General Plan includes policies that promote groundwater sustainability and protection of recharge areas. These include Policy LU-1.10, which requires development to be located on suitable soils and away from high groundwater areas; Policy PFS-3.9, which requires source water sufficiency studies for new development; Policy PFS-4.1, which requires adequate

water supply infrastructure to support growth; and Policy NCR-4.6, which requires groundwater sufficiency analyses consistent with California Water Code §10912 (SB 610).

Compliance with these General Plan policies and the GSP would ensure that future housing development does not result in unsustainable groundwater use or impair recharge functions. Impacts would be less than significant, and no mitigation is required.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Construction activities associated with future residential development could disturb soils and temporarily increase erosion potential. However, coverage under the NPDES Construction General Permit would be required for projects disturbing more than one acre, which mandates preparation of a SWPPP with erosion and sediment control BMPs. In addition, the General Plan includes policies such as PFS-6.1, which requires storm drainage systems to be designed to minimize impacts, and PFS-6.8, which calls for the use of erosion-reducing BMPs. These measures would ensure erosion impacts are less than significant.

- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Future development would increase impervious surfaces and surface runoff volumes. However, Policies PFS-6.1 and PFS-6.2 require stormwater facilities to capture and manage runoff, protect water quality, and promote infiltration where feasible. Also, the County's development review process, including compliance with County Code §21.25.013: Grading and Erosion Control and storm drainage requirements in County Code Chapter 23.31: Improvement Standards, would ensure that site-specific drainage systems are properly designed. Therefore, the Project's impacts related to runoff and drainage system capacity would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. Some candidate housing sites may be located within or adjacent to mapped floodplains. However, the County's development review process requires project-specific flood hazard analysis and compliance with applicable federal, State, and local floodplain management regulations. Policy HS-2.1 requires new development to provide 100-year flood protection, and Policy HS-2.3 prohibits development from redirecting floodwaters in a manner that increases risk to adjacent properties. These requirements would ensure future development does not impede or redirect flood flows. Impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The County is located inland and is not subject to tsunami risk. The candidate housing sites are not adjacent to large water bodies or enclosed basins that could be subject to seiche activity. Therefore, the Project would not result in pollutant release due to inundation from tsunami or seiche events, and no impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. All future development would be subject to applicable water quality and groundwater protection regulations, including the Central Coast RWQCB Basin Plan and the North San Benito GSP. As described under Thresholds 4.10(a) and 4.10(b), compliance with the NPDES Construction General Permit, General Plan policies, and County Code requirements would ensure consistency with adopted water quality and groundwater management plans. Therefore, the Project would not conflict with or obstruct implementation of such plans. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.11 LAND USE AND PLANNING

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
11.	LAND USE AND PLANNING. Would the project:				
a)	Physically divide an established community?				х
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			Х	

a) Physically divide an established community?

No Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

The Project's purpose is to accommodate the County's RHNA and to promote housing production across a range of income levels. The candidate housing sites are primarily vacant or underutilized parcels located within or adjacent to existing developed areas that are already served by infrastructure and compatible land uses.

Future housing facilitated by the Project would be subject to the County's development review process and would occur in a manner consistent with the General Plan's land use framework and community design policies. None of the candidate sites are situated in a location that would introduce new physical barriers or disrupt existing roadways, pedestrian connections, or established neighborhood patterns. The Project would not create new infrastructure or development patterns that sever or isolate existing communities. Therefore, the Project would not physically divide an established community. No impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

AMBAG 2045 MTP/SCS: Less Than Significant Impact. AMBAG adopted its most recent MTP/SCS, titled *Moving Forward Monterey Bay 2045*, in June 2022. As the federally designated Metropolitan Planning Organization (MPO) for the tri-county region, AMBAG prepares this long-range transportation and land use plan every four years in accordance with the California Sustainable Communities and Climate Protection Act (SB 375) and federal law. The 2045 MTP/SCS outlines a

regional strategy to reduce GHG emissions from passenger vehicles by promoting compact, infill development near jobs, services, and transit.

The Project would implement the County's HEU by facilitating rezoning of 12 candidate housing sites to allow higher-density residential development, consistent with RHNA obligations. These sites are located in areas with existing infrastructure and are generally situated within or adjacent to established communities, in alignment with the MTP/SCS's land use efficiency and infill priorities. The Project does not propose new development in outlying areas, and instead supports the regional objective of accommodating population growth within existing urban footprints.

As summarized in Table 8: Project Consistency with AMBAG 2045 MTP/SCS, the Project would not conflict with any applicable goal, policy, or implementation measure adopted in the regional plan for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not result in a significant environmental impact due to a conflict with the AMBAG 2045 MTP/SCS. Impacts would be less than significant and no mitigation is required.

Table 8: Project Consistency with AMBAG 2045 MTP/SCS

AMBAG 2045 MTP/SCS Goals and Policy Objectives	Consistency
Access and Mobility. Provide convenient, accessible, and reliable travel options while maximizing productivity for all people and goods in the region.	Consistent. The HEU would facilitate residential development within designated growth areas of San Benito County, many of which are located near existing roadways, services, and infrastructure. Although the HEU does not directly construct transportation improvements, it encourages higher-density and infill housing development patterns that, in turn, support the future implementation of transit and multimodal transportation options by concentrating growth in areas that can be more efficiently served. This planned growth pattern would improve access to travel options, reduce reliance on single-occupancy vehicle trips, and maximize the efficient use of the existing transportation network.
Economic Vitality. Raise the region's standard of living by enhancing the performance of the transportation system.	Consistent. By increasing the supply of housing, particularly affordable and workforce housing, the Project would help address regional housing shortages that affect economic productivity and labor mobility. Facilitating residential growth in strategic locations supports regional economic vitality by helping residents live closer to employment centers and reducing commute times, which in turn enhances the efficiency of the transportation system.
Environment. Promote environmental sustainability and protect the natural environment.	Consistent . The HEU prioritizes infill development and higher-density housing in areas already served by infrastructure, which helps avoid sprawl and reduces pressures to develop environmentally

AMBAG 2045 MTP/SCS Goals and Policy Objectives	Consistency
	sensitive lands. In addition, housing near jobs and services can reduce reliance on single-occupancy vehicle trips and associated GHG emissions, supporting long-term environmental sustainability consistent with State and regional climate goals.
Healthy Communities. Protect the health of our residents; foster efficient development patterns that optimize travel, housing, and employment choices and encourage active transportation.	Consistent. The Project supports compact, walkable housing types that promote efficient land use and are compatible with active transportation modes such as biking and walking. While the HEU is policy-based and does not directly construct new infrastructure, its implementation would result in housing patterns that allow more residents to live near jobs, parks, schools, and commercial services, contributing to healthier and more active lifestyles.
Social Equity. Provide an equitable level of transportation services to all segments of the population.	Consistent. The HEU is required by State law to affirmatively further fair housing and ensure that new housing opportunities are distributed equitably throughout the County. Facilitating the development of a wider range of housing types, particularly for lower-income households, helps ensure that all population segments can access transportation, employment, and services regardless of income or location. The Project also supports equitable access to infrastructure investments over time.
System Preservation and Safety. Preserve and ensure a sustainable and safe regional transportation system.	Consistent. Although the Project does not include physical transportation improvements, the housing growth it facilitates is generally aligned with existing infrastructure systems and does not require large-scale expansion of the transportation network. By encouraging orderly, planned growth in existing communities, the Project supports long-term preservation of transportation assets and avoids creating safety or maintenance challenges that could result from dispersed, unplanned development.
Source: AMBAG, 2022	

San Benito County 2035 General Plan: Less Than Significant Impact. The San Benito County 2035 General Plan provides the County's long-term policy framework for managing physical growth, protecting environmental resources, and ensuring the health, safety, and welfare of residents. The General Plan includes numerous policies specifically adopted to avoid or mitigate environmental effects, including those related to air and water quality, biological resources, GHG emissions, energy, hazards, and noise.

The proposed Project includes a General Plan Amendment to the Land Use Element to apply a new land use designation (Residential High) that allows for residential development at densities of 20

to 45 du/ac. This amendment is necessary to align the General Plan with the HEU and the proposed Zoning Code and Zoning Map amendments. State Housing Law requires these changes to accommodate the County's assigned RHNA and ensure that adequate land is available to meet housing needs across all incomes.

Following adoption of the proposed General Plan Amendment, the Project would be consistent with the General Plan as modified. As summarized in Table 9: Project Consistency with the 2035 County General Plan, the Project supports key County policies related to compact and sustainable development, infill and infrastructure-efficient growth, GHG reduction, energy conservation, and protection of open space and agricultural lands.

Future housing development facilitated by the Project would be subject to site-specific development review and would be required to comply with all applicable General Plan policies, the County Code, and any relevant design guidelines or environmental standards in effect at the time of development.

Therefore, the proposed Project would not result in a significant environmental impact due to a conflict with any General Plan policy adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant, and no mitigation is required.

Table 9: Project Consistency with the 2035 County General Plan

2035 County General Plan Policy LU-1.2: Sustainable Development Patterns. The County shall promote compact, clustered development patterns that use land efficiently; reduce pollution and the expenditure of energy and other resources; and facilitate walking, bicycling, and transit use; and encourage employment centers and shopping areas to be proximate to residential areas to reduce vehicle trips. Such patterns would apply to infill development, unincorporated communities, and the New Community Study Areas. The County recognizes that the New Community Study Areas comprise locations that can promote such sustainable development.

Consistent. The HEU facilitates future residential

development by rezoning sites in proximity to existing jobs, services, and infrastructure. It emphasizes infill and higher-density opportunities in established areas, supporting compact development patterns that can reduce VMT and associated energy use. No new communities are proposed in greenfield areas, and future development would be subject to site-specific review for General Plan consistency.

Consistency

LU-1.5 Infill Development. The County shall encourage infill development on vacant and underutilized parcels to maximize the use of land within existing urban areas, minimize the conversion of productive agricultural land and open spaces, and minimize environmental impacts associated with new development as one way to accommodate growth.

Consistent. The Project facilitates future housing development primarily through the rezoning of existing parcels located within or adjacent to established unincorporated communities. These sites are either vacant or underutilized and are served by existing infrastructure and roadway networks. No candidate housing sites identified in the HEU would require the conversion of productive agricultural land or designated open space. By directing future growth to infill areas, the Project advances the County's objective of minimizing environmental impacts associated with land conversion and sprawl.

2035 County General Plan Policy	Consistency
LU-2.7: Sustainable Location Factor. The County shall encourage new development in locations that provide connectivity between existing transportation facilities to increase efficiency, reduce congestion, and improve safety.	Consistent. The HEU identifies housing sites with access to major roads, transit corridors, and community infrastructure. By directing growth toward areas with existing transportation connectivity, the Project helps reduce traffic inefficiencies and supports safe and coordinated transportation planning.
LU-2.1: Sustainable Building Practices. The County shall promote, and where appropriate, require sustainable building practices that incorporate a "whole system" approach to designing and constructing buildings that consume less energy, water, and other resources; facilitate natural ventilation; use daylight efficiently; and are healthy, safe, comfortable, and durable.	Consistent . Future residential projects would be required to comply with the California Energy Code and CALGreen standards in place at the time of construction, which promote high-performance buildings that reduce resource consumption and maximize occupant comfort and energy efficiency.
LU-2.2: Green Sustainable Building Practices. The County shall encourage sustainable building practices that go beyond the minimum requirements of the Title 24 CALGreen Code (i.e., Tier 1 or Tier 2 measures) and to design new buildings to achieve a green building standard such as Leadership in Energy and Environmental Design (LEED).	Consistent . Although the HEU does not mandate LEED or Tier 1/2 CALGreen certification, future development is expected to exceed minimum requirements as California's building standards evolve. The County retains discretion through design review and permitting to encourage green practices consistent with this policy.
HS-5.7: Greenhouse Gas Emission Reductions. The County shall promote greenhouse gas emission reductions by supporting carbon efficient farming methods (e.g., methane capture systems, no-till farming, crop rotation, cover cropping); supporting the installation of renewable energy technologies; and protecting grasslands, open space, oak woodlands, riparian forest and farmlands from conversion to urban uses.	Consistent . The HEU does not propose development in active agricultural or open space areas and is designed to avoid conversion of such lands. It promotes urban infill that can reduce vehicle emissions and energy demand. Future development may also support rooftop solar and energy efficiency in alignment with State and County GHG goals.
HS-5.8: GHG Reduction Targets. The County acknowledges that the State endeavors to achieve 1990 greenhouse gas (GHG) emission levels and establish a long-term goal to reduce GHG emissions by 80 percent below 1990 levels by 2050. The County will encourage projects that support these goals, recognizing that these goals can be met only if the state succeeds in decarbonizing its fuel supply.	Consistent . The HEU supports State GHG targets by facilitating residential growth in areas that reduce reliance on long commutes and support resource-efficient development. Mitigation measures ensure future projects consider consistency with statewide climate plans, including the 2022 Scoping Plan.
PFS-7.5: Waste Diversion. The County shall require waste reduction, recycling, composting, and waste separation to reduce the volume and toxicity of solid wastes sent to landfill facilities and to meet or exceed State waste diversion requirements of 50 percent.	Consistent. Future residential development would be subject to State-mandated construction and operational solid waste reduction and diversion requirements, including those under CALGreen and AB 341, ensuring compliance with this policy.
PFS-7.6: Construction Materials Recycling. The County shall encourage recycling and reuse of	Consistent. All future projects would be subject to CALGreen's requirement to divert at least 65% of

2035 County General Plan Policy	Consistency
construction waste, including recycling materials generated by the demolition of buildings, with the objective of diverting 50 percent to a certified recycling processor. The County shall encourage salvaged and recycled materials for use in new construction.	construction and demolition materials. The County may also impose additional conditions to promote material reuse where feasible.
PFS-8.7: Renewable Energy Grid-Connections. The County shall coordinate with public utility providers to design their facilities so that private and public onsite renewable energy facilities (e.g., solar, wind, biomass, geothermal) can connect to the larger electricity grid.	Consistent. The HEU does not inhibit renewable energy development or utility coordination. New residential construction is subject to the State's solar photovoltaic requirements (Title 24, Part 6), and the Project enables development in areas already served by utility infrastructure, allowing for seamless grid connections.
Source: County of San Benito, 2015	

County Code: Less Than Significant Impact. The Project includes two zoning amendments to implement the HEU: (1) a Zoning Code Amendment to establish a new Residential High zoning district permitting residential densities of 20 to 45 du/ac, and (2) a Zoning Map Amendment to apply the new Residential High zone to 12 candidate housing sites identified in the HEU.

These zoning changes are intended to increase the County's capacity to accommodate its 6th Cycle RHNA, in compliance with State Housing Element Law. The Project itself does not authorize site-specific physical development but facilitated future residential development by aligning zoning regulations with General Plan land use designations and State-mandated housing capacity targets. While the HEU establishes the framework for increased housing capacity, it does not guarantee or require that all candidate sites be built out during the planning period. Actual development would depend on market conditions, developer interest, and property owner decisions.

All future housing facilitated by the Project would be subject to compliance with the County Code, including zoning, subdivision, grading, stormwater, and development standards in effect at the time of project application. The County Code is designed to ensure that new development is consistent with applicable policies, avoids environmental impacts, and minimizes land use conflicts. Future projects would undergo the County's standard review process, including consistency checks with zoning and County-adopted environmental and design standards.

Therefore, while the Project proposes zoning changes to facilitate residential development, these changes are consistent with the intent and structure of the County Code and do not conflict with any adopted standard or regulation intended to avoid or mitigate environmental effects. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.12 MINERAL RESOURCES

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
12.	MINERAL RESOURCES. Would the project:				
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			Х	
b)	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			Х	

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

The County contains significant mineral resources, primarily sand and gravel, including approximately 33 million tons of permitted reserves, 113 million tons of unpermitted reserves, and 386 million tons of crushed rock resources located in the northern portion of the County within the Monterey Bay Production-Consumption (P-C) region. Across the full Monterey Bay P-C region, which includes portions of neighboring counties, total permitted aggregate reserves are estimated at 1,210 million tons, sufficient to meet approximately 91 percent of projected regional demand.

The County, along with the Cities of Hollister and San Juan Bautista, has adopted mineral resource management policies that incorporate the classification system established under the California Surface Mining and Reclamation Act (SMARA). These policies promote the long-term protection and efficient use of mineral resources while discouraging incompatible land uses near resource areas. County zoning regulations also restrict development that could conflict with existing or future mining operations.

None of the 12 candidate housing sites are located within areas zoned for mineral extraction or within areas identified as locally important mineral resource recovery sites in the General Plan or

other land use plans. General Plan Policy NCR-5.1 encourages conservation of regionally significant mineral resources. Policy NCR-5.2 supports the use of the state's classification system to guide land use decisions. Policy NCR-5.3 requires that purchasers of property within one-half mile of a known mineral resource area be notified of its presence. Policy NCR-5.13 limits residential and urban uses that could restrict access to identified mineral resources. These policies would apply to future housing development facilitated by the Project and would minimize the potential for conflict with mineral resource recovery.

Because the Project does not authorize development on or adjacent to protected mineral resource areas, and because all future implementing projects would be subject to compliance with existing policies and regulations that protect mineral resources, the Project would not result in the loss of availability of regionally or locally important mineral resources. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.13 **NOISE**

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
13.	NOISE. Would the project result in:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			х	
b)	Generation of excessive groundborne vibration or groundborne noise levels?		Х		
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			Х	

Regulatory Setting

U.S. Department of Housing and Urban Development (HUD)

The U.S. Department of Housing and Urban Development (HUD) establishes environmental standards for noise exposure applicable to HUD-supported or assisted housing projects. HUD regulations identify three noise exposure zones based on day-night average sound level (L_{dn}):

- Acceptable Zone (≤65 dBA L_{dn}): Projects may be approved without mitigation.
- Normally Unacceptable Zone (65–75 dBA L_{dn}): Projects may be approved with mitigation. Required attenuation includes 5 dBA above standard construction in the 65–70 dBA range and 10 dBA in the 70–75 dBA range.
- Unacceptable Zone (>75 dBA L_{dn}): Projects are generally not approved.

California Department of Health Services (DHS)

The California Department of Health Services, Office of Noise Control, developed generalized land use compatibility guidelines based on community noise exposure (L_{dn}). These guidelines categorize noise levels for various land uses as "normally acceptable," "conditionally acceptable," "normally unacceptable," or "clearly unacceptable." A "conditionally acceptable" designation indicates that new

development should be allowed only with appropriate noise mitigation measures to achieve compatibility.

