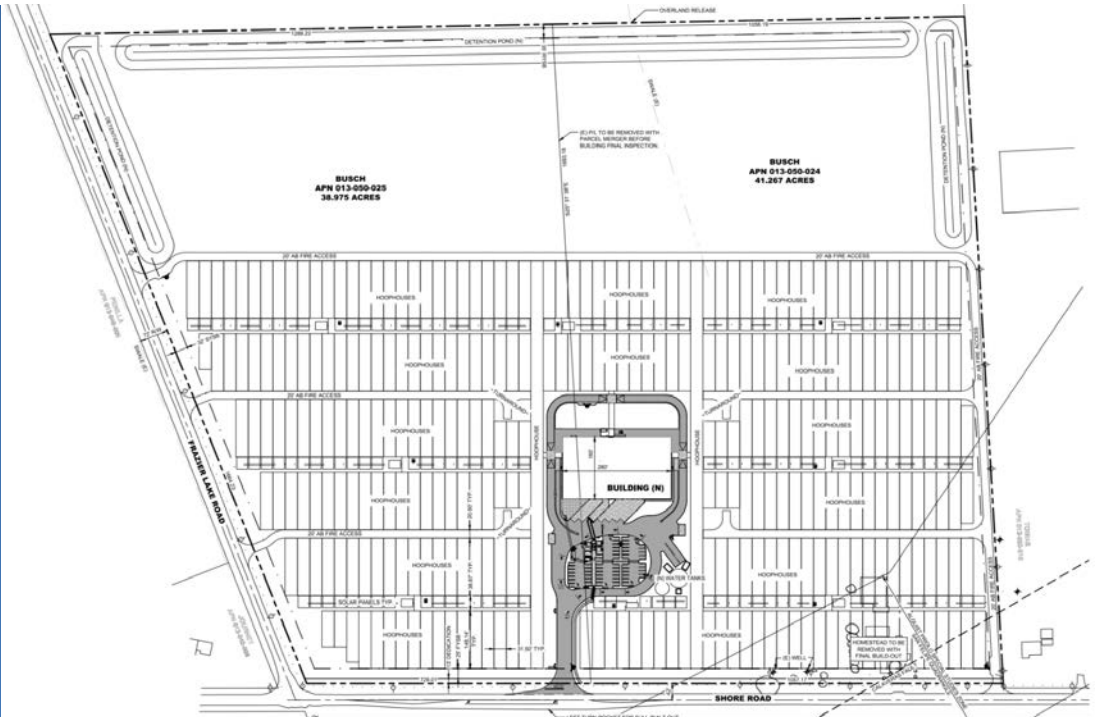
Public Review Mitigated Negative Declaration

2370 Shore Road (Hippo Harvest)

February 18, 2026







Prepared by

EMC Planning Group

PUBLIC REVIEW MITIGATED NEGATIVE DECLARATION

2370 SHORE ROAD (HIPPO HARVEST)

PREPARED FOR

County of San Benito
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February 18, 2026

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PUBLIC REVIEW MITIGATED NEGATIVE DECLARATION

In Compliance with the California Environmental Quality Act (CEQA)

Project Name	2370 Shore Road (Hippo Harvest)
Lead Agency	County of San Benito
Project Proponent	Hippo Harvest Inc.
Project Location	2370 Shore Road Unincorporated San Benito County
Project Description	The proposed property is located on two parcels (APNs 013-050-024 and -025) totaling 80.25 acres at 2370 Shore Road in unincorporated San Benito County. Improvements are proposed on 47 acres of the property, with 25 acres remaining in its existing condition (row crops including chicory, sunflower, celery, brussels sprouts, fennel, and pepper varieties), and approximately eight acres dedicated to the proposed detention ponds and septic leach field. The applicant proposes to demolish the existing single-family residence, barn, and appurtenances and construct a 45,000 square foot central processing building with a maximum height of 30 feet. The proposed project also includes approximately 28 acres of hoop house greenhouse structures (total of 265 structures) measuring approximately 31.5 feet wide, 147 feet long, and 21.75 feet high. Approximately 25 acres of the existing row crops on the northern portion of the project site will remain. The applicant proposes to grow, pack, and ship leafy greens.
Public Review Period	Begins – Monday, February 23, 2026 Ends – Tuesday, March 24, 2026
Written Comments To	County of San Benito Abraham Prado, Director of Planning and Building Services 2301 Technology Parkway Hollister, CA 95023 Email: aprado@sanbenitocountyca.gov

Proposed Findings

The County of San Benito is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based.

The initial study indicates that the proposed project has the potential to result in significant adverse environmental impacts. However, the mitigation measures identified in the initial study would reduce the impacts to a less than significant level. There is no substantial evidence, in light of the whole record before the lead agency County of San Benito that the project, with mitigation measures incorporated, may have a significant effect on the environment. See the following project-specific mitigation measures:

Mitigation Measures

Air Quality

AQ-1 During any construction involving ground disturbance, the developer shall implement measures to control dust and exhaust. Implementation of the measures listed below would reduce the air quality impacts associated with grading and new construction to a less-than-significant level. The developer shall implement the following Best Management Practices that are required of all projects:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Sweep paved roads where materials have accumulated.
7. Limiting area disturbance daily to 2.2 acres for earthwork (grading, excavation) and 8.1 acres for minimal earthwork activity.

These measures shall be included on all grading and construction plans, prior to issuance of a grading permit, subject to review and approval by the San Benito County Planning Division.

AQ-2 The developer shall prepare a construction management plan to reduce the potential exposure of sensitive receptors to temporary construction toxic air contaminants. The construction management plan language shall be included in all bid documents, grading, and construction plans to be implemented by the project contractor during construction. The following measures shall be included in the Construction Management Plan:

1. Heavy-duty diesel vehicles will have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation, and will not be staged within 500 feet of occupied residences; and

2. Idling of construction equipment and heavy-duty diesel trucks will be avoided where feasible, and if idling is necessary, it will not exceed three minutes.

3. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications and will be checked by a certified visible emissions evaluator.

4. All non-road diesel construction equipment will, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112. Further, where feasible, construction equipment will use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

The construction management plan shall be subject to the review and approval of the San Benito County Planning Division prior to issuance of a grading permit.

Biological Resources

BIO-1 The *U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) shall be implemented prior to initiation of each project phase and during any construction activity on the project site to avoid unintended take of individual San Joaquin kit foxes.

Prior to each phase, preconstruction/pre-activity surveys for San Joaquin kit fox shall be conducted by a qualified biologist no less than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity that may impact San Joaquin kit fox. The surveys shall include all work and staging areas and a minimum 200-foot buffer of the project site. The preconstruction surveys shall identify kit fox habitat features on the project site, evaluate use by kit fox and, if possible, assess the potential impacts of the proposed activity. The status of all dens shall be determined and mapped.

If a natal/pupping den is discovered within the project area or within 200 feet of the project boundary, the County and the applicant shall consult with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service to establish an

appropriate avoidance buffer. The avoidance buffer shall be maintained until such time as the burrow is no longer active and/or an incidental take permit is determined to be required and is obtained.

In addition, the following measures shall be observed during construction activities:

a. Construction-related vehicles shall observe a 20-mph speed limit in all project areas; this is particularly important at night when kit foxes are most active. To the extent possible, night-time construction shall be minimized. Off-road construction traffic outside of designated project area shall be prohibited.

b. To prevent inadvertent entrapment of kit foxes or other animals during the construction phase of the project, all excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the procedures under Number 11 of the Construction and Operational Requirements in the Standardized Recommendations must be followed.

c. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the U.S. Fish and Wildlife Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.

d. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in closed containers and removed at least once a week from a construction or project site.

e. No firearms shall be allowed on the project site during construction activities.

f. To prevent harassment, mortality of kit foxes or destruction of dens by dogs or cats, no pets shall be permitted on site during construction activities.

g. Use of rodenticides and herbicides on the project site during construction shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and Federal legislation, as well as additional project-related

restrictions deemed necessary by the U.S. Fish and Wildlife Service. If rodent control must be conducted, zinc phosphide shall be used because of proven lower risk to kit fox.

h. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape.

i. Any contractor, employee, or agency personnel who inadvertently kills or injures a San Joaquin kit fox shall immediately report the incident to the County of San Benito, which will contact the CDFW and USFWS as needed.

BIO-2 Prior to the start of construction of each project phase, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of special-status species potentially occurring in the project vicinity, including, but not limited to, San Joaquin kit fox, burrowing owl, Swainson's hawk, California red-legged frog, special-status bats, and nesting birds and raptors. Their habitats, general measures that are being implemented to conserve species as they relate to the project, and the boundaries within which construction activities will occur will be explained. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction personnel shall undergo this mandatory environmental awareness training.

The qualified biologist will train biological monitors selected from the construction crew by the construction contractor (typically the project foreman). Before the start of work each day, the monitor will check for animals under any equipment such as vehicles and stored pipes within active construction zones. The monitor will also check all excavated steep-walled holes or trenches greater than one foot deep for trapped animals. If a special-status species is observed within an active construction zone, the qualified biologist will be notified immediately and all work within 50 feet of the individual will be halted and all equipment turned off until the individual has left the construction area.

Evidence of completion of this training shall be submitted to the County of San Benito, where it will be kept on file.

BIO-3 To avoid/minimize impacts to burrowing owls potentially occurring within the project site and staging areas, a biologist qualified in ornithology shall conduct surveys for burrowing owl prior to the construction start of each project phase. The approved biologist shall conduct a two-visit (i.e., morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to the project site boundary no less than 14 days prior to the start of construction or ground disturbance activities. Surveys shall be conducted according to the methods for take avoidance described in the *Burrowing Owl Survey Protocol and Mitigation Guidelines* (California Burrowing Owl Consortium 1993) and the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). If no burrowing owls are found, a letter report confirming absence will be prepared and submitted to the County of San Benito and no further mitigation is required.

If burrowing owls are found occupying habitat within the project vicinity, seasonal no-disturbance buffers shall be in place around occupied habitat prior to and during any ground disturbance activities as outlined in the *Burrowing Owl Survey Protocol and Mitigation Guidelines* (CBOC 1993) and the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). Because burrowing owls occupy habitat year-round, the following table includes buffer areas based on the time of year and level of disturbance (CDFW 2012), unless a qualified biologist approved by the California Department of Fish and Wildlife verifies through non-invasive measures that either: 1) birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance Buffers (meters)		
		Low	Med	High
Nesting Sites	April 1 – Aug 15	200 m	500 m	500 m
Nesting Sites	Aug 16 – Oct 15	200 m	200 m	500 m
Nesting Sites	Oct 16 – Mar 31	50 m	100 m	500 m

If a burrowing owl is found and avoidance is not possible, burrow exclusion may be conducted by qualified biologists only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. Occupied burrows shall be replaced with artificial burrows at a ratio of one collapsed burrow to one constructed artificial burrow (1:1). Evicted burrowing owls may attempt to colonize or re-colonize an area that would be impacted, thus ongoing surveillance during project activities shall be conducted at a rate sufficient to detect burrowing owls if they return.

If surveys locate occupied burrows in or near construction areas, consultation with the California Department of Fish and Wildlife shall occur to interpret survey results and develop a project-specific avoidance and minimization approach. Once the absence of burrowing owl has been confirmed, a letter report will be prepared and submitted to the County of San Benito.

BIO-4 California Red-Legged Frog. One of the following options shall be followed:

Option 1: Preconstruction Surveys and Avoidance

Prior to and During Construction of each Project Phase:

1. A qualified biologist shall conduct preconstruction surveys following the guidance documented in the *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (USFWS 2005) no more than two weeks (14 days) prior to the start of disturbance activities. The biologist shall prepare a report documenting the results of the preconstruction surveys for submittal to the County of San Benito prior to ground disturbance.

2. Trenches or pits one foot or deeper that are going to be left unfilled for more than 48 hours shall be securely covered with boards or other material to prevent the California red-legged frog from falling into them. If trenches or pits must be left uncovered, earthen escape ramps will be built to allow wildlife to exit.

3. If at any point a California red-legged frog is encountered, all activities which have the potential to result in the harassment, injury, or death of the individual shall be immediately halted. A qualified biologist shall then assess the situation and select a course of action that would avoid or minimize adverse effects to the animal. Coordination with the U.S. Fish and Wildlife Service to determine the appropriate course of action per the requirements of the Federal Endangered Species Act (e.g., obtaining an Incidental Take Permit) shall occur prior to resuming construction activities.

During Construction of the Proposed Detention Pond and Within 300 feet of the Wetland Area:

1. Construction activities involving ground disturbance within 300 feet of the wetland area shall be avoided between November 1 and March 31, the time period when California red-legged frogs are most likely to be moving through the project area. Ground disturbance activities shall not occur during rain events or within 24 hours following a rain event.

Option 2: Assume Presence and Obtain Incidental Take Permit

1. Coordinate with the U.S. Fish and Wildlife Service to obtain an Incidental Take Permit for potential impacts to California red-legged frog and implement the permit requirements prior to ground disturbance.

BIO-5 Swainson's Hawk. If work is planned to occur between March 1 and September 1 for any phase of the project, a qualified biologist shall survey for nesting Swainson's hawks within a half-mile radius around the project site. Preconstruction surveys for Swainson's hawk should be conducted according to the Swainson's Hawk Technical Advisory Committee's Recommended Timing and Methodology for Swainson's Hawk Nesting Survey in California's Central Valley. If an active nest is identified within the half-mile radius and work cannot be delayed until the nest has fledged or is no longer active, California Department of Fish and Wildlife will be consulted for appropriate avoidance measures. If an active nest is found, the applicant must adhere to the following mitigation measures:

a. Swainson's Hawk Avoidance Buffer. A minimum of ½-mile no-disturbance buffer shall be delineated and maintained around each nest during nesting season, regardless of whether it was detected by surveys or observed incidentally. These buffers would remain in place until the breeding season has ended or until a

qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent nest abandonment and other take of Swainson's hawk as a result of project activities.

b. Swainson's Hawk Take Authorization. In the event an active Swainson's hawk nest is detected within a ½-mile of the applicant's planning construction disturbance zone for a given project phase as determined by submitted grading and building plans, consultation with California Department of Fish and Wildlife is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with the California Endangered Species Act.

c. Swainson's Hawk Foraging Habitat Mitigation. Compensation for the loss of Swainson's hawk foraging habitat as described in with California Department of Fish and Wildlife's "Staff Report Regarding Mitigation for Impacts to Swainson's Hawks" (CDFG 1994) to reduce impacts to foraging habitat to less than significant is required as follows:

    1. For projects within one mile of an active nest tree, a minimum of one acre of habitat management land for each acre of development is advised.

    2. For projects within five miles of an active nest but greater than one mile, a minimum of ¾-acre of habitat management land for each acre of development is advised.

    3. For projects within 10 miles of an active nest tree but greater than five miles from an active nest tree, a minimum of ½-acre of habitat management land for each acre of development is advised.

BIO-6 To avoid impacts to nesting birds during the nesting season (January 15 through September 15), all construction activities associated with each project phase should be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction occurs during the bird nesting season, then a qualified biologist will conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project construction.

If project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys.

a. Two surveys for active bird nests will occur within 14 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger

raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the County of San Benito and no further mitigation is required.

b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the County of San Benito.

BIO-7 Special-Status Bat Species. Within 15 days prior to tree removal, vegetation clearance, building demolition, grading, or the initiation of any construction activity in any area of the project site (all phases), the applicant shall retain a qualified wildlife biologist to conduct a habitat assessment for bats and potential roosting sites in trees to be removed, in buildings and trees within 50 feet of the construction footprint, and surrounding structures situated within 50 feet of disturbance activities by the project. Bats potentially roosting on the exteriors of buildings on the project site may be disturbed by construction activities. Bats that roost in buildings are usually in structural voids, the spaces between the exterior and interior envelopes of a building. Bats enter voids through openings on the exterior of buildings. A colony may remain unnoticed unless someone sees, hears, or smells them.

If no roosting sites or bats are found, a letter report confirming absence shall be submitted by the biologist to the County of San Benito where it will be kept on file, and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents shall be provided by the biologist to the County of San Benito prior to ground disturbance activities and the following monitoring, exclusion, and habitat replacement measures shall be implemented:

If bats are found roosting outside of the nursery season (May 1 through October 1), they shall be evicted as described under (b) below. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats shall be evicted as described under (b) below. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal or on any structures within 50 feet of project disturbance activities, the individuals shall be safely evicted, under the direction of a qualified bat biologist. If pre-construction surveys determine that there are bats present in any trees or structures to be removed, exclusion structures (e.g., one-way doors or similar methods) shall be installed by a qualified biologist. The exclusion structures shall not be placed until the time of year in which young are able to fly, outside of the nursery season. Information on placement of exclusion structures shall be provided to the California Department of Fish and Wildlife prior to construction. If needed, other removal methods could include: carefully opening the roosting area in a tree or snag by hand to expose the cavity and opening doors/windows on structures, or creating openings in walls to allow light into the structures. Removal of any trees or snags and disturbance within 50 feet of any structures shall be conducted no earlier than the following day (i.e., at least one night shall be provided between initial roost eviction disturbance and tree removal/disturbance activities). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

BIO-8 Prior to ground disturbance of the identified on-site potential jurisdictional wetland, the applicant will retain a qualified biologist to determine the extent of potential wetlands and waterways regulated by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). If impacts to wetlands or waters of the U.S. regulated by the USACE will occur, the applicant shall retain a qualified biologist to obtain a Clean Water Act Section 404 Nationwide Permit. If the impacts to the jurisdictional features do not qualify for a Nationwide Permit, the applicant will proceed with obtaining an Individual Permit from the USACE. If impacts to wetlands or waters of the State regulated by the RWQCB will occur, the applicant shall retain a qualified biologist to obtain a Clean Water Act Section 401 Water Quality Certification. If impacts to riparian vegetation regulated by the CDFW will occur, the applicant shall retain a qualified biologist to coordinate with the CDFW to obtain a Streambed Alteration Agreement.

To compensate for temporary and/or permanent impacts to wetlands that would be impacted as a result of the proposed project, mitigation shall be provided as required by the regulatory permits. Mitigation would be provided through one of the following mechanisms:

i. A Wetland Mitigation and Monitoring Plan shall be developed that will outline mitigation and monitoring obligations for temporary impacts to wetlands and other waters as a result of construction activities. The Wetland Mitigation and Monitoring Plan would include thresholds of success, monitoring and reporting requirements, and site-specific plans to compensate for wetland losses resulting from the project. The Wetland Mitigation and Monitoring Plan shall be submitted to the appropriate regulatory agencies for review and approval during the permit application process.

ii. To compensate for permanent impacts, the purchase and/or dedication of land to provide suitable wetland restoration or creation shall ensure a no net loss of wetland values or functions. If restoration is available and feasible, a minimum 1:1 mitigation to impact ratio would apply to projects for which mitigation is provided in advance.

