# RJR Recycling & Transfer Station Condition Use Permit Amendment

County Planning File PLN250019

# CEQA Initial Study

Lead Agency: San Benito County Resource Management Agency, Planning and Land Use Division

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# Table of Contents


1. Introduction ..... 6
   - 1.1 Environmental Setting ..... 7
     - 1.1.1 Surrounding Land Uses ..... 7
   - 1.2 Background ..... 7
     - 1.2.1 Existing Site Conditions and Facilities ..... 7
     - 1.2.2 Permit History ..... 14
     - 1.2.3 Existing Operations ..... 14
     - 1.2.4 Existing Equipment ..... 17
   - 1.3 Project Description ..... 17
     - 1.3.1 Proposed Full Solid Waste Facility Permit ..... 17
     - 1.3.2 Proposed Construction Activities ..... 18
     - 1.3.3 Proposed Operational Activities ..... 19
   - 1.4 Project Objectives ..... 21
   - 1.5 Required Permits and Agency Approval ..... 21

2. Environmental Checklist Form ..... 22
   - 2.1 Environmental Factors Potentially Affected ..... 22
   - 2.2 Determination ..... 22

3. Evaluation of Environmental Impacts ..... 24
   - 3.1 Aesthetics ..... 25
     - 3.1.1 Setting ..... 26
     - 3.1.2 Impact ..... 26
     - 3.1.3 Mitigation ..... 27
     - 3.1.4 Conclusion ..... 27
   - 3.2 Agriculture and Forest Resources ..... 27
     - 3.2.1 Setting ..... 28
     - 3.2.2 Impact ..... 28
     - 3.2.3 Mitigation ..... 29
     - 3.2.4 Conclusion ..... 29
   - 3.3 Air Quality ..... 29
     - 3.3.1 Setting ..... 30
     - 3.3.2 Impact ..... 30

3.3.3 Mitigation ..... 36
3.3.4 Conclusion ..... 36
3.4 Biological Resources ..... 36
3.4.1 Setting ..... 37
3.4.2 Impact ..... 38
3.4.3 Mitigation ..... 39
3.4.4 Conclusion ..... 39
3.5 Cultural Resources ..... 40
3.5.1 Setting ..... 40
3.5.2 Impact ..... 41
3.5.3 Mitigation ..... 41
3.5.4 Conclusion ..... 42
3.6 Energy ..... 42
3.6.1 Setting ..... 42
3.6.2 Impact ..... 43
3.6.3 Mitigation ..... 43
3.6.4 Conclusion ..... 43
3.7 Geology and Soils ..... 43
3.7.1 Setting ..... 44
3.7.2 Impact ..... 45
3.7.3 Mitigation ..... 46
3.7.4 Conclusion ..... 46
3.8 Greenhouse Gas Emissions ..... 46
3.8.1 Setting ..... 47
3.8.2 Impact ..... 48
3.8.3 Mitigation ..... 48
3.8.4 Conclusion ..... 49
3.9 Hazards and Hazardous Materials ..... 49
3.9.1 Setting ..... 50
3.9.2 Impact ..... 51
3.9.3 Mitigation ..... 53
3.9.4 Conclusion ..... 53
3.10 Hydrology and Water Quality ..... 53
3.10.1 Setting ..... 54
3.10.2 Impact ..... 55

3.10.3 Mitigation ..... 56
3.10.4 Conclusion ..... 56
3.11 Land Use and Planning ..... 56
3.11.1 Setting ..... 57
3.11.2 Impact ..... 58
3.11.3 Mitigation ..... 58
3.11.4 Conclusion ..... 58
3.12 Mineral Resources ..... 58
3.12.1 Setting ..... 59
3.12.2 Impact ..... 59
3.12.3 Mitigation ..... 59
3.12.4 Conclusion ..... 59
3.13 Noise ..... 59
3.13.1 Setting ..... 60
3.13.2 Impact ..... 61
3.13.3 Mitigation ..... 62
3.13.4 Conclusion ..... 62
3.14 Population and Housing ..... 62
3.14.1 Setting ..... 62
3.14.2 Impact ..... 63
3.14.3 Mitigation ..... 63
3.14.4 Conclusion ..... 63
3.15 Public Services ..... 63
3.15.1 Impact ..... 64
3.15.2 Mitigation ..... 65
3.15.3 Conclusion ..... 65
3.16 Recreation ..... 65
3.16.1 Setting ..... 66
3.16.2 Impact ..... 66
3.16.3 Mitigation ..... 66
3.16.4 Conclusion ..... 66
3.17 Transportation and Traffic ..... 67
3.17.1 Setting ..... 67
3.17.2 Impact ..... 68
3.17.3 Mitigation ..... 70