California Government Code §65302(f)

Government Code §65302(f) requires that all General Plans include a Noise Element to address existing and projected future noise conditions. General Plans must identify major noise sources, including:

- Highways, freeways, major arterials
- Passenger and freight rail lines
- Airports and associated ground facilities
- Industrial plants and stationary sources
- Other significant sources identified by local agencies

San Benito 2035 County General Plan

The General Plan contains policies intended to protect public health and welfare by minimizing exposure to environmental noise. The General Plan adopts state land use compatibility guidelines and establishes the following policies relevant to future development:

- Goal HS-8 To protect the health, safety, and welfare of County residents through the elimination of annoying or harmful noise levels.
- Project Design. The County shall require new development to comply with the noise standards shown in Tables 9-1 and 9-2 through proper site and building design, such as building orientation, setbacks, barriers (e.g., earthen berms), and building construction practices. The County shall only consider the use of soundwalls after all design-related noise mitigation measures have been evaluated or integrated into the project or found infeasible.
- Policy HS-8.2 Acoustical Analysis. The County shall require an acoustical analysis to be performed prior to development approval where proposed land uses may produce or be exposed to noise levels exceeding the "normally acceptable" criteria (e.g., "conditionally acceptable," "normally unacceptable") shown in Table 9-2. Land uses should be prohibited from locating, or required to mitigate, in areas with a noise environment within the "unacceptable" range.
- **Policy HS-8.3** Construction Noise. The County shall control the operation of construction equipment at specific sound intensities and frequencies during day time hours between 7:00 a.m. and 6:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays. No construction shall be allowed on Sundays or federal holidays.
- **Policy HS-8.4** Aircraft Noise. The County shall prohibit new noise-sensitive development within the projected future 60 dB Ldn noise contour of any public or private airstrips, and require that new noise-sensitive development within the projected future 55-60 dB CNEL complete an acoustical analysis demonstrating how residential units have been designed to meet an interior noise level of 45 dB CNEL.

- **Policy HS-8.6 Vibration Screening Distances.** The County shall require new residential and commercial uses located adjacent to major freeways or railroad tracks to follow the Federal Transit Administration (FTA) screening distance criteria.
- **Policy HS-8.7** Acceptable Vibration Levels. The County shall require construction projects anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby noise-sensitive uses based FTA criteria.
- **Policy HS-8.8 Noise Exemptions.** The County shall support the exemption of the following noise sources from the standards in this element:
 - a. Emergency warning devices and equipment operated in conjunction with emergency situations, such as sirens and generators which are activated during power outages. The routine testing of such warning devices and equipment shall also be exempt provided such testing occurs during the hours of 7:00 am to 10:00 pm.
 - b. Activities at schools, parks, or playgrounds, provided such activities occur during daytime hours.
 - c. Activities associated with County-permitted temporary events and festivals.
- **Policy HS-8.9** Interior Noise Standards. Adopt the State of California Code of Regulations' (Title 24) minimum noise insulation interior performance standard of 45 dBA Ldn for all new residential construction including hotels, motels, dormitories, apartment houses, and single-family dwellings.
- Policy HS-8.11 New Project Noise Mitigation Requirements. Require new projects to include appropriate noise mitigation measures to reduce noise levels in compliance with the Table 9-1 and 9-2 standards within sensitive areas. If a project includes the creation of new non-transportation noise sources, require the noise generation of those sources to be mitigated so they do not exceed the interior and exterior noise level standards of Table 9-2 at existing noise-sensitive areas in the project vicinity, unless an exception is made by the County on a case-by-case basis. However, if a noise-generating use is proposed adjacent to lands zoned for residential uses, then the noise generating use shall be responsible for mitigating its noise generation to a state of compliance with the standards shown in Table 9-2 at the property line of the generating use in anticipation of the future residential development, unless an exception is made by the County on a case-by-case basis.
- **Policy HS-8.12** Construction Noise Control Plans. Require all construction projects to be constructed within 500 feet of sensitive receptors to develop and implement construction noise control plans that consider the following available controls in order to reduce construction noise levels as low as practical:
 - Utilize 'quiet' models of air compressors and other stationary noise sources where technology exists;
 - Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;

- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses; Locate staging areas and construction material areas as far away as possible from adjacent land uses; Prohibit all unnecessary idling of internal combustion engines;
- Notify all abutting land uses of the construction schedule in writing; and
- Designate a "disturbance coordinator" (e.g., contractor foreman or authorized representative) who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

San Benito County Code of Ordinances

County Code Chapter 19.39: Noise Control Regulations sets forth enforceable noise limits by land use category and time of day. County Code §19.39.030 prohibits sound levels that:

- Exceed the thresholds in **Table 10: Maximum Sound Level Standards** for more than 15 minutes in any 60-minute period;
- Exceed ambient levels by 5dB;
- Violate applicable A-weighted equivalent sound level (Leq) standards at property boundaries.

Table 10: Maximum Sound Level Standards presents the established daytime and nighttime maximum permissible sound levels ranging from 35 dBA (nighttime rural areas) to 70 dBA (industrial areas, daytime). These standards apply at the receiving land use property line.

Table 10: Maximum Sound Level Standards

Land Use Designation	Noise L	evel (dBA)	
Land Use Designation	Day	Night	
Ag Rangeland			
Ag Productive	45	35	
Rural			
Rural Transitional	45	35	
Rural Residential	45	55	
Single-Family (R1)			
Residential Multiple (RM)	50	40	
Planned Unit Development			
Commercial (C-1)	65	55	
Commercial (C-2)	65	55	
Controlled Manufacturing (CM)			
Light Industrial (M-1)	70	60	
Heavy Industrial (M-2)			

Source: San Benito County Code of Ordinances. (2011). Article II. Sound Level Restrictions, Table 1: Maximum Sound Level Standards. Retrieved from: https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/sanbenito_ca/0-0-0-23220, accessed July 11, 2025.

Noise/Land Use Compatibility Guidelines

The County's noise/land use compatibility matrix (General Plan Table 9-2) categorizes land uses by the level of acceptable community noise exposure, measured in CNEL or L_{dn} . Residential and other sensitive uses are considered clearly unacceptable above 70–75 dBA L_{dn} without exceptional mitigation measures. The County encourages context-sensitive noise mitigation, recognizing evolving trends such as higher noise tolerance in mixed-use environments and urban corridors.

Table 11: San Benito County Land Use Compatibility Guidelines for Community Noise Environments shows the noise and land use compatibility standards for various land uses in the County.

Table 11: San Benito County Land Use Compatibility Guidelines for Community Noise Environments

	Community Noise Exposure (L _{dn} or CNEL, dBA)						
Land Use Category	9	55		65	70	75	80
Residential Low Density Single-Family, Duplex, Mobile Homes							
Residential – Multi-Family							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial, and Professional							
Industrial, Manufacturing, Utilities, Agricultural							

	Community Noise Exposure (L _{dn} or CNEL, dBA)						
Land Use Category		55	60	65	70	75	80
		xposure is no interfer	ence from ai				y be carried out with or and outdoor noise
	Normally Acceptable The noise exposure is great enough to be of some concern, but common building construction will make the indoor environment acceptable, even for sleeping quarters.						
	necessary to	posure is ensure ad	significantly equate perfo	rmance of act		ntial areas: bar	uilding construction is riers must be created it tolerable.)
Clearly Unacceptable The noise exposure is so severe that construction costs to make the indoor environment acceptable for performance of activities would be prohibitive. (Residential areas: the outdoor environment would be intolerable for normal residential use.).							
Source: San Benito County. (2015). San Benito County Community Noise Environments. Retrieved July 11, 20. https://www.sanbenitocountyca.gov/home/showpubl	25, from		•	•	e 9-2: Land Us	se Compatibi	lity Guidelines for

California Code of Regulations, Title 24

Title 24 establishes the statewide interior noise limit of 45 dBA CNEL for new residential construction, including single-family homes, multifamily dwellings, hotels, dormitories, and similar uses. Compliance typically requires enhanced sound insulation, upgraded windows, and mechanical ventilation systems in high-noise environments.

Impact Analysis

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Construction Noise. Construction activities associated with future residential development could generate intermittent noise from heavy-duty equipment (e.g., dozers, graders, concrete mixers) and vehicle traffic (e.g., haul trucks, worker commutes). Noise levels would vary depending on the type, location, and duration of each development. While the County does not maintain a quantitative construction noise threshold, General Plan Policy HS-8.12 requires all construction projects within 500 feet of sensitive receptors to implement a construction noise control plan.

As shown in **Table 12: Typical Construction Equipment Noise Levels**, construction equipment such as jackhammers or graders can generate noise levels up to approximately 94 dBA at 25 feet. Given the potential proximity of sensitive receptors (e.g., existing residences), localized temporary increases in ambient noise levels could occur. However, noise would attenuate with distance, and noise levels associated with construction of future development would be reduced through

compliance with General Plan Policy HS-8.12 and Policy HS-8.3, which limits construction to daytime hours (7:00 AM to 6:00 PM weekdays, 8:00 AM to 5:00 PM Saturdays, with no work allowed Sunday or holidays). Therefore, following compliance with General Plan policies, enforced through the County's standard development review process, construction noise impacts from future housing development would be less than significant.

Table 12: Typical Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 25 feet from Source	Typical Noise Level (dBA) at 50 feet from Source	Typical Noise Level (dBA) at 100 feet from Source				
Air Compressor	86	80	74				
Backhoe	86	80	74				
Compactor	88	82	76				
Concrete Mixer	91	85	79				
Concrete Pump	88	82	76				
Concrete Vibrator	82	76	70				
Crane, Mobile	89	83	77				
Dozer	91	85	79				
Generator	88	82	76				
Grader	91	85	79				
Impact Wrench	91	85	79				
Jack Hammer	94	88	82				
Loader	86	80	74				
Paver	91	85	79				
Pneumatic Tool	91	85	79				
Pump	83	77	71				
Roller	91	85	79				
Saw	82	76	70				
Scraper	91	85	79				
Shovel	88	82	76				
Truck	90	84	78				
Source: Federal Transit Administration, <i>Transit Noise and Vibration Impact Assessment Manual</i> , September 2018.							

Operational Noise. Future housing development would incrementally introduce stationary noise sources (e.g., heating, ventilation, and air conditioning [HVAC] units, garbage collection) and increase traffic on local roadways. However, residential uses are not typically associated with substantial noise generation. Future residential development would be required to comply with the General Plan, including Policies HS-8.1 through HS-8.13, and County Code noise standards, which set thresholds based on ambient conditions and land use compatibility.

Cumulative traffic noise increases are only considered significant if they exceed 3 dBA and result in levels above applicable standards. The traffic volumes associated with future development of the candidate housing sites are not anticipated to double existing traffic volumes and would not result in perceptible increases in community noise. Therefore, operational noise impacts would be less than significant, and no mitigation is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant With Mitigation Incorporated. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions.

Construction of future housing could involve equipment that generates groundborne vibration (e.g., bulldozers, jackhammers, pile drivers). As shown in **Table 13: Typical Vibration Levels for Construction Equipment**, typical construction activities would generate vibration levels well below the Federal Transit Administration (FTA) architectural damage threshold of 0.2 inches per second peak particle velocity (PPV), except for pile driving.

Where pile driving is proposed within 50 feet of sensitive receptors (e.g., non-engineered timber or masonry structures), it could exceed the 0.2 in/sec PPV threshold. MM NOI-1 would require a pre-construction building survey and the use of alternative installation methods to reduce vibration levels. Additionally, General Plan Policy HS-8.7 requires all projects to meet FTA screening thresholds for vibration. With implementation of MM NOI-1 and compliance with applicable policies, construction vibration impacts would be reduced to less than significant.

Table 13: Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inches/second)	Approximate peak particle velocity at 50 feet (inches/second)
Large bulldozer	0.089	0.031
Loaded Trucks	0.076	0.027
Small Bulldozer	0.003	0.001
Auger/drill rigs	0.089	0.031
Jackhammer	0.035	0.012
Pile Driver	0.644	0.228
Vibratory hammer	0.035	0.012

Notes:

1. Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018. Table 12-

PPV equip = $PPVref \times (25/D)1.5$

where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance

PPV (ref) = the reference vibration level in in/sec from FTA *Transit Noise and Vibration Impact Assessment Manual,* Table 12-2.

D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

^{2.} Calculated using the following formula:

Operation of future residential uses is not expected to generate substantial groundborne vibration or noise. No industrial or rail uses are proposed, and typical residential activities would not exceed applicable vibration thresholds. Therefore, operational vibration impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. Of the 12 candidate housing sites, only one (Site R-12) is located within 2.0 miles of Hollister Municipal Airport. However, Site R-12 is located approximately 1.4 miles south of the airport and lies outside the 65 dBA community noise equivalent level (CNEL) contour identified in the Hollister Municipal Airport Land Use Compatibility Plan. There are no private airstrips within 2.0 miles of any of the candidate housing sites. General Plan Policy HS-8.5 prohibits new noise-sensitive development within the 60 dB L_{dn} noise contour and requires new noise-sensitive development within the 55-60 dB CNEL complete an acoustical analysis demonstrating how residential units have been designed to meet an interior noise level of 45 dB CNEL. Therefore, the Project would not expose future residents to excessive airport-related noise, and impacts would be less than significant.

Mitigation Measures

MM NOI-1

Pile Driving – Preconstruction Survey. To avoid impacts to vibration-sensitive land uses (e.g., non-engineered timber and masonry buildings) located within a 50-foot radius of pile driving activities, the following measures shall be specified on project plans and implemented during construction, prior to demolition, grading, or building permit issuance:

A qualified structural engineer retained by the project applicant shall conduct a preconstruction survey to document the existing condition of all vibration-sensitive land uses within a 50-foot radius of proposed pile driving activities. The survey shall include written and photographic documentation of susceptible structural elements, finishes, and fixtures. This documentation shall be used to evaluate any potential construction-related damage.

Pile driving within a 50-foot radius of vibration-sensitive land uses shall utilize alternative installation methods (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers) to ensure that vibration velocities remain below the 0.2 inch/second peak particle velocity (PPV) threshold established by the Federal Transit Administration (FTA).

If damage resulting from pile driving is identified, the project applicant shall be responsible for repairing or restoring the affected features to their preexisting condition. The County shall verify that the preconstruction survey has been completed, and the recommended alternative methods have been incorporated prior to the issuance of grading or building permits.

4.14 POPULATION AND HOUSING

ENV	IRONMENTAL IMPACTS POPULATION AND HOUSING. Would the project:	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			х	
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			х	

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development. Rather, it facilitates future residential development by implementing the County's 6th Cycle HEU, which includes rezoning 12 candidate housing sites to allow residential densities of 20 to 45 dwelling units per acre. Future development on these sites would occur incrementally and would depend on market conditions, local economic factors, and decisions by individual property owners. In some cases, future housing development may be subject to ministerial approvals only and therefore would not undergo project-specific CEQA review.

The Housing Element identifies a theoretical maximum development capacity of 4,497 DU across the 12 candidate sites. However, only 754 DU are needed to satisfy the County's RHNA for the 2023–2031 planning period. The additional units represent a buffer to ensure compliance with the state's "no net loss" requirement over time. For purposes of CEQA, this Initial Study conservatively evaluates the full 4,497 DU to provide a worst-case assessment. The analysis also does not subtract existing units that may be redeveloped or replaced, which would reduce net population growth.

Existing Plus Project Growth Comparison

As shown in **Table 14: Existing Plus Project Growth Projections**, full buildout of the candidate housing sites would increase the County's housing stock by approximately 56.5 percent and population by 63.1 percent over existing 2025 conditions.

Description	Housing (Dwelling Units)	Population
2025 Estimate/Existing ¹	7,960	21,252
2031 Estimated Project	4,497	13,402²
2025 Existing Plus Project	12,457	34,657
% Change 2025:2031	56.5%	63.1%

Table 14: Existing Plus Project Growth Projections

The Association of Monterey Bay Area Governments (AMBAG) 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) includes regional growth forecasts based on an employment-driven forecast model in collaboration with local jurisdictions, including San Benito County. As indicated in **Table 15: AMBAG Plus Project Growth Projections**, AMBAG projects the County's population will grow to 35,331 by 2045. When AMBAG's 2045 forecast is linearly extrapolated to 2031 (the end of the 6th Cyle planning period), the County's population is estimated to reach approximately 25,476 persons and 8,775 housing units.

Table 15: AMBAG Plus Project Growth Projections

Description	Housing (Dwelling Units)	Population
2025 Existing Population ¹	7,960	21,252
2045 AMBAG Forecast ²	10,678	35,331
Change 2025 to 2045	2,718	14,079
Change per Year 2025 to 2045	136	704
Extrapolated AMBAG 2031 Estimate ³	8,775	25,476
Extrapolated AMBAG 2031 Population With Project	13,272	38,881
Extrapolated AMBAG 2031 Population With Project (% increase)	51.2%	52.6%

^{1.} Table 3: County Population (2020-2025) and Table 4: County Housing Units (2020-2025)

The HEU would facilitate housing capacity beyond AMBAG's extrapolated 2031 population forecast. However, this growth would not be considered unplanned because:

- It directly implements state housing law (Gov. Code §65583 et seq);
- Future housing development would occur incrementally based on market conditions and other factors, such that potential effects concerning population growth (i.e., utilities, fire, police, and other services and infrastructure) would not occur at any single point in time;
- All future housing developments facilitated by the Project and within overlay zones would be subject to compliance with all federal, State, and local requirements for minimizing

^{1.} Source: Table 3: County Population (2020-2025) and Table 4: County Housing Units (2020-2025)

^{2.} Assumes 2.98 persons per household based on the California Department of Finance, Demographic Research Unit. (2025, May 1). Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2025, with 2020 Benchmark. Retrieved July 7, 2025, from https://dof.ca.gov/forecasting/demographics/estimates/.

^{2.} Association of Monterey Bay Area Governments (AMBAG). 2022 Regional Growth Forecast: Appendix A – Population, Housing Units and Employment by Jurisdiction (2020–2045). December 2022. Accessed July 18, 2025. https://ambag.org/sites/default/files/2022-12/REVISED PDFAAppendix%20A 2022%20RGF.pdf.

^{3.} Based on constant growth rates between 2025 and 2031.

growth-related impacts through the County's development review process, which would occur on a project-by-project basis; and

• No new infrastructure or roadway extensions are proposed as part of the Project that would induce indirect growth.

Furthermore, any future development that is discretionary in nature would remain subject to future CEQA review; however, some housing projects may be approved ministerially, consistent with state law and zoning standards established by the Project.

Given that growth would occur incrementally, aligns with state-mandated housing production targets, and may involve ministerial approvals without discretionary agency action, the Project would not induce substantial unplanned population growth. Impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing through implementation of the County's 6th Cycle HEU, which includes rezoning 12 candidate housing sites to allow for higher-density residential uses. Across all 12 sites, only three existing housing units have been identified. While future redevelopment could result in the removal of these units, such displacement would be minimal and would not constitute a substantial number of housing units or residents.

Any future removal of existing housing would be subject to applicable state laws, including the Housing Crisis Act of 2019 (SB 330), which prohibits the net loss of protected and affordable housing units and requires one-for-one replacement where applicable. In addition, the California Relocation Assistance Act (Government Code §§ 7260–7277) provides protections for displaced tenants and property owners. Redevelopment of the affected sites would occur incrementally over time, depending on individual property owner decisions, development feasibility, and market conditions.