Cultural Resources

CUL-1 The following language shall be incorporated into any plans associated with tree removal, demolition, grading, and construction, "In the event that archaeological resources are encountered during ground disturbing activities, contractor shall temporarily halt or divert excavations within 50 meters (165 feet) of the find until it can be evaluated. All potentially significant archaeological deposits shall be evaluated to demonstrate whether the resource is eligible for inclusion on the California Register of Historic Resources, even if discovered during construction. If archaeological deposits are encountered, they will be evaluated and mitigated simultaneously in the timeliest manner practicable, allowing for recovery of materials and data by standard archaeological procedures. For indigenous archaeological sites, this data recovery involves the hand-excavated recovery and non-destructive analysis of a small sample of the deposit. Historic resources shall also be sampled through hand excavation, though architectural features may require careful mechanical exposure and hand excavation.

Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance by a qualified Archaeologist. Significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites."

CUL-2 The following language shall be incorporated into any plans associated with tree removal, demolition, grading, and construction, "In the event that human remains (or remains that may be human) are discovered at the project site, Public Resource Code Section 5097.98 must be followed. All grading or earthmoving activities shall

immediately stop within 50 meters (165 feet) of the find. The San Benito County Coroner will be notified immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the project proponent shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (Public Resource Code [PRC] § 5097). The coroner shall contact the Native American Heritage Commission (NAHC) to determine the most likely descendant(s) (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD will determine the most appropriate means of treating the human remains and associated grave artifacts, and shall oversee the disposition of the remains. In the event the NAHC is unable to identify an MLD or the MLD fails to make a recommendation within 48 hours after being granted access to the site, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity within the project area in a location not subject to further subsurface disturbance if: a) the Native American Heritage Commission is unable to identify the MLD or the MLD failed to make a recommendation within 48 hours after being allowed access to the site; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner."

Geology and Soils

GEO-1 The project developer shall include the recommendations presented in the *Geotechnical Investigation Design Phase for 2370 Shore Road, Hollister, San Benito County, California* by Butano Geotechnical Engineering Inc., and in the *Geotechnical Engineering Report Hippo Harvest Development 2370 Shore Road Hollister, California* by Earth Systems Pacific in the project plans, and the recommendations shall be implemented during construction of the project.

GEO-2 Due to the possibility that buried paleontological resources might be discovered during construction, the following language shall be included on all construction documents and on any permits issued for the project site, including, but not limited to, grading and building permits associated with proposed project:

"If paleontological resources are unexpectedly discovered during construction, work shall be halted immediately within 50 meters (160 feet) of the find, and the Planning Department notified, until it can be evaluated by a qualified professional paleontologist. If the find is determined to be significant, an appropriate resource recovery shall be formulated, with the concurrence of the San Benito County, and implemented."

Hazards and Hazardous Materials

HAZ-1 Prior to issuance of any ground-disturbing permit, the applicant shall provide a Phase I Environmental Site Assessment to the County Planning Division for the project phase specifically outlined in the ground-disturbing permit. If no hazardous materials exist within the site soils, no further mitigation is required.

If hazardous materials are found within the site soils, the applicant shall prepare a Phase II Environmental Site Assessment prior to any ground-disturbing activities. All recommendations provided within the Phase II Environmental Site Assessment shall be incorporated by the project applicant.

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PUBLIC REVIEW INITIAL STUDY

2370 SHORE ROAD (HIPPO HARVEST)

PREPARED FOR

County of San Benito

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TABLE OF CONTENTS

A. BACKGROUND 1

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 13

C. DETERMINATION 14

D. EVALUATION OF ENVIRONMENTAL IMPACTS 15

1. Aesthetics 17
2. Agriculture and Forest Resources 20
3. Air Quality 22
4. Biological Resources 28
5. Cultural Resources 49
6. Energy 52
7. Geology and Soils 55
8. Greenhouse Gas Emissions 59
9. Hazards and Hazardous Materials 63
10. Hydrology and Water Quality 66
11. Land Use and Planning 72
12. Mineral Resources 73
13. Noise 74
14. Population and Housing 76
15. Public Services 77
16. Recreation 79
17. Transportation 80
18. Tribal Cultural Resources 83
19. Utilities and Service Systems 84
20. Wildfire 87
21. Mandatory Findings of Significance 88

E. SOURCES 90

Appendices

Appendix A Full Buildout Project Plans

Appendix B Air Quality and Greenhouse Gas Emissions Assessment

Appendix C Special-Status Species with Potential to Occur in the Project Vicinity

Appendix D 2030 Fuel Demand

Appendix E Geotechnical Investigation

Appendix F Geotechnical Engineering Report

Appendix G Site Access Evaluation

Appendix H VMT Assessment

Figures

Figure 1 Location Map 5

Figure 2 Aerial Photograph 7

Figure 3 Site Photographs 9

Figure 4 Site Plan 11

Figure 5 Habitat Map 31

Figure 6 Special-Status Species Within the Project Vicinity 33

Tables

Table 1 Project Phasing 2

Table 2 Construction Emissions - Unmitigated 24

Table 3 Operational Emissions 26

Table 4 Annual Project Greenhouse Gas Emissions 60

Table 5 Water Demand Comparison 69

A. BACKGROUND

Project Title	2370 Shore Road (Hippo Harvest)
Lead Agency Contact Person and Phone Number	Abraham Prado, Director of Planning and Building Services Resource Management Agency San Benito County 831.902.2273
Date Prepared	February 18, 2026
Study Prepared by	EMC Planning Group Inc. 601 Abrego Street Monterey, CA 93940
Project Location	2370 Shore Road, San Benito County (APN 013-050-024 and -025)
Project Sponsor Name and Address	Kevin Burg, Project Manager Hippo Harvest Inc. 3439 Cloverdale Road Pescadero, CA 94060
General Plan Designation	Agriculture (A)
Zoning	Agricultural Productive (AP)

Setting

The proposed property is located on two parcels (APNs 013-050-024 and -025) totaling 80.25 acres at 2370 Shore Road in unincorporated San Benito County. Improvements are proposed on 47 acres of the property, with 25 acres remaining in its existing condition, and approximately eight acres dedicated to the proposed detention ponds and septic leach field ("project site"). The project site currently consists of row crops and a single-family residence, barn, and appurtenances. Row crops grown during the time of the September 2025 reconnaissance-level biological field survey included chicory, sunflower, celery, brussels sprouts, fennel, and pepper varieties.

The project site is bordered by agricultural uses to the north; agricultural uses and single-family residences to the east; Shore Road and agricultural uses to the south; and Frazier Lake Road, agricultural uses and single-family residences to the west. The site has the land use designation of "Agricultural (A)" in the *San Benito County 2035 General Plan* ("General Plan") and is zoned "Agricultural Productive (AP)."

Figure, 1, Location Map, identifies the project site's regional location. Figure 2, Aerial Photograph, illustrates the uses on, and surrounding, the project site. Figure 3, Site Photographs, provides a visual of the project site from a pedestrian's viewpoint.

Description of Project

Hippo Harvest (the applicant) is a grower, packer, and shipper of leafy greens. They grow USDA Certified Organic produce in hydroponic greenhouses ("hoop houses") that use mobile robots as tractors. They partner with local outdoor growers to combine the best of both indoor and outdoor production (e.g., growing sensitive varieties indoors during transition seasons) to deliver high quality and reliable products year-round.

Physical Improvements

The applicant proposes to demolish the existing single-family residence, barn, and appurtenances and construct a 45,000 square foot central processing building with a maximum height of 30 feet. The proposed project also includes approximately 28 acres of hoop house greenhouse structures (total of 265 structures) measuring approximately 31.5 feet wide, 147 feet long, and 21.75 feet high. The proposed project would utilize three 1-megawatt (MW) combined heat and power microturbine generator units to generate electrical power; the units would operate for 13 hours each day (six days a week). Approximately 25 acres of the existing row crops on the northern portion of the project site will remain. The applicant proposes to grow, pack, and ship leafy greens.

Construction and operational development of the proposed processing building are planned in four distinct phases illustrated in Table 1, Project Phasing, and in Appendix A.

Table 1 Project Phasing

Phase	Improvements	Timing
1	▪ Four (4) acres of greenhouse farming ▪ One detention pond ▪ Internal roads and parking lot (28 car parking spaces) ▪ 20 employees/day	Early 2026
2	▪ 25,000 square foot central processing building ▪ 24 acres total of greenhouse farming ▪ 30 car parking spaces and two semi-truck parking spaces ▪ Septic system and leach field ▪ Two additional detention ponds[1]	2027
3 and 4	▪ 20,000 square foot addition to the central processing building ▪ Total 28 acres of greenhouse farming ▪ Total 58 car parking spaces and two semi-truck parking spaces ▪ 60 total employees/day	Late 2028-2029

SOURCE: Balian Architects 2025; Construction Data Sheet 2025; Abraham Prado, Director of Planning and Building Services 2025
NOTE: Additional greenhouse construction may occur during Phase 2, 3, or 4.

Employees and Hours of Operation

Phase 1 of the proposed project would consist of approximately 20 employees per day and 10-15 employees per shift. The full buildout anticipates approximately 120 total employees to visit the site per day operating two daily shifts with 60 employees working during any given shift. The proposed hours of operation would span 6:00 AM to 8:00 PM, Monday through Saturday. Shift times would follow a schedule of 6:00 AM – 2:30 PM and 11:30 AM – 8:00 PM.

Tree Removal

The proposed project would require the removal of 15 trees at full build-out. The trees consist of a row of pepper trees, one large deodar cedar, and small almond trees located adjacent to the developed residence. Phase 1 would not require tree removal.

Figure 4, Site Plan, provides an illustration of the project's site plan. The full buildout project plans can be found in Appendix A.

Other Public Agencies Whose Approval is Required

- California Department of Fish and Wildlife;
- U.S. Fish and Wildlife Service;
- U.S. Army Corps of Engineers; and/or
- Regional Water Quality Control Board.

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.?

On September 12, 2025, the County sent out offer letters of consultation to Native American tribes traditionally and culturally affiliated with the project area. No requests for consultation were received (Victor Tafoya, email message, October 13, 2025).

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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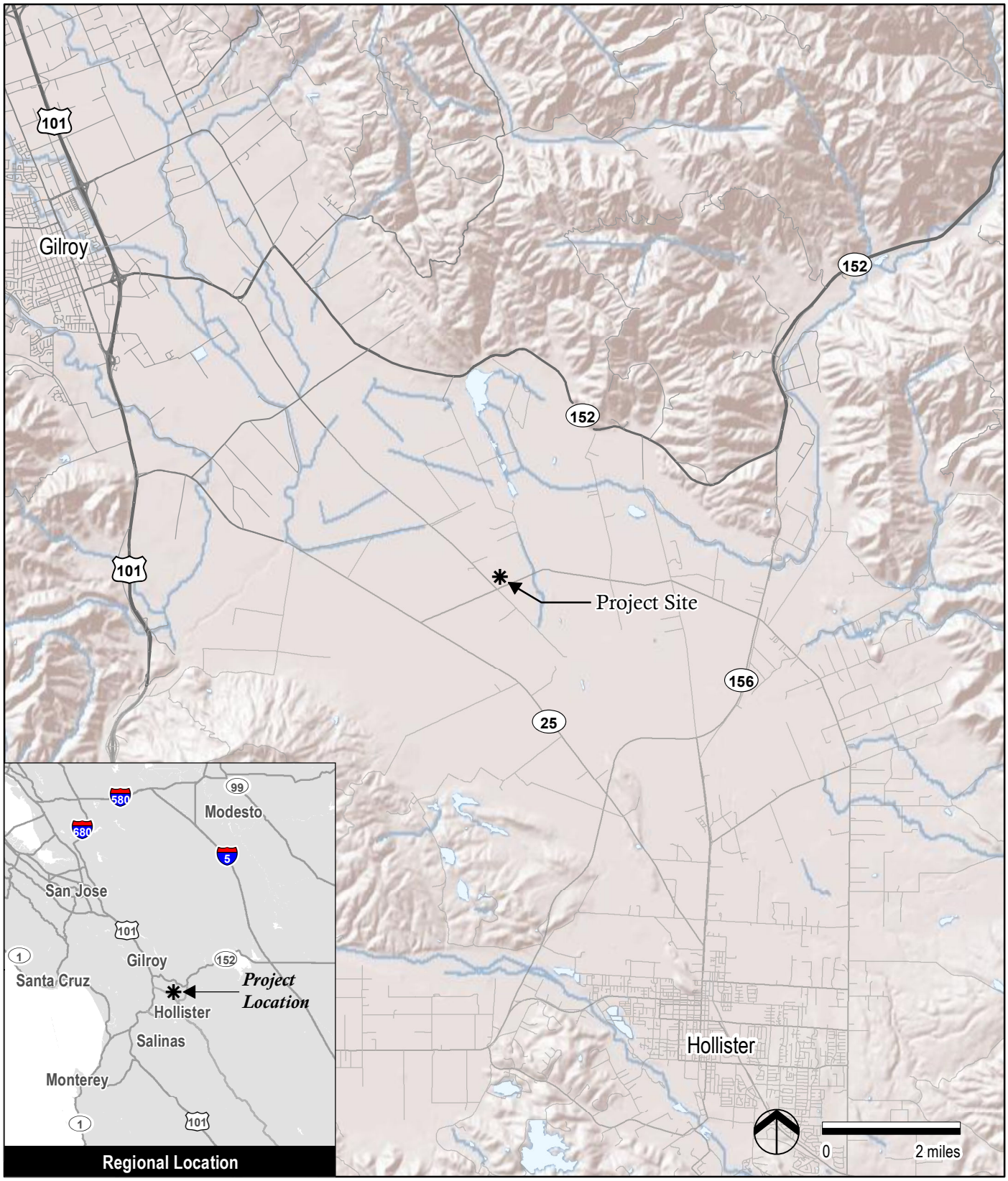

Source: ESRI 2025

Figure 1

Location Map

2370 Shore Road (Hippo Harvest) Initial Study

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Source: San Benito County GIS 2025, Google Earth 2025

Figure 2

Aerial Photograph

2370 Shore Road (Hippo Harvest) Initial Study

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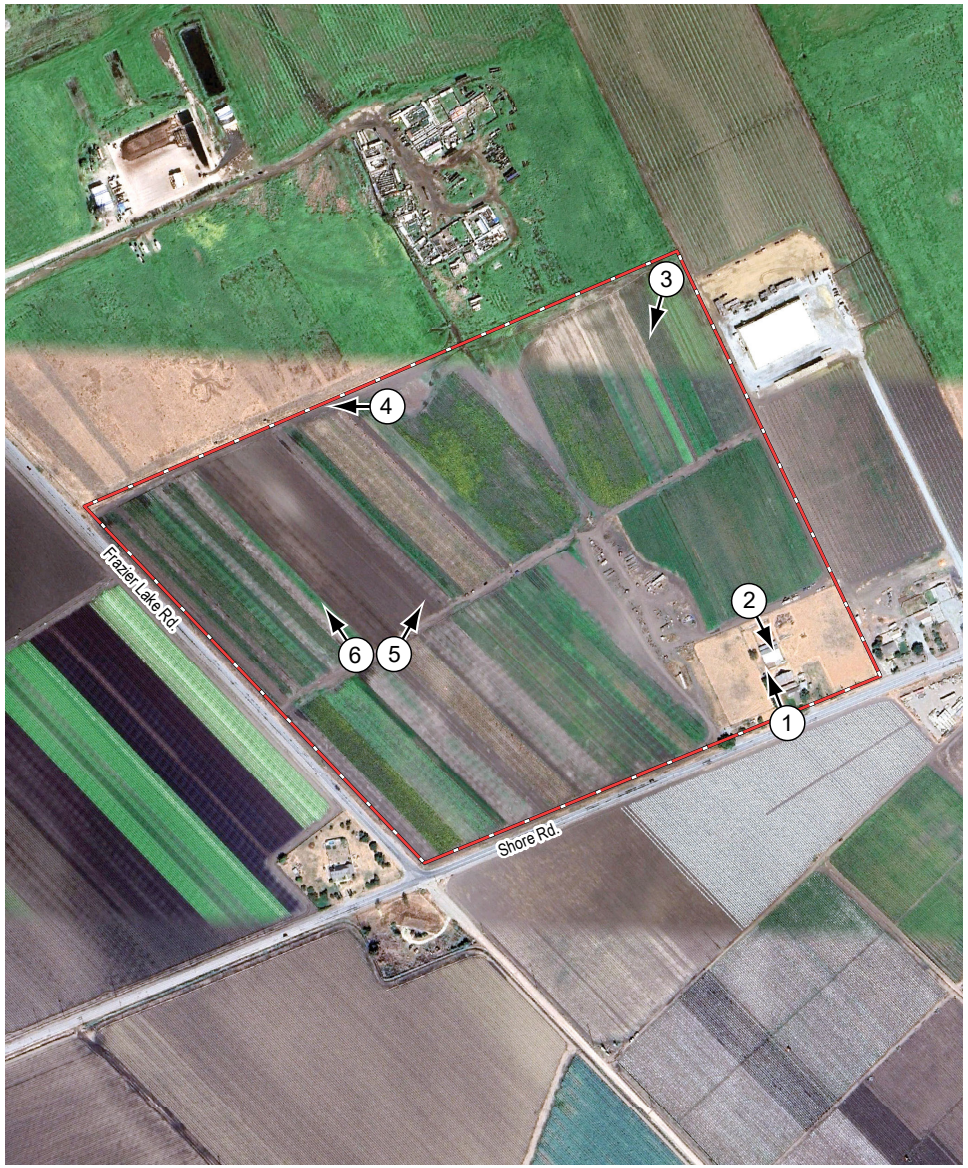
1 From Shore Road facing the existing residence to be demolished.



2 On the project site facing an existing structure to be demolished.



3 From the northern corner of the project site facing south.



Project Site

Source: Google Earth 2025
Photographs: EMC Planning Group 2025



4 From the northern boundary of the project site facing west.



5 From the western portion of the project site facing northeast.



6 From the western portion of the project site facing northwest.

Figure 3
Site Photographs

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0 330 feet

Source: Kelley Engineering & Survey 2025

Figure 4
Site Plan

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B. 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
- ☐ Agriculture and Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology/Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology/Water Quality
- ☐ Land Use/Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population/Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities/Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance

C. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

Abraham Prado, Date
Director of Planning and Building Services

D. EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a) Earlier Analyses Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a) the significance criteria or threshold, if any, used to evaluate each question; and
    b) the mitigation measure identified, if any, to reduce the impact to less than significance

1. AESTHETICS

Except as provided in Public Resources Code Section 21099 (Modernization of Transportation Analysis for Transit-Oriented Infill Projects), would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Comments:

a. Scenic vistas are views from a public place that is expansive and considered locally important. The County specifies five County-designated scenic roadways, including U.S. Highway 101 and State Routes 129 and 146. However, these scenic corridors are located at least five miles from the project site.