3.17.4 Conclusion ..... 70
3.17.5 References ..... 70
3.18 Tribal Cultural Resources ..... 71
3.18.1 Setting ..... 71
3.18.2 Impact ..... 72
3.18.3 Mitigation ..... 72
3.18.4 Conclusion ..... 72
3.19 Utilities and Service Systems ..... 73
3.19.1 Setting ..... 73
3.19.2 Impact ..... 74
3.19.3 Mitigation ..... 75
3.19.4 Conclusion ..... 75
3.20 Wildfire ..... 75
3.20.1 Setting ..... 76
3.20.2 Impact ..... 76
3.20.3 Mitigation ..... 77
3.20.4 Conclusion ..... 77
3.21 Mandatory Findings of Significance ..... 77
3.21.1 Impact ..... 78
3.21.2 Mitigation ..... 79
3.21.3 Conclusion ..... 79

# List of Tables

Table 1-1: Summary of the RJR Facility Permit History (2015 to Present) ..... 14
Table 1-2: Station Sort Line with 2-inch Minus Screen ..... 18
Table 1-3: Material Storage Area ..... 18
Table 3-1: CalEEMod Results: Estimated Operational Emissions (Unmitigated) ..... 33
Table 3-2: CalEEMod Results: Estimated Construction Emissions (Unmitigated) ..... 34
Table 3-3: Maximum Permissible Sound Pressure Levels Hourly Average Noise Level Limits at the Property Line Noise Level (dBA) ..... 60

# List of Figures

Figure 1-1:Project Vicinity Map ..... 8
Figure 1-2: Project Location Map ..... 10
Figure 1-3: Project Area Land Use and Zoning Map ..... 11
Figure 1-4: Facility Site Map ..... 12
Figure 1-5: RJR Facility Photos ..... 13
Figure 1-6 - Traffic Flow through Project Site ..... 20

# List of Appendices

Appendix A: RJR Registration Tier Permit

Appendix B: Current RJR Recycling Facility Plan

Appendix C: MBARD Permit

Appendix D: Results of CalEEMod

Appendix E: Northwest Information Center letter and Cultural Resources Survey

Appendix F: Industrial Activities SWPPP

Appendix G: Special Concern Species

# 1. Introduction

The RJR Recycling and Transfer Station (hereafter referred to as the "RJR Facility" or "Facility") is owned and operated by RJR Environmental Professional Services, Inc. The facility currently maintains one "Registration Tier Permit" last issued by the California Department of Resources Recycling and Recovery (CalRecycle) on June 27, 2019. As San Benito County is not authorized to be a Local Enforcement Agency, CalRecycle serves as the Solid Waste Enforcement Agency (CalRecycle EA) for San Benito County and regulates the facility as a Medium Volume Transfer/Processing Facility (Permit Number and Solid Waste Identification System Number 35-AA-0030) for the processing and handling of up to 99.99 tons per day (tpd) of the following:

- Agricultural By-Product Material as defined by the California Code of Regulations (CCR), Title 14, Sections 17852(a) (4.5);
- Agricultural Material received directly from agricultural businesses as defined by CCR Title 14, Section 17852 (a)(5);
- Green Material as defined by CCR Title 14 Section 17852 (a)(21).
- In addition to these materials, RJR also accepts Municipal Solid Waste, Construction and Demolition Material and Recyclable Materials as defined by CCR Title 14, respectively.