The purpose of the Project is to increase overall housing capacity in the County to accommodate its RHNA, not to reduce or eliminate housing. The potential removal of three existing units would be more than offset by the Project's capacity to facilitate up to 4,497 new units. Accordingly, the Project would not displace a substantial number of existing people or housing in a way that necessitates construction of replacement housing elsewhere, and the impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.15 PUBLIC SERVICES

	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
15.	PUBLIC SERVICES. Would the project:				
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire protection?			Х	
	ii) Police protection?			Х	
	iii) Schools?			Х	
	iv) Parks?			Х	
	v) Other public facilities?			Х	

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection?

Less Than Significant Impact. Fire protection services for unincorporated San Benito County (including the candidate housing sites), as well as the Cities of Hollister and San Juan Bautista, are primarily provided by the City of Hollister Fire Department. The Aromas Tri-County Fire Department, San Juan Bautista Volunteer Fire Department, and CAL FIRE provide additional fire protection services within the County.

Implementation of the HEU would facilitate future housing development that could result in a population increase of approximately 13,402 persons (see Section 4.14: Population and Housing).

This growth would occur gradually over time as development is built and occupied, resulting in a corresponding increase in demand for fire protection services.

The General Plan EIR acknowledges that future development may increase demand for public services, including fire protection, and that such increases could necessitate the expansion of existing facilities or construction of new ones. However, future residential development would be subject to the County's development review process and required to pay applicable fees pursuant to County Code Chapter 5.01: County Fees, which includes a Fire Mitigation Fee. This fee is collected at building permit issuance and is intended to fund the cost of new or expanded fire protection facilities and equipment needed to serve new development.

In addition, General Plan Policy PFS-13.7 requires new development to pay its fair share toward fire protection infrastructure, including facilities, equipment, and staffing. This policy allows the County to require participation in a special assessment district or other funding mechanism to ensure that service standards are maintained. Policy PFS-13.9 further requires all proposed development to demonstrate compliance with the California Fire Code and other applicable state regulations.

Because the Project does not directly propose or authorize site-specific physical development, it would not, at the program level, result in the construction of new fire protection facilities. All candidate housing sites are located in areas currently served by existing fire service providers. Although some future development facilitated by the Project could warrant expanded fire facilities, any such improvements would be evaluated through project-level CEQA review, unless statutorily or categorically exempt. In cases where CEQA exemptions apply, such impacts would still be addressed through Development Impact Fees and consistency with applicable General Plan policies.

Therefore, the Project would not result in substantial adverse physical impacts related to the provision or need for new or physically altered fire protection facilities. Impacts would be less than significant, and no mitigation is required.

ii) Police protection?

Less Than Significant Impact. The San Benito County Sheriff's Department provides law enforcement services in San Benito County. The proposed Project would not directly construct new housing but would facilitate future residential development under the HEU. All candidate housing sites are located within areas already served by the Sheriff's Department.

An estimated population increase of approximately 13,402 persons (see **Section 4.14**) is anticipated. This growth would occur over time as development is built and occupied, resulting in a corresponding increase in demand for police protection services. The General Plan EIR recognizes that increased development may require additional police staffing, equipment, and facilities to maintain acceptable service levels. As such, future housing development could contribute to the need for new or expanded police protection facilities, the construction of which may have the potential to result in significant environmental impacts.

To address these potential impacts, County Code Chapter 5.01 includes a Law Enforcement Impact Fee program, which requires new development to contribute toward the cost of new or expanded police protection facilities. All future housing would be subject to this program and to project-specific CEQA review, where applicable. Projects qualifying for CEQA exemptions would still be required to pay impact fees and comply with service adequacy requirements.

At the program level, the Project would not directly result in the construction of police protection facilities. If future development triggers the need for new facilities, those projects would undergo separate CEQA review unless exempt. Therefore, the Project would not result in substantial adverse environmental impacts related to police protection. Impacts would be less than significant, and no mitigation is required.

iii) Schools?

Less Than Significant Impact. The San Benito County Office of Education oversees educational services across the County. Pre-kindergarten through Grade 12 education is provided by 12 local school districts, including the Hollister Elementary and San Benito County High School Districts, which would serve most future housing facilitated by the Project.

The Project would not directly construct housing but could indirectly generate population growth of approximately 13,402 persons (see **Section 4.14**), potentially increasing student enrollment and demand for school services and facilities. General Plan Policies PFS-1.12 and PFS-1.13 require new development to mitigate public facility impacts, including school demand, and require early consultation with affected school districts. However, the County's ability to mitigate school impacts is constrained by state law. Government Code §§ 65995-65998 (SB 50) authorizes school districts to collect statutory developer fees to offset facility impacts. Under Government Code § 65995(h), payment of these fees is deemed full CEQA mitigation for school facility impacts.

All future residential development would be required to pay school impact fees, based on building square footage, at the time of building permit issuance. These fees are reviewed regularly by each school district to ensure adequacy. While school enrollment may increase in certain areas, the existing regulatory framework ensures that impacts are fully mitigated in compliance with CEQA.

Therefore, the Project would not result in substantial adverse environmental impacts associated with school facilities. Impacts would be less than significant, and no mitigation is required.

iv) Parks?

Less Than Significant Impact. See **Section 4.16: Recreation**.

v) Other public facilities?

Less Than Significant Impact. Other public facilities, such as library facilities, are provided through the consolidated San Benito County Free Library system, which operates a single library facility offering a full range of services.

The Project would not directly result in housing construction but would facilitate population growth of approximately 13,402 persons. This growth would occur over time as development is

built and occupied, resulting in a corresponding increase in demand for library services. All future development would be subject to the County's development review process and required to pay Library Facility Impact Fees under County Code Chapter 5.01, Article XIV. These fees support construction, expansion, and equipment purchases for library services.

Because housing development would occur incrementally over time, public facility needs would grow proportionately and be funded through impact fees and general tax revenue. If future demand necessitates new or expanded facilities, those projects would undergo separate CEQA review unless exempt. However, the incremental demand from the Project is not expected to be substantial enough to require new library construction, and existing mechanisms ensure that facility needs are addressed as growth occurs.

Therefore, the Project would not result in substantial adverse environmental impacts related to library services. Impacts would be less than significant, and no mitigation is required

Mitigation Measures

No mitigation measures are required.

4.16 RECREATION

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
16.	RECREATION.				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			Х	
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			Х	

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. Implementation of the HEU would facilitate future residential development that could generate a population increase of approximately 13,402 persons (see **Section 4.14**). Based on the County's adopted parkland standard of five acres per 1,000 residents (General Plan Policy NCR-3.2), this population growth would generate a demand for approximately 67 acres of additional parkland, assuming buildout of all 4,497 DU identified under the HEU.

All future development would be subject to the County's development review process and required to comply with applicable General Plan policies and County Code Chapter 5.01: County Fees, including payment of Park and Recreation Impact Fees. These fees fund the expansion and improvement of recreational facilities needed to serve future residents. This mechanism ensures that growth would not result in the substantial deterioration of existing park facilities due to overuse.

Additionally, the 12 candidate housing sites are geographically dispersed throughout the unincorporated County. This distribution reduces the likelihood that any one neighborhood or regional park would be overburdened by increased demand, thereby minimizing the potential for localized deterioration of recreation facilities.

Because the Project does not directly propose or authorize site-specific development or recreational facilities, it would not result in physical impacts associated with the construction or expansion of new recreational amenities. Any future recreational improvements would undergo separate environmental review as warranted.

Accordingly, the Project would not cause or accelerate substantial physical deterioration of existing recreational facilities, nor would it result in adverse physical impacts associated with the construction of new facilities. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.17 TRANSPORTATION

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
17.	TRANSPORTATION. Would the project:				
a)	Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			х	
b)	Would the project conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?		Х		
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			Х	
d)	Result in inadequate emergency access?			Х	

a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The Project would not directly result in site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. The HEU does not contain any goals, policies, or implementation programs that would conflict with adopted plans or regulations addressing the circulation system.

San Benito County and the SBCOG have adopted multiple plans and programs that collectively establish a planning framework for achieving a safe, accessible, and sustainable transportation system for all users. These include the San Benito County 2035 General Plan Circulation Element, which provides the framework for decision-making regarding the movement of people and goods across the County through various transportation modes. It includes a Circulation Diagram that identifies future roadway improvements needed to support the General Plan Land Use Diagram.

The San Benito County Regional Transportation Plan (RTP) 2020–2045, prepared by SBCOG, outlines long-term goals and short-term strategies to improve the efficiency of the countywide transportation system in compliance with State and federal requirements. The San Benito County Bikeway and Pedestrian Master Plan guides the development of bicycle and pedestrian facilities

and promotes non-motorized transportation options in the unincorporated County and within the cities of Hollister and San Juan Bautista. The San Benito County Local Transportation Authority Short Range Transit Plan sets forth goals, objectives, and service recommendations for public transit in Hollister, San Juan Bautista, northern San Benito County, and the Gilroy corridor, with implementation planned through 2027. In addition, the Traffic Impact Fee Ordinance (County Code Chapter 5.01, Article VII) requires project applicants to pay traffic impact fees to help fund transportation and transit improvements necessitated by development.

San Benito County is part of the AMBAG region. AMBAG adopted the 2045 MTP/SCS in 2022, which outlines a regional strategy for integrated transportation, land use, and housing planning that reduces VMT and GHG emissions in accordance with SB 375. The MTP/SCS promotes compact development near jobs and services aligned with regional housing needs allocations. The Project would support infill development and increased residential densities on appropriately located candidate housing sites and is therefore consistent with the MTP/SCS goals for transportation efficiency, VMT reduction, and sustainable growth.

Future housing development facilitated by the HEU would be subject to the County's standard development review process and required to demonstrate consistency with these adopted transportation plans and programs. New development would also be required to contribute to circulation system improvements through payment of traffic impact fees or other applicable exactions. Therefore, the Project would not conflict with any applicable transportation-related program, plan, ordinance, or policy. Impacts would be less than significant, and no mitigation is required.

b) Would the project conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact with Mitigation Incorporated. Senate Bill 743 required a change to how transportation impacts are evaluated under CEQA, replacing automobile delay, as measured by "level of service" (LOS) and other similar metrics, with VMT as the primary metric for significance determination. State CEQA Guidelines §15064.3(b), which became effective on July 1, 2020, identifies VMT as the appropriate measure of transportation impact under CEQA.

The Governor's Office of Planning and Research (now part of the Governor's Office of Land Use and Climate Innovation [LCI]) issued a Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018), which provides recommendations for screening criteria, thresholds of significance, and examples of feasible mitigation strategies.

San Benito County has adopted an SB 743 Implementation Policy that aligns with the State's Technical Advisory. This policy establishes the County's thresholds of significance under a VMT-based framework and requires that all discretionary development projects evaluate transportation impacts using the VMT metric.

The proposed Project would not directly result in physical development but would facilitate future housing development by implementing the HEU. The HEU was designed to reduce environmental

impacts, including VMT, by prioritizing infill development, proximity to existing services, and access to public transportation and recreational opportunities.

Future residential development facilitated by the Project would be subject to project-level VMT screening or assessment consistent with the County's SB 743 Implementation Policy. Projects that do not qualify for screening would be required to prepare a VMT Assessment. Future housing developments that have a significant VMT impact (as determined by the VMT Analysis) would be required to mitigate these impacts through implementation of MM TRANS-1, which includes feasible mitigation strategies that can help projects avoid or substantially reduce VMT-related impacts to a level that is less than significant. Furthermore, future housing development would be subject to all State and local requirements for minimizing VMT-related impacts. Additionally, future development would be subject to the General Plan, which encourages transportation improvements to reduce traffic congestion associated with regional and local trip increases, as well as the maintenance of efficient roadway capacities and the minimization of traffic hazards near residential uses. Therefore, the Project would not conflict or be inconsistent with State CEQA Guidelines §15064(b), and impacts would be less than significant with MM TRANS-1 incorporated.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The Project would not directly result in the construction of new housing but would facilitate future housing development by implementing actions associated with the HEU. Future housing development facilitated by the HEU would occur incrementally and would utilize existing roadway infrastructure in areas generally proximate to established urban services.

Hazards related to geometric design features, such as sharp curves, substandard sight distances, or dangerous intersections, are not anticipated, as future development would be located along or adjacent to existing roadways that are already part of the County's established transportation network. Any future roadway modifications necessary to serve new development would be subject to review and approval through the County's development review process and would be required to comply with applicable General Plan policies, County Code standards, and design guidelines intended to ensure traffic and roadway safety.

In addition, all future housing development would be required to comply with applicable State and local building codes, fire safety regulations, and access requirements, including standards related to emergency vehicle access and turning radii. Projects would also be reviewed for potential conflicts with adjacent land uses, including the potential for hazardous interactions between residential development and nearby agricultural operations or farm equipment, and would be conditioned as necessary to reduce and avoid any safety hazards.

Accordingly, the Project would not result in the introduction of hazardous design features or incompatible uses that would substantially increase transportation-related safety risks. Impacts would be less than significant, and no mitigation is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. The Project would not directly result in site-specific development but would facilitate housing development by implementing actions associated with the HEU, including rezoning 12 candidate housing sites. All future housing development facilitated by the HEU would be subject to the County's standard development review process and would be required to comply with applicable General Plan and County Code provisions related to emergency access.

The County has adopted the California Fire Code (CFC) as outlined in County Code §21.01.021. The CFC establishes minimum standards for emergency access, including roadway widths, turning radii, grades, vertical clearance, and surface materials to ensure adequate emergency vehicle access. In addition, the California Building Code (CBC) includes requirements for structural design and site4 planning intended to address access during emergency conditions, including those related to wildfire, seismic hazards, flooding, and other natural disasters.

All future development would be required to demonstrate adequate emergency access during the County's development review and permitting process. Compliance with these codes and standards ensures that emergency vehicles, including fire, police, and medical services, can access the site safely and efficiently during both construction and long-term operations.

Accordingly, future housing development facilitated by the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

MM TRANS-1 Vehi

Vehicle Miles Traveled (VMT). Prior to issuance of a building permit, one or more of the following measures shall be implemented to reduce VMT-related impacts associated with future projects that cannot be screened out of the VMT analysis process, such that the development's VMT falls below the low-VMT thresholds identified by County's SB 743 Implementation Policy or other applicable guidelines adopted by San Benito County at the time of the development application:

- Modify the project's built environment characteristics to reduce VMT generated by the project;
- Implement Transportation Demand Management (TDM) strategies to reduce project-generated VMT; and/or
- Participate in a fair share traffic impact fee program or VMT mitigation banking program, if available.

Examples of potential VMT-reducing measures include, but are not limited to:

- Improve or increase access to transit
- Increase access to common goods and services, such as groceries, schools, and daycare;
- Incorporate affordable housing into the project;
- Orient the project toward transit, bicycle, and pedestrian facilities;
- Improve pedestrian or bicycle networks, or transit service;

- Provide traffic calming features;
- Provide secure bicycle parking;
- Limit or eliminate on-site parking supply;
- Unbundle parking costs from residential units;
- Implement or provide access to a commute reduction program;
- Provide car-sharing, bike-sharing, or ride-sharing programs;
- Provide subsidized or free transit passes.

4.18 TRIBAL CULTURAL RESOURCES

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
18.	TRIBAL CULTURAL RESOURCES. Would the project:				
a)	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?		X		
	ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		X		

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in

subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation Incorporated. Pursuant to Government Code §21080.3.2(b) and §21074(a)(1)(A)-(B) (Assembly Bill 52) and Senate Bill 18 requirements, the County has provided formal notification to California Native American tribal representatives that have previously requested such notice regarding projects within the geographic area traditionally and culturally affiliated with tribe(s). Native American groups may possess knowledge about cultural resources in the area and may have concerns about the adverse effects of development on tribal cultural resources, as defined in Public Resources Code § 21074. The County contacted the tribes and tribal representatives listed below.

- Amah Mutsun Tribal Band, Valentin Lopez, Chairperson
- Amah Mutsun Tribal Band, Ed Ketchum, Vice-Chairperson
- Amah Mutsun Tribal Band of Mission San Juan Bautista, Garry Zimmer, Senior Cultural Monitor & Consultant
- Amah Mutsun Tribal Band of Mission San Juan Bautista, Irenne Zwierlein, Chairperson
- Amah Mutsun Tribal Band of Mission San Juan Bautista, Christopher Zimmer, Senior Cultural Monitor & Consultant, Councilman
- Amah Mutsun Tribal Band of Mission San Juan Bautista, Michelle Zimmer, Senior Cultural Monitor & Consultant
- Amah Mutsun Tribal Band of Mission San Juan Bautista, Shelby Brown, Senior Cultural Monitor & Consultant, Councilwoman
- Costanoan Ohlone Rumsen-Mutsen Tribe, Patrick Orozco, Chairman
- Costanoan Rumsen Carmel Tribe, Henry Muñoz, Cultural Resource Officer
- Costanoan Rumsen Carmel Tribe, Carla Munoz, Tribal Council
- Costanoan Rumsen Carmel Tribe, Samuel Rodriguez, Cultural Resource Officer
- Indian Canyon Mutsun Band of Costanoan, Kanyon Sayers-Roods, Tribal ChairWoman
- Indian Canyon Mutsun Band of Costanoan, Ann Marie Sayers, Retired Honorable Elder
- Salinan Tribe of Monterey, San Luis Obispo Counties, Patti Dunton, Tribal Administrator
- Salinan Tribe of Monterey, San Luis Obispo Counties, Robert Piatti, Cultural Protection Lead
- Tule River Indian Tribe, Neil Peyron, Chairperson
- Wuksachi Indian Tribe/Eshom Valley Band, Kenneth Woodrow, Chairperson
- Xolon-Salinan Tribe, Penny Hurt, Cultural Preservation Administrator

• Xolon-Salinan Tribe, Karen White, Chairperson

Correspondence between the County and the tribal representatives is available for public review during normal business hours at the County of San Benito Resource Management Agency Planning and Land Use Division, at 2301 Technology Parkway, 1st Floor, Hollister, CA 95023. As of the public review of this Initial Study, the County has received request for consultation from the following tribe:

• Amah Mutsun Tribal Band of Costanoan/Ohlone Indians ("AMTB")

The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU, including rezoning of 12 candidate housing sites. Future development would occur incrementally over time. Although no known listed or eligible for listing tribal cultural resources, or tribal cultural resources determined by the lead agency, have been identified in the candidate house sites, future grading or excavation associated with housing development could expose previously undiscovered tribal cultural resources. Undeveloped sites have a higher likelihood of containing intact resources, while previously developed areas are less likely due to prior disturbance. If such materials meet the definition of a tribal cultural resource, the Project could cause a substantial adverse change in the significance of a tribal cultural resource. However, to address this potential, future development would be subject to General Plan Policy NCR-7.11, which prohibits unauthorized grading or collection of archaeological or tribal cultural resources; Policy NCR-7.12, which requires archaeological reports prepared by qualified specialists in areas likely to contain significant artifacts; and County Code Chapter 19.05: (Archaeological Site Review), which mandates site surveys and evaluations for development on sensitive lands. Further, given the locations of the candidate housing sites, the AMTB recommends various mitigation measures. As such, future housing development facilitated by the Project would incorporate MM TCR-1, which requires a Preliminary Archaeological Survey, MM TCR-2, which requires monitoring of all subsurface excavation by a Tribal Monitor, MM TCR-3, which specifies the procedures in the event there is discovery of human remains, and MM TCR-4, which specifies the disposition of ceremonial items and other tribal cultural resources. Future housing development would be subject to compliance with regulatory requirements pertaining to tribal cultural resources, as applicable, and MM TCR-1 through MM TCR-4. Given compliance with the established regulatory framework and with MM TCR-1 through MM TCR-4 incorporated, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM TCR-1

Preliminary Archaeological Survey. Following the completion of an application for residential development within a candidate housing site, the County shall require the applicant to contract with an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards, in order to complete an archaeological records search and pedestrian archaeological survey of the subject property. A report detailing the results of the archaeological survey must be submitted to the County, and the County

will transmit a copy of the survey report to a designated representative of the Amah Mutsun Tribal Band. A list of archaeological consultants preferred by the Amah Mutsun Tribal Band for their professional competency in the identification of tribal cultural resources will be provided to the applicant upon request.