The County does not specify scenic vistas within the General Plan; however, common scenic vistas can include, but are not limited to, distant mountain ranges, agricultural lands, and/or river corridors. Tequisquita Slough is located approximately 12,000 feet north of the project site and Santa Ana Creek is located approximately 2,000 feet east of the project site; however, the proposed project would not affect views of these water features. The project site is surrounded by agricultural land and is located in an agricultural region of north San Benito County. Additionally, distant views of the Diablo Range to the north and east, Gabilan Range to the south, and Santa Cruz Mountains to the west can be seen from travelers northbound and southbound on Frazier Lake Road and east-bound and west-bound on Shore Road.

Implementation of the proposed project would result in a change to the existing, expansive agricultural views of the site and may obstruct some existing views of the distant mountain ranges for travelers on Shore Road and Frazier Lake Road. However,

the proposed uses for the site are consistent with the uses permitted in the Agricultural Productive (AP) Zoning District and the heights of the greenhouses and processing facility meet the height limitations of the zoning district.

Therefore, impacts on scenic vistas associated with implementation of the proposed project would be less than significant.

b. There are no state-designated scenic highways near the project site. The nearest being State Route 152, which is officially designated near the intersection of State Route 152 and Dinosaur Point Road located approximately 16 miles northeast of the site. Therefore, implementation of the project would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.

c. The project site is located within a non-urbanized area and currently consists of row crops, a single-family residence, barn, and appurtenances. The project site is surrounded by agricultural land and is located in an agricultural region of north San Benito County.

The proposed project includes a processing building and greenhouses, which would introduce new development of greater density and height compared to the current conditions of the project site. This would change the existing visual character or quality of public views of the site and its surroundings. However, the maximum height for the greenhouses would be approximately 22 feet and the maximum height of the processing building would be 30 feet – both of which meet the height restrictions of the Agricultural Productive (AP) Zoning District. Additionally, the proposed uses are consistent with the General Plan land use designation for the site (Agriculture); therefore, the County has anticipated such uses for the project site and evaluated the potential impacts on existing visual character and quality of public views of the site in the *Revised Draft Environmental Impact Report 2035 San Benito County General Plan Update State Clearinghouse #2011111016* ("General Plan EIR"). The proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

d. The project site currently consists of row crops, a single-family residence, barn, and appurtenances, some of which includes existing light sources. Implementation of the proposed project would eliminate the existing light sources, and introduce new sources of light or glare to the area. The site photometric study included in Appendix A illustrates the lighting features and areas of illumination that would be introduced to the project site. The outdoor lighting introduced by the proposed would be directed inside the project site and would not be positioned to impact the adjoining public streets or adjacent properties.

The proposed project would be required to comply with County Code Section 19.31.011, which requires that the project be reviewed and approved by the Planning Director whom, among other things, ensure that the proposed lighting complies with County requirements and is arranged as to deflect the light away from adjoining properties. The proposed project is within Lighting Zone III and would be required to comply with County Code Section 19.31.006 which applies general lighting requirements and County Code Section 19.31.009 which limits total outdoor light output. The project will also be required to comply with County Code Section 25.07.012 that provides lighting standards

and requires submittal of a preliminary outdoor lighting plan. Pursuant to County Public Works Division requirements, lighting at the site shall be provided within the development and installed and shielded in a manner so as not to impact vehicular traffic utilizing adjoining public streets or the adjacent properties.

Required compliance with the County Code would ensure that impacts associated with new sources of light or glare, which would adversely affect day or nighttime views in the area, would be less than significant.

2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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 nonagricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Comments:

The proposed project would replace existing row crops at the project site such as chicory, sunflower, celery, brussels sprouts, fennel, and pepper varieties, and replace them with the production of leafy greens in hydroponic agricultural hoop houses.

a. According to the California Department of Conservation's Important Farmland Finder tool, approximately 69 acres of the project site is designated as Prime Farmland and 11.2 acres is designated as Other Land. The proposed project consists of agricultural use

(greenhouses) and industrial use supporting agriculture (processing facility), which are consistent with the site's zoning and land use designation for the site. Therefore, the project would not convert Prime Farmland to non-agricultural use.

b. The project site is zoned Agricultural Productive (AP). Table 25.03-B of the County Code (Section 25.03.004) specifies agricultural uses associated with indoor commercial production of plants is a conditional use within this zoning district and would require a conditional use permit while industrial uses associated with agricultural processing of products grown on-site is a permitted use. Therefore, proposed project would not conflict with existing zoning for agricultural use.

The two project parcels are enrolled in a Williamson Act contract (contract 87-6). The proposed project would continue to be used for agriculture and agricultural supporting uses, and therefore, would not conflict with the Williamson Act contract.

c-d. The project site is zoned for agricultural uses. The project site and vicinity do not contain any forest land or lands zoned for forest land or timberland production. Therefore, the project would not 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)); or result in the loss of forest land or conversion of forest land to non-forest use.

e. The project site is surrounded by agricultural land uses and development of this site with agricultural and agriculture-supporting industrial uses would be consistent with the zoning and General Plan land use designation of the site. There are no forest lands in the project site or in the vicinity of the project site. Therefore, implementation of the project would not 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.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d.	Result in other emissions, such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Comments:

This section is based on the *Hippo Harvest Air Quality and Greenhouse Gas Emissions Assessment – Hollister, San Benito County, California* ("air quality and greenhouse gas emissions assessment") dated January 21, 2026 prepared by Illingworth & Rodkin to document potential air quality and greenhouse gas (GHG) emissions impacts associated with the proposed project. Air quality impacts from the proposed project would be associated with demolition of the existing structures, construction of the processing building, greenhouses, and infrastructure, and operation of the proposed project (Illingworth & Rodkin 2026a). The air quality and greenhouse gas emissions assessment, including results of emissions modeling using the California Emission Estimation Model (CalEEMod), is included as Appendix B.

a. The project site is located in the North Central Coast Air Basin; air quality in the air basin is regulated by the Monterey Bay Air Resources District (hereinafter referred to as "air district" or "MBARD," formerly the Monterey Bay Unified Air Pollution Control District). MBARD has developed the *2012-2015 Air Quality Management Plan* (AQMP) and *CEQA Air Quality Guidelines* (CEQA Guidelines) as its guidance documents pertaining to air quality impacts.

According to the air district's CEQA Guidelines, the proposed project's cumulative impacts on regional air quality can be determined through a consistency determination. Project emissions which are not consistent with the AQMP would have a significant impact. The proposed project would introduce new workers in the region but would not

induce unplanned population growth. The proposed project would not cause a significant increase in air pollutant emissions that exceed thresholds established by the air district, and would not cause a significant impact associated with an increase in vehicle miles traveled (VMT). Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan.

b. The six most common and widespread air pollutants of concern, or "criteria pollutants," are ground-level ozone, nitrogen dioxide, particulate matter, carbon monoxide, sulfur dioxide, and lead. In addition, reactive organic gases (ROG) also referred to as volatile organic gases or compounds (VOC) are a key contributor to the criteria air pollutants because they react with other substances to form ground-level ozone. Health effects from prolonged exposures to criteria air pollutants include asthma, bronchitis, chest pain, coughing, and heart diseases.

The air district is the agency with the primary responsibility for ensuring that national and state ambient air quality standards are attained and maintained in the air basin. The air district is responsible for monitoring air quality in the air basin, which is designated in attainment for the federal and state ozone and $PM_{2.5}$ ambient air quality standards, and the federal PM_{10} standard, but in nonattainment for the state 24-hour PM_{10} standard (Monterey Bay Air Resources District 2023). The air district has developed criteria pollutant emissions thresholds, which are used to determine whether or not a proposed project would violate an air quality standard or contribute to an existing violation during operations and/or construction.

Construction Emissions

According to the air district's *CEQA Air Quality Guidelines*, construction projects using typical construction equipment such as dump trucks, scrapers, bulldozers, compactors, and front-end loaders that temporarily emit precursors of ozone (i.e., volatile organic compounds (VOC) or oxides of nitrogen (NOx)) are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone thresholds (Monterey Bay Unified Air Pollution Control District 2008, p. 5-3). Both VOCs and reactive organic gases (ROGs) are precursors to ozone, and are summed under the header ROG.

Air district CEQA guidelines Table 5-2, Construction Activity with Potentially Significant Impacts, identifies the level of construction activity that could result in significant temporary fugitive dust impacts if not mitigated. Construction activities with grading and excavation that disturb more than 2.2 acres per day and construction activities with minimal earthmoving that disturb more than 8.1 acres per day are assumed to generate more than 82 pounds of particulate matter per day, which would exceed the threshold of significance. Construction activities for the proposed project would occur across 47 acres of the property. Projects with activity levels that exceed the air districts screening level thresholds may have a significant impact on air quality.

Criteria air pollutant emissions generated during construction are included in the CalEEMod results in Appendix B. Table 2, Construction Emissions - Unmitigated, summarizes unmitigated criteria air pollutant emissions resulting from project construction and construction truck traffic. Detailed emissions modeling results are presented in Appendix B.

Table 2 Construction Emissions - Unmitigated

Year	Reactive Organic Gases (ROG)	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Particulate Matter (PM_{10})	Particulate Matter ($PM_{2.5}$)
2026	3.90	34.65	36.98	9.79 [2]	5.44
2028	33.11	31.98	36.49	9.64 [2]	5.30
2029	0.72	6.07	7.96	0.39 [2]	0.23
MBARD Threshold (pounds/day)	N/A [1]	N/A [1]	550	82 [3]	N/A
Exceeds Threshold?	No	No	No	No	No

SOURCE: Illingworth & Rodkin 2026a
NOTE: Max Daily Construction Emissions Per Year (pounds/day)
1 Project does not use unusual construction equipment that is not included in the air quality management plan inventories.
2 Includes off-site emissions.
3 Applies only to on-site emissions that include off-site operation within ¼ mile of facility.

The model results confirm that the proposed project's construction emissions would not exceed the air district's criteria air pollutants emissions thresholds for ambient air quality. However, site preparation, grading, and construction activities would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust can include disturbed soils at the project site, trucks carrying uncovered loads of soils, and mud deposited on local streets from vehicles leaving the project site, which can cause airborne dust after it dries. Implementation of Mitigation Measure AQ-1 would reduce fugitive dust and particulate matter emissions and ensure on-site emissions of particulate matter during construction activities would remain below air district thresholds and impacts would be less than significant.

Mitigation Measure

AQ-1 During any construction involving ground disturbance, the developer shall implement measures to control dust and exhaust. Implementation of the measures listed below would reduce the air quality impacts associated with grading and new construction to a less-than-significant level. The developer shall implement the following Best Management Practices that are required of all projects:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).

5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

6. Sweep paved roads where materials have accumulated.

7. Limiting area disturbance daily to 2.2 acres for earthwork (grading, excavation) and 8.1 acres for minimal earthwork activity.

These measures shall be included on all grading and construction plans, prior to issuance of a grading permit, subject to review and approval by the San Benito County Planning Division.

Operational Emissions

The proposed project would result in new sources of operational mobile, energy, and area source emissions. Additionally, the proposed project would utilize three 1-megawatt (MW) combined heat and power microturbine generator units to generate electrical power; the units would operate for 13 hours each day (Monday through Saturday). Air district CEQA guidelines Table 5-3, Thresholds of Significance for Criteria Pollutants of Concern Operational Impacts, identifies the criteria pollutant emissions thresholds, which are used to determine whether or not the proposed project would violate an air quality standard or contribute to an existing violation during operations. Project operations that emit 137 pounds per day or more of an ozone precursor air pollutant (VOC/ROG or NOx); directly emit 550 pounds per day or more of CO; exceed ambient air quality standards along unpaved roads (off-site); emit 82 pounds per day or more of PM_{10} on-site; or directly emit 150 pounds per day or more of sulfur oxides would exceed the thresholds of significance. A comparison of the model results with the air district standards is shown in Table 3, Operational Emissions. Detailed emissions modeling results are presented in Appendix B.

The model results confirm that the proposed project emissions would not exceed the air district's criteria air pollutants emissions thresholds for ambient air quality. Therefore, operational activities of the proposed project would not result in significant air quality impacts and the project's contribution to regional air quality would be less than significant.

Table 3 Operational Emissions

Scenario	Reactive Organic Gases (ROG)	Nitrous Oxides (NO_x)	Carbon Monoxide (CO)	Particulate Matter (PM_{10})	Particulate Matter ($PM_{2.5}$)
2030 Max Daily Project Operational Emissions	3.90	58.32	22.71	6.34 [1]	5.69
MBARD Threshold (pounds/day)	137	137	550	82 [2]	55
Exceeds Threshold?	No	No	No	No	No

SOURCE: Illingworth & Rodkin 2026a
NOTE: 1 Includes off-site emissions.
2 Applies only to on-site emissions that include off-site operation within ¼ mile of facility.

c. Project construction activities would generate temporary and limited localized emissions diesel equipment exhaust. The proposed project has the potential to expose sensitive receptors to localized health risks associated with toxic air contaminant (TAC) emissions from construction equipment exhaust. TACs are pollutants that may be expected to result in an increase in mortality or serious illness or may pose a present or potential hazard to human health. Health effects include cancer, birth defects, neurological damage, damage to the body's natural defense system, and diseases that lead to death. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuels combustion, and commercial operations (e.g., dry cleaners). Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs. Diesel particulate matter (DPM) is the primary TAC of concern within diesel exhaust. The primary community risk impact issues associated with construction exhaust emissions are cancer risk (DPM exposures) and exposure to $PM_{2.5}$.

According to the air district's CEQA guidelines, a sensitive receptor is generally defined as a location where human populations, especially children, seniors, and sick persons, are located where there is reasonable expectation of continuous human exposure. These typically include residences, hospitals, and schools. The closest sensitive receptor to the project site is a single-family residence located approximately 55 feet to the east and outside of the project site. The proposed project would not introduce new receptors to the area.

Exposure to construction emissions from the project site is a potentially significant health risk impact. The air district recommends the use of best management practices during construction to reduce construction fugitive dust emissions by up to 50 percent (Monterey Bay Air Pollution Control District 2008). Additionally, emissions from engines used in construction that are diesel powered are subject to control under regulations adopted by both California Air Resources Board and U.S. Environmental Protection Agency. U.S. Environmental Protection Agency promulgated new emission standards for off-road engines in 1998, with CARB adopting parallel standards in 2000. In 2004, Tier 4 emission standards were adopted and were phased for new engines between 2011 and

2014. In 2007, the California Air Resources Board adopted an off-road equipment regulation to accelerate reductions of NO_x and diesel PM from existing off-road engines. Beginning in 2012 and through 2023, the off-road regulation requires operators of older equipment to either install abatement devices, upgrade to Tier 3 and eventually Tier 4 engines, or to retire older equipment.

Implementation of the following mitigation measure, which reflects the air district's best management practices, would ensure that health risks from potential exposures to construction TAC emissions exposures would be less than significant.

Mitigation Measure

AQ-2 The developer shall prepare a construction management plan to reduce the potential exposure of sensitive receptors to temporary construction toxic air contaminants. The construction management plan language shall be included in all bid documents, grading, and construction plans to be implemented by the project contractor during construction. The following measures shall be included in the Construction Management Plan:

1. Heavy-duty diesel vehicles will have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation, and will not be staged within 500 feet of occupied residences.

2. Idling of construction equipment and heavy-duty diesel trucks will be avoided where feasible, and if idling is necessary, it will not exceed three minutes.

3. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications and will be checked by a certified visible emissions evaluator.

4. All non-road diesel construction equipment will, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112. Further, where feasible, construction equipment will use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

The construction management plan shall be subject to the review and approval of the San Benito County Planning Division prior to issuance of a grading permit.

d. According to the air district CEQA guidelines, odors are objectionable emissions of one or more pollutants that are a nuisance to healthy persons and may trigger asthma episodes in people with sensitive airways. Nuisance odors are commonly associated with refineries, landfills, sewage treatment, agriculture, etc. The proposed project would include greenhouse agriculture and indoor processing of leafy greens, and is not anticipated to be a source of odors that would affect a substantial number of people. Impacts of the proposed project would be less than significant.

4. BIOLOGICAL RESOURCES

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
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, filing, hydrological interruption, or other means?	☐	☒	☐	☐
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?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Comments:

This section is based on a reconnaissance-level biological field survey conducted by EMC Planning Group biologist, Kimiya Ghadiri, on September 5, 2025, to document existing plant communities/wildlife habitats and assess the suitability of the site to support special-status species. Biological resources were documented in field notes, including plant and wildlife species observed, dominant plant communities, wildlife habitat quality, disturbance levels, and aquatic resources.

Prior to conducting the survey, Ms. Ghadiri reviewed site plans, aerial photographs, natural resource database mapping and reports, and other relevant scientific literature. This included searching the U.S. Fish and Wildlife Service (USFWS) *Information for Planning and Consultation* database (USFWS 2025a), California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CDFW 2025a, CDFW 2025b), and California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants* (CNPS 2025a) to identify special-status plants, wildlife, and habitats known to occur in the vicinity of the project site. A review of the USFWS *National Wetlands Inventory* (NWI) database was also conducted to identify jurisdictional aquatic features (wetlands, drainages, and/or riparian areas) on or adjacent to the project site (USFWS 2025b).

Existing Conditions

The project site is located in unincorporated San Benito County on the San Felipe U.S. Geological Survey (USGS) quadrangle maps, with an approximate elevation of 115 feet above sea level. The project site consists mostly of agricultural fields, a developed single-family dwelling and barn on the southeast corner of the project site, and ruderal areas on the southern portions of the project site. Habitats in and around the project site include agriculture, ruderal vegetation, and developed areas (refer to Figure 5, Habitat Map).

Plant and Wildlife Habitats

Agriculture. The majority of the project site is agricultural fields with row crops that are regularly tilled. Row crops grown during the time of the September 2025 reconnaissance-level biological field survey include chicory (*Cichorium intybus*), sunflower (*Helianthus* sp.), celery (*Apium graveolens*), brussels sprouts (*Brassica oleracea* var. *gemmifera*), fennel (*Foeniculum vulgare*), and pepper varieties (*Capsicum* spp.). Some of the agricultural fields did not have active row crops and had non-native vegetation dispersed through the area. In addition, the margins of the row crops and agricultural dirt roads had non-native vegetation dispersed throughout, including wild oat (*Avena* sp.), broadleaved pepperweed (*Lepidium latifolium*), bull thistle (*Cirsium vulgare*), knotweed (*Fallopia* sp.), sow thistle (*Sonchus oleraceus*), prostrate amaranth (*Amaranthus blitoides*), flax leaved horseweed (*Erigeron bonariensis*), and annual grasses.