As Article IX of the San Benito County Code indicates, proposed uses in a Heavy Industry zoning district shall be reviewed by San Benito County. This review found that the California Environmental Quality Act (CEQA) process was needed to be initiated by San Benito County, prompting the preparation of this Initial Study. The San Benito Planning Department is the CEQA Lead Agency under CEQA due to the land use component of the project. CalRecycle is a Responsible Agency as it requires the CEQA review for its issuance of the Full Solid Waste Facility Permit

The proposed project includes two main components. The first includes the continuation of all existing RJR Facility operations, including those associated with the recycling facility, under the new Full Solid Waste Facility Permit. The second includes increasing the maximum daily permitted processing capacity from 99.99 tpd to 350 tpd (including source-separated, commingled residential and commercial recyclables). The 350 tpd throughput at RJR would make it a Large Volume Transfer/Processing Facility under CCR Title 14, Section 17403.7, thus requiring RJR to move from the CalRecycle Registration Tier Permit to the Full Solid Waste Facility Permit.

The project proponent proposes to make the RJR Facility open to the public to receive material between 7:00 a.m. and 5:00 p.m. Monday through Saturday, and 9 a.m. – 3 p.m. on Sunday, as it is currently. All Facility processing and sorting operations, cleaning, and maintenance activities will and currently do occur during operating hours Monday through Sunday under the new Full Solid Waste Facility Permit.

# 1.1 Environmental Setting

The project site is the existing RJR Recycling property, located at 1771 San Felipe Road, directly adjacent to the City of Hollister, at an elevation of approximately 240 feet above mean sea level. The 13.58-acre parcel is composed of one parcel (San Benito County Assessor's Parcel Number 0190300160 in an unincorporated portion of San Benito County. The project property is zoned for Heavy Industry by San Benito County.

## 1.1.1 Surrounding Land Uses

The project site is located approximately 2 1/4 miles north of downtown Hollister on San Felipe Road (a.k.a. State Highway 156 Business), near the intersection of Flynn Road. Although the subject property is in an unincorporated portion of San Benito County it is bounded by the city limits of Hollister on the north and west sides. Figures 1-1 and 1-2 below display project vicinity and location.

On the north side of the RJR facility property, within the Hollister city limits, and within a Light Industrial Zone, are various commercial enterprises such as a cannabis cultivation supply facility, a paving stone manufacturer and a window shutter manufacturing facility. West of the RJR facility, across San Felipe Road, lies Hollister Municipal Airport, a public general aviation airport that also hosts CalFire's Hollister Air Attack Base for regional wildfire response. Also, an Amazon Distribution Center is now operational at the southwest corner of San Felipe Road and Flynn Road.

On east side, agricultural cultivation is ongoing on land that is zoned Agricultural Productive by San Benito County. The southern properties bordering RJR facility are zoned either Heavy or Light Industry by San Benito County and are a mix of primarily commercial and industrial uses such as auto repair, offices, and a biotechnology testing laboratory.

The project site is currently zoned as M-2, Heavy Industry. Figure 1-3 displays the zoning on and around the project location.

# 1.2 Background

## 1.2.1 Existing Site Conditions and Facilities

The existing and future project site encompasses approximately thirteen (13) acres located within an industrial area on the northern side of the city of Hollister. Access to RJR is via an entrance off San Felipe Road, near the intersection of San Felipe and Flynn Roads.

The site is currently developed with an industrial building containing offices and plant operations (tipping, conveying, sorting, and grinding); a scale house and truck/trailer scale; an equipment

maintenance and repair building; a fuel shed; a moveable maintenance canopy; parking areas; an equipment wash area; a loading dock; stockpile areas; a hazardous waste locker and materials and feed stock bunkers. A site plan for the existing RJR Facility is shown in Figure 1-4.

An agreement is in place with CalRecycle to remove any hazardous waste inadvertently received and recovered through the load-checking program. The entire property is fenced to restrict access and prevent litter from being transported off-site by the wind.