MM TCR-2

Tribal and Archaeological Monitoring. All subsurface excavation at the San Benito County Housing Element Residential High Rezone candidate housing sites shall be monitored by a Tribal Monitor supported by a Lead Archaeologist, both designated by the Amah Mutsun Tribal Band. The Tribal Monitor shall work in coordination with the Lead Archaeologist and representatives of San Benito County for the duration of the project.

- The Amah Mutsun Land Trust (AMLT) shall designate a Lead Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards to support the tribal monitoring program and comply with applicable mitigation measures. AMLT shall arrange a pre-excavation meeting with construction personnel to brief them regarding the proper procedures in the event that buried cultural materials are encountered.
- The Lead Archaeologist/AMLT Tribal Monitor (or designee of AMLT) shall perform a premonitoring site check to observe and document conditions of the project site prior to the commencement of ground disturbing activities. When feasible, this site check will coincide with the pre-excavation meeting with construction personnel.
- Tribal Monitors shall be provided with a minimum of 72-hour notice for all work that is to be done that requires a Tribal Monitor, including, but not limited to, ground disturbance activities in accordance with the Mitigation Measures.
- The property owner/construction manager shall provide the Tribal Monitor with access
 to the project site as reasonably necessary for the Monitor to effectively perform the
 services required. During the project, the Tribal Monitor may briefly halt ground
 disturbing activity to more closely investigate the point of excavation. Any investigation
 shall be in full compliance with project safety protocols.
- If archaeological or potentially significant previously unidentified subsurface tribal cultural resources are discovered during ground-disturbing activities or construction (whether or not an archaeologist is present), soil disturbing work within 100 feet of the find shall cease. If present, the on-site Tribal Monitor shall halt or redirect construction activities away from the area of the find to allow evaluation.
- The Tribal Monitor in coordination with the Lead Archaeologist shall evaluate the discovered resource(s). While determinations typically occur in the field with minimal stoppages, the Tribal Monitor may require further guidance from tribal cultural experts or subject matter experts to complete a determination. If the discovered resource is determined to be potentially significant, the Lead Archaeologist may provide and implement a plan for additional subsurface investigation as needed to define and assess the extent of the resource within the project area and how it would be affected by the

project. In these instances, the Lead Archaeologist or the Tribe may request a further stoppage of work in order to complete an assessment of the find.

- If an encountered resource is determined significant, the Lead Archaeologist shall notify the County and consult with AMTB to develop a culturally appropriate treatment plan. Treatment plans shall consider avoidance and preservation of the resource(s) in place as a preferred option. All potential means of avoiding or reducing ground disturbance within the project site boundaries shall be considered including modifications of building footprint, modification of landscaping, placement of protective fill, establishment of a preservation easement, or more substantial modifications where feasible that will permit avoidance or substantial preservation in place of the resource.
- The archaeologist, in coordination with AMTB (and NAHC-designated MLD if applicable) shall prepare a report describing any resource(s) unearthed, the treatment of such resource(s), and the evaluation of the resource(s) with respect to the California Register of Historic Resources. If the resource(s) are found to be significant, a separate report detailing the results of the recovery and evaluation process shall be prepared.

MM TCR-3

Discovery of Human Remains. If human remains are discovered during ground-disturbing activities or project construction, work shall be halted within at least 150 feet of the discovery location, and at a greater distance if determined necessary by the Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards, and within any nearby area reasonably suspected to overlie human remains (Public Resources Code, Section 7050.5). The San Benito County Coroner shall be notified immediately to determine if the cause of death must be investigated. Notice will also be provided immediately to the Amah Mutsun Tribal Band.

If the County Coroner determines that the remains are of Native American origin, the Coroner shall ensure that notification is provided to the Native American Heritage Commission (NAHC) as required by California Public Resources Code Section 5097.98(a). A determination of the Most Likely Descendant (MLD) under California Public Resources Code Section 5097.98 shall be made by the NAHC upon notification to NAHC of the discovery of said remains at the Project site. Work may not resume until the MLD has made a recommendation to the County regarding appropriate means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

Given the well-established cultural and historical ties of AMTB to Tribal Cultural Landscape, when and if Native American human remains are discovered at the project site, the Amah Mutsun Tribal Band shall be consulted as part of the repatriation process irrespective of whether the NAHC-designated MLD is an AMTB member.

The Amah Mutsun Tribal Band shall be allowed to (1) inspect the site of the discovery and (2) make recommendations as to how the human remains and grave goods should be

treated with appropriate dignity. The County shall discuss and confer with the Tribe all reasonable options with regard to its preferences and recommendations for treatment.

The term "Native American human remains" encompasses more than human bones because AMTB ancestral traditions call for the burial of associated cultural resources (grave goods and funerary objects) with the deceased, and the ceremonial burning of Native American human remains, funerary objects, grave goods and animals. Ashes and other remnants of these burning ceremonies, as well as grave goods and funerary objects, associated with or buried with the Native American remains shall be treated in the same manner as human bones, human bone fragments, and cremations of human remains.

Unless otherwise required by law, the site of any reburial of Native American human remains shall not be disclosed and will not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code §6250 et seq. The County Coroner is expected to withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code §6254(r).

MM TCR-4

Disposition of Ceremonial Items and Other Cultural Resources. Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Amah Mutsun Tribal Band. The County agrees to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to AMTB for possession during course of the project and, if necessary, appropriate treatment, unless the County is ordered to do otherwise by a court or agency of competent jurisdiction. In addition, all other potentially significant Native American-associated cultural resources that are recovered during the course of archaeological investigations on or adjacent to the project site shall be returned to the tribe when the Tribe and the Lead Archaeologist have determined the finds to be potentially significant cultural resources.

Where appropriate (from the perspective of the Tribe), and agreed upon in advance by the County, the Tribe, and Lead Archaeologist, certain analyses of certain artifact types shall be permitted, which may include, but may not necessarily be limited to, shell, bone, ceramic, stone and/or other artifacts. The preferred location for repatriation of cultural material by the Tribe shall be in close proximity to the site of discovery but protected from future intrusion. Repatriation of any material shall occur at the conclusion of the project.

4.19 UTILITIES AND SERVICE SYSTEMS

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
19.	UTILITIES AND SERVICE SYSTEMS. Would the project:				
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			Х	
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			Х	
c)	Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			Х	
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			Х	
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			Х	

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time, depending on market conditions, economic factors, and individual property owner decisions. All candidate housing sites are located along the

boundary of the City of Hollister within its Sphere of Influence but under the jurisdiction of unincorporated San Benito County. These generally rural areas have been identified in the HEU as appropriate for residential growth due to their proximity to existing infrastructure and services.

Water. Future housing development would likely connect to existing potable water systems operated by the City of Hollister, Sunnyslope County Water District, or other local purveyors. Infrastructure improvements—such as pipeline extensions or replacement of undersized lines—may be necessary in some locations to ensure adequate capacity. These improvements would occur within existing public rights-of-way and would involve temporary, construction-related impacts typical of utility upgrades.

In accordance with SB 610 (Water Code §10910 et seq.), any future development project of 500 or more residential units would be required to prepare a Water Supply Assessment (WSA) to confirm the availability of sufficient long-term water supply. In addition, General Plan Policy PFS-4.2 requires verification of adequate water service prior to final map approval.

Site-specific CEQA review would address the environmental impacts of any required off-site or onsite water infrastructure improvements. Developers would be required to pay their proportionate share of any necessary improvements and comply with all applicable State and local regulations governing water system expansion.

Wastewater Treatment and Infrastructure

Wastewater treatment in San Benito County is provided by several entities, including the City of Hollister, City of San Juan Bautista, Sunnyslope Water District, and Tres Pinos Water and Sewer District. Some rural sites may require individual on-site septic systems, subject to review and approval by the County Department of Environmental Health.

Where connection to existing wastewater systems is feasible, minor extensions or upgrades (e.g., line extensions, manhole replacement) may be needed to serve future residential development. These activities would occur within existing developed corridors and would result in temporary, localized construction impacts. Future housing development would be reviewed on a project-by-project basis to confirm wastewater treatment capacity and service availability in accordance with General Plan Policies PFS-5.3 and PFS-5.4. Where service is not available, development would not be approved until adequate capacity or alternative treatment solutions are demonstrated.

Connection fees and fair-share infrastructure contributions would be imposed in accordance with County Code and utility provider policies. Any potential impacts associated with new or expanded facilities would be addressed through project-level CEQA review, as appropriate.

Storm Water Drainage

See **Section 4.10: Hydrology and Water Quality**, for analysis related to storm water drainage infrastructure. That section concludes that future development would result in less than significant impacts related to storm water facilities.

Dry Utilities (Electricity, Natural Gas, Telecommunications)

All candidate housing sites are located in areas currently served by Pacific Gas and Electric (electricity and natural gas) and various telecommunications providers. Given the proximity to existing utility corridors, future development would connect to these systems with limited need for off-site infrastructure improvements.

Any upgrades would be subject to CPUC-regulated utility extension policies, as well as County development standards. Future projects would be required to comply with applicable building codes, including the California Building Code and Title 24 energy efficiency requirements.

Conclusion

Although future development facilitated by the HEU may require localized extensions or upgrades to water, wastewater, stormwater, and dry utility systems, these improvements are anticipated to occur within existing public rights-of-way or disturbed areas and would not, in themselves, result in significant environmental impacts.

All future development would be subject to site-specific review under the County's development review process, including compliance with CEQA, applicable General Plan policies, and infrastructure adequacy standards. Accordingly, the Project would not result in the need for utility infrastructure improvements that would cause significant environmental effects, and impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future housing development by implementing the HEU. Future development would occur incrementally over time and would be subject to site-specific environmental review, including evaluation of water supply availability at the time development is proposed.

All candidate housing sites are located in unincorporated San Benito County within the City of Hollister's Sphere of Influence, in areas identified in the HEU as suitable for residential growth based on proximity to existing water infrastructure and planned urban services. Water service in the Project area is primarily provided by the City of Hollister or Sunnyslope County Water District, while the SBCWD manages surface and groundwater resources within the northern portion of the Pajaro River Watershed.

According to the 2019 Pajaro River Watershed Integrated Regional Water Management (IRWM) Plan, the SBCWD relies on both Central Valley Project (CVP) surface water deliveries and local groundwater to meet existing and future demand. The region has taken proactive steps to secure water supply reliability, including long-term water supply contracts, groundwater management plans under SGMA, and infrastructure investments that support conjunctive use and drought resilience strategies.

The Pajaro IRWM Plan concludes that sufficient water supplies are available to serve existing demands and accommodate planned growth through the 2040 horizon under normal, single-dry, and multiple-dry year conditions, based on current demand projections and available water sources. The Plan also identifies strategies to address potential future shortfalls, including water conservation, recycled water expansion, and improved water banking.

Future housing development facilitated by the HEU would be reviewed on a project-by-project basis to confirm the availability of adequate water supplies. In accordance with SB 610 (Water Code \$10910 et seq.), any future project proposing 500 or more residential units would be required to prepare an WSA demonstrating sufficient supplies during normal, dry, and multiple dry years over a 20-year horizon.

General Plan Policy PFS-4.2 requires verification of adequate water service prior to the approval of any final map. In addition, SBCWD and other local water purveyors retain discretion to deny service to any proposed development that cannot demonstrate adequate water availability or payment of appropriate connection and capacity fees.

Based on regional planning documents and the existing management of water supplies within the Pajaro River Watershed, sufficient water supplies are anticipated to be available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years. Future development would be subject to site-specific verification of supply and infrastructure capacity in accordance with applicable law. Therefore, water supply impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The Project does not propose or authorize site-specific physical development but would facilitate future residential development by implementing the County's 6th Cycle HEU. The HEU includes the rezoning of 12 candidate housing sites to allow residential densities ranging from 20 to 45 dwelling units per acre, which exceeds the density assumptions analyzed in the General Plan EIR. Accordingly, the potential for increased wastewater generation associated with higher buildout at these sites represents a more conservative development scenario than was previously evaluated.

Wastewater treatment in the County is provided by four entities: the City of Hollister, City of San Juan Bautista, Sunnyslope Water District, and the Tres Pinos Water and Sewer District. In unincorporated rural areas not served by a centralized wastewater system, future development may utilize individual or community septic systems, which are subject to review and approval by the County Department of Environmental Health.

Although the HEU increases allowable residential densities on certain sites, it does not approve specific development projects or commit the County or wastewater providers to provide infrastructure to individual properties. All future housing projects would be subject to the County's discretionary or ministerial review processes and would be required to demonstrate the availability

of adequate wastewater collection, conveyance, and treatment capacity prior to approval. This requirement is established by General Plan Policies PFS-5.3 and PFS-5.4, which prohibit the approval of new development unless adequate wastewater service can be provided without adversely affecting existing users.

Furthermore, the wastewater service providers that may serve future development under the HEU, including the City of Hollister and Sunnyslope Water District, retain independent authority to review connection requests and determine whether sufficient system and treatment capacity exists to serve a proposed project. If additional capacity or infrastructure upgrades are necessary, project applicants would be required to fund those improvements as a condition of service.

To the extent that future residential development facilitated by the HEU results in higher wastewater flows than previously planned, those impacts would be identified and evaluated at the time of project-specific review. Projects would either be conditioned to demonstrate service availability or would not be approved until adequate capacity is confirmed.

While the HEU introduces a more intensive land use scenario than assumed in the General Plan EIR, no physical development would occur without verification of adequate wastewater treatment capacity and appropriate permitting from the responsible wastewater provider. Therefore, although future development could result in increased wastewater demand, the Project would not result in a determination by any wastewater treatment provider that it lacks adequate capacity to serve the Project in addition to existing commitments. Impacts would be less than significant.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Implementation of the HEU would facilitate future housing development that could result in a population increase of approximately 13,402 persons. This growth would occur gradually over time as development is built and occupied, resulting in a corresponding increase in solid waste generation. However, all future housing projects would be subject to the County's development review process, which would ensure compliance with the applicable solid waste regulations.

Solid waste collection in the County is administered through the San Benito County Integrated Waste Management Regional Agency, which provides franchise oversight for collection services in the County and the cities of Hollister and San Juan Bautista. Solid waste collection services in the unincorporated County are provided by a single private hauler, Recology, which currently operates 14 to 15 trucks per day. Curbside service includes separate collection of garbage, recyclables, and green waste using source-separated bins.

Solid waste from future housing development facilitated by the Project is anticipated to be disposed of at the John Smith Road Landfill, a Class III municipal solid waste facility located at 2650 John Smith Road in Hollister. Waste Connections operates the landfill under a contract

administered by the County. The facility accepts household waste, construction and demolition debris, vegetative materials, and other nonhazardous solid waste typical of residential land uses. According to the General Plan EIR, the John Smith Road Landfill has adequate remaining permitted daily throughput (i.e., amount of waste material processed) and capacity to serve projected growth within the County through the General Plan horizon, particularly with continued implementation of diversion programs and landfill expansion planning.

Construction activities associated with future residential development may generate solid waste in the form of demolition debris, cleared vegetation, and grading spoils. These materials would be subject to State and local requirements for source separation, reuse, and recycling. Future development would be required to comply with applicable waste diversion and construction waste reduction standards, including those contained in the California Green Building Standards Code (CalGreen).

In addition, future housing development would be subject to a range of solid waste management regulations and policies, including the California Integrated Waste Management Act of 1989 (AB 939), AB 341 (mandatory commercial recycling), AB 1826 (mandatory commercial organics recycling), SB 1383 (organic waste diversion and food recovery targets), SB 1019 (single-use packaging and recycling requirements), and applicable County regulations, including County Code Chapter 15.01: Solid Waste Regulations. These statutes establish recycling, diversion, and reporting obligations that local agencies and private service providers must comply with, ensuring that long-term waste management objectives are met.

Future development would also be subject to General Plan goals and policies aimed at reducing landfill demand and supporting integrated waste management, including the implementation of source reduction, reuse, recycling, and public education programs.

Although future housing facilitated by the HEU may increase overall waste generation, this increase would occur gradually, be offset by compliance with waste reduction regulations, and would not exceed the capacity of local solid waste infrastructure or conflict with applicable waste management statutes. Therefore, solid waste impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.20 WILDFIRE

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
20.	WILDFIRE. If located in or near state responsibility ar severity zones, would the project:	eas or lands c	lassified as very	high fire haza	rd
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				х
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				Х
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				х
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				Х

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. According to the CalFire Fire Hazard Severity Zone Map, the candidate housing sites are not located within a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone. ¹⁰ Therefore, future housing development facilitated by the Project would result in no impact concerning wildfires, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

¹⁰ California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zones – ArcGIS Online Viewer. Published December 2022. Accessed July 24, 2025. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENV	IRONMENTAL IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	project:	X		
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		х		
c)	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		Х		

a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. On the basis of the foregoing analysis, the proposed Project does not have the potential to significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten or eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

The Project would not directly construct new housing but would facilitate housing development by implementing actions associated with the HEU. All future housing development facilitated by the Project would be required to adhere to all federal, state, and local requirements. The Project would not result in any direct environmental impacts that would substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. As concluded under **Sections 4.0** and **5.0**, with adherence to existing federal, State, and County requirements, the Project would result in less than significant impacts concerning biological and cultural resources.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact With Mitigation Incorporated. State CEQA Guidelines §15065(a)(3) defines "cumulatively considerable" as times when "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." This document provides a programmatic analysis of the effects of future housing development facilitated by Project implementation.