Ruderal. Ruderal areas occur adjacent to the developed and agricultural areas on the southern portion of the project site. The ruderal areas are dominated by annual grasses including, kikuyu grass (*Pennisetum clanestinum*) and wild oat that are regularly mowed. Non-native species including wild mustard (*Brassica* sp.), broadleaved pepperweed, bristly oxtongue (*Helmintheca echioides*), morning glory species (*Ipomoea* sp.), flax leaved horseweed, and vinegarweed (*Trichostema lanceolatum*) are dispersed throughout ruderal areas. A row of pepper trees (*Schinus* sp.), one large deodar cedar (*Cedars deodar*), and small almond trees (*Prunus dulcis*) were planted in the ruderal area adjacent to the developed residence.

Wildlife Observations

Wildlife species observed during the reconnaissance-level biological field survey included American crow (*Corvus brachyrhynchos*), turkey vulture (*Cathartes aura*), black phoebe (*Sayornis nigricans*), European starling (*Sturnus vulgaris*), common raven (*Corvus corax*), black-tailed jackrabbit (*Lepus californicus*), California ground squirrel (*Otospermophilus beecheyi*), and western fence lizard

(*Sceloporus occidentalis*). The project site could also host striped skunk (*Mephitis mephitis*), Virginia opossum (*Didelphis virginiana*), California scrub-jay (*Aphelocoma californica*), racoon (*Procyon lotor*) and other common fauna.

Wetlands and Waterways

The project site is located within an active agricultural area, approximately 2,000 feet to the west of Santa Ana Creek and 12,000 feet south of Tequisquita Slough. An agricultural drainage ditch with standing water and wetland vegetation was observed at the edge of the row crops on the northern portion of the project site (Figure 5, Habitat Map). This small, L-shaped area was located along the corner of an agricultural field and held minimal (one to two inches) of standing water at the time of the site investigation in September 2025. Vegetation present within the drainage was dominated by non-native and ruderal species such as bristly oxtongue and wild radish (*Raphanus sativus*); however, scattered individual native species including tall flatsedge (*Cyperus eragrostis*), alkali heliotrope (*Heliotropium curassavicum*), cattail (*Typha* sp.), and dotted smartweed (*Persicaria punctata*) were also present.

Based on historical aerial photographs, this drainage appears to be a remnant of a previously continuous intermittent drainage associated with the Tequisquita Slough. Based on current observations, the agricultural drainage ditch is no longer connected to any known jurisdictional features. Standing water is likely accumulated due to agricultural irrigation and vegetation is frequently disturbed during routine agricultural operations.

a. **Special-Status Species.** Special-status species in this report are those listed as Endangered, Threatened, or Rare or as candidates for listing by the USFWS and/or CDFW; as Species of Special Concern or Fully Protected species by the CDFW; or as Rare Plant Rank 1B or 2B species by CNPS. Appendix C. Special-Status Species with Potential to Occur in the Project Vicinity, presents tables with special-status species search results, which lists the special-status species documented within the project vicinity, their listing status, suitable habitat description, and their potential to occur on the project site. Figure 6, Special-Status Species Within the Project Vicinity, presents a map of *California Natural Diversity Database* results.

   Critical Habitat. Critical habitat is a designation used by the USFWS for specific geographic areas that contain features essential to the conservation of an endangered or threatened species and that may require special management and protection. The project site is not within a critical habitat area (USFWS 2025c).

   Special-Status Plant Species. Special-status plant species were evaluated for probability to occur on the project site. No special-status plants were observed during the biological survey. Suitable habitat for special-status plant species recorded as occurring within the project vicinity was not found.



0 450 feet

Project Site
Ruderal
Potentially Jurisdictional Wetland
Agriculture
Developed

Source: San Benito County GIS 2025, Google Earth 2025

Figure 5

Habitat Map

2370 Shore Road (Hippo Harvest) Initial Study

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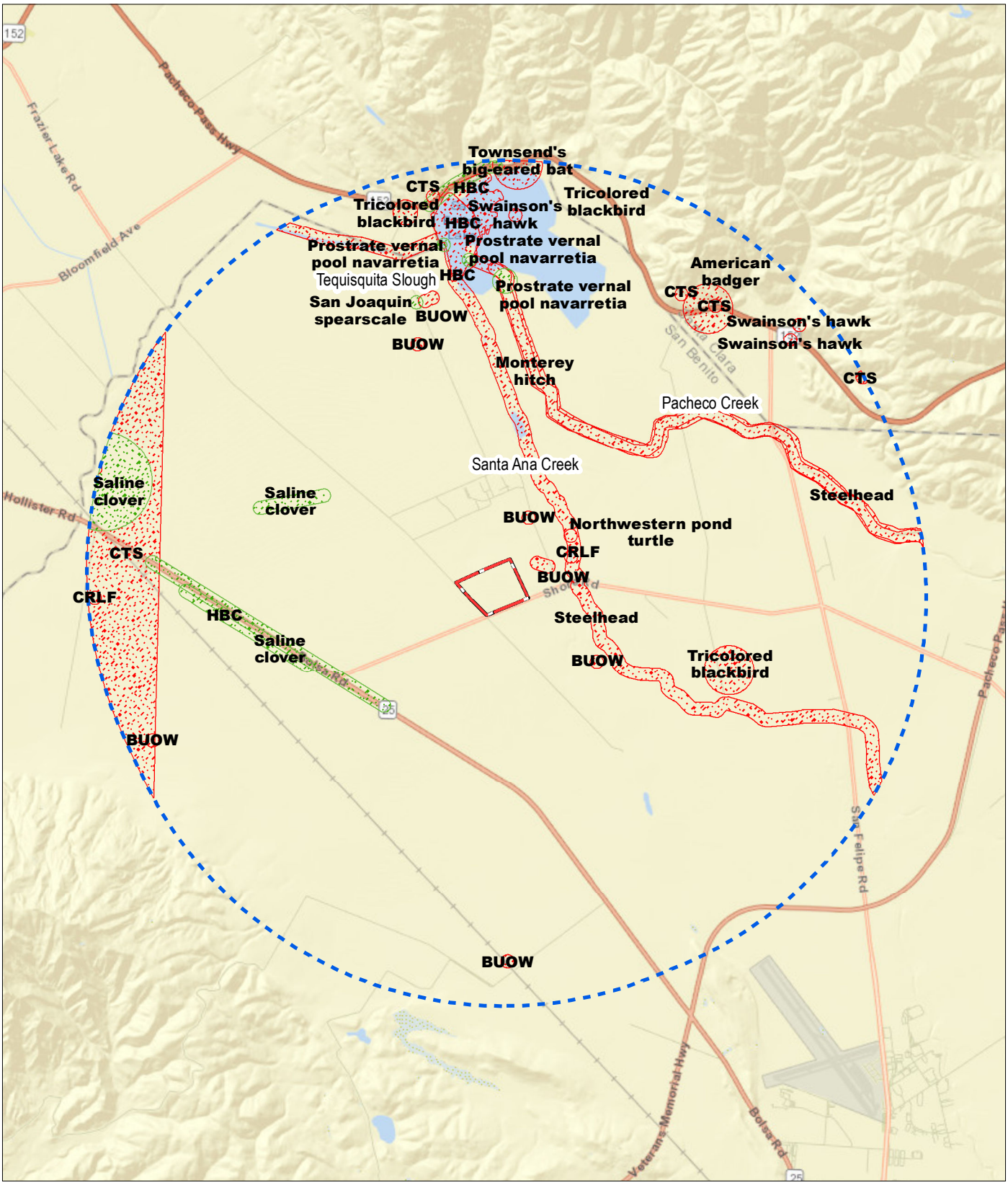

Source: ESRI 2025, San Benito County GIS 2025
BUOW: Burrowing Owl
CRLF: California Red-Legged Frog
CTS: California Tiger Salamander
HBC: Hoover's Button-Celery

Figure 6

Special-Status Species Within the Project Vicinity

2370 Shore Road (Hippo Harvest) Initial Study

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Special-Status Wildlife Species. Special-status wildlife species with potential to occur on the project site include burrowing owl (*Athene cunicularia*), California red-legged frog (*Rana draytonii*), merlin (*Falco columbarius*), pallid bat (*Antrozous pallidus*), San Joaquin kit fox (*Vulpes macrotis mutica*), Swainson's hawk (*Buteo swainsoni*), Townsend's big-eared bat (*Corynorhinus townsendii*), and white-tailed kite (*Elanus leucurus*). Protected nesting birds may also occur at the project site.

San Joaquin Kit Fox. The San Joaquin kit fox is a federally-listed endangered species and a state-listed threatened species. The present range of the San Joaquin kit fox extends from the southern end of the San Joaquin Valley, north to Tulare County, and along the interior Coast Range valleys and foothills to central Contra Costa County. San Joaquin kit foxes typically inhabit annual grasslands or grassy open spaces with scattered shrubby vegetation but can also be found in some agricultural habitats and urban areas. This species needs loose-textured sandy soils for burrowing, and they also need areas that provide a suitable prey base, including black-tailed hare, desert cottontails, and California ground squirrels, as well as birds, reptiles, and carrion.

Most recorded observations near Hollister are over 50 years old, with few from the 1990s and 2000s. The nearest CNDDB occurrence of this species was documented in 1971 approximately 5.6 miles from the project site (Occurrence No. 1027, CDFW 2025a). Six additional occurrences of this species are within ten miles of the project site (Occurrence Nos. 1026, 1029, 874, 45, 1028, and 605, CDFW 2025a).

In April 1988, San Benito County adopted Ordinance No. 541, which established a habitat conservation plan study area for the San Joaquin kit fox and set interim mitigation fees for the preparation and adoption of a Habitat Conservation Plan to provide for the long-term protection of the species. The County is in the process of preparing a draft Benito County Conservation Plan (SBCCP), which is a multi-year process; however, no plan has been adopted. The County may collect fees from the proposed project for the plan. Information regarding the process of developing the plan can be found at the following website: https://www.sanbenitocountyca.gov/departments/resource-management-agency/planning-and-land-use-division/san-benito-county-conservation-plan-sbccp.

There is potential for San Joaquin kit fox to occur on the project site. Loss of or harm to individual kit foxes could result if they are present on the site or seek shelter during construction within artificial structures, such as stored pipes or exposed trenches. Loss or harm to San Joaquin kit fox is considered a significant adverse impact. Implementation of the following mitigation measures would reduce this potentially significant impact to San Joaquin kit fox to a less-than-significant level.

Mitigation Measures

BIO-1 The *U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) shall be implemented prior to initiation of each project phase and during any construction activity on the project site to avoid unintended take of individual San Joaquin kit foxes.

Prior to each phase, preconstruction/pre-activity surveys for San Joaquin kit fox shall be conducted by a qualified biologist no less than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity that may impact San Joaquin kit fox. The surveys shall include all work and staging areas and a minimum 200-foot buffer of the project site. The preconstruction surveys shall identify kit fox habitat features on the project site, evaluate use by kit fox and, if possible, assess the potential impacts of the proposed activity. The status of all dens shall be determined and mapped.

If a natal/pupping den is discovered within the project area or within 200 feet of the project boundary, the County and the applicant shall consult with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service to establish an appropriate avoidance buffer. The avoidance buffer shall be maintained until such time as the burrow is no longer active and/or an incidental take permit is determined to be required and is obtained.

In addition, the following measures shall be observed during construction activities:

a. Construction-related vehicles shall observe a 20-mph speed limit in all project areas; this is particularly important at night when kit foxes are most active. To the extent possible, night-time construction shall be minimized. Off-road construction traffic outside of designated project area shall be prohibited.

b. To prevent inadvertent entrapment of kit foxes or other animals during the construction phase of the project, all excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the procedures under Number 11 of the Construction and Operational Requirements in the Standardized Recommendations must be followed.

c. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly

inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the U.S. Fish and Wildlife Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.

d. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in closed containers and removed at least once a week from a construction or project site.

e. No firearms shall be allowed on the project site during construction activities.

f. To prevent harassment, mortality of kit foxes or destruction of dens by dogs or cats, no pets shall be permitted on site during construction activities.

g. Use of rodenticides and herbicides on the project site during construction shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and Federal legislation, as well as additional project-related restrictions deemed necessary by the U.S. Fish and Wildlife Service. If rodent control must be conducted, zinc phosphide shall be used because of proven lower risk to kit fox.

h. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape.

i. Any contractor, employee, or agency personnel who inadvertently kills or injures a San Joaquin kit fox shall immediately report the incident to the County of San Benito, which will contact the CDFW and USFWS as needed.

BIO-2 Prior to the start of construction of each project phase, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of special-status species potentially occurring in the project vicinity, including, but not limited to, San Joaquin kit fox, burrowing owl, Swainson's hawk, California red-legged frog, special-status bats, and nesting birds and raptors. Their habitats, general measures that are being implemented to conserve species as they relate to the project, and the boundaries within which construction activities will occur will be explained. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction personnel shall undergo this mandatory environmental awareness training.

The qualified biologist will train biological monitors selected from the construction crew by the construction contractor (typically the project foreman). Before the start of work each day, the monitor will check for animals under any equipment such as vehicles and stored pipes within active construction zones. The monitor will also check all excavated steep-walled holes or trenches greater than one foot deep for trapped animals. If a special-status species is observed within an active construction zone, the qualified biologist will be notified immediately and all work within 50 feet of the individual will be halted and all equipment turned off until the individual has left the construction area.

Evidence of completion of this training shall be submitted to the County of San Benito, where it will be kept on file.

Burrowing Owl. Burrowing owl is a California Species of Special Concern and is a candidate for higher listing under the California Endangered Species Act. Burrowing owls live and breed in burrows in the ground, especially in abandoned California ground squirrel burrows. Optimal habitat conditions include large, open, dry and nearly level grasslands or prairies with short to moderate vegetation height and cover, areas of bare ground, and populations of burrowing mammals.

The nearest CNDDB occurrence is approximately 0.14 miles from the project site, documented in 2009, within annual grassland habitat (Occurrence No. 773, CDFW 2025a). There are six other CNDDB occurrences for this species within three miles of the project site (Occurrence Nos. 277, 278, 648, 1223, 1224, and 1225, CDFW 2025a). Few small mammal burrows occur in the ruderal areas and agricultural areas of the project site, which provide low quality habitat for this species. However, annual grasslands occur directly north of the project site that could provide suitable foraging and nesting habitat for this species. Given the proximity to known occurrences for this species and suitable habitat within the project vicinity, this species has a moderate potential to occur on the project site. If burrowing owl is present on or adjacent to the project site, construction activities could result in the loss or disturbance of individual animals. This would be a significant adverse environmental impact. Implementation of Mitigation Measures BIO-2, which requires a training session on special-status species potentially present on the construction site for all personnel, and the following mitigation measure would reduce this potentially significant impact to less than significant.

Mitigation Measure

BIO-3 To avoid/minimize impacts to burrowing owls potentially occurring within the project site and staging areas, a biologist qualified in ornithology shall conduct surveys for burrowing owl prior to the construction start of each project phase. The approved biologist shall conduct a two-visit (i.e., morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to the project site boundary no less than 14 days prior to the start of construction or ground disturbance activities. Surveys shall be conducted according to the methods for take avoidance described in the *Burrowing Owl Survey Protocol and Mitigation*

Guidelines (California Burrowing Owl Consortium 1993) and the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). If no burrowing owls are found, a letter report confirming absence will be prepared and submitted to the County of San Benito and no further mitigation is required.

If burrowing owls are found occupying habitat within the project vicinity, seasonal no-disturbance buffers shall be in place around occupied habitat prior to and during any ground disturbance activities as outlined in the *Burrowing Owl Survey Protocol and Mitigation Guidelines* (CBOC 1993) and the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). Because burrowing owls occupy habitat year-round, the following table includes buffer areas based on the time of year and level of disturbance (CDFW 2012), unless a qualified biologist approved by the California Department of Fish and Wildlife verifies through non-invasive measures that either: 1) birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance Buffers (meters)		
		Low	Med	High
Nesting Sites	April 1 – Aug 15	200 m	500 m	500 m
Nesting Sites	Aug 16 – Oct 15	200 m	200 m	500 m
Nesting Sites	Oct 16 – Mar 31	50 m	100 m	500 m

If a burrowing owl is found and avoidance is not possible, burrow exclusion may be conducted by qualified biologists only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. Occupied burrows shall be replaced with artificial burrows at a ratio of one collapsed burrow to one constructed artificial burrow (1:1). Evicted burrowing owls may attempt to colonize or re-colonize an area that would be impacted, thus ongoing surveillance during project activities shall be conducted at a rate sufficient to detect burrowing owls if they return.

If surveys locate occupied burrows in or near construction areas, consultation with the California Department of Fish and Wildlife shall occur to interpret survey results and develop a project-specific avoidance and minimization approach. Once the absence of burrowing owl has been confirmed, a letter report will be prepared and submitted to the County of San Benito.

California Red-legged Frog. A federally-listed threatened species and California Species of Special Concern, California red-legged frog occurs in lowlands and foothills primarily in perennial or ephemeral ponds, pools, and streams where water remains long enough (14-28 weeks) for breeding and metamorphosis of tadpoles. Specific breeding sites

include streams, creeks, ponds, marshes, sag ponds, deep pools, backwater areas, dune ponds, lagoons, and estuaries. California red-legged frog may disperse from their aquatic breeding habitats to upland habitats during the dry season. They prefer upland habitats that provide moisture to prevent desiccation and protection from predators, including downed logs, woody vegetation, boulders, moist leaf litter, or other refugia during the dry season. In areas where upland habitats do not contain structure, they take refuge in burrows. However, if there is sufficient water at their breeding location, they may remain in aquatic habitats year-round instead of moving to adjacent uplands.

During wet seasons, frogs can move long distances between habitats, traversing upland areas or ephemeral drainages. Dispersal distances are typically less than 0.3 mile, with a few individuals moving 1.2-2.2 miles. Seeps and springs in open grasslands can function as foraging habitat or refugia for wandering frogs.

CNDDB records indicate that the closest known occurrence of California red-legged frog is approximately 0.4 miles from the project site documented in 1990 (Occurrence No. 39, CDFW 2025a). There is only one other CNDDB occurrence within three miles of the project site (Occurrence No. 232, CDFW 2025a). Low quality upland habitat is present within the ruderal and agricultural areas of the project site; therefore, there is a very low potential for this species to occur on the project site. However, the distance between Occurrence No. 39 and the project site is within the species' known dispersal distance and the possibility of an individual moving through the project site cannot be ruled out. Therefore, implementation of Mitigation Measure BIO-2, which requires a training session on special-status species potentially present on the construction site for all personnel, and the following mitigation measure would reduce this potential, significant impact to California red-legged frog to a less-than-significant level.