Figure 1-1:Project Vicinity Map

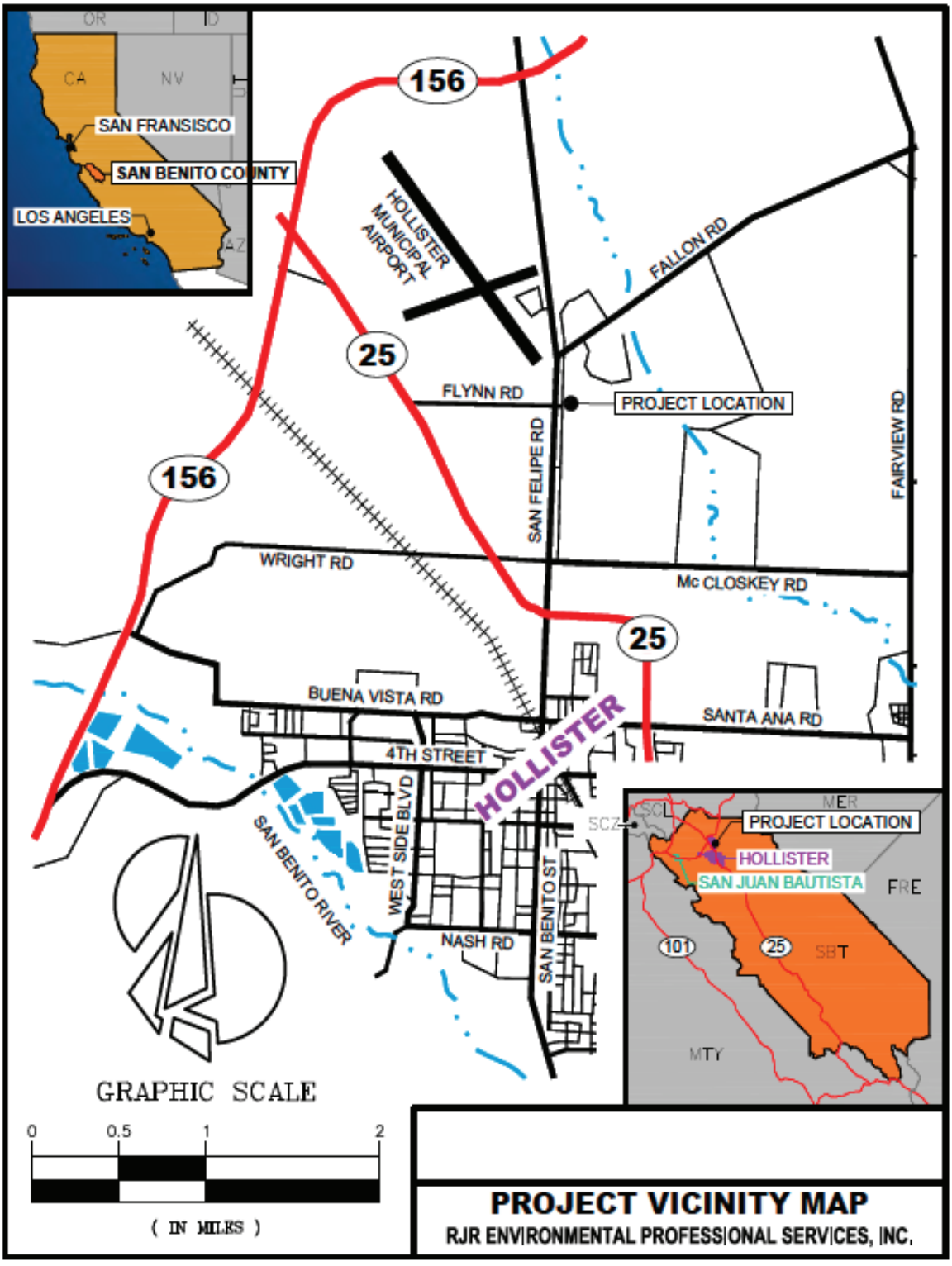

OR
ID
CA
NV
UT
AZ
SAN FRANSISCO
SAN BENITO COUNTY
LOS ANGELES
156
HOLLISTER MUNICIPAL AIRPORT
FALLON RD
25
FLYNN RD
PROJECT LOCATION
FAIRVIEW RD
SAN FELIPE RD
156
WRIGHT RD
Mc CLOSKEY RD
25
BUENA VISTA RD
SANTA ANA RD
4TH STREET
HOLLISTER
SAN BENITO RIVER
WEST SIDE BLVD
NASH RD
SAN BENITO ST
MER
SCL
SCZ
PROJECT LOCATION
HOLLISTER
SAN JUAN BAUTISTA
FRE
101
25
SBT
MTY
GRAPHIC SCALE
0
0.5
1
2
( IN MILES )
PROJECT VICINITY MAP
RJR ENVIRONMENTAL PROFESSIONAL SERVICES, INC.