Cumulative effects were addressed in Section 4.3: Air Quality, Section 4.8: Greenhouse Gas Emissions, Section 4.11: Land Use and Planning, Section 4.13: Noise, Section 4.14: Population and Housing, Section 4.15: Public Services, and Section 4.17: Transportation and determined to result in less than significant impacts with mitigation incorporated for Greenhouse Gasses, Noise, and Transportation. The Project would not directly construct new housing but would facilitate housing development by implementing actions associated with the HEU. Future housing development facilitated by the Project would be located within an urbanized area. Future housing development facilitated by the Project would occur as market conditions allow and at the discretion of the individual property owners and does not propose changes to current land use designations and zoning. Based on these factors, and since all future housing development facilitated by the HEU would be subject to the County's development review process, the Project would not result in environmental effects, which are individually limited but cumulatively considerable.

- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?
 - Less Than Significant Impact. There are no known substantial adverse effects on human beings that would be caused by the proposed Project. The Project would not directly construct new housing but would facilitate housing development by implementing actions associated with the

HEU. Future housing development facilitated by the Project would be located within an urbanized area. The HEU provides capacity for future housing development consistent with State Housing Law. The candidate housing sites are dispersed throughout the community to minimize the potential for adverse environmental impacts. The provision of additional housing in the County is intended to create adequate housing availability at all income levels. The creation of more economically and socially diverse housing choices is a goal of the HEU, intended to provide new housing opportunities for low-income households. Implementation of the HEU would provide additional housing options for a variety of income levels, as allocated by RHNA. Moreover, MMs GHG-1, HAZ-1, NOI-1, and TRANS-1 concerning greenhouse gasses, hazardous materials, noise, and VMT, respectively, would result in diminishing effects to humans.

Mitigation Measures

See MMs GHG-1, HAZ-1, NOI-1, and TRANS-1 in Section 4.8, Section 4.9, Section 4.13, and 4.17, respectively.

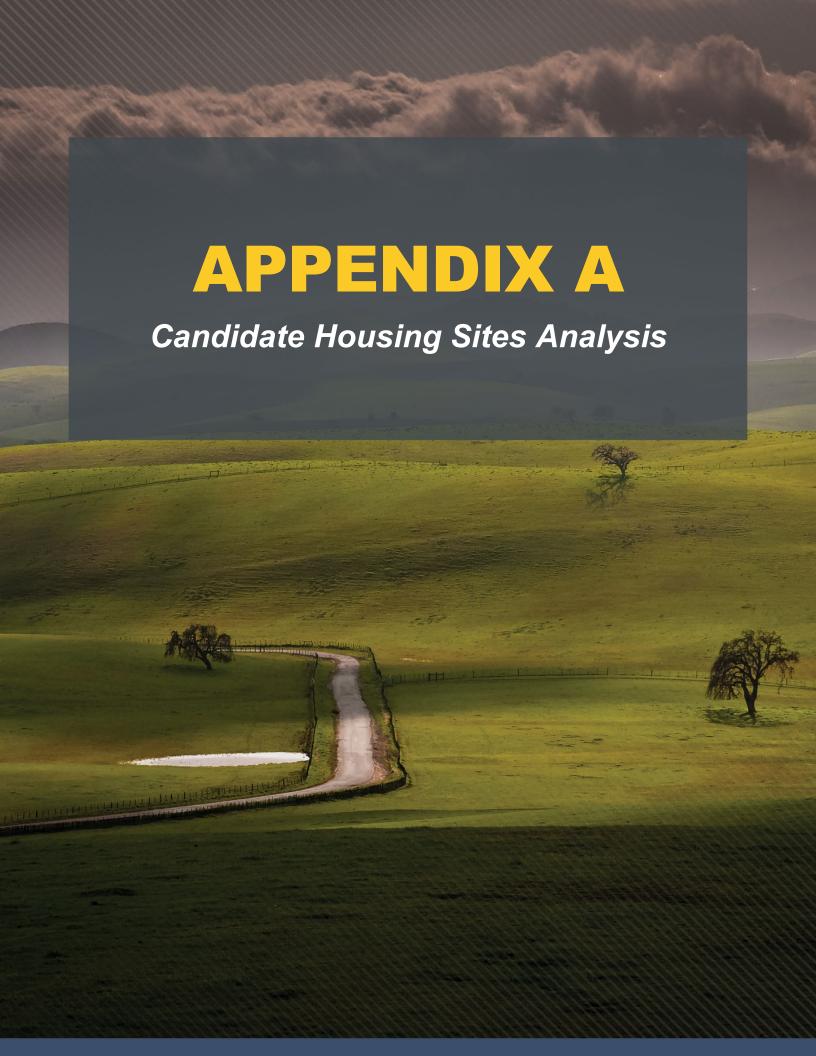
5.0 REFERENCES

- California Department of Fish and Wildlife (CDFW). 2024. Conservation Plan Boundaries (HCP and NCCP) DS760. Published May 30, 2024. Accessed July 16, 2025. Available: https://data-cdfw.opendata.arcgis.com/datasets/CDFW::conservation-plan-boundaries-hcp-and-nccp-ds760/explore.
- California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zones ArcGIS Online Viewer. Published December 2022. Accessed July 24, 2025. Available: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/.
- California Geological Survey (CGS). 2024. Earthquake Zones of Required Investigation. Accessed July 16, 2025. Available:

 https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e93088-layer-27%3A13680.
- City of Hollister. 2018. Hollister Municipal Airport Master Plan. Accessed July 11, 2025. Available: https://hollister.ca.gov/government/departments/airport/airport planning.php#outer-25.
- County of San Benito. 2015. San Benito County General Plan. Adopted July 2015.
- County of San Benito. 2015. 2035 San Benito County General Plan Update Environmental Impact Report. Certified July 2015.
- County of San Benito. 2025. County of San Benito 2023–2031 Housing Element. Adopted May 2025.
- County of San Benito Code of Ordinances. Title 25 Zoning.
- National Park Service (NPS). n.d. National Register of Historic Places. Accessed July 16, 2025. Available: https://www.nps.gov/subjects/nationalregister/index.htm.
- San Benito County Office of Emergency Services. 2023. San Benito County Operational Area Emergency Operations Plan: The Basic Plan. Adopted December 19, 2023. Accessed July 17, 2025. Available: https://www.sanbenitocountyca.gov/home/showpublisheddocument/11957/63841512275353000
- U.S. Department of Housing and Urban Development (HUD). n.d. Comprehensive Housing Affordability Strategy (CHAS) Data (2006–2021). Accessed July 7, 2025. Available: https://www.huduser.gov/portal/datasets/cp.html#query 2006-2021.

Appendix A

Candidate Housing Sites Inventory



Appendix B: Candidate Housing Sites Analysis

Government Code Section 65583.2 requires the Housing Element to include an inventory of parcels (or sites) suitable and available for residential development through the 6th planning cycle. The inventory of sites must accommodate the regional housing needs allocation for all income levels, as shown in **Table B-1** below.

Table B-1: San Benito County 6th Cycle RHNA by Income Category						
Income Category	Percent of Area Median Income (AMI)*	RHNA				
Very Low-Income**	< 50%	246 units				
Low-Income	51 to 80%	198 units				
Moderate-Income	81 to 120%	103 units				
Above Moderate-Income	>120%	207 units				
	Total:	754 units				

^{*}The San Benito County area median income (AMI) is \$140,200 for a family of four, according to the 2023 HCD Income Limits.

Table B-2 summarizes how the County will demonstrate capacity to accommodate 2023-2031 RHNA growth need through a variety of methods, including:

- Projected Accessory Dwelling Unit (ADU) construction;
- Projects currently in the pipeline, (approved or under construction); and
- Rezone strategies.

Table B-2: RHNA Summary Table							
	Extremely Low/Very Low-Income		Moderate- Income	Above Moderate- Income	Total		
2021-2029 RHNA	246	198	103	207	754		
Projected ADU Construction	13′	1	66	22	219		
Pipeline Projects	12	1	132	1,824	2,077		
Units that have received							
Certificate of Occupancy	24		0	64	88		
(Beginning July 1, 2023)							
Net Remaining Unmet RHNA	168	3			168		
Strate	gies to Increase	Developme	nt Capacity				
Multifamily Residential Rezones	409	•	611	1,024	2,044		
Vacant Sites	204	1	305	512	1,021		
Nonvacant Sites	205	5	306	512	1,023		
	Total Un	it Capacity					
Total Potential Development Capacity	685		809	2,934	4,428		

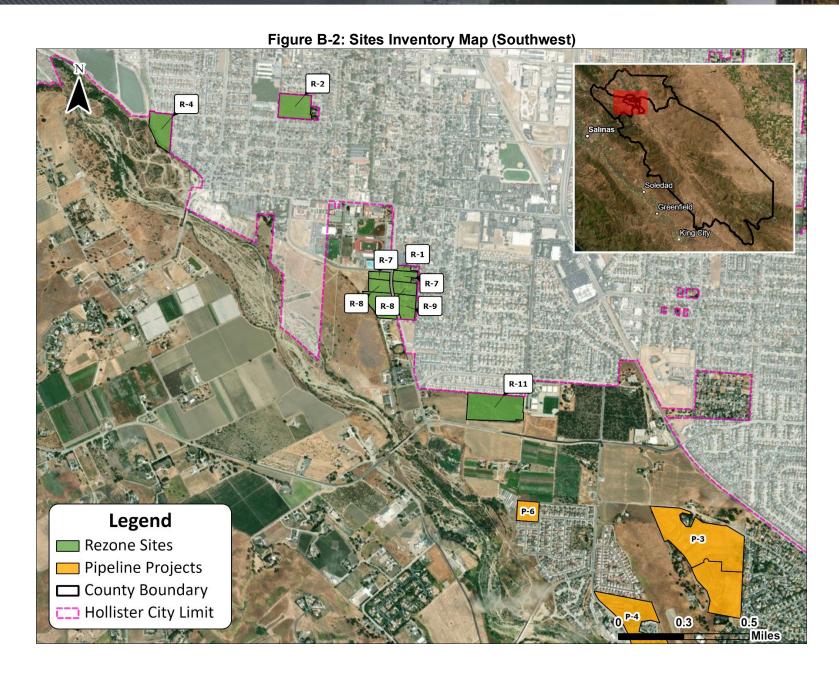
^{**}The Very Low-Income (VLI) category includes Extremely Low-Income (ELI) households (<30% AMI) and accounts for half of the total VLI RHNA. The total ELI RHNA is 123 units.

These identified sites provide future development opportunities distributed equitably to areas with accessibility to resources, public transportation, and employment. None of the identified sites are environmentally constrained or have other constraining factors (i.e., land use restrictions, parcel shape, contaminations, title conditions, etc.). All sites have been assessed for the highest potential for residential development during the planning period.

Each identified site has been evaluated by existing use; access to infrastructure, water, utilities; and other service needs. Any sites exhibiting increased barriers to development, environmental concerns, infrastructure concerns or existing conditions and development concerns (slope, grading, hazardous uses, restrictive development standards, etc.) were not considered. **Figures B-1** through **B-4** illustrate the rezone sites and pipeline projects identified to meet the RHNA. Rezone sites include 12 parcels (2,044 total units) located throughout unincorporated County area along Hollister's city boundaries. Pipeline projects include nine (9) projects consisting of 2,077 total units located in unincorporated County.

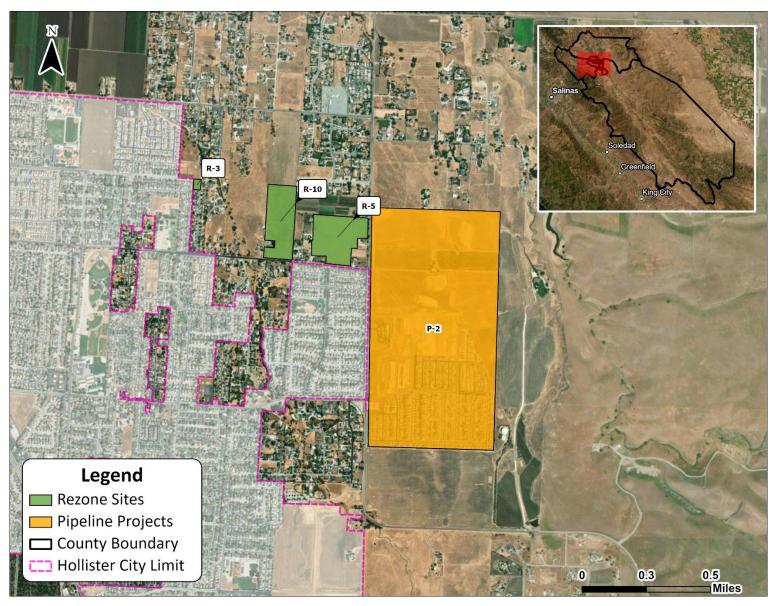
Legend Rezone Sites **Pipeline Projects** ☐ County Boundary Hollister City Limit R-6 P-2 P-1 0.7 1.4 **■Miles**

Figure B-1: San Benito County 6th Cycle Housing Element Sites Inventory Map



2023-2031 HOUSING ELEMENT

Figure B-3: Sites Inventory Map (East)





Legend Rezone Sites **Pipeline Projects** ☐ County Boundary Hollister City Limit 0.3

Figure B-4: Sites Inventory Map (Northwest)

A. Adequacy of Sites to Accommodate RHNA

1. Availability of Water, Sewer, and Dry Utilities

The County has existing or planned water, sewer, and dry utilities that have been designed and located to accommodate potential residential development identified for the 2023-2031 Housing Element.

Water resources in San Benito County are managed by five separate water districts throughout the unincorporated area of the County: the Aromas Water District, Pacheco Pass Water District, Sunnyslope County Water District, San Benito County Water District (SBCWD) and Tres Pinos Water District. The County's groundwater and surface water resources are primarily managed by the SBCWD. The District is governed by an elected five-member Board of Directors and administered by the District Manager. Small portions of the County receive water services managed by the city of Hollister Management Services. The District owns two surface water treatment plants in the Hollister Urban Area that deliver potable water to Sunnyslope County Water District (serving the eastern side of Hollister, and parts of the County) and the city of Hollister.

The Pacheco Pass Water District operates a dam and reservoir located in Santa Clara County, which serves the northeastern part of the irrigated land in San Benito County. The Sunnyslope County Water District provides water service to the unincorporated area east and southeast of Hollister, the Ridgemark development, and incorporated properties east of Memorial Drive in Hollister, and it is in the process of drilling new wells to increase its capacity. The District also provides sewer service to Ridgemark and other areas to Hollister's southeast, but not to other parts of its water service area. The Tres Pinos Water District provides sewer and water service to the unincorporated area of Tres Pinos. The district presently has transmission and water capacity limitations and there is a moratorium for new development. The San Benito County Water District is responsible for the administration of the United States Bureau of Reclamation San Felipe Water Project.

Currently, the County does not have its own sewer system. Rural development and unfavorable soil composition make it difficult to install a regional sewer system. Less than one percent of the unincorporated area of the County has the potential to utilize public sewer and water service, and a majority utilize private septic tank systems. Poor septic planning and general lack of knowledge about proper homeowner septic-tank system maintenance can contaminate groundwater supply and lead to degraded water quality. The County conducted a study to assess the feasibility of constructing, operating, and maintaining a new sewer facility for new development that cannot be accommodated with septic systems, and which cannot be served by the city of Hollister. To address potential water quality issues associated with new development, a County-led study found that a proposed sewage facility could process 100,000 gallons per day and could

accommodate 715 houses¹. The number of units served may increase depending on the establishment of efficient water systems in denser areas.

As the unincorporated County is largely rural, with few locations close to services and amenities, multifamily housing is generally only located within and near the incorporated cities of Hollister and San Juan Bautista. Multifamily development is typically only feasible where both public water and public sewer services are available, and only Hollister and San Juan Bautista have these services. The County's other two towns, Aromas and Tres Pinos, are not presently suited for multifamily housing development, as Aromas has no public sewer and Tres Pinos' water, and sewer capacity is significantly constrained.

Currently, new development in unincorporated County areas is subject to the sewer system design standards outlined in Article V of the Municipal Code. The average dry weather flow (ADWF) for new development is calculated based on the number of units per acre, gross acreage, land use type, and zone name. For example, developments in multi-family zones have an ADWF based on the number of units per acre multiplied by 250 times the gross acreage. The County has also collaborated with the city of Hollister to construct a reclamation plant under the Hollister Urban Area Water & Wastewater Master Plan, which allows for reclaimed residential wastewater to be treated and reused for agricultural and landscaping purposes. The Plan covers unincorporated areas in the County designated for urban development, which is part of the Hollister Urban Area (HUA).

San Benito County's electric services are provided by both Central Coast Community Energy (CCCE) and Pacific Gas and Electric (PG&E). Gas utility services are provided by PG&E through a combined infrastructure system with electricity. One main natural gas pipeline runs horizontally through San Benito County, which then is diverted to different areas of the County for household distribution.

Ability to Accommodate 2023-2031 RHNA Growth Need

Each site in the Sites Inventory Table (**Table B-9**) has been evaluated to confirm there is adequate existing or planned access to utility services and connections. These include water, sewer, and dry utilities. Each site is situated with a direct connection to, or within at least 250 feet of a public street that has the appropriate water and sewer mains and other infrastructure services. Most recent development immediately surrounding the city of Hollister has had to connect to city sewer lines and the County believes that in collaboration with Hollister, future development applicants can also connect to existing infrastructure, mitigating potential infrastructure constraints. Through **Program 3-4** in **Chapter 6: Policy Plan**, the County is committed to facilitating and coordinating water and sewer access in any capacity it has.

2. Accessory Dwelling Units and Junior Accessory Dwelling Units

The County has identified capacity to develop Accessory Dwelling Units (ADUs) and Junior (JADUs) on existing and future residential properties. It is estimated that up to 219 ADUs can be accommodated throughout the County during the 2023-2031 planning period.

Appendix B: Candidate Housing Site Analysis

¹ San Benito County's Regional Housing Need Determination, <u>Final RHNA Plan – 6th Cycle Resolution NO. 2022-19</u>, County of San Benito County Governments.

The State Department of Housing and Community Development (HCD) has supported a strategy to estimate future development of ADUs by projecting the average number of ADUs recently constructed (2021 to 2023). **Table B-3** displays the County's constructed ADUs from 2021 through 2023. The data shows the County doubled ADU production between 2021 and 2022. The County has implemented actions that streamline ADU production and contribute to lower construction costs. In the prior 5th Cycle planning period, the County updated its Municipal Code to comply with State ADU laws. In 2022, the County published an "ADU Guidebook" providing guidance for building an ADU in San Benito County. In 2023, the County released six free, preapproved ADU plans to make it easier for residents to build ADUs. These six plans range from 400 to 1,500 square feet.