Mitigation Measure

BIO-4 California Red-Legged Frog. One of the following options shall be followed:

Option 1: Preconstruction Surveys and Avoidance

Prior to and During Construction of each Project Phase:

1. A qualified biologist shall conduct preconstruction surveys following the guidance documented in the *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (USFWS 2005) no more than two weeks (14 days) prior to the start of disturbance activities. The biologist shall prepare a report documenting the results of the preconstruction surveys for submittal to the County of San Benito prior to ground disturbance.

2. Trenches or pits one foot or deeper that are going to be left unfilled for more than 48 hours shall be securely covered with boards or other material to prevent the California red-legged frog from falling into them. If trenches or pits must be left uncovered, earthen escape ramps will be built to allow wildlife to exit.

3. If at any point a California red-legged frog is encountered, all activities which have the potential to result in the harassment, injury, or death of the individual shall be immediately halted. A qualified biologist shall then assess the situation and select a course of action that would avoid or minimize adverse effects to the animal. Coordination with the U.S. Fish and Wildlife Service to determine the appropriate course of action per the requirements of the Federal Endangered Species Act (e.g., obtaining an Incidental Take Permit) shall occur prior to resuming construction activities.

During Construction of the Proposed Detention Pond and Within 300 feet of the Wetland Area:

1. Construction activities involving ground disturbance within 300 feet of the wetland area shall be avoided between November 1 and March 31, the time period when California red-legged frogs are most likely to be moving through the project area. Ground disturbance activities shall not occur during rain events or within 24 hours following a rain event.

Option 2: Assume Presence and Obtain Incidental Take Permit

1. Coordinate with the U.S. Fish and Wildlife Service to obtain an Incidental Take Permit for potential impacts to California red-legged frog and implement the permit requirements prior to ground disturbance.

Swainson's Hawk. Swainson's hawk is a state-listed threatened species and a long-distance migrator. Their nesting grounds occur in northwestern Canada, the western U.S., and Mexico and most populations migrate to wintering grounds in the open pampas and agricultural areas of South America (Argentina, Uruguay, southern Brazil). This round-trip journey may exceed 14,000 miles. The birds return to the nesting grounds and establish nesting territories in early March.

Swainson's hawk nests are generally found in scattered trees or along riparian systems adjacent to agricultural fields or pastures in the Central Valley. These open fields and pastures are their primary foraging areas. Suitable foraging habitat for Swainson's hawk is found in both the northern and southern portions of the project site and potential nesting habitat can be found in the riparian woodlands growing adjacent to the east of the project site.

Three recent observations of Swainson's hawk have been recorded within two to three miles of the project site in Coyote Valley (Occurrence Nos. 2831, 2832, and 2833 in 2020 and 2022, near San Felipe, CNDDB 2025b). In addition, an adult Swainson's hawk was observed on iNaturalist approximately 0.26 miles from the project site in 2024 (iNaturalist 2025). Swainson's hawk is more commonly observed nesting and foraging in the Sacramento and San Joaquin valleys. However, due to the recent observations of nesting Swainson's hawk within three miles of the project site and the presence of suitable nesting and/or foraging habitat at the project site, there is potential for this species to occur. Loss or harm to Swainson's hawk is considered a significant adverse impact.

The *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks in the Central Valley of California* (CDFG 1994) provides guidance on how impacts on Swainson's hawk are to be mitigated. Implementation of Mitigation Measure BIO-2, which requires a training session on special-status species potentially present on the construction site for all personnel, and the following mitigation measure would reduce this potential, significant impact to Swainson's hawk to a less-than-significant level.

Mitigation Measure

BIO-5 Swainson's Hawk. If work is planned to occur between March 1 and September 1 for any phase of the project, a qualified biologist shall survey for nesting Swainson's hawks within a half-mile radius around the project site. Preconstruction surveys for Swainson's hawk should be conducted according to the Swainson's Hawk Technical Advisory Committee's Recommended Timing and Methodology for Swainson's Hawk Nesting Survey in California's Central Valley. If an active nest is identified within the half-mile radius and work cannot be delayed until the nest has fledged or is no longer active, California Department of Fish and Wildlife will be consulted for appropriate avoidance measures. If an active nest is found, the applicant must adhere to the following mitigation measures:

a. Swainson's Hawk Avoidance Buffer. A minimum of ½-mile no-disturbance buffer shall be delineated and maintained around each nest during nesting season, regardless of whether it was detected by surveys or observed incidentally. These buffers would remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent nest abandonment and other take of Swainson's hawk as a result of project activities.

b. Swainson's Hawk Take Authorization. In the event an active Swainson's hawk nest is detected within a ½-mile of the applicant's planning construction disturbance zone for a given project phase as determined by submitted grading and building plans, consultation with California Department of Fish and Wildlife is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with the California Endangered Species Act.

c. Swainson's Hawk Foraging Habitat Mitigation. Compensation for the loss of Swainson's hawk foraging habitat as described in with California Department of Fish and Wildlife's "Staff Report Regarding Mitigation for Impacts to Swainson's Hawks" (CDFG 1994) to reduce impacts to foraging habitat to less than significant is required as follows:

1. For projects within one mile of an active nest tree, a minimum of one acre of habitat management land for each acre of development is advised.

2. For projects within five miles of an active nest but greater than one mile, a minimum of ¾-acre of habitat management land for each acre of development is advised.

3. For projects within 10 miles of an active nest tree but greater than five miles from an active nest tree, a minimum of ½-acre of habitat management land for each acre of development is advised.

Nesting Birds. Protected nesting birds and raptor species, such as merlin and white-tailed kite, have the potential to nest in buildings or structures, on open ground, or in any type of vegetation, including trees, during the nesting bird season (January 15 through September 15). The project site and surrounding properties contain a variety of trees and shrubs, resulting in the potential for impacts to protected nesting birds. Construction activities, including ground disturbance, can impact nesting birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code, should nesting birds be present during construction. If protected bird species are nesting adjacent to the project site during the bird nesting season, then noise-generating construction activities could result in the loss of fertile eggs, nestlings, or otherwise lead to the abandonment of nests. Implementation of Mitigation Measure BIO-2, which requires a training session on special-status species potentially present on the construction site for all personnel, and the following mitigation measure would reduce potential, significant impacts to nesting birds to less than significant.

Mitigation Measure

BIO-6 To avoid impacts to nesting birds during the nesting season (January 15 through September 15), all construction activities associated with each project phase should be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction occurs during the bird nesting season, then a qualified biologist will conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project construction.

If project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys.

a. Two surveys for active bird nests will occur within 14 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which

access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the County of San Benito and no further mitigation is required.

b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the County of San Benito.

Special-Status Bat Species. Trees and/or buildings or structures on or adjacent to the project site could potentially provide roosting habitat for bats listed as California Species of Special Concern, including pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*) (CDFW 2025b).

The pallid bat is found in low elevations throughout California. It occupies a wide variety of habitats including grasslands, shrublands, woodlands, and forests. Pallid bats may roost in woodlands and forests but prefer open, dry, and rocky habitats. They can also roost in abandoned buildings, bird boxes, road culverts, and under bridges.

Townsend's big-eared bats inhabit a diversity of habitats, including coastal conifer forests, oak woodlands, grasslands, and deserts. Known roosting sites in California include limestone caves, lava tubes, mine tunnels, buildings, and other human-made structures. Females typically roost in large maternity colonies which are highly susceptible to disturbances by humans. Males usually roost singly or in small groups and are probably not affected as much as females by disturbances.

The distribution of special-status bats is not well documented in San Benito County; however, pallid bat and Townsend's big-eared bat are known to occur in the project vicinity and could be present on the project site. Project development could result in impacts to these species from injury or mortality during construction, if present. Loss or harm to special-status bat species is considered a significant adverse environmental impact. Implementation of Mitigation Measure BIO-2, which requires a training session

on special-status species potentially present on the construction site for all personnel, and the following mitigation measure would reduce potentially significant impacts to special-status bat species to a less than-significant-level.

Mitigation Measure

BIO-7 Special-Status Bat Species. Within 15 days prior to tree removal, vegetation clearance, building demolition, grading, or the initiation of any construction activity in any area of the project site (all phases), the applicant shall retain a qualified wildlife biologist to conduct a habitat assessment for bats and potential roosting sites in trees to be removed, in buildings and trees within 50 feet of the construction footprint, and surrounding structures situated within 50 feet of disturbance activities by the project. Bats potentially roosting on the exteriors of buildings on the project site may be disturbed by construction activities. Bats that roost in buildings are usually in structural voids, the spaces between the exterior and interior envelopes of a building. Bats enter voids through openings on the exterior of buildings. A colony may remain unnoticed unless someone sees, hears, or smells them.

If no roosting sites or bats are found, a letter report confirming absence shall be submitted by the biologist to the County of San Benito where it will be kept on file, and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents shall be provided by the biologist to the County of San Benito prior to ground disturbance activities and the following monitoring, exclusion, and habitat replacement measures shall be implemented:

If bats are found roosting outside of the nursery season (May 1 through October 1), they shall be evicted as described under (b) below. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats shall be evicted as described under (b) below. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal or on any structures within 50 feet of project disturbance activities, the individuals shall be safely evicted, under the direction of a qualified bat biologist. If pre-construction surveys determine that there are bats present in any trees or structures to be removed, exclusion structures (e.g., one-way doors or similar methods) shall be installed by a qualified biologist. The exclusion structures shall

not be placed until the time of year in which young are able to fly, outside of the nursery season. Information on placement of exclusion structures shall be provided to the California Department of Fish and Wildlife prior to construction. If needed, other removal methods could include: carefully opening the roosting area in a tree or snag by hand to expose the cavity and opening doors/windows on structures, or creating openings in walls to allow light into the structures. Removal of any trees or snags and disturbance within 50 feet of any structures shall be conducted no earlier than the following day (i.e., at least one night shall be provided between initial roost eviction disturbance and tree removal/disturbance activities). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

b. **Sensitive Natural Communities.** Sensitive natural communities are communities that are of limited distribution statewide or within a county or region, and are often vulnerable to environmental effects of projects. CDFW's *List of California Terrestrial Natural Communities* is based on the best available information, and indicates which natural communities are considered sensitive (CDFW 2025c). Wetland and riparian vegetation are typically considered sensitive natural communities. However, vegetation within the disturbed wet area observed during the reconnaissance-level biological field survey was dominated by invasive and ruderal species, with only a few scattered native individuals. The composition of vegetation present did not meet the definition of a sensitive natural community and no mitigation is required. Impacts to the potential wetland area are addressed further below

c. **Jurisdictional Wetlands, Waterways, or Riparian Habitat.** A review of the National Wetlands Inventory online database was conducted to identify the closest jurisdictional aquatic features on or adjacent to the project site (USFWS 2025b). The closest jurisdictional features include Santa Ana Creek, which is approximately 2,000 east of the project site and Tequisquita Slough which is located approximately 12,000 feet north of the project site (Figure 6, Special-Status Species Within the Project Vicinity). During the September 2025 reconnaissance-level biological field survey, an agricultural drainage ditch with standing water and wetland vegetation was observed on the northern portion of the project site. Based on historical aerial photographs, this drainage appears to be a remnant of a previously continuous intermittent drainage associated with the Tequisquita Slough. Based on current observations, the agricultural drainage ditch is no longer connected to any known jurisdictional features. However, the agricultural drainage ditch feature could fall under the jurisdiction of the Regional Water Quality Control Board (RWQCB).

Impacts to jurisdictional wetland and waterway features are considered significant adverse environmental impacts. The following mitigation measure would assure that this potentially significant impact is reduced to a less-than-significant level.

Mitigation Measure

BIO-8 Prior to ground disturbance of the identified on-site potential jurisdictional wetland, the applicant will retain a qualified biologist to determine the extent of potential wetlands and waterways regulated by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). If impacts to wetlands or waters of the U.S. regulated by the USACE will occur, the applicant shall retain a qualified biologist to obtain a Clean Water Act Section 404 Nationwide Permit. If the impacts to the jurisdictional features do not qualify for a Nationwide Permit, the applicant will proceed with obtaining an Individual Permit from the USACE. If impacts to wetlands or waters of the State regulated by the RWQCB will occur, the applicant shall retain a qualified biologist to obtain a Clean Water Act Section 401 Water Quality Certification. If impacts to riparian vegetation regulated by the CDFW will occur, the applicant shall retain a qualified biologist to coordinate with the CDFW to obtain a Streambed Alteration Agreement.

To compensate for temporary and/or permanent impacts to wetlands that would be impacted as a result of the proposed project, mitigation shall be provided as required by the regulatory permits. Mitigation would be provided through one of the following mechanisms:

i. A Wetland Mitigation and Monitoring Plan shall be developed that will outline mitigation and monitoring obligations for temporary impacts to wetlands and other waters as a result of construction activities. The Wetland Mitigation and Monitoring Plan would include thresholds of success, monitoring and reporting requirements, and site-specific plans to compensate for wetland losses resulting from the project. The Wetland Mitigation and Monitoring Plan shall be submitted to the appropriate regulatory agencies for review and approval during the permit application process.

ii. To compensate for permanent impacts, the purchase and/or dedication of land to provide suitable wetland restoration or creation shall ensure a no net loss of wetland values or functions. If restoration is available and feasible, a minimum 1:1 mitigation to impact ratio would apply to projects for which mitigation is provided in advance.

d. **Wildlife Movement**. Terrestrial species must navigate a habitat landscape that meets their needs for breeding, feeding and shelter. Natural and semi-natural components of the landscape must be large enough and connected enough to meet the needs of all species that use them. Wildlife movement corridors provide connectivity between habitat areas, enhancing species richness and diversity, and usually also provide cover, water, food, and breeding sites.

The project site is located within an active agricultural area, approximately 2,000 feet to the west of Santa Ana Creek and approximately 12,000 feet south of Tequisquita Slough. The project site is not located within any previously defined essential connectivity areas as

mapped by the *California Essential Habitat Connectivity Project* (CDFW 2024c). The project site is not likely to facilitate major wildlife movement due to the current disturbance from crops and adjacent agricultural uses. As such, the proposed project would have no impact on wildlife movement.

e. **Local Biological Resource Policies/Ordinances.**

San Benito County. Measures to protect sensitive biological resources within San Benito County are identified in Section 8, Natural and Cultural Resources Element, of the *San Benito County 2035 General Plan,* such as: Goal NCR-2 is "To protect and enhance wildlife communities through a comprehensive approach that conserves, maintains, and restores important habitat areas." Additional goals in Section 8 include: coordination for habitat preservation, the establishment of a habitat conservation plan, maintenance of habitat corridors, mitigation for wetland disturbance or removal, mitigation and regeneration of oak woodland communities, pre-development biological resource assessment, mitigation funding and site protection, and management of invasive plant and wildlife species.

Mitigation measures contained in this section will mitigate impacts to biological resources to a less-than-significant level. With these considerations, the proposed project would not conflict with local policies and ordinances related to biological resources.

Protected Trees. County Code Chapter 19.33 restricts the removal of mature trees countywide. Protected trees include native species such as coast live oak, blue oak (*Quercus douglasii*), California pepper (*Schinus molle*), and coast redwood. No person can conduct any tree cutting or removal without first obtaining a permit from the Director of the San Benito County Planning Department.

The applicant proposes to remove 15 trees adjacent to the developed residence at buildout of the site (Figure 5, Habitat Map). Therefore, a tree removal permit shall be obtained in accordance with County Code Chapter 19.33 to ensure potential impacts are less than significant.

f. **Conservation Plans**. There are no critical habitat boundaries, habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans applicable to the proposed project site. San Benito County is developing a multi-species Habitat Conservation Plan/Natural Community Conservation Plan, referred to as the San Benito County Conservation Plan, compliant with the Endangered Species Act and the California Natural Community Conservation Planning Act to address and mitigate potential impacts to threatened and endangered species associated with growth and development in the County. The project site is within the habitat plan permit area; however, the San Benito County Conservation Plan is currently in development and not yet approved. See also previous discussion.

Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

5. CULTURAL RESOURCES

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Cause a substantial adverse change in the significance of a *historical resource* pursuant to section 15064.5?	☐	☐	☒	☐
b.	Cause a substantial adverse change in the significance of a *unique archaeological resource* pursuant to section 15064.5?	☐	☒	☐	☐
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Comments:

Vanessa Potter, MA, Registered Professional Archaeologist, with EMC Planning Group Inc. prepared the *2370 Shore Road, San Benito County – Hippo Harvest Project Archaeological Phase I Survey Report* ("cultural resource evaluation") for the proposed project in December 2025. Much of the information provided in this section is from this source unless otherwise noted.

a. The project site includes agricultural land with active plantings and tilling, as well as a residential, single-story home and associated structures. Adjacent to the house there is an area of wood pallets, trucks, and storage containers. The materials are not considered cultural resources under age criterion. The results from the NWIC show that there is one resource found within the project area (the existing single-family residence identified as P-35-000222) and one resource found within a one-quarter mile radius of the project site boundary (structures identified as P-35-000231, or "Gabilan Valley Sportsman's Club").

Implementation of the proposed project would not impact the structures (P-35-000231) located within a one-quarter mile radius of the project site.

The on-site resource, the existing single-family structure, was built in 1920. According to the historic property survey report prepared by Caltrans (1991) the structure was deemed ineligible for the National Register due to extensive remodeling that resulted in a loss of integrity. Additionally, the house has no known associations with persons or event important to local or regional history.

However, the structure was built more than 100 years ago requiring the applicant to adhere to General Plan Policy NCR-7.5, which states that applicants proposing to remove structures 100 years or older shall demonstrate why preservation of the structures and integration of the structures into the development proposal is inappropriate or infeasible. The applicant will be required to comply with this General Plan policy in order to ensure impacts to the resource are less than significant.

b. The results from the NWIC show that there are no known indigenous historic resources or unique archaeological resources located on-site or within one-quarter mile of the project site. However, unknown buried significant historic or unique archaeological resources could be present. Such resources, if present, could be damaged or destroyed by ground disturbing construction activities associated with the project. This would be a significant impact. Implementation of the following mitigation measure would ensure that potential impacts would be less than significant.

Mitigation Measure

CUL-1 The following language shall be incorporated into any plans associated with tree removal, demolition, grading, and/or construction, "In the event that archaeological resources are encountered during ground disturbing activities, contractor shall temporarily halt or divert excavations within 50 meters (165 feet) of the find until it can be evaluated. All potentially significant archaeological deposits shall be evaluated to demonstrate whether the resource is eligible for inclusion on the California Register of Historic Resources, even if discovered during construction. If archaeological deposits are encountered, they will be evaluated and mitigated simultaneously in the timeliest manner practicable, allowing for recovery of materials and data by standard archaeological procedures. For indigenous archaeological sites, this data recovery involves the hand-excavated recovery and non-destructive analysis of a small sample of the deposit. Historic resources shall also be sampled through hand excavation, though architectural features may require careful mechanical exposure and hand excavation.

Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance by a qualified Archaeologist. Significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites."

c. It is unknown whether Native American remains are located at the project site. However, there remains the possibility that ground disturbing activities associated with the proposed project could damage or destroy previously undiscovered Native American human remains. Disturbance of Native American human remains would be a significant impact. The following mitigation measure would reduce this potential impact to a less-than significant level.

Mitigation Measure

CUL-2 The following language shall be incorporated into any plans associated with tree removal, demolition, grading, and/or construction, "In the event that human remains (or remains that may be human) are discovered at the project site, Public Resource Code Section 5097.98 must be followed. All grading or earthmoving activities shall immediately stop within 50 meters (165 feet) of the find. The San

Benito County Coroner will be notified immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the project proponent shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (Public Resource Code [PRC] § 5097). The coroner shall contact the Native American Heritage Commission (NAHC) to determine the most likely descendant(s) (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD will determine the most appropriate means of treating the human remains and associated grave artifacts, and shall oversee the disposition of the remains. In the event the NAHC is unable to identify an MLD or the MLD fails to make a recommendation within 48 hours after being granted access to the site, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity within the project area in a location not subject to further subsurface disturbance if: a) the Native American Heritage Commission is unable to identify the MLD or the MLD failed to make a recommendation within 48 hours after being allowed access to the site; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner."

6. ENERGY

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Comments:

a. Energy impacts are assessed based on the proposed project energy demand profile and on its relationship to the state's energy efficiency regulations and the County's land use planning regulations. Both are summarized below:

Projected Energy Use

Electricity. According to the California Energy Commission Energy Consumption Data Management System, the total electricity consumption in San Benito County in 2024 was 393,400,000 kilowatt-hours (kWh) (California Energy Commission 2025a). Table 5.11, Operational Energy Consumption – Electricity, in the project CalEEMod results included in Appendix B show that projected electricity demand would be 1,104,958 kWh. The project's energy consumption (largely from the central processing building) accounts for less than one-half of one percent of the County's 2024 total electricity demand.

Natural Gas. According to the California Energy Commission Energy Consumption Data Management System, the total natural gas consumption in San Benito County in 2024 was 14,990,000 therms (California Energy Commission 2025b). The combined heating and power generator units would consume natural gas to convert into electrical energy; the units would consume approximately 139,160 million British thermal units, or converted to 1,391,932 therms of natural gas (Illingworth & Rodkin 2026b). The project's combined heating and power generator units natural gas consumption accounts for approximately 9.3 percent of the County's 2024 total natural gas demand. The central processing building would not include natural gas.

Transportation Fuel. The California Air Resources Board 2021 Emissions Factor model (EMFAC), version 1.0.2, estimates the official emissions inventories of on road mobile sources in California. The EMFAC model was developed by the California Air Resources Board to assess emissions from on-road vehicles including cars, trucks, and buses in California, and to support related state regulatory and air quality planning efforts to meet the Federal Highway Administration's transportation planning requirements. As detailed

in the EMFAC 2030 Fuel Demand results, Appendix D, projected total annual fuel demand resulting from the project in 2030 is projected to be approximately 18,517 gallons.

Regulatory Requirements

A multitude of state regulations and legislative acts are aimed at improving vehicle fuel efficiency, energy efficiency, and enhancing energy conservation. For example, the Pavley I standards focus on transportation fuel efficiency. The gradual increased use of electric cars powered with cleaner electricity will reduce consumption of fossil fuel. Vehicle miles traveled are expected to decline with the continuing implementation of Senate Bill 743, resulting in less vehicle travel and less fuel consumption. In the renewable energy use sector, representative legislation for the use of renewable energy includes, but is not limited to, Senate Bill 350 and Executive Order B-16-12. In the building energy use sector, representative legislation and standards for reducing natural gas and electricity consumption include, but are not limited to, Assembly Bill 2021, CALGreen, and the California Building Standards Code.

The California Building Standards Code is enforceable at the project level. The California Energy Code (California Code of Regulations, Title 24, Part 6), which is incorporated into the California Building Standards Code, was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Code is updated every three years by the California Energy Commission as the Building Energy Efficiency Standards to allow consideration and possible incorporation of new energy efficiency technologies and construction methods. California's energy code is specifically designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings.

The Green Building Standards Code (also known as CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, was most recently updated in 2025 and became effective January 1, 2026. These comprehensive regulations are intended to achieve major reductions in interior and exterior building energy consumption.

A project could be considered to result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy if its energy demand is extraordinary relative to common land use types, its gross energy demand is excessive relative to total demand in San Benito County, and/or it fails to comply with energy efficiency/conservation regulations that are within the applicant's control. The project is an agricultural use consistent with the General Plan. Based on data provided by the project applicant, approximately 30 percent of the applicant's company workforce currently carpool together at an existing facility elsewhere and it is assumed employees of the proposed project would continue to carpool together. From a land use perspective, project employee carpooling can result in lower VMT and lower transportation fuel demand, which is the case for the proposed project. The project energy demand would not be excessive relative to total demand and agricultural use is not an inherent source of

wasteful energy demand. The combined heating and power units would use heat from power generation to air condition the greenhouses and other facility operations in an efficient manner. The project applicant would be required to comply with the primary state regulatory requirements for reducing building energy demand found in Title 24 of the current California Building Code and with CALGreen requirements. The proposed project would consume energy, but it would not be inefficient, wasteful, or unnecessary. Therefore, the impact would be less than significant.

b. CALGreen requires the proposed project be built to the Building Energy Efficiency Standards in effect at the time building permits are issued. By incorporating energy efficiency and renewable energy measures per the Building Energy Efficiency Standards, and incorporating green building features per the CALGreen standards, the project would comply with existing state and local energy standards and would not conflict with or obstruct a state or local plan for energy efficiency.

7. GEOLOGY AND SOILS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	(1) 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?	☐	☒	☐	☐
	(2) Strong seismic ground shaking?	☐	☒	☐	☐
	(3) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
	(4) Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Comments:

Butano Geotechnical Engineering Inc. prepared the *Geotechnical Investigation Design Phase for 2370 Shore Road, Hollister, San Benito County, California* ("geotechnical investigation") for the proposed project, which is included as Appendix E. The report presents the results of the geotechnical investigation to evaluate soil and groundwater conditions at the project sites, geotechnical

engineering recommendations for use in design of specific construction elements, provides criteria for site preparation and engineering fill construction (Butano Geotechnical Engineering Inc. 2025, p. 3).

Additionally, Earth Systems Pacific prepared the *Geotechnical Engineering Report Hippo Harvest Development 2370 Shore Road Hollister, California* ("geotechnical engineering report") for the proposed project, which is included as Appendix F. The report supplements the geotechnical investigation prepared by Butano Geotechnical Engineering Inc. by including the results of subsurface exploration and laboratory soils testing and presenting preliminary geotechnical engineering recommendations (Earth Systems Pacific 2025, p. 2).

a. Potential impacts from exposure to geologic risks are as follows:

(1) Fault Rupture and (2) Seismic Ground Shaking. San Benito County is a region of high seismic activity. Major faults showing evidence of earthquake activity within the past 200 years include the Calaveras fault, San Andreas fault, Quien Sabe fault, Zayante-Vergeles fault, and Ortigalita fault. The project site is approximately 0.2 miles northwest of the Calaveras fault, 3.5 miles northeast of the Sargent fault, and 7.8 miles northeast of the San Andreas fault (Earth Systems Pacific 2025, p. 4). The southeastern portion of the project site is partially located within the Calaveras Fault Zone and Alquist-Priolo Fault Zone (Butano Geotechnical Engineering Inc. 2025, p. 8) (California Department of Conservation 2025). Greenhouses placed within these fault zones could be subject to damage or destruction caused by discrete faulting during a seismic event or gradual creep movement (Butano Geotechnical Engineering Inc. 2025, p. 8-9). It is also reasonable to expect that the project area would be subject to intense ground shaking during an earthquake. Ground shaking and ground failure can result in structural failure and collapse, local damage to underground utilities, and the cracking of paved areas, presenting a hazard to people and structures. Implementation of Mitigation Measure GEO-1 would reduce impacts associated with rupture of a known earthquake fault and strong seismic ground-shaking to a less-than-significant level.

Mitigation Measure

GEO-1 The project developer shall include the recommendations presented in the *Geotechnical Investigation Design Phase for 2370 Shore Road, Hollister, San Benito County, California* by Butano Geotechnical Engineering Inc., and in the *Geotechnical Engineering Report Hippo Harvest Development 2370 Shore Road Hollister, California* by Earth Systems Pacific in the project plans, and the recommendations shall be implemented during construction of the project.

(3) Liquefaction. Soil liquefaction is a state of soil particles suspension caused by a complete loss of strength when the effective stress drops to zero. Liquefaction usually occurs under vibratory conditions such as those induced by seismic event. The geotechnical investigation and geotechnical engineering report evaluated the potential for soil liquefaction at the project site during a seismic event and found that the soils at the project site are potentially liquefiable (Butano Geotechnical Engineering Inc. 2025, p. 8) (Earth Systems Pacific 2025, p. 4). The location of the proposed processing building was

analyzed for liquefaction potential, but a detailed liquefaction analysis was not performed by the geotechnical consultants for the greenhouses as they are not considered habitable structures (Butano Geotechnical Engineering Inc. 2025, p. 7). Due to the shallow potential for liquefaction, the probability of liquefaction hazards to occur at the site is moderate to high. Therefore, implementation of Mitigation Measure GEO-1, presented previously, would be required to ensure that impacts associated with liquefaction are less than significant.

(4) Landslides. The proposed project site is flat and there are no open-slope faces near the proposed project site. Therefore, the potential for landslides is low.

b. Construction activities involving demolition, excavation, and grading expose soils to wind, water, and other eroding elements. The proposed project includes demolition and some grading at the project site, which could result in erosion.

The project would also disturb more than one acre of soil and, therefore, is required by the Central Coast Regional Water Quality Control Board under the County's National Pollutant Discharge Elimination System program to implement construction-related soil erosion prevention measures (e.g., watering for dust control and treating exposed slopes and material stockpiles). Additionally, the project developer would be required to comply with the applicable regulations outlined in County Code Chapter 19.17, Grading, Drainage, and Erosion Control, which states that an erosion and drainage control plan is required with all applications for grading permits.

Compliance with the applicable state and local regulations identified above would ensure that impacts associated with erosion would be less than significant.

c. According to the geotechnical report and geotechnical investigation, the site soils generally consist of a mixture of sand, clay, silt, and random mixtures thereof. The depth to groundwater varies from and 7 to 10 feet (Earth Systems Pacific 2025, p. 6) across the proposed project site. There may be variation in groundwater depth due to seasonal changes, including variations in rainfall, temperature, and recharge, and groundwater levels should not be considered constant. Groundwater levels encountered in the borings appear to not be representative of regional groundwater levels and possibly indicate perched groundwater conditions at the site (Earth Systems Pacific 2025, p. 6).

Although the potential for landslides and lateral spreading to occur at the site is low, the risk of liquefaction is moderate to high. Therefore, implementation of Mitigation Measure GEO- 1 would ensure that impacts associated with soil instability are less than significant.

d. According to the geotechnical engineering report, the near surface soils at the site have low shrinkage/swelling potential (Earth Systems Pacific 2025, p. 8). Therefore, impacts associated with expansive soils are not anticipated to occur.

e. The project proposes a new septic wastewater treatment system and leach field. The State Water Resources Control Board requires a permit for all new or replacement septic systems, either through a local jurisdiction or from the Central Coast Water Board. The

State Water Resources Control Board *Onsite Wastewater Treatment Systems (OWTS) Policy*, amended in April 2023, identifies tiers for OWTS based on if the septic system is existing, new, or a replacement and if the jurisdiction has an approved Local Agency Management Plan (LAMP). Each tier includes specific siting, design standards, and construction and installation standards that must be met for permit approval of OWTS.

San Benito County does not have an approved LAMP (California State Water Resources Control Board 2025) and, therefore, the proposed project is subject to Tier 1 of the OWTS Policy and must meet the minimum site and design standards. Compliance with the OWTS Policy would help ensure the proposed project would not result in adverse environmental impacts related to OWTS. Additionally, the proposed project would be required to comply with County Code Section 23.31.082, which requires that the on-site sewer system meet the requirements of the Central Coast Regional Water Quality Control Board and U.S. Department of Health, Education, and Welfare.

The existing single-family residence on the project site utilizes an OWTS and, therefore, development of the proposed project and a new OWTS would not be inconsistent with existing uses on the property. Therefore, compliance with applicable state and federal regulations would ensure that impacts are less than significant.

f. There are no unique geologic features within the project site. Therefore, the proposed project would not have an impact on a unique geological feature.

Paleontological resources, including a range of plant and animal fossil remains, have been encountered at many locations within San Benito County, including Tumey Gulch, Griswold Hills, Lariaus Creek, San Carlos Creek, the Bolsa Valley, Tres Pinos Creek, the San Benito River Valley, and within formations, including the Moreno and Tremblor Formations and the Panoche Formation within the Panoche-Coalinga area (General Plan EIR, p. 9-25). There are no known paleontological resources within the boundaries of the project site; however, it is possible that undiscovered paleontological resources exist within the project site. Disturbance of paleontological resources would be considered a significant impact. Implementation of Mitigation Measure GEO-2 would ensure that impacts to paleontological resources are less than significant.

Mitigation Measure

GEO-2 Due to the possibility that buried paleontological resources might be discovered during construction, the following language shall be included on all construction documents and on any permits issued for the project site, including, but not limited to, grading and building permits associated with proposed project:

> "If paleontological resources are unexpectedly discovered during construction, work shall be halted immediately within 50 meters (160 feet) of the find, and the Planning Department notified, until it can be evaluated by a qualified professional paleontologist. If the find is determined to be significant, an appropriate resource recovery shall be formulated, with the concurrence of the San Benito County, and implemented."

8. GREENHOUSE GAS EMISSIONS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Comments:

This section is based on the *Hippo Harvest Air Quality and Greenhouse Gas Emissions Assessment – Hollister, San Benito County, California* ("air quality and greenhouse gas emissions assessment") dated January 21, 2026 prepared by Illingworth & Rodkin, Inc. to document potential air quality and greenhouse gas (GHG) emissions impacts associated with the proposed project. The air quality and greenhouse gas emissions assessment, including results of emissions modeling using the California Emission Estimation Model (CalEEMod), is included as Appendix B.

a. Neither the County nor MBARD have developed or adopted a threshold of significance for GHGs from land use development projects, such as the proposed project. In the absence of a local qualified plan, lead agencies may defer to plans and thresholds of other agencies. In lieu of an available qualified plan, the Bay Area Air Quality Management District (BAAQMD) thresholds were utilized for evaluating project impacts. The BAAQMD thresholds are intended to address the consistency of project with the State's goals to reduce emissions to 40 percent below year 1990 levels by 2030 and carbon neutrality by 2045. The threshold is 10,000 MT CO_2e for projects with stationary sources of GHG emissions. The thresholds of significance considered for GHG emissions in this initial study are:

1. Meet State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; and

2. Emissions from stationary sources permitted by the air district must not exceed 10,000 metric tons per year (Illingworth & Rodkin, Inc. 2026a, p. 25).

Detailed GHG emissions thresholds and modeling results are presented in Appendix B.

GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal.

Table 4, Annual Project Greenhouse Gas Emissions, summarizes annual construction and operational GHG emissions resulting of the proposed project.

Table 4 Annual Project Greenhouse Gas Emissions

Source Category	Proposed Project (MT CO_2e)[1]
Construction	
Year 2026	300
Year 2028	698
Year 2029	117
Operation in 2030	
Mobile	196
Area	1
Energy Consumption (from CalEEMod)	311
Water Usage	10
Solid Waste Generation	13
Refrigerants	199
Off-Road Equipment	12
Transportation Refrigeration Units	44
Emergency Diesel Generator	1
Combined Heat and Power Units (3)	8,126
Total Land Use	785
Total Stationary	8,127

SOURCE: Illingworth & Rodkin, Inc. 2026a
NOTE: Expressed in metric tons of carbon dioxide equivalent per year.

Construction Greenhouse Gas Emissions

Neither the County nor MBARD have an adopted threshold of significance for construction-related GHG emissions (Illingworth & Rodkin, Inc. 2026a). MBARD does not specifically recommend best management practices to reduce GHG emissions during construction where feasible and applicable. Industry-accepted best management practices include using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment for at least 15 percent of the fleet, using local building materials of at least 10 percent, and recycling or reusing at least 65 percent of construction waste or demolition materials. Projected construction-related GHG emissions are presented for informational purposes only.

Operational Greenhouse Gas Emissions

The combined heat and power units dominate the project emissions inventory at 8,126 MT of CO_2e, followed by energy at 311 MT of CO_2e, and refrigerant sources at 199 MT of CO_2e. Transportation (mobile) sources, transportation refrigeration units,

solid waste sources, off-road equipment, water, area sources, and the emergency diesel generator contain the remaining 267 MT of CO_2e balance of emissions. The total annual land-use operational GHG emissions are forecast at 785 MT of CO_2e in 2030, and total annual stationary-source GHG emissions are forecast at 8,127 MT of CO_2e, which includes 1 MT of CO_2e for the emergency diesel generator.

Stationary Sources. The proposed project would utilize three 1-MW combined heat and power microturbine generator units to convert natural gas into electrical power; the units would operate for 13 hours each day for 365 days per year. The emergency diesel generator is assumed to operate 50 hours per year. The combined heat and power units and the diesel generator would be subject to permitting by MBARD. Although the combined heating and power units will use natural gas, the units will be subject to the stationary source threshold.

Land Use Sources. The primary land use-associated sources of GHG emissions are energy consumption, transportation (mobile) sources, refrigerants, and transportation refrigerated units. The CalEEMod modeling results presented in Appendix B do not incorporate future regulations that would reduce GHG emissions, and the CalEEMod results are based on regulations in place in 2020 for on-road vehicles and current emission rates of electricity providers. Under new State laws, these emissions are anticipated to decrease substantially beyond those levels predicted by CalEEMod (Illingworth & Rodkin, Inc. 2026a).

As stated in Section 6.0, Energy, under checklist question "a," the proposed project would be required to comply with the County's building codes and CALGreen and Title 24 building code requirements at the time of permitting. The combined heating and power units would use heat from power generation to air condition the greenhouses and other facility operations in an efficient manner. The central processing building would use electricity for energy and would not include natural gas.

The proposed project would result in 102 daily trips, which is less than the 110-trip threshold for small developments and would not have a significant impact on VMT. The proposed project would include EV charge stations and EV ready parking spaces, as well as electric plug-in outlets at loading docks.