Figure 1-2: Project Location Map

Figure 1-3: Project Area Land Use and Zoning Map

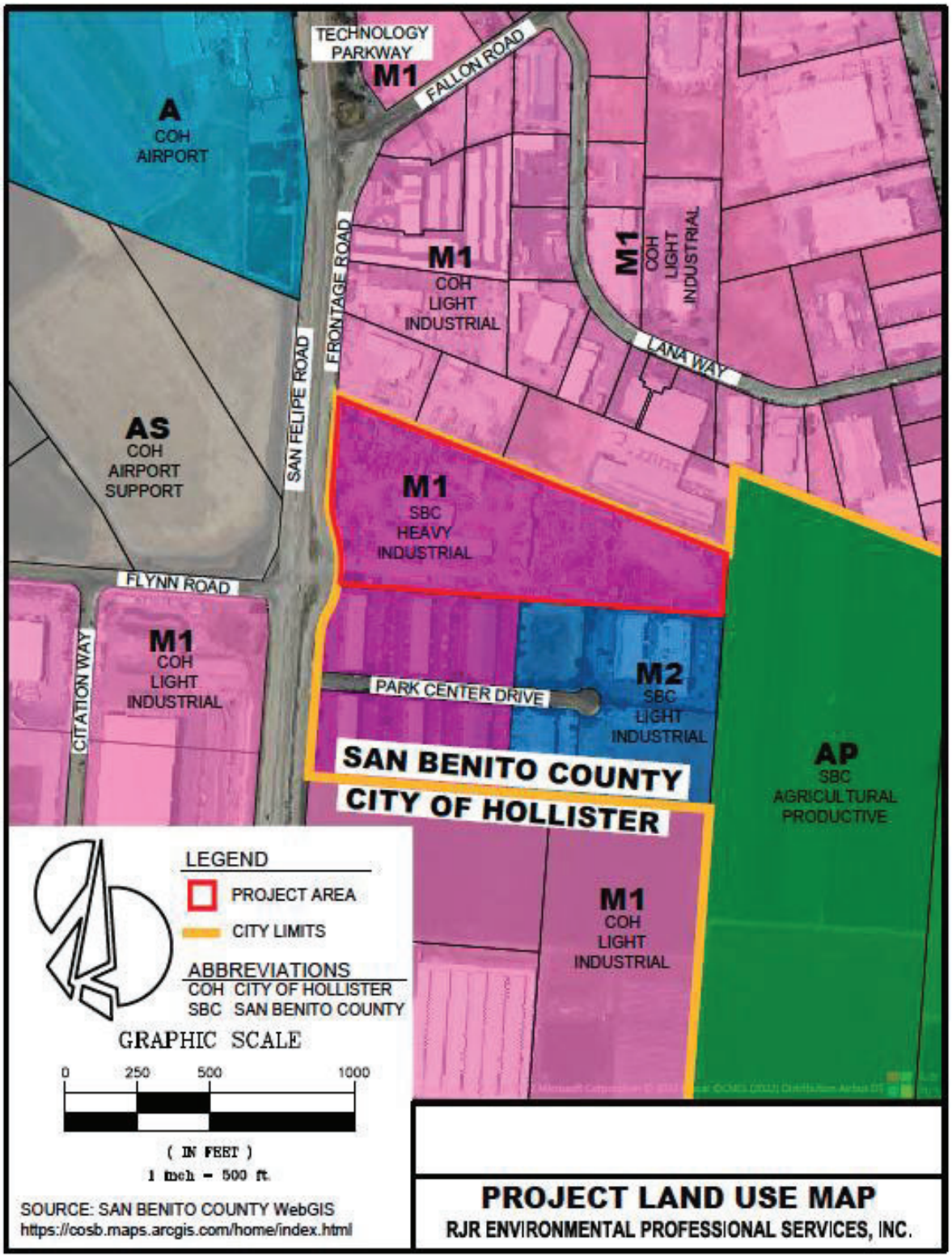


Figure 1-4: Facility Site Map