By providing pre-approved plans, San Benito County contributes to streamlining the process and encourages more people to consider adding ADUs to their properties. While the County has made it easier and less cost prohibitive to develop ADUs, the County has not seen a significant increase in ADU applications as expected. The County attributes this to increasing construction costs and rising interest rates which makes it increasingly difficult for applicants to develop even with pre-approved plans. Though the rate of ADU development has increased at a slower pace in 2023, the County believes ADU production will continue to increase annually throughout the planning period as construction costs and interest rates decrease.

From January 1, 2021, to December 31, 2023, the County issued building permits for 65 ADUs, with an average of 22 per year over the three-year period. Additionally, the Vista Del Calabria project will provide 7 ADUs and the Fairview Corners project is approved to develop 20 second units which can be ADUs.

Using a conservative estimate of 25 ADUs per year, a 13 percent increase of the annual average of 22 per year from 2021 to 2023, the County anticipates a total of 219 new ADUs between 2023 and 2031. The estimates are consistent with the County's most recent ADU trends and are reflective of the changes in State law and the County's recent efforts to promote, streamline review, and incentivize ADU production.

Table B-3: Accessory Dwelling Units Past Performance and Future Projections					
Year	ADU Permitted and Projected				
2021	14				
2022	32				
2023	19 ¹				
Annual Projection (2023-2031)	25 per year				
2023 ²	19 ¹				
2024	25				
2025	25				
2026	25				
2027	25				
2028	25				
2029	25				
2030	25				
2031	25				
Projection Period Total	219				

Note: Data for 2021 through 2023 is based on the total number of building permits issued for ADUs and reported in the General Plan and Housing Element Annual Progress Reports.

- 1. Including all of 2023
- 2. Only including units during the 6th Cycle projection period beginning July 1, 2023

In accordance with State law, ADUs are allowed in all zones that allow single-family or multiple-family residences. In addition to recent efforts to facilitate the development of ADUs, the County has added **Programs 1-9** and **1-10** to facilitate the development of ADUs available for lower-income households.

For the purposes of Sites Inventory, the County assumes a percentage of ADUs will be affordable based on the *Using ADUs to Satisfy RHNA Technical Memo*, produced by the Association of Bay Area Governments (ABAG). ABAG's analysis consisted of the following steps:

- Calculated maximum rent limits for RHNA income categories for one-person and two person households by county;
- Surveyed rents for ADUs in the region;
- Used survey data to determine proportion of ADUs within each income category; and
- Created assumption of how many persons will occupy each ADU, finalize proportions.

Using ABAG's analysis, **Table B-4** shows estimated ADU projections for San Benito by income category.

Table B-4: Accessory Dwelling Unit Projections by Income Category							
Income Category Percentage Units							
Low- and Very Low-Income	60%	131 units					
Moderate-Income	30%	66 units					
Above Moderate-Income	10%	22 units					
	Total	219 units					

The County has included **Program 1-10** to produce and distribute informal, voluntary surveys of rental pricing for ADUs annually. The voluntary surveys will be provided to future ADU applicants in the County. Based on anecdotal information and rental listing websites, it is believed that many ADUs in the County and the region are provided at no or low cost to family members or friends due to the lack of rental listings found online.

3. Projects in the Pipeline

"Projects in the pipeline" are defined as active projects that have applied for entitlements, have recently received Planning approval, and/or have submitted for building permits that have not yet been approved and issued. HCD guidance states that residential projects that are in review, approved, permitted, or receive a certificate of occupancy after the beginning of the RHNA projection period may be credited toward meeting the RHNA based on the affordability and unit count of the development.

As shown in **Table B-5**, there are nine projects in the pipeline that will provide additional residential units that will contribute towards meeting the County's 6th Cycle RHNA obligation. These projects range from single-family modular units to larger scale developments with multifamily units. Many of these projects include affordable units as a component of the development, through deed restrictions as a result of the affordable housing program, and/or as part of development agreements. Projects listed as "Planning Application Filed" are currently going through Planning review to ensure compliance with the County's Zoning Code and projects listed as "Approved" are either currently working with the Building Department to receive building permits or they have received entitlements, and the County expects that the applicant will apply for building permits and complete their project during the 6th Cycle planning period. Projects listed

below do not have any known barriers or County-imposed phasing requirements, and they should thus move forward without delays.

Table B-5 shows nine projects in the pipeline totaling 2,077 units, including the following:

- 121 low- and very low-income units
- 132 moderate-income units
- 1,824 above moderate-income units



	Table B-5: Projects in the Pipeline							
	Project Project				Projected Units by Income Category			gory
ID	Name	Status*	Address	Description	Very Low/ Low	Moderate	Above Moderate	Total
P-1	San Juan Oaks	Under Construction	3825 Union Rd, Hollister, CA	The Project, as set forth in the Specific Plan, proposes development a full build out of up to 1,084 residential units, up to 25,000 square feet of amenity space, a 200-room hotel, an approximately four-acre assisted living/skilled nursing/memory care facility, and up to 65,000 square feet of neighborhood commercial uses. The project consists of 1,017 age-restricted units (55+ years old), and 67 non-age restricted units. Phase 1 under currently construction (279 units).	0	0	1,084	1,084
P-2	Santana Ranch (SFR)	Under Construction	East of Fairview Rd intersections with Hillcrest and Sunnyslope Rds, Hollister, CA	Part of the Santana Ranch Specific Plan which proposes a total of 1,092 units. The project proposes 774 single-family units. A total of 606 units were permitted and finaled in the 5th Cycle, 33 units were finaled during the 6th Cycle project period, and 135 units remain unpermitted. 63 units are currently under review.	0	0	135	135
P-2	Santana Ranch (MFR- Apartments)	Under Construction	1231 Pine Rock Dr, Hollister, CA	Part of the Santana Ranch Specific Plan which proposes a total of 1,092 units. The project proposes 318 multifamily units. Development Agreement (DA) requires that 10% of the whole project must be affordable (equal to 110 units). The owner elected to satisfy the		104	152	262
P-3	Vista Del Calabria	Under Construction	213 Enterprise Rd, Hollister, CA	Vista Del Calabria is under construction and has begun grading and roadways. No building permits have been issued for any of the units to date. The project will develop a total of 156 units. The project complies with the affordable housing program and will comply through a combination of collected fees and construction of 23 affordable units (15% of 156 units) on-site. The developer will pay \$4,500 for each market rate unit (133 units) towards a down payment assistance program. The amount collected will be divided evenly amongst the 16 for-sale affordable units (moderate-income) to be used towards down payment, closing costs,	7	16	133	156

	Table B-5: Projects in the Pipeline							
	Project	Project			Projecte	ed Units by I	ncome Cateo	ory
ID	Name	Status*	Address	Description	Very Low/ Low	Moderate	Above Moderate	Total
				or a combination of both. The 16 for-sale affordable (moderate-income level) units will be deed restricted for 30 years. The project will include the construction of no less than 7 ADUs to be rented. All ADUs will be rented to very low- and low-income households. The ADUs will be deed-restricted for 15 years.				
P-4	Homekey 2.0	Under Construction	3235 Southside Rd, Hollister, CA	The project consists of 16 extremely low-income tiny home modular units. Five out of 16 units are complete but not affixed to the ground, no units will be eligible for occupancy until all 16 units are complete. Project is funded by Homekey 2.0 funding.	16	0	0	16
P-5	Fairview Corners	Approved	511 Fairview Rd, Hollister, CA	Fairview Corners Specific Plan (FCSP). Based on the tentative map for 189 residential units, the owner is required to reserve a total of 10% of the total units as affordable with 50% for low-income households and the remaining 50% for moderate-income households. The affordable units are required as part of the Development Agreement (DA). The DA allows the affordable housing obligation to be satisfied by the provision of on-site secondary dwelling units. Currently, the applicant intends to construct 20 secondary units to meet 100% of the affordable housing requirement in accordance with the DA. The Gavilan College San Benito Campus, which is adjacent to the FCSP project area, began construction in July 2023 and the first phase of the campus is scheduled to be completed by fall 2024. While Gavilan College is not part of the FCSP project area, the SP envisions the college as vital component of the development. The Gavilan College Board of Trustees owns both parcels.	9	11	169	189
P-6	Bray	Approved	0 Southside Rd, Hollister, CA	Rezone of a four-acre parcel to single-family residential use and subdivide it into 11 lots. Of these, 10 would contain between 6,000 and 7,600 square feet and be used for residential use, while the other lot would be reserved for public utility use by the Sunnyslope County Water District (SSCWD).	0	0	10	10
P-7	Baler Place	Active Planning Application	340 Bridgevale Rd, Hollister, CA	Proposal to develop 54 affordable deed restricted units. The project will include a community space that will allow a development team to provide on-site supportive services for all tenants, free of charge. Upon completion, Baler Place will offer 53 units reserved for households	53	1	0	54

	Table B-5: Projects in the Pipeline							
Project Project				Projecte	ed Units by I	ncome Cate	gory	
ID	Name	Status*	Address	Description	Very Low/ Low	Moderate	Above Moderate	Total
				earning 30%-60% AMI out of which one unit is for the on-site manager. There will be six one-bedroom units, 24 two-bedroom units, and 23 three-bedroom units (One three-bedroom is manager unit). The proposal is utilizing the Density Bonus. The applicant resubmitted an application and the County provided comments to the applicant on 7/10/2024. The applicant resubmitted on 8/17/2024. The County provided a letter response with minor revisions to parking requests to comply with minimum parking standards per Density Bonus Law. County issued a letter regarding granted concessions and waivers per Density Bonus on 8/21/2024 and 12/12/2024. The applicant resubmitted on 10/17/2024 and the County provided a comment letter on 11/15/2024. The applicant is working with the City of Hollister to secure water/sewer services, no update as of 12/23/2024. Funding sources may vary depending on approved applications. Applications have been submitted to HOME and CDLAC/CTCAC and waiting approval. The applicant must properly abandon a well on the property which may take several weeks to months depending on the specific well conditions which are unknown at this time. The project applicant needs to submit a NEPA Environmental Assessment, and the review may take up to one year. The project applicant will need to address outstanding Public Works comments to receive final project approval which may take several weeks to months. Concurrently, the applicant is requesting access to water and sewer services from the City of Hollister. The applicant is participating in ongoing discussions with the City of Hollister, but the County cannot provide a timeline for the granting of water and sewer access as the County cannot dictate City services. Through Program 3-4 in Chapter 6: Policy Plan, the County is committed to facilitating and coordinating in any capacity it has. If the project applicant continues responding to comments at the same pace, they can feasible complete the remaining steps to receive county approval within 12-24 months. If granted w				



				Table B-5: Projects in the Pipeline					
	Project	Project				Projected Units by Income Category			
ID	Name	Status*	Address	Description	Very Low/ Low	Moderate	Above Moderate	Total	
P-8	Lands of Lee	Active Planning Application	291 Old Ranch Rd, Hollister, CA	Proposal to develop 141 residential lots consisting of 121 single-family detached (SFD) homes, 20 single-family attached (SFA) duets, and 30 accessory dwelling units (ADU) will be deed restricted for low-income for 30-years, per the applicant's application. The applicant has decided to comply with the County's Affordable Housing Regulations by developing affordable units on-site. Project application going to Planning Commission on September 11th, 2024. Project application was presented to the Planning Commission on September 11th, 2024. The Public Hearing was continued to October 23rd to address comments made by the Planning Commission with regard to the affordable housing plan, VMT, and other items raised at the meeting. The Project was denied by the Planning Commission on October 23, 2024, and an appeal to the Board of Supervisors was submitted on October 24, 2024. The Board of Supervisors approved the project on November 12, 2024. The Board of Supervisors adopted Resolution No. 2024-146 on November 26, 2024, to certify the EIR. The timeline for development has not been established but the applicant has indicated that development will begin within the 6th Cycle Planning Period.	30	0	141	171	
				Total Projected Units	121	132	1,824	2,077	
*As c	of January 2025	5							

B. Very Low- and Low-Income Sites Inventory

1. Strategy for Accommodating Very Low- and Low-Income RHNA

Existing Zoning and Land Use

State law (Government Code section 65583.2, subdivision (c)(3)(B)) has identified 20 dwelling units per acre (du/acre) as the minimum default density or feasible density to accommodate very low- and low-income housing in unincorporated San Benito County². The County's General Plan Land Use Element (GPLU) establishes two land use designations that allow up to 20 du/acre: Residential Mixed (RM) which allows single-family housing and Commercial Neighborhood (CN) which allows apartments and higher density housing types. Because HCD's *minimum* default density is the County's *maximum* allowable density, the County cannot utilize default density assumptions as described in HCD's memorandum titled, "Default Density Standard Option – 2020 Census Update."

The County's Affordable Housing Program has been utilized in the development of affordable units and will continue to play an important part in future developments. Density bonus incentives may also result in the development of additional units beyond what the County's density limits establish. Additional details on both the Affordable Housing Program and the density bonus regulations are provided in **Chapter 3**.

Units Constructed in the 6th Cycle Projection Period, Pipeline Projects, and ADUs

A summary of the County's candidate sites strategy is shown on **Table B-2**. Projects that have been approved, permitted, or received a certificate of occupancy since the beginning of the RHNA projection period may be credited toward meeting the RHNA allocation based on the affordability and unit count of the development³.

Since June 30, 2023, the County has awarded 88 certificates of occupancies. A total of 24 units were part of the Riverview Estates II project which is a 100 percent affordable housing project for very low- and low-income households. This accounts for approximately 5.5 percent of the County's total lower-income RHNA.

As shown in **Table B-5**, there are six projects currently in the pipeline that are accommodating a total of 121 lower-income units. The table includes status updates for these projects as of November 2024. Projects in the pipeline can accommodate up to 27 percent of the County's total lower-income RHNA.

The County has projected that an additional 131 lower-income units can be accommodated through the development of ADUs, as analyzed earlier in this appendix. This accounts for 29.5

² The State Department of Housing and Community Development (HCD), Default Density Standard Option – 2020 Census Update, https://www.hcd.ca.gov/community-development/housing-element/housing-element-h

³ The State Department of Housing and Community Development (HCD), Housing Element Site Inventory Guidebook Government Code Section 65583.2, https://www.hcd.ca.gov/community-development/housing-element/housing-e

percent of the County's total lower-income RHNA. Together, units constructed in the 6th Cycle projection period, projects in the pipeline, and projected ADU construction are estimated to accommodate 62 percent of the County's total lower-income RHNA.

Rezoning

After utilizing units constructed in the 6th Cycle projection period, projects in the pipeline, and projected ADU construction, the County has a remaining unmet RHNA of 168 lower-income units. To accommodate the shortfall or any potential unmet need, the County has identified a total of 12 parcels covering 121 acres to be rezoned.

The County's complete rezone strategy and analysis is detailed below in **Section 5**: **Rezone Strategy to Increase Capacity of Lower-Income Housing Beyond RHNA Need.**

2. Unit Capacity Calculations

The proposed "Residential High" rezone and GPLU amendment analyzed in **Section B.5** will have a density range of 20-45 du/acre. In the Sites Inventory, the County assumed an average density of 25 du/acre which is 55 percent of the maximum density allowed in the proposed zone. The assumed average density of 25 du/acre is comparable to the average residential density of the "Bridgevale Road" pipeline project currently under review (gross density of 30 du/acre) and recent projects within the City of Hollister, Gilroy, and Morgan Hill as analyzed later in this Appendix. The proposed rezone will include provisions to incentivize higher density developments, and the goal is to facilitate maximum capacities, but the County was conservative in its assumed average density of rezoned sites.

Site-by-Site Calculation

The County has identified unit capacity on sites considering existing uses on parcels and the feasibility of adding housing, development standards for the respective zone, and the feasible buildable acreage of the parcel if the parcel is nonvacant and the existing use is not discontinued. It is feasible that existing uses are removed, and 100 percent of the parcels are utilized, but this analysis assumes existing uses will remain. Unit capacity was calculated by multiplying the net acreage of the site (considering existing environmental issues and existing structures) by the assumed density. The "assumed density" used as the basis for analysis in Table B-10 was established based on past performance on existing zoning. The proposed maximum density accounts for development standards, common on-/off-site improvements, and unique parcel conditions. Individual sites were analyzed and were "discounted" to account for development standards, common on-/off-site improvements, and unique parcel conditions, resulting in a density range that is feasible and realistic. The analysis in Chapter 3, Table 3-3: Land Use Analysis was completed using all identified candidate sites to determine appropriate densities. Hypothetical development standards were applied to identified sites to determine if hypothetical proposed projects would be able to develop at full density without exceptions if development standards were applied.

The County will propose increasing the maximum height requirement to 36 feet to accommodate up to three stories on rezoned parcels. The development scenario analysis conservatively assumed an average 1,200 square foot unit size and applied all existing development standards required in the RM zone such as maximum lot coverage, setbacks, parking requirements, and open space requirements to Candidate Sites. The analysis also made a conservative assumption that 25 percent of the total floor area would be used for circulation purposes (hallways, stairs,

elevators, etc.). Based on the conservative analysis, an applicant would feasibly be able to develop up to the proposed maximum densities without the need for variances, density bonuses, or exceptions. In fact, the analysis determined that the maximum density could be increased 9 percent and still be feasible under the hypothetical development standards and on-/off-site requirement scenarios.

While the County has not adopted or determined the development standards for the proposed Residential High Rezone, **Program 3-2** in the **Policy Plan** commits to adopt a Residential High Rezone that establishes development standards that facilitate achieving maximum densities. The Development standards will be established to facilitate achieving maximum densities on parcels proposed to be rezoned and will consider both on-/off-site improvement requirements, and unique parcel conditions.

Sample site calculations for a vacant and nonvacant parcel are shown below in **Tables B-6** and **B-7**, respectively.

Table B-6: Sample Sites Calculation (Vacant)						
Site Descriptor	Data					
APN	0200800220					
Zone	Rezone					
Density Range	20-45 du/ac					
Gross Unit Total at Maximum Density	326 units					
Buildout Density Assumed in the Candidate Sites Analysis	25 du/acre					
Existing Use	Vacant Lot					
Existing Structures	0					
Total Acreage	7.25 acres					
Assumed Buildable Acreage	7.25 acres					
Net Units	181 units					
Lower-Income Assumptions	20% Lower-Income					
Total Affordable Unit Yield	36 units					

Table B-7: Sample Sites Calculation (Nonvacant)	
Site Descriptor	Data
APN	0201700370
Zone	Rezone
Density Range	20-45 du/ac
Gross Unit Total at Maximum Density	176 units
Buildout Density Assumed in the Candidate Sites Analysis	25 du/acre
Existing Use	Large, mostly vacant parcel with existing single-family home occupying approximately 5% of the total parcel acreage.
Existing Structures	One single-family home.
Total Acreage	3.92 acres
Assumed Buildable Acreage if Existing Use is not Discontinued	2.35 acres
Net Units	60 units
Affordability Assumptions	20% Lower-Income
Total Affordable Unit Yield	12 units

Affordability Assumptions

Sites identified for rezoning to accommodate capacity beyond RHNA are assumed to develop 20 percent of units affordable to very low- and low-income households, 30 percent of units affordable to moderate-income households, and 50 percent market rate or above moderate-income. Nonvacant parcels may develop at lower rates of affordability due to existing development onsite but can utilize concessions and incentives to offset costs. Development of nonvacant parcels would incur additional costs from demolition of existing structures and additional costs that do not typically exist for vacant parcels. Other factors such as existing uses with hazardous conditions i.e., auto repair shops, laundromats, etc., land and construction costs, and development trends may increase redevelopment costs that ultimately impacts affordability.