The proposed project would be consistent with reducing GHG emissions in order to meet 2030 and 2045 State goals, and stationary-source emissions from the proposed project would be below the threshold of 10,000 MT of CO_2e per year. Therefore, impacts associated with GHG emissions would be less than significant.

b. The California Air Resources Board's *2022 Scoping Plan for Achieving Carbon Neutrality* is the State's latest plan to achieve targets for carbon neutrality and reduce greenhouse gas emissions by 85 percent below 1990 levels no later than 2045 (California Air Resources Board 2022). The proposed project would be required to adhere to the statewide programs and regulations identified by the *2022 Scoping Plan for Achieving Carbon Neutrality* and implemented by State, regional, and local agencies to achieve the statewide GHG

reduction goals of AB 32, SB 32, and AB 1279. Project conformance with the County of San Benito building codes, the latest CALGreen codes, and the latest Title 24 building code requirements, which aim to reduce GHG emissions and promote efficient use of energy, would ensure that the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs and no impact would occur.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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, create a significant hazard to the public or the environment?	☐	☐	☐	☒
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 a public-use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Comments:

a. According to the project materials, hazardous materials are manufactured or used on-site such as cleaning agents for the facilities and diesel fuel storage trucks. Transportation, storage, use, and disposal of hazardous materials during construction and operation of the proposed project would be required to comply with applicable federal, state, and local statutes and regulations. Additionally, the project site is not located in a highly populated area. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials facilities.

b. Agricultural production has been a long-term use on the majority of the project site and, therefore, site soils may contain agricultural chemicals and pesticides at concentration that could result in a public hazard if accidentally released during ground-disturbing construction activities. Therefore, the following mitigation is required to ensure that impacts associated with the release of hazardous materials into the environment are less than significant.

Mitigation Measure

HAZ-1 Prior to issuance of any ground-disturbing permit, the applicant shall provide a Phase I Environmental Site Assessment to the County Planning Division for the project phase specifically outlined in the ground-disturbing permit. If no hazardous materials exist within the site soils, no further mitigation is required.

If hazardous materials are found within the site soils, the applicant shall prepare a Phase II Environmental Site Assessment prior to any ground-disturbing activities. All recommendations provided within the Phase II Environmental Site Assessment shall be incorporated by the project applicant.

c. The nearest school to the project site is the Spring Grove School, located approximately 5.3 miles southeast of the project site. No schools are located within a quarter mile of the project site. Therefore, the proposed project would not emit or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. The following lists were reviewed:

- Hazardous Materials Waste and Substances Sites from the Department of Toxic Substances Control EnviroStor Database (Department of Toxic Substances Control 2025);
- Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker Database (State Water Resources Board 2025);
- Solid Waste Disposal Sites Identified by Water Board with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit (California Environmental Protection Agency 2025a);
- "Active" Cease and Desist Order and Cleanup and Abatement Orders from Water Board (California Environmental Protection Agency 2025b); and
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the Department of Toxic Substances Control (California Environmental Protection Agency 2025c).

The project site is not identified on any of these lists. Therefore, the proposed project would not create a significant hazard to the public or the environment.

e. The nearest public-use airport to the project site is the Frazier Lake Airpark, located 0.66 miles north of the project site. According to Figure 3, General Plan Land Use, and Figure 5a, FAR Part 77 Surfaces, of the *Airport Land Use Compatibility Plan Frazier Lake Airpark* (ALUCP), the project site is within the Federal Aviation Regulation Part 77

Surfaces area, which assesses obstructions to navigation and establishes a height limitation of 301 feet above sea level. However, the elevation of the project site is 164 feet above sea level and the maximum height of the proposed project would be 30 feet and is not anticipated to result in an obstruction to navigation (Google Earth 2025) (County of San Benito 2019). Additionally, as shown in Figure 4, Noise Contours, of the ALUCP, the project site is not within a designated aircraft noise exposure contour. According to the ALUCP, the potential for aircraft accidents in the area of the project site is relatively low and the need for land use restrictions are minimal (County of San Benito 2019, Figure 6). Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area.

f. The unincorporated San Benito County emergency evacuation/response plans are coordinated with the *San Benito County Operational Area Emergency Operations Plan*. It is assumed that the County's primary evacuation routes would be along State Route 25 and State Route 156. The proposed project is located approximately 1.4 miles northeast from State Route 25 and approximately 3.6 miles west from State Route 156. The proposed project would not impair or obstruct these evacuation routes.

   Shore Road would provide primary access to the project site, with two additional access points on Frazier Lake Road. Neither roadway is considered an emergency evacuation route. Evacuation information is developed and directed in real time in response to the unique conditions of the emergency, which would include consideration of the length of time to adequately evacuate areas through implementation of County of San Benito emergency plans. The proposed project is required to undergo review by the County Fire Department (per General Plan Policy PFS-4.7) and other applicable agencies, which would ensure that the project does not impede or conflict with an adopted emergency response or evacuation plans. Therefore, the proposed project would not impede or conflict with any adopted emergency response or evacuation plans.

g. According to the California Department of Forestry and Fire Protection's maps for Fire Hazard Severity Zones in State Responsibility Areas and Local Responsibility Areas in San Benito County, the project site is not located within a fire hazard severity zone in a local or state responsibility area. The project site is surrounded by agricultural uses (row crops) and rural single-family residential uses. Therefore, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

10. HYDROLOGY AND WATER QUALITY

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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:				
(1)	Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(2)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(3)	Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(4)	Impede or redirect flood flows?	☐	☐	☐	☒
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Comments:

a. **Construction Water Quality Impacts.** The State Water Resources Control Board has implemented a National Pollutant Discharge Elimination System (NPDES) Program to control and enforce storm water pollutant discharge reduction per the Clean Water Act. The Central Coast Regional Water Quality Control Board issues and enforces the NPDES permits for discharges to water bodies in San Benito County.

Development of the project site has the potential to increase discharge of storm water pollutants during construction activities. Projects disturbing more than one acre of land during construction, such as the proposed project, are required to file a notice of intent to be covered under the State NPDES Construction General Permit for discharges of storm water associated with construction activities. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that details how water quality would be protected during construction activities. The SWPPP must contain a site map(s) that shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography (both before and after construction), and drainage patterns across the project. Best Management Practices, which are detailed within each permit, are to be implemented to protect water quality.

By complying with the Construction General Stormwater Permit requirements, the proposed project would not violate any water quality standards or degrade water quality.

Post-Construction (Operational) Water Quality Impacts. The proposed project would alter existing storm water drainage conditions by replacing undeveloped land with impervious surfaces such as greenhouses and the processing building. The change in surface conditions could result in an increase in storm water runoff relative to existing conditions where a significant portion of storm water percolates though exposed soil back to groundwater. Increases in the rate or volume of storm water delivered into receiving waters can cause erosion of downstream drainage courses.

The project will be designed to retain stormwater on the project site to the greatest extent feasible through the use of the permeable drainage features (e.g., French drains) to assist with keeping stormwater onsite. The project will also be designed to direct excess stormwater to storm drain infrastructure constructed by the project (sheets C5.0.2, C5.1, C7.0-C8.1 of Appendix A). The best management practices that will be implemented to retain stormwater on the project site, as required by General Plan Policy PFS-6.2, are required to meet the post-construction storm water management requirements of the Central Coast Regional Water Quality Control Board, whose primary objective in establishing these requirements is to ensure that land development projects reduce pollutant discharges to the maximum extent practicable and to prevent storm water discharges from causing or contributing to a violation of receiving water quality standards.

Additionally, County Code Section 19.17.009.B.5 requires that detailed plans of all surface and subsurface drainage devices be provided showing the drainage area and the estimated runoff of the area served by any drains. Further, the project is required to comply with General Plan Policy PFS-6.1, which requires that stormwater drainage facilities are properly designed, sited, constructed, and maintained to efficiently capture and dispose of runoff and minimize impacts to water quality.

The project includes several proposed storm detention ponds at the northern end of the project site; these detention ponds are required to be consistent with General Plan Policy

PFS-6.5, which requires that projects that include an on-site detention/retention facility and/or velocity reducers maintain pre-development runoff flows. Additionally, the project's proposed storm detention pond will be required to comply with General Plan Policy PFS-6.6, which states that the stormwater detention basin must be designed to ensure public safety, be visually unobtrusive, and provide temporary or permanent wildlife habitat.

Required compliance with post-construction water quality performance standards as well as applicable General Plan policies would ensure that applicable water quality standards would be met. The project's impact on water quality would be less than significant.

b. **Groundwater Supplies.** Water use for the proposed project will be provided by an existing private groundwater well located within the project site. The depth to groundwater varies from 5.5 to 9 feet across the proposed project site, and there may be variation in groundwater depth due to seasonal changes. According to the Groundwater Basin Boundary Assessment Tool by the Department of Water Resources (California Department of Water Resources 2025a), the project site lies within the Bolsa Management Area of the North San Benito subbasin of the Gilroy - Hollister Valley Groundwater Basin, which covers approximately 131,000 acres of land in San Benito County. The San Benito County Water District's (SBCWD) *Annual Groundwater Report Water Year 2024* prepared by Todd Groundwater reports that the net change in the balance of groundwater storage in the Bolsa Management Area for the year 2024 is -1,663-acre feet (Todd Groundwater 2025, p. 26). Inflows in the Bolsa Management Area were within normal ranges and outflows were slightly higher than recent years due to increased groundwater discharge to streams. The Bolsa Management Area was the only management area where storage decreased in water year 2024 (September 2023 to September 2024); however, the water storage remains above the low levels during water year 2022 (Todd Groundwater 2025).

Table 5, Water Demand Comparison, provides a calculation of the project's water demand compared to the water demand under existing conditions using an average population density of 3.11 persons per household (California Department of Finance 2025), water demand factors from the General Plan EIR (residential and industrial uses), the SBCWD *2020 Agricultural Water Management Plan* (agricultural uses), and information provided by the applicant (processing building and greenhouses).

As presented in the table below, the proposed project is estimated to result in an 80 acre-feet per year reduction in water demand compared to existing conditions at the site. The proposed project would use groundwater for agricultural uses, including cultivation and processing of leafy greens on land consisting of existing row crops, and would be required to comply with SBCWD groundwater management regulations. Because the proposed project is estimated to result in a decrease in water demand compared to the existing water demand at the site, the proposed project is not anticipated to substantially decrease groundwater supplies such that the project may impede sustainable groundwater management of the basin.

Table 5 Water Demand Comparison

Uses[1]	Demand Factor	Water Demand	Total[3]
Current Site			191 acre-feet per year
One single-family dwelling (3 people)	0.165 acre-feet per year/capita	0.50 acre-feet per year	
68 acres of row crops	2.8 acre-feet per year/acre	190.4 acre-feet per year	
Proposed Project			111 acre-feet per year
Processing building		1.7 acre-feet per year[2]	
Greenhouses		39.2 acre-feet per year[2]	
25 acres of row crops	2.8 acre-feet per year/acre	70 acre-feet per year	
			<80> acre-feet per year

SOURCE: California Department of Finance 2025; San Benito 2035 General Plan EIR; SBCWD 2020 Agricultural Water Management Plan; October 6, 2025 correspondence with David Macdonald, SBCWD; Victor Tafoya, email message, October 13, 2025.

NOTES:

1. Because of the variety of crops grown on the project site, an average crop demand of 2.8 acre-feet per year was used (SBCWD 2020 Agricultural Water Management Plan).
2. Provided by applicant.
3. Totals are rounded.

Groundwater Recharge. The proposed detention ponds located on the northern portion of the project site would temporarily hold stormwater runoff and allow infiltration of stormwater into the surrounding soils, contributing to groundwater recharge. Therefore, the proposed project would not substantially interfere with groundwater recharge.

c. The project site does not contain any streams or rivers. The project site consists of a single-family residence, barn, appurtenances, and row crops. The proposed project would increase the amount of impervious surfaces due to the construction of greenhouses, a processing building, and driveway; therefore, the project would alter the existing drainage pattern of the site. Potential impacts from the increase in impervious surfaces are discussed below.

(1) Erosion. Refer to the discussion under checklist question "b" within Section 7.0, Geology and Soils.

(2) Flooding. The proposed project would increase the amount of impermeable surface on the site. Consequently, the volume of stormwater runoff would increase under post-development conditions. The increased runoff could contribute to localized flooding on- or off-site if the project's stormwater infrastructure and best management practices on the project site are not designed properly to accommodate the increased flows.

The application materials state that the proposed project could construct drainage channels, detention ponds, and/or swales at the project site during Phase 1. Additionally, because the project site will be required to be designed to accommodate maximum daily rainfall events, which could otherwise cause flooding at the site, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

(3) Runoff. Development of the proposed project would create stormwater runoff. The grading plan (sheet C2.0 in Appendix A) indicates that stormwater from the proposed project will drain into drainage channels, detention ponds, and/or swales located on the northern boundary of the project site. Compliance with General Plan Policy PFS-6.5, discussed previously, would ensure that the project does not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

(4) Flood Flows. As discussed under checklist item "d" below, the project site is located within an area of minimal flood hazard. Therefore, development of the proposed project would not impede or redirect flood flows.

d. The project site is not located within a tsunami or seiche hazard zone due to its distance from large bodies of water.

According to the Federal Emergency Management Agency's (FEMA) Flood Map Service Center, the project site is located within an area of minimal flood hazard and, therefore, implementation of the proposed project would not risk release of pollutants due to project inundation.

e. The Sustainable Groundwater Management Act is a State law that requires local agencies to form Groundwater Sustainability Agencies (GSA) and for those agencies to develop and implement Groundwater Sustainability Plans (GSP) to manage groundwater and mitigate basin overdraft within 20 years (California Department of Water Resources 2025b). The project site is located within the Gilroy - Hollister Valley Groundwater Basin. SBCWD is a GSA tasked with monitoring and managing the groundwater of the North San Benito subbasin and the *North San Benito Subbasin Groundwater Sustainability Plan* is the approved GSP which includes goals, projects, and actions to achieve sustainable groundwater management (Todd Groundwater 2021, p. ES-1 and p. 1-2). Projects are substantial efforts that involve an increase in water supply or a reduction in demand; projects include developing surface water storage, expanding managed aquifer recharge, enhancing conjunctive use, and enhancing water conservation. Actions provide a framework for groundwater management including establishing GSP procedures or policies, filling data gaps with scientific studies or improved monitoring, and providing for funding; actions include improved monitoring and data management, developing response plans, enhancing water quality improvement programs, reducing potential impacts to groundwater-dependent ecosystems, providing long-term basin-wide funding mechanisms, and providing further administration, monitoring, and reporting (Todd Groundwater 2021, p. 8-8). SBCWD last updated and adopted its groundwater sustainability plan on November 17, 2021 and the plan was approved by the California Department of Water Resources in July 2023. Groundwater would continue to be managed by SBCWD and implementation of the water management plans and the GSP. The groundwater basin has been managed sustainably, and data in the GSP indicates the groundwater basin has not exceeded significant thresholds for chronic lowering of groundwater levels and depletion of groundwater storage (Todd Groundwater 2021,

p. 6-7) (Todd Groundwater 2025, p. 69 and 71). The project would comply with applicable regulations associated with stormwater flows and runoff and provides detention ponds that would retain stormwater on-site and allow for stormwater infiltration into the groundwater table. The project will be designed to include a drainage system that also incorporates drainage channels and/or swales that contribute to the sustainability goals of the groundwater sustainability plan. Therefore, the project would not conflict with or obstruct implementation of a sustainable groundwater management plan.

The *Water Quality Control Plan for the Central Coastal Basin* (hereinafter "Basin Plan") shows how the quality of the surface and ground waters in the Central Coast Region should be managed to provide the highest water quality reasonably possible. The Regional Water Quality Control Board implements the Basin Plan by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose waste discharges can affect water quality. These requirements can be either State Waste Discharge Requirements for discharges to land, or federally delegated NPDES permits for discharges to surface water. As discussed under checklist item "a" above, the project applicant would be required to obtain a State NPDES Construction General Permit for development on the project site. By complying with the Construction General Stormwater Permit requirements, the proposed project would not conflict with the Basin Plan.

11. LAND USE AND PLANNING

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Cause any 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?	☐	☐	☐	☒

Comments:

a. The project site is located in unincorporated San Benito County, approximately three miles northwest of the City of Hollister and approximately four miles southeast of the City of Gilroy. Existing use on the project site includes a single-family residence, barn, appurtenances, and row crops. Land uses adjacent to the project site include agricultural land and rural residences. The proposed project would not physically divide an established community.

b. The various environmental topics in this initial study address applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. This initial study shows that for those environmental topics (e.g., air quality, biological resources, greenhouse gas emissions, etc.), there are either no impacts, less than significant impacts, or significant impacts that can be mitigated to a less-than-significant level. Therefore, the project would not create any 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.

12. MINERAL RESOURCES

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Result in 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 in a local general plan, specific plan, or other land-use plan?	☐	☐	☐	☒

Comments:

a-b. According to the General Plan, the County of San Benito recognizes areas classified as Mineral Resource Zone 2 (MRZ-2) or Scientific Zone (SZ) as mineral resources of statewide and regional significance (p. 8-9). The project site is in an area classified "MRZ-1: Areas where available geologic information indicates that little likelihood exists for the presence of significant construction aggregate resources" by the Department of Conservation. Therefore, the proposed project would not 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 nor would the project result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan.

13. NOISE

Would the project result in:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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 in applicable standards of other agencies?	☐	☐	☒	☐
b.	Generation of excessive ground-borne vibration or ground borne noise levels?	☐	☐	☐	☒
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, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Comments:

a. **Construction Noise**. Construction activity would generate temporary noise in the project site vicinity, exposing nearby sensitive receptors to increased noise levels. The nearest sensitive receptor (residence) is a single-family residence, located approximately 50 feet east of project site. The next closest residence is located approximately 130 feet west of the project site (Google Earth 2025). Project construction noise would be generated by heavy-duty diesel construction equipment used for site preparation, grading, and building construction.

The applicant would be required to comply with General Plan Policy HS-8.1, which requires new development to comply with noise standards shown in Table 9-2 of the General Plan through proper site design, building design, and building construction practices; General Plan Policy HS-8.3, which requires that construction activities be limited to the 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, and no construction shall be allowed on Sundays or federal holidays. Further, the applicant would be required to comply with General Plan Policy HS-8.11, which requires new projects to include appropriate noise mitigation measures to reduce noise levels with County standards established in Table 9-2 of the General Plan. Lastly, General Plan Policy HS-8.12 requires all construction projects to be constructed within 500 feet of sensitive receptors to develop and implement construction noise control plans that consider available noise controls in order to reduce construction noise levels as low as practical, designate a disturbance coordinator responsible for responding to local complaints about construction noise, and implement reasonable measures to correct the problem.