The goal of the 2023-2031 Housing Element is to create more opportunities for affordable housing and to work with the affordable housing development community to bring additional very low- and low-income housing opportunities to San Benito County.

The County has identified sufficient land identified for rezoning, to accommodate the 2023-2031 RHNA. To support the assumption that projects will develop with affordable units, the County has identified programs and policies encouraging affordable developer interest and feasibility. These programs are detailed in **Chapter 6: Policy Plan**.

3. Adequacy of Sites to Accommodate Lower-Income Housing

Vacant Parcels

The County has identified sufficient land to accommodate lower-income RHNA need on vacant parcels. Of the 18 total parcels identified as having potential to accommodate lower-income units, nine parcels are currently vacant and have been identified to accommodate 288 lower-income units. Additionally, the County can accommodate an additional 131 lower-income units through ADU development.

Four of the vacant sites to accommodate lower-income units are pipeline projects containing 84 lower-income units. The remaining five vacant sites are identified in the Sites Inventory (Table B-9).

Therefore, the existing uses on the remaining sites identified to accommodate lower-income units are not presumed to impede additional residential development. Existing uses on the nonvacant sites have also been evaluated for potential to accommodate future residential uses.

Use of Small and Large Sites

Sites identified to meet the County's lower-income RHNA were selected in consideration of AB 1397 parcel size standards, among others. AB 1397 states parcels between 0.50 acre and 10 acres are considered appropriate size to develop affordable housing. AB 1397 further states parcels that are sized less than 0.50 acre ("smaller") or more than 10 acres ("larger") may be inadequate to accommodate lower-income housing unless there is demonstrated evidence that affordable housing projects can develop on smaller or larger sites.

Nine parcels, accommodating 187 lower-income units, fall within the AB 1397 sizing criteria. Three larger parcels have been identified to accommodate an additional 222 lower-income units. The three parcels range from 14.7 to 20.97 acres. The County has a demonstrated history of approving residential projects on larger parcels, specifically projects with affordable units. The

most recent examples of residential projects on larger parcels are highlighted in **Table B-5** above. Almost all projects in **Table B-5** fall out of the AB 1397 size criteria, but almost all have an affordable component. Many of these projects are currently under construction or have been approved and are currently under review for building permits.

Larger sites were analyzed for potential for development. The analysis concluded that two of the larger sites could be subdivided to utilize portions of the parcels that exhibited higher potential for redevelopment. This finding led the County to determine the usable acreage of individual large sites. The following sites were identified:

Table B-8: Large Sites Identified												
APN	Gross Acreage	Identified Acreage										
0200400590	19.41	11.6										
0202800070	14.72	11.8										

The County has analyzed past developments to determine the feasibility of development on parcels larger than 10 acres and the data supports the viability of the 6th Cycle identified candidate sites for affordable housing development. Additionally, each site identified in the County's Sites Inventory meets the minimum default density of 20 dwelling units through a rezone as outlined in Section 5 below.

4. Nonvacant Sites

The County has identified sufficient land to accommodate 288 lower-income units on vacant parcels, which is more than half its lower-income RHNA of 444 lower-income units. The County has identified additional parcels (surplus sites) to accommodate lower-income units to increase capacity and encourage affordable housing development. These surplus sites have existing uses which include residential and nonresidential uses. A summary of the County's candidate sites strategy is shown on Table B-2.

For non-vacant sites, State law requires that the County analyze:

- Existing Uses;
- Development trends;
- Market conditions; and
- Availability of Regulatory and/or other Incentives.

Existing Uses

The County has identified six nonvacant parcels to accommodate a surplus of its RHNA for all income categories. As analyzed in this appendix, the County has sufficient capacity to accommodate its 6th Cycle RHNA but has selected surplus sites to increase capacity and encourage affordable housing development. The six nonvacant parcels identified in the Sites Inventory can accommodate 205 lower-income units, 306 moderate-income units, and 512 above moderate-income units. All six nonvacant parcels are underutilized, largely vacant (more than 80% of the parcel) or are functionally vacant but cannot be classified as vacant per HCD's definition of a vacant site.

Underutilized sites with potential for additional residential development or redevelopment are listed in **Table B-10**, which analyzes existing uses for each site. Recent development activities and trends indicate that the development of residential uses on nonvacant sites that are underutilized is prevalent throughout the region. This is further supported by Policy 1.5, Policy 3.1 and other policies further listed in the Policy Plan. The most significant opportunities for additional

housing development are directly adjacent to the city of Hollister limits where infrastructure exists. The analysis of existing uses determined that the existing uses do not preclude residential development or redevelopment, and on five of the six parcels, residential uses can be incorporated into existing uses.

Lease Analysis

Existing lease agreements on nonvacant properties present a potential impediment that may prevent residential development within the planning period. State law requires the County to consider lease terms in evaluating the use of nonvacant sites. The County does not have access to private party lease agreements or other contractual agreements amongst private parties, but existing uses have not shown to pose a constraint to development feasibility due to incentives and greater development opportunities.

Development Trends

Given the complexity of factors that influence property owner decisions regarding development, it has been necessary for the purposes of this Sites Inventory to utilize simple, standardized factors to determine which sites may realistically develop during the planning period. The broadest factor that the County has utilized is remaining residential development capacity, calculated as the difference between a site's rezoned residential capacity and existing residential units on site. The County analyzed recent and past development trends and found that a majority of past nonvacant development projects had at least 70 percent of remaining residential development capacity. The County also found that existing uses were more than 25 years old and often much older.

Considering those findings, the County removed parcels that did not have more than 70 percent vacancy and parcels with uses that have been developed within the last two decades due to the low likelihood of redevelopment during the planning period.

Past Performance Developing Nonvacant Sites for Residential Uses

Table B-9 lists previously approved projects developed on nonvacant sites in the 5th Cycle planning period. As shown, the County has been successful in not only approving residential housing developments on nonvacant sites, but also in approving the development of affordable units on non-vacant sites, supporting the County's use of nonvacant sites in the Sites Inventory. As mentioned above, nonvacant sites are not being used to accommodate any of the County's RHNA but are identified to accommodate surplus units to increase capacity and encourage affordable housing development.



Ta	able B-9:	Past Residentia	al Development	s on Non-Va	cant Sites (5 th	Cycle Pl	anning Period	
Project	Acres	Previous Use	GP Designation	Density	Year Completed	Total Units	Affordable Units	Candidate Site Equivalent
Vista Del Calabria 213 Enterprise Rd	49.9	Single-family residence; Agriculture	RM/PUD	5-7 du/ac	Under Construction	149	23	Size: R-9, R- 10, R-11 Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12
Santana Ranch 1517 Santana Ranch Dr	292.0	Single-family residence; Agriculture	Santana Ranch SP	1-20 du/ac	Under Construction	1,092	110	Size: N/A Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12
Lands of Lee 291 Old Ranch Rd	27.5	Single-family residence; Agriculture	RM/PUD	5-7 du/ac	Denied 2023 – Revised Application Under Review	171	30	Size: R-9, R- 10, R-11 Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12
Riverview Estates II 3115 Dennis Lalor	4.88	Convalescent hospital	R1	5-7 du/ac	2023	24	24	Size: R-7, R-8, R-12 Existing Use/Condition: N/A
Sunnyside Estates 2780 Southside Rd	44.4	Single-family residence; Agriculture (orchard)	R1	5-7 du/ac	2021	200	0	Size: R-9, R- 10, R-11 Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12
Bennett Ranch 3101 Southside Rd	26.0	2 Single- family residences; Agriculture (orchard)	R1	5-7 du/ac	2021	84	0	Size: R-9, R- 10, R-11 Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12
1724 Santa Ana Rd	7.4	Single-family residence (will remain)	RR	1 du/ac	Under Construction	4	0	Size: R-7, R-8, R-9, R-10, R- 11, R-12 Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12

Ta	Table B-9: Past Residential Developments on Non-Vacant Sites (5 th Cycle Planning Period) Previous GP Year Total Affordable Candidate													
Project	Acres	Previous Use	GP Designation	Density	Year Completed	Total Units	Affordable Units	Candidate Site Equivalent						
1450 Santa Ana Rd	7.6	Single-family residence; Agriculture	RR	1 du/ac	2018	6	0	Size: R-7, R-8, R-9, R-10, R- 11, R-12 Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12						
1512 Santa Ana Rd	8.6	Mobile home; Agriculture; Barn	RR	1 du/ac	2023	7	0	Size: R-7, R-8, R-9, R-10, R- 11, R-12 Existing Use/Condition: R-7, R-8, R-9, R-10, R-11, R- 12						

The "Candidate Site Equivalent" in the table above lists similarities between the past project examples and the County's identified Candidate Sites. As shown above, virtually all the examples above are similar or identical in size, existing use, and condition of sites included in the Sites Inventory (**Table B-10**). The examples above include Pipeline Projects which are currently under construction.

The County has identified nonvacant candidate sites with large, vacant, or underutilized, areas that are ripe for redevelopment. Given the County's past development history on nonvacant parcels, shown in **Table B-9**, as well as with **Program 1-12: Nonvacant Sites Incentives** included in the **Policy Plan**, the County does not anticipate existing uses nonvacant candidate sites to impede residential development.

Market Conditions

Much of the County's recent development has been on vacant parcels and large parcels that are nonvacant but have large areas that are functionally vacant. Past examples of nonvacant parcels that have been redeveloped have typically been parcels with one single-family home or largely vacant parcels with shell, accessory, or temporary structures, similar to the nonvacant sites identified in **Table B-10**. These parcels have been attractive to developers as the existing uses were relatively simple to remove prior to development. These examples highlight the demand for nonvacant parcels and highlight the feasibility of redevelopment.

As analyzed in **Chapter 3**, existing infrastructure plays a vital role in development feasibility. It is increasingly difficult for developers to propose housing on parcels that are far from existing infrastructure. The nonvacant parcels identified were specifically selected due to their proximity to existing infrastructure. Their proximity to infrastructure makes these parcels uniquely attractive to potential developers who may want to develop housing in and around the city of Hollister. The nonvacant sites identified are all either connected to or within 200 feet of existing water and sewer. This may increase market demand for these parcels as offsite improvement costs may be significantly lower than parcels that are not connected or close to existing infrastructure, increasing the feasibility of the sites' redevelopment, regardless of existing uses. Because much

of the County does not have access to water and sewer, parcels with existing connections or within close proximity to connections are ripe for more intensive, compact and infill development or redevelopment and reuse.

To determine the estimated densities, a survey of recent development within the County and region was conducted to identify trends in actual built densities. Based on this, the City has determined the densities of recently built projects average approximately 70 to 80 percent of the maximum permitted. This percent average was used to project out development potential on all identified Housing Element sites. Additional affordable and market-rate units will be added through density bonus incentives and the County's Inclusionary Housing Ordinance.

Past performance shows that the County has not facilitated a significant amount of higher density housing but contributes this to infrastructure constraints, specifically water, in the City of Hollister since 2002. One of the most significant factors influencing development in the County within the last two decades are the various growth management practices placed on the City of Hollister, initiated by voters, and adopted by the City. A combination of the building moratorium and the City of Hollister's Growth Management Program decreased the rate of housing growth in the County from 2001 to approximately 2020. The County is committed to working with utility and infrastructure servicers to facilitate the development of higher density housing.

The County and City of Hollister believe it is too soon to see the effects of the lifted development caps and recent changes to infrastructure capacity, but both have been facilitating the development of higher density residential as a direct result of recent changes. For example, Pipeline Project P-7, otherwise known as "Baler Place/Bridgevale," proposes to develop at a gross density of 30 du/acre. The net density will be greater and will surpass the County's assumed Residential High Rezone density of 25 du/acre. Additionally, The City of Hollister has begun seeing higher density development as a result of recent changes. The examples below highlight the feasibility of higher density development in the County and wider region. All the County's Candidate Sites are within 1-3 miles of the examples below which are in the City of Hollister:

- 500 San Benito St. (APN: 054-080-090) Mixed-use development with a density of 120 du/acre. Exceptions not known.
- 375 4th St. (APNs: 054-110-001, 054-110-002) 100% Affordable Project with a density of 84 du/acre. Lot merger of two parcels with a mixed-use component. Exceptions not known.
- 430 San Benito St. (APN: 054-110-036) Mixed-use development with a density of 76 du/acre. The project has an affordable component. Exceptions not known.

Recent real estate development trends in the urban portions of San Benito, Santa Cruz, Santa Clara, and Monterey counties demonstrate the increasing market feasibility of multi-family and mixed-use redevelopment at densities well above 20 units/acre on nonvacant. San Benito County presents an attractive opportunity for similar development scenarios and believes rezones and an updated General Plan will attract and spark new development.

The County has looked to the nearby jurisdictions of Gilroy and Morgan Hill to guide what a transition from decades of single-family development to higher density development may look like. Both Gilroy and Morgan Hill have experienced similar or identical residential development trends that produced almost exclusively single-family homes for much of their history. Abundant open land, affordable land costs, and existing zoning at the time led to large, planned communities with the same product type; single-family homes. Development in the cities of Gilroy and Morgan

Hill have begun trends towards higher density, and the City of Hollister and the County of San Benito have also begun to receive applications at densities beyond historical density trends. Gilroy and Morgan Hill are now facilitating the development of higher density residential and serve as an example of what developers in San Benito County and the City of Hollister may be pivoting towards.

Below are a few examples of recent projects proposed, entitled, or developed in Morgan Hill that represent development scenarios that can feasibly develop in San Benito County with the anticipated Residential High Rezone and the County's vision of future development:

- Magnolias (Monterey-First Community Housing) 66 rental units that are 100% affordable. The project has a gross density of 43 du/acre, though the net density is greater. The project is located on a 1.53-acre parcel and received a 20% density bonus, allowing the development to go 20% beyond the max density allowed. This development is similar in size to 5 of the 12 sites identified in the Sites Inventory (Site IDs: R-1, R-3, R-4, R-7, and R-8) and exhibits a built density greater than that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities.
- Morgan Hill Senior Housing 82 age-restricted rental units that are 100% affordable. The project has a gross density of 43 du/acre, though the net density is greater. The project is located on a 1.89-acre parcel and received an 80% density bonus, allowing the development to go 80% beyond the max density allowed. This development is similar in size to 5 of the 12 sites identified in the Sites Inventory (Site IDs: R-1, R-3, R-4, R-7, and R-8) and exhibits a built density greater than that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities.
- Jemcor (Monterey-Miner) 249 rental units that are 100% affordable. The project has a gross density of 33.2 du/acre, though the net density is greater. The project is located on a 7.5-acre parcel and received an 40% density bonus, allowing the development to go 40% beyond the max density allowed. This development is similar in size to 3 of the 12 sites identified in the Sites Inventory (Site IDs: R-2, R-6, and R-1) and exhibits a built density slightly greater than that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities. This project is similar in size to both recent projects and pipeline projects, justifying the inclusion of similar sites in the Sites Inventory.
- Tennant-Ten South Acquisitions 259 multi-family attached units. The project has a gross density of 23 du/acre, though the net density is greater. The project is located on a 11.25-acre parcel and was a Planned Unit Development. This development is similar in size to 4 of the 12 sites identified in the Sites Inventory (Site IDs: R-5, R-9, R-10, and R-11) and exhibits a built density almost identical to that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities. This project is similar in size to both recent projects and pipeline projects, justifying the inclusion of similar sites in the Sites Inventory. If the project were proposed in San Benito County, it would be subject to the County's Affordable Housing Regulations, requiring an affordable unit percentage in line with assumed affordability in the Sites Inventory.

Below are a few examples of recent projects proposed, entitled, or developed in Gilroy that represent development that can feasibly develop in San Benito County with the anticipated Residential High Rezone:

- Monterey/Gilroy Gateway Apartments 75-unit multifamily senior rental project with a density of 40 du/acre. The project is located on a 1.87-acre parcel and received a 30% density bonus, allowing the development to go 30% beyond the max density allowed. This development is similar in size to 5 of the 12 sites (Site IDs: R-1, R-3, R-4, R-7, and R-8) identified in the Sites Inventory and exhibits a built density greater than that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities.
- Alexander Station Apartments 263-unit multifamily rental project with a density of 39 du/acre. The project is located on a 6.5-acre parcel and received an 30% density bonus, allowing the development to go 30% beyond the max density allowed. This development is similar in size to 3 of the 12 sites identified in the Sites Inventory (Site IDs: R-2, R-6, and R-1) and exhibits a built density slightly greater than that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities. This project is similar in size to both recent projects and pipeline projects, justifying the inclusion of similar sites in the Sites Inventory.
- Harvest Park Apartments 81-unit multifamily rental project with a density of 35 du/acre. The project is located on a 2.31-acre parcel and received a 20% density bonus, allowing the development to go 20% beyond the max density allowed. This development is similar in size to 5 of the 12 sites identified in the Sites Inventory (Site IDs: R-1, R-3, R-4, R-7, and R-8) and exhibits a built density greater than that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities.
- 6630, 6680, & 6730 Monterey Road 94 rental units that are 100% affordable. The project has a gross density of 33 du/acre, though the net density is greater. The project is located on a 2.88acre parcel and received a 10% density bonus, allowing the development to go 10% beyond the max density allowed. This development is similar in size to 5 of the 12 sites identified in the Sites Inventory (Site IDs: R-1, R-3, R-4, R-7, and R-8) and exhibits a built density greater than that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities.
- 325 Las Animas Ave 501 rental units that are 20% affordable. The project has a gross density of 19.4 du/acre, though the net density is 22 du/ac. The project is located on a 26.1-acre parcel and is proposed at 73 percent of the maximum allowed density which is similar to the assumptions made in the Sites Inventory. This development is similar in size to 4 of the 12 sites identified in the Sites Inventory (Site IDs: R-5, R-9, R-10, and R-11) and exhibits a built density almost identical to that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities. This project is similar in size to both recent projects and pipeline projects, justifying the inclusion of similar sites in the Sites Inventory. If the project were proposed in San Benito County, it would be subject to the County's Affordable Housing Regulations, requiring an affordable unit percentage in line with assumed affordability in the Sites Inventory.
- 95 Howson St 46 multi-family townhomes. The project has a net density of 23.5 du/acre.
 The project is located on a 1.96-acre parcel and is proposed at 78 percent of the maximum

allowed density which is similar to the assumptions made in the Sites Inventory. This development is similar in size to 5 of the 12 sites identified in the Sites Inventory (Site IDs: R-1, R-3, R-4, R-7, and R-8) and exhibits a built density similar to that assumed in the Sites Inventory. An applicant can reasonably propose a similar or greater density with current and proposed densities.