Compliance with the abovementioned General Plan Policies and County Code noise regulations identified in County Code Section 19.39.030 Maximum Permissible Sound Pressure Levels and Section 19.39.051 Exemptions for construction would ensure that the project's impact associated with temporary construction activities would be less than significant.

Operational Noise. The proposed project includes the construction and operation of greenhouses, a processing building, and associated parking. Noise generated from operation of the proposed project would include sources such as agricultural equipment, ventilation fans, employee vehicles, and trucks.

The proposed project would be required to comply with General Plan Policy HS-8.11, which requires new projects to include appropriate noise mitigation measures to reduce noise levels with County standards established in Table 9-2 of the General Plan. The proposed project would also be required to comply with the noise regulations identified in County Code Section 19.39.030 Maximum Permissible Sound Pressure Levels and Section 19.39.051 Exemptions. Further, the proposed project would not result in ambient noise levels inconsistent with adjacent agricultural uses.

The project's required compliance with General Plan policies and applicable County Code sections would ensure that the project does not generate a significant, permanent increase in ambient noise levels in the vicinity of the project in excess of standards.

b. Standard construction methods are anticipated, and these methods do not involve significant vibration-causing activities. Vibration levels generated during project construction activities may at times be perceptible at neighboring land uses, but vibration levels would not be excessive causing cosmetic or structural damage to buildings. Long-term operational activities associated with the proposed project also would not involve the use of any equipment or processes that would result in potentially significant levels of ground vibration.

c. The nearest public-use airport to the project site is the Frazier Lake Airpark, located 0.66 miles north of the project site. As described in Section 13.0, Hazards and Hazardous Materials under checklist item "e," the project site is not within a designated aircraft noise exposure contour. Therefore, the proposed project would not expose people residing or working in the project to excessive noise levels from airport or airstrip operations.

14. POPULATION AND HOUSING

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Comments:

a. The proposed project consists of greenhouses, a processing building, and solar panels between rows of greenhouses. Therefore, the project would not induce substantial unplanned population growth in the area. New infrastructure, such as solar power, septic wastewater treatment system and leach field, and a stormwater system would be constructed to serve the site; however, these improvements would not induce unplanned growth indirectly. Therefore, the proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly.

b. The project proposes to demolish the existing buildings on-site, one of which is a single-family residence. Demolition of one single-family residence does not constitute the displacement of substantial numbers of existing people or housing. Therefore, development of the project would not displace a substantial number of people or housing and would not necessitate the construction of replacement housing elsewhere.

15. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or 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 following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

Comments:

a. The City of Hollister provides fire protection services to the County of San Benito, with the current contract term running through June 30, 2029. The nearest fire station is Hollister Fire Department Station 3 located at the Hollister Airport, approximately four miles southeast of the project site.

The proposed project would employ approximately 60 people. General Plan Policies PFS-1.11 requires new development to pay its fair share of the public facility and service costs and PFS-1.12 requires new development to mitigate project impacts associated with public facilities and services. The proposed project would be required to pay its fair share of the development impact fees for fire protection facilities, which helps to reduce the project's contribution to cumulative impacts on fire protection facilities.

Compliance with the abovementioned General Plan policies would ensure that the proposed project's contribution to impacts associated with the construction or expansion of fire protection facilities, if and when necessary, would be less than significant.

b. The San Benito County Sheriff's Department provides police protection services to unincorporated San Benito County, including the project site, which is designated as Responsibility Area 4 (San Benito County Office of the Sheriff, 2025). The San Benito County Sheriff's Department is headquartered at 2301 Technology Parkway in Hollister, approximately 4.5 miles from the project site. The proposed project would employ approximately 60 people. General Plan Policies PFS-1.11 and PFS-1.12, discussed previously, require that the proposed project pay its fair share of the development impact fees for police protection facilities, which helps to reduce the project's contribution to cumulative impacts on police protection facilities.

Compliance with the abovementioned General Plan policies would ensure that impacts associated with the construction or expansion of police protection facilities are less than significant.

c. The proposed project does not involve residential uses and would not result in the addition of school-age children. The proposed project would be required to pay its fair share of development impact fees for school impacts. Therefore, the proposed project would not result in the need to construct new or physically alter existing school facilities.

d-e. The proposed project does not involve the generation of residents that would utilize parks or other facilities within the County; therefore, the proposed project would not result in the need to construct new or physically alter existing park or other public facilities.

16. RECREATION

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☐	☒

Comments:

a-b. The proposed project consists of agricultural use (greenhouses) and industrial use supporting agriculture (processing building) at the project site. The proposed project would not result in the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, no recreational facilities are proposed, and its operation would not require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

17. TRANSPORTATION

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b.	Conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d.	Result in inadequate emergency access?	☐	☐	☐	☒

Comments:

Hexagon Transportation Consultants, Inc. prepared the *Site Access Evaluation for the Proposed Hippo Harvest Agricultural Facility at 2370 Shore Road in San Benito County, California* ("site access evaluation") for the proposed project, which is included as Appendix G. The site access evaluation estimates the amount of additional traffic that would be added to the roadway system as a result of the proposed project and includes a review of the proposed project site access point to identify any potential deficiencies or safety issues related to the project access point and its effects on Shore Road (Hexagon Transportation Consultants, Inc. 2025a, p. 1).

Additionally, Hexagon Transportation Consultants, Inc. prepared the *VMT Assessment for the Proposed Hippo Harvest Agricultural Facility at 2370 Shore Road in San Benito County, California* ("VMT assessment") for the proposed project, which is included as Appendix H. The VMT assessment presents the results of an analysis of vehicle miles traveled (VMT) to estimate the potential transportation impacts of the proposed project. VMT is the total miles of travel by personal motorized vehicles a project is expected to generate in a day. VMT measures the full distance of personal motorized vehicle-trips associated with the project (2025b, p. 1).

a. **Regional Transportation Plan.** The *San Benito Regional Transportation Plan 2020-2045* includes both a long- and short-range program of strategies and actions that lead to the development of an integrated intermodal transportation system that facilitates the efficient movement of people and goods. The proposed project was reviewed against the transit-related goals and strategies in the Regional Transportation Plan and was found to be consistent.

Transit Facilities. There is no bus service within the immediate project vicinity; the nearest bus stop is located on Central Avenue in Hollister, six miles south of the project site. The project does not propose any transit facilities; however, based on data provided by the project applicant, approximately 30 percent of the applicant's company workforce currently carpool together at an existing facility elsewhere and it is assumed employees of the proposed project would continue to carpool together. General Plan Policy C-3.8 requires new development at densities of one unit per acre or greater to provide funding for or construct transit stops and signs in appropriate locations. Therefore, the project would not result in a significant local adverse effect associated with transit service and would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit.

Roadway Facilities. Primary access to the project site is located on Shore Road with secondary access on Frazier Lake Road. Regional access to the site is provided by San Felipe Road, Fairview Road, State Route 25, State Route 152, and State Route 156. The project does not involve new roadways or expansion of existing roadways.

Approximately 30 percent of the applicant's company workforce currently carpool together at an existing facility elsewhere and it is assumed employees of the proposed project would continue to carpool together. Additionally, the VMT assessment concludes that the project would generate 102 vehicle trips, which is not a significant number of trips that could adversely impact the surrounding roadways. General Plan Policy C-1.5 requires new development to pay its fair share of transportation facility costs. The proposed project would be required to pay its fair share of the development impact fees for transportation facilities, which helps to reduce the project's contribution to cumulative impacts on transportation facilities. The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway facilities.

Bicycle Facilities. There are no bicycle facilities adjacent to the project site. Figure 6-4, Northern San Benito County Existing and Proposed Bikeways, of the *San Benito County Bikeway and Pedestrian Master Plan,* shows no existing bikeways in the project vicinity and a Class III Bike Route on SR 25 located 1.2 miles east of the project site as the nearest proposed facility (San Benito Council of Governments 2009, p. 6-9). The project does not propose bicycle facilities.

Approximately 30 percent of the company's workforce currently carpool together at an existing facility elsewhere and it is assumed employees of the proposed project would continue to carpool together. No General Plan policies associated with bicycle facilities are applicable to the project. The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including bicycle facilities.

Pedestrian Facilities. There are no sidewalks or marked crosswalks in the project site vicinity and the project does not propose any pedestrian facilities.

Approximately 30 percent of the company's workforce currently carpool together at an existing facility elsewhere and it is assumed employees of the proposed project would

continue to carpool together. No General Plan policies associated with pedestrian facilities are applicable to the project. The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including pedestrian facilities.

Compliance with the abovementioned General Plan policies would ensure that impacts associated with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities are less than significant.

b. Pursuant to CEQA Guidelines 15064.3.b and Senate Bill 743, a vehicle miles traveled (VMT) analysis was prepared for the proposed project to evaluate the VMT generated by the proposed project. According to the VMT analysis, the County has not established a VMT standard nor significance criteria for VMT evaluations in San Benito County. As a result, the analysis used state guidance with regard to analysis and significance criteria.

Based on data provided by the project applicant, approximately 30 percent of the company's workforce currently carpool together at an existing facility elsewhere. Therefore, it is assumed that at least 10 employees during each shift (1/3 of all employees) will carpool to work while the remaining employees will drive alone. The VMT analysis concludes that the project would generate a total of 102 daily trips. The 102 daily trips are less than the 110-trip threshold for small developments (2025b). Therefore, the proposed project would not have a significant impact on VMT.

c. Primary access to the facility would be provided via a full access driveway on Shore Road. Access to the greenhouses on the western portion of the project site would be provided by driveways on Frazier Lake Road.

The site access evaluation analyzed the adequacy of the site's access point. The project site has adequate site access and site distance for semi-trailer trucks, and the proposed project is not anticipated to result in queuing or truck turning issues. The site access evaluation states that proposed project would not be required to install right- or left-turn lanes.

Therefore, the proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d. As stated above, primary access to the project site would be provided by a driveway on Shore Road with two secondary access points on Frazier Lake Road; should one or two of the access points be blocked, an alternate access would be available. The proposed project is required to undergo review by the County Fire Department (per General Plan Policy PFS-13.9) and other applicable agencies, which would ensure that the complies with the California Fire Code and other applicable State laws. The project's required compliance with General Plan policies and applicable State laws would ensure that the project would not result in inadequate emergency access.

18. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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, or 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:				
(1) 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), or	☐	☐	☐	☒
(2) 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.	☐	☐	☐	☒

Comments:

a. The CEQA statute as amended by Assembly Bill 52 (Public Resources Code Sections 21073 and 21074) define "California Native American tribe" and "tribal cultural resources." A California Native American tribe is defined as a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission. Public Resources Code Section 21080.3.1 outlines procedures for tribal consultation as part of the environmental review process.

On September 12, 2025, the County sent out offer letters of consultation to Native American tribes traditionally and culturally affiliated with the project area. No requests for consultation were received (Victor Tafoya, email message, October 13, 2025).

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒	☐	☐
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, single-dry and multiple- dry years?	☐	☐	☒	☐
c.	Result in a determination by the wastewater treatment provider, which 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Comments:

a. **Water, Wastewater, and Stormwater Facilities.** The project would utilize an existing private groundwater well located within the project site and construct new water lines to connect to that existing well. The proposed project would construct a private septic wastewater system and leach field and new stormwater infrastructure including drainage channels, detention ponds, and/or swales.

Potentially significant construction impacts associated with the implementation of these infrastructure improvements are identified in the air quality, biological resources, cultural resources, and greenhouse gas emissions sections of this initial study. All such impacts are either less than significant or mitigated to less than significant with implementation of mitigation measures. Please refer to the respective sections for more information.

Electric Power and Natural Gas. The project would connect to existing electric power, and would construct solar panels between rows of greenhouses for additional power generation. The proposed project would use natural gas to power three 1-MW combined heat and power microturbine generator units, which would provide the majority of electrical power and heat to the greenhouses. The proposed project would connect to an existing PG&E natural gas service line along Shore Road.

Therefore, the proposed project would not require relocation or construction of new or expanded electric power or natural gas facilities and no significant environmental effects would occur.

Additional Utilities. The proposed project would connect to existing telecommunication facilities and would not require or result in the relocation or construction of new or expanded facilities which could cause significant environmental effects.

b. As shown in Table 5, Water Demand Comparison, in Section 10.0, Hydrology and Water Quality, under checklist item "b," the estimated water demand of the proposed project is approximately 111 acre-feet of water per year and would result in a decrease of approximately 80 acre-feet of water per year compared to the existing water demand. SBCWD states that the groundwater basin has been managed sustainably and data in the GSP indicates the groundwater basin has not exceeded significant thresholds for chronic lowering of groundwater levels and depletion of groundwater storage (Todd Groundwater 2021, p. 6-7) (Todd Groundwater 2025, p. 69 and 71).

Therefore, it is anticipated that there are sufficient water supplies available to serve the project.

c. The proposed project would construct a new on-site septic wastewater system and would not require wastewater treatment services from a service provider. Therefore, the proposed project is not subject to the capacity limits of service providers. No off-site wastewater system improvements are necessary.

d-e. The proposed project would be served by Recology San Benito County for solid waste services. Construction and demolition activities of the proposed project would be required to comply with a 65 percent debris recycling requirement in accordance with the CALGreen Code. Additionally, the proposed project would work with the Local Enforcement Agency to determine if a compositing permit is required by CalRecycle.

Recology transports solid waste to the John Smith Road Landfill (JSRL), which is owned by the San Benito County Integrated Waste Management Department and operated by Waste Connections, Inc. The JSRL is the only operating active solid waste landfill in San Benito County. The JSRL is located at 2650 John Smith Road, approximately five miles southeast of downtown Hollister, in unincorporated San Benito County. It has a maximum permitted throughput of 1,000 tons per day. As of March 31, 2018, the JSRL has a remaining capacity of approximately 3,499,000 cubic yards. According to available

information from the Central Coast Regional Water Quality Control Board regarding the JSRL, based on current waste disposal rates, the estimated closure date (when capacity is expected to be reached) is 2032 (Victor Tafoya, email message, October 13, 2025).

Using a solid waste disposal generation of 1.85 tons per employee per year (CalRecycle 2025), the processing building is estimated to generate approximately 111 tons of solid waste per year or approximately 0.3 tons of solid waste per day. The existing agricultural uses on-site do not generate solid waste, resulting in an increase in solid waste generation compared to existing conditions.

However, this total amount of solid waste generated per day by the project represents less than one percent of the throughput the JSRL is permitted to accept each day and an even smaller percentage when comparing to the landfill's remaining capacity. The project would also be required to comply with General Plan Policy PFS-7.3, which requires that all new nonresidential development have the necessary on-site facilities for temporary solid waste and recycling storage, handling, and collection prior to issuing building permits.

Given that the project's solid waste generation represents such a small amount of what the landfill accepts each day and its remaining capacity, the project would not 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, and the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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 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?	☐	☐	☐	☒

Comments:

a-d. According to the California Department of Forestry and Fire Protection, the project site is not located within a state responsibility area or lands classified as very high fire hazard severity zones (California Department of Forestry and Fire Protection, 2025). The project would not result in wildfire-related impacts.

21. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Does the project 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 an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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)	☐	☒	☐	☐
c.	Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Comments:

a. As discussed in Section 4.0, Biological Resources, the proposed project has the potential to have a substantial adverse effect to the following special-status wildlife species: burrowing owl, California red-legged frog, merlin, pallid bat, San Joaquin kit fox, Swainson's hawk, Townsend's big-eared bat, white-tailed kite, and nesting birds. The proposed project also has the potential to impact protected wetlands and waterways. Implementation of Mitigation Measures BIO-1 through BIO-8 would reduce potential impacts to a less-than-significant level. Therefore, with implementation of these mitigation measures, the proposed project would not 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; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

As discussed in Section 5.0, Cultural Resources, the project site no known historic resources or unique archaeological resources. However, it is possible that unknown indigenous historic resources or unique archaeological resources and/or Native American human remains could be accidentally uncovered and disturbed during grading and construction activities. In the event that this should occur, Mitigation Measures CUL-1 and CUL-2 are required in order to ensure that potential impacts are less than significant.

Therefore, with implementation of these mitigation measures, the proposed project would not have the potential to eliminate important examples of the major periods of California history or prehistory.

b. The proposed project has the potential to result in cumulatively considerable impacts in the areas of air quality (pollutant emissions and toxic air contaminants), biological resources (potential disturbance to existing habitats and potential wetlands/waterways), geology and soils (earthquake faults, ground-shaking, liquefaction, unstable soils, and paleontological resources), and hazards and hazardous materials (release of hazardous materials from the site soil). However, with the implementation of Mitigation Measures AQ-1 and AQ-2; BIO-1 through BIO-8; GEO-1 and GEO-2; and HAZ-1, impacts would be less than cumulatively considerable.

   As discussed in Section 8.0, Greenhouse Gas Emissions, the proposed project would be required to comply with the County of San Benito building codes, the latest CALGreen codes, and the latest Title 24 building code requirements at the time of permitting. These requirements aim to reduce construction and operations GHG emissions and achieve statewide GHG reduction goals. Proposed project compliance with the requirements mentioned above would aim to achieve statewide GHG reduction goals and would not result in cumulatively considerable GHG emissions.

   As discussed in Section 13.0, Noise, the nature of the proposed project, and because the project would not generate a significant volume of vehicle trips, would not result in the permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the General Plan or County Code Chapter 19.39. Therefore, impacts would be less than cumulatively considerable.

c. The proposed project has the potential to result in adverse environmental effects that could cause substantial adverse effects on human beings from construction-related fugitive dust emissions and construction-related emissions of dust and diesel exhaust. Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce potential impacts to a less-than-significant level.

   As discussed in Section 7.0, Geology and Soils, the project has the potential to result in potential impacts from exposure to geologic risks. Implementation of Mitigation Measure GEO-1 would address impacts resulting from faulting, seismic ground shaking, and liquefaction.

   As discussed in Section 9.0, Hazards and Hazardous Materials, agricultural production has been a long-term use on the majority of the project site and, therefore, site soils may contain agricultural chemicals and pesticides at concentration that could result in a public hazard if accidentally released during ground-disturbing construction activities. Implementation of Mitigation Measure HAZ-1 would ensure that impacts associated with the release of hazardous materials into the environment are less than significant.

E. SOURCES

Environmental Setting

County of San Benito. County of San Benito Web GIS. Accessed on September 10, 2025. https://experience.arcgis.com/experience/eccc7174b6904afe857b91253314c5f0/

Ghadiri, Kimiya, Associate Biologist, and Potter, Vanessa, Registered Professional Archaeologist, EMC Planning Group Inc. Site Visit Conducted on September 5, 2025.

Project Description

Balian Architects, Inc. June 2025. Project Plans.

Construction Data Sheet provided by applicant on December 4, 2025.

Aesthetics

California Department of Transportation. "California State Scenic Highways". Accessed on September 10, 2025. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

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