The sample projects analyzed above are substantially similar to the sites identified in the Sites Inventory, justifying their inclusion, and confirming the feasibility of the assumptions made. The County believes that increasing densities will attract developers from to the region. Low maximum densities, development caps, and limited competition have resulted in almost exclusively single-family development in the County. The County is confident that new developers will begin proposing development in the County which will lead to the development of new, higher density, more affordable housing types. Availability of Regulatory and/or other Incentives

State Government Code Section 65583.2 requires jurisdictions to describe existing or planned financial assistance or regulatory relief from development standards that encourage and facilitate more intensive residential development on the identified nonvacant sites.

Many local governments develop partnerships with prospective developers to assist in making redevelopment economically feasible. Examples of these incentives include:

- Organizing special marketing events geared towards the development community;
- Identifying and targeting specific financial resources;
- Allowing streamlined or by right development application processing for infill sites; and
- Reducing appropriate development standards.

The County currently offers pro-rata reduction of impact fees to developments that provide 100-percent affordable housing. Additionally, the County encourages the use of density bonuses to increase the feasibility of development. The utilization of density bonuses may increase development feasibility through increases in allowable densities, parking reductions, and deviations from development standards. As part of the density bonus provisions, the County may offer additional incentives and concessions at its discretion.

Affordable Housing Regulations

The County amended its adopted Affordable Housing Regulations in 2023 to further its affordable housing goals. An alternative to compliance with the inclusionary requirement of the Affordable Housing Regulations is the payment of in-lieu fees. To the maximum extent possible, any monies received by the County pursuant to the Affordable Housing Regulations shall be used to increase, improve, and preserve the supply of affordable housing and services to provide extremely low-, very low-, low-, and/or moderate-income housing. Any monies received pursuant to the Affordable Housing Regulations may be used for appropriate monitoring, enforcement, and administrative costs. Monies received may also be used to assist the County with all costs associated with construction, acquisition, unit purchase, development, and rehabilitation of property for rental or homeownership purposes as long as the property is offered for very low-, low-, and moderateincome housing. Monies received may also be used to provide subsidies for equity participation loans, low-interest loans, rent subsidies, grants, housing trusts, or down payment assistance to eligible participants of extremely low-, very low-, low-, or moderate-income housing. Monies received may also be used for related activities that promote affordable housing such as homebuyer education, grant writing workshops, credit management workshops, financial literacy workshops and foreclosure prevention education.

Any monies received by the County pursuant to the Affordable Housing Regulations shall be used to provide reasonable reimbursement to approved governmental agencies or non-profit organizations for related expenses associated with preserving an affordable "at-risk" unit for extremely low-, very low-, low-, or moderate-income in order to prevent foreclosure. Any monies received by the County pursuant to the Affordable Housing Regulations may also be used to provide reasonable reimbursement to the County to cover infrastructure costs associated with impact fee waivers provided to 100 percent affordable housing developments.

Future Availability of Regulatory and Incentives

To encourage and facilitate future redevelopment of nonvacant sites, the County will consider offering incentives and concessions to applicants proposing redevelopment of nonvacant parcels. These may include, but are not limited to:

- Allowing streamlined or by-right development application processing for infill sites; and/or
- Reducing appropriate development standards.

The County may also organize special marketing events geared towards the development community and identify and targeting specific financial resources.

Replacement Analysis

The Sites Inventory includes six sites with existing residential units. This includes three pipeline projects (Vista Del Calabria, Santana Ranch, and the Lands of Lee project sites) and three sites in **Table B-5**. The pipeline projects each have one existing residential unit on the parcel. The Vista Del Calabria and Santana Ranch projects have already removed the residential units and the Lands of Lee project is under review but proposes removing the existing use. The projects have not triggered replacement requirements, but the County will continue to monitor development and identify units that must be replaced.

It is assumed that the three additional sites in **Table B-5** with residential units can develop at the capacities assumed without demolishing existing units. Development of the parcels may be facilitated via subdivision, parceling, site planning, or other methods to ensure existing residential units are not demolished. All three of these parcels are already informally subdivided through the use of physical barriers such as fences, gates, and railings.

While assumptions do not anticipate the demolition of existing units, applicants may propose demolition and, as such, **Program 3-3** is included in the Policy Plan to ensure demolished residential units occupied by lower-income households, or households subject to affordability requirements within the last five years, are replaced in compliance with Government Code Section 65915.

5. Rezone Strategy to Increase Capacity of Lower-Income Housing Beyond RHNA Need

After utilizing units constructed in the 6th Cycle projection period, projects in the pipeline, and projected ADU construction, the County has a remaining unmet RHNA of 168 lower-income units. To accommodate additional capacity, the County has identified a total of 12 parcels on 99.9 acres to be rezoned. The following rezone strategy is identified to accommodate unmet need and additional capacity beyond the County's RHNA need.

Residential High Zone and General Plan Land Use Designation

The County has identified 12 parcels for rezoning to accommodate unmet need and additional lower-income RHNA. The County will be amending the General Plan and rezoning these sites to accommodate future residential development. The 12 parcels total 99.9 acres, of which 81.8 acres are assumed to be utilized. Six parcels are underutilized, nonvacant parcels with existing uses covering less than 25 percent of the total parcel acreage, and six parcels are vacant.

Of the 12 parcels that will be rezoned, 10 are currently zoned Rural Residential and are within the Residential Mixed GPLU which currently allows up to 20 du/acre. The proposed "Residential High" rezone and GPLU amendment will have a density range of 20-45 du/acre. In the Sites Inventory, the County assumed an average density of 25 du/acre which is 55 percent of the maximum density allowed. The assumed average density of 25 du/acre is comparable to the average residential density of the "Bridgevale Road" pipeline project currently under review (gross density of 30 du/acre) and recent projects within the City of Hollister, Gilroy, and Morgan Hill. The County assumes an affordability factor of 20 percent for rezoned parcels. In total, the proposed rezoned parcels can accommodate 2,044 units, of which 409 units (20 percent) are estimated to be affordable to lower-income households.

Though the County is not relying on its Affordable Housing Program to accommodate affordable units, it is important to note that the County's Affordable Housing Program has been utilized in the development of affordable units, as evident in many of the Pipeline Projects identified in **Table B-5** and will continue to play an important part in future developments. Density bonus incentives may also result in the development of additional units beyond what the County's density limits establish. Additional details on both the Affordable Housing Program and the density bonus regulations are provided in **Chapter 3**.

C. Moderate- and Above Moderate-Income Sites Inventory

This Section contains a description and listing of the sites identified to meet San Benito County's moderate- and above moderate-income allocation.

1. Strategy for Accommodating Moderate-Income Allocation

Utilizing units constructed in the 6th Cycle projection period, pipeline projects, and projected ADU assumptions, the County can fully accommodate the 103 moderate-income RHNA utilizing the sources detailed below.

Projects in the Pipeline

As shown in **Table B-5**, there are four projects currently in the pipeline that are accommodating a total of 132 moderate-income units. The Santana Ranch project is currently under construction and will provide a total of 104 units affordable to moderate-income households. The Vista Del Calabria project is also under construction and will provide a total of 16 moderate-income units. The Fairview Corners project is approved and will provide 11 moderate-income units when constructed.

Accessory Dwelling Units (ADUs)

Based on ABAG's *Using ADUs to Satisfy RHNA Technical Memo*, the County estimates 30 percent of the 219 projected ADUs will develop at a moderate-income affordability, totaling 66 units. **Table B-4** provides a breakdown of projected ADU development by affordability level.

Rezone Strategy

As discussed in **Section B.5** of this Appendix, the rezone strategy is anticipated to accommodate an additional 611 moderate-income units.

San Benito County Affordable Housing Regulations

Though the County is not relying on its Affordable Housing Program to accommodate moderate-income units, it is important to note that the County's Affordable Housing Program has been utilized in the development of moderate-income units, as evident in many of the Pipeline Projects identified in **Table B-5** and will continue to play an important part in future developments. Additional details on the Affordable Housing Program are provided in **Chapter 3**.

2. Strategy for Accommodating Above Moderate-Income Allocation Projects in the Pipeline

As shown in **Table B-5**, there are seven projects currently in the pipeline that are accommodating a total of 1,824 above moderate-income units. The San Juan Oaks project has begun Phase 1 of construction and will develop 279 market-rate units. The Santana Ranch project is currently under construction and will provide a total of 287 units affordable to above moderate-income households. The Vista Del Calabria project is also under construction and will provide a total of 133 market-rate units. The Fairview Corners and Bray projects are approved and will provide 169 and 10 market-rate units, respectively, when constructed. An additional 121 market-rate units are proposed and under review.

Accessory Dwelling Units (ADUs)

Based on ABAG's *Using ADUs to Satisfy RHNA Technical Memo*, the County estimates 10 percent of the 219 projected ADUs will develop at an above moderate-income affordability, totaling 22 units. **Table B-4** provides a breakdown of projected ADU development by affordability level.

Rezone Strategy

As discussed in **Section B.5** of this Appendix, the rezone strategy is anticipated to accommodate an additional 1,024 above moderate-income level.

D. Summary of RHNA Status and Sites Inventory

The County has reviewed all sites for environmental concerns and considerations as well as development and land use restrictions. Additionally, each site has been reviewed for existing use, access to infrastructure, water, utilities, and additional development constraints. Where the analysis showed increased barriers to development related to environmental concerns, infrastructure concerns or existing conditions and development concerns (such as slope and grading, hazardous surrounding uses, restrictive development standards) the sites were removed. None of the parcels identified in the 6th Cycle Housing Element Sites Inventory were identified in a previous Housing Element. The result is a list and analysis of sites that are most

ripe for development or redevelopment for housing (Table B-10 below). A summary of the County's ability to meet the RHNA obligation for 2023-2031 is shown in Table B-1.



ID APN	ADN	Street Address	Vacancy	Existing	Gross	Identified	HCD Sizing	Current	Current	Current Density	Proposed	Proposed	Proposed Density	Expected	Net Potential	Net L	Inits by l Categor		Existing Use and Additional
	AFN	Street Address	vacancy	Units	Acres	Acreage	Criteria	Zoning	GPLU	Range	Zoning	GPLU	Range	Density	Units	Low/ VL	Mod	Above Mod	Information
R-1	0201700250	CIENEGA RD	Yes	0	0.95	0.95	Yes	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	24	5	7	12	Vacant parcel
R-2	0200800220	896 POWELL ST	Yes	0	7.25	7.25	Yes	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	181	36	54	91	Vacant parcel
R-3	0200400360	EL CAMINO PARAISO	Yes	0	0.72	0.72	Yes	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	18	4	5	9	Vacant parcel
R-4	0200600140	APRICOT LN	Yes	0	4.69	4.69	Yes	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	117	23	35	59	Vacant parcel
R-5	0253500670	FAIRVIEW RD	Yes	0	20.97	20.97	No	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	524	105	157	262	Vacant parcel
R-6	0192300320	BUENA VISTA RD	Yes	0	6.3	6.3	Yes	Agricultural Productive	Agriculture	0-1 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	157	31	47	79	Vacant Parcel
R-7	0201700370	1720 CIENEGA RD	No	1	3.92	2.35	Yes	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	60	12	18	30	Largely vacant parcel that is split by San Benito St. West of San Benito St. is completely vacant and east of San Benito St. is approximately 90% vacant. A single-family home is located on the northeast corner of the parcel and is informally subdivided from the rest of the parcel by a wooden fence. The informal subdivision can be formalized to allow for development of the remaining vacant area of the parcel. The existing use is anticipated to remain, and the analysis does not assume the demolition of the existing home. The age of the single-family home is unknown, and the overall condition is well maintained. The property has a low improvement value (18%) indicating the higher likelihood for redevelopment although this analysis does not anticipate the existing use will be removed. Although the existing home occupies less than 10% of the parcel area,



	ID	APN	Street Address	Vacancy	Existing	Gross Acres	Identified	HCD Sizing	Current	Current GPLU	Current Density	Proposed	Proposed GPLU	Proposed Density	Expected Density	Net Potential	Net Units by Income Category		ry	Existing Use and Additional
					Units	Acres	Acreage	Criteria	Zoning	GPLU	Range	Zoning	GPLU	Range	Density	Units	Low/ VL	Mod	Above Mod	Information
																				this analysis assumes use of only 60% of the parcel. The parcel is adjacent to APNs: 0201700380, 0201700390, and 0201700250 (vacant) and have mutual ownership. The vacant portions of each of the parcels can be subdivided from existing uses and then consolidated to allow for the development of residential uses on the entirely vacant land. The parcel is adjacent to existing residential uses.
F	₹-8	0201700380	1770 CIENEGA RD	No	1	4.67	2.8	Yes	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	70	14	21	35	Largely vacant parcel that is split by San Benito St. West of San Benito St. is completely vacant and east of San Benito St. is approximately 90% vacant. A single-family home is located on the southeast corner of the parcel and is informally subdivided from the rest of the parcel. The informal subdivision can be formalized to allow for development of the remaining vacant area of the parcel. The existing use is anticipated to remain, and the analysis does not assume the demolition of the existing home. The property has a low improvement value (20%) indicating the higher likelihood for redevelopment although this analysis does not anticipate the existing use will be removed. Although the existing home occupies less than 10% of the parcel area, this analysis assumes use of only 60% of the parcel. The age of the single-family home is unknown, and the overall condition is well maintained. The parcel is adjacent to APNs: 0201700370, 0201700390, and



ID	APN	Street Address	Vacancy	Existing	Gross	Identified	HCD Sizing	Current	Current	Current Density	Proposed	Proposed	Proposed Density	Expected	Net Potential	Net l	Jnits by Catego		Existing Use and Additional
יטו	AFN	Street Address	Vacancy	Units	Acres	Acreage	Criteria	Zoning	GPLU	Range	Zoning	GPLU	Range	Density	Units	Low/ VL	Mod	Above Mod	Information
																			0201700250 (vacant) and have mutual ownership. The vacant portions of each of the parcels can be subdivided from existing uses and then consolidated to allow for the development of residential uses on the entirely vacant land. The parcel is adjacent to existing residential uses.
R-9	0201700390	CIENEGA RD	No	0	10	6	Yes	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	150	30	45	75	Largely vacant parcel that is split by San Benito St. West of San Benito St. is completely vacant and east of San Benito St. is approximately 95% vacant. A barn/storage structure is located on the northeast corner of the parcel and is informally subdivided from the rest of the parcel. The informal subdivision can be formalized to allow for development of the remaining vacant area of the parcel. The existing use is anticipated to remain, and the analysis does not assume the demolition of the existing home. The property has a low improvement value (13%) indicating the higher likelihood for redevelopment although this analysis does not anticipate the existing use will be removed. Although the existing home occupies less than 10% of the parcel area, this analysis assumes use of only 60% of the parcel. The parcel is adjacent to APNs: 0201700380, 0201700370, and 0201700250 (vacant) and have mutual ownership. The vacant portions of each of the parcels can be subdivided from existing uses and then consolidated to allow for the development of residential



ID APN	ADN	Street Address	Vacancy	Existing	Gross	Identified	HCD Sizing	Current	Current	Current Density	Proposed	Proposed	Proposed Density	Expected	Net Potential	Net l	Jnits by Catego		Existing Use and Additional
שו	APN	Street Address	vacancy	Units	Acres	Acreage	Criteria	Zoning	GPLU	Range	Zoning	GPLU	Range	Density	Units	Low/ VL	ow/ VL Mod Above Mod		Information
																			uses on the entirely vacant land. The parcel is adjacent to existing residential uses.
R-10	0200400590	HILLCREST RD	No	0	19.41	11.65	No	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	291	58	87	146	Largely vacant parcel that is informally subdivided into three portions via wired fences. The parcel is approximately 95% vacant. A barn/storage structure in poor conditions is located on the center/west portion of the parcel and is situated on two different parcels which are mutually owned. The structure is modular and moving the structure to the adjacent parcel would be relatively simple and would create a vacant parcel. The property has a low improvement value (less than 1%) indicating the higher likelihood for redevelopment. The informal subdivision can be formalized to allow for development of the remaining vacant area of the parcel. The existing use can remain or be removed, but the analysis does not assume the demolition of the existing use. Although the existing home occupies less than 5% of the parcel area, this analysis assumes use of only 60% of the parcel. The vacant portions of the parcels can be subdivided to allow for the development of residential uses on the entirely vacant land. The parcel is adjacent to existing residential uses.
R-11	0202800070	120 LADD LN	No	1	14.72	11.78	No	Rural Residential	Residential Mixed	1-20 du/acre	Residential High	Residential High	20-45 du/acre	25 du/acre	294	59	88	147	Large parcel bounded by Ladd Ln and Union Rd. Approximately 95% of the parcel is an orchard with the remaining area used as a single-family home. The age of the single-family home is unknown and is well



Table B-10: County of San Benito 6th Cycle Housing Element Sites Inventory

R-12 0191400080 O SAN FELIPE RD No 0 6.34 6.34 Yes Agriculture Productive PRD No 0 6.34 6.34 Yes Agriculture Productive	ID	APN	Street Address	Vacancy	Existing	Gross	Identified	HCD Sizing	Current	Current	Current Density	Proposed	Proposed	Proposed Density	Expected	Net Potential	Net Units by Income Category			Existing Use and Additional
R-12 019140080 O SAN FELIPE RD No 0 6.34 Yes Agricultural Productive RD No 0 6.34 G-34 Yes Agricultural Agriculture Productive RD No 0 6.34 G-34 Yes Agricultural Agriculture O-1 Residential High Valence Substitute O-1 Residential Productive O-1 Residential Productive O-1 Residential Valence O-1 Residential O-1 Residential Productive O-1 Residential O-1 Res	טו	AFN	Street Address	vacancy	Units	Acres	Acreage	Criteria	Zoning	GPLU	Range	Zoning	GPLU		Density				Above	
R-12 0191400080 PD No D Agricultural Productive RD No D Agricu																				structures will remain. The property has a low improvement value (15%) indicating the higher likelihood for redevelopment although this analysis does not anticipate the existing use will be removed. This analysis assumes that only 80% of the parcel will accommodate additional development. This can be done via parcel subdivision. Parcels to the north of this parcel have recently developed from vacant agricultural land into residential uses, indicating the feasibility of redevelopment.
	R-12	0191400080		No	0	6.34	6.34	Yes	Agricultural Productive	Agriculture										Rd and Flora Ave. Approximately 80% of the parcel is vacant with the remaining area used as an equipment storage structure. It is assumed that the existing structures will be removed to allow for full redevelopment of the parcel. The parcel is bounded by the city of Hollister on all sides. Future residential development on the parcel would have direct access to public transportation along San Felipe Rd and will be in close proximity to existing services

B-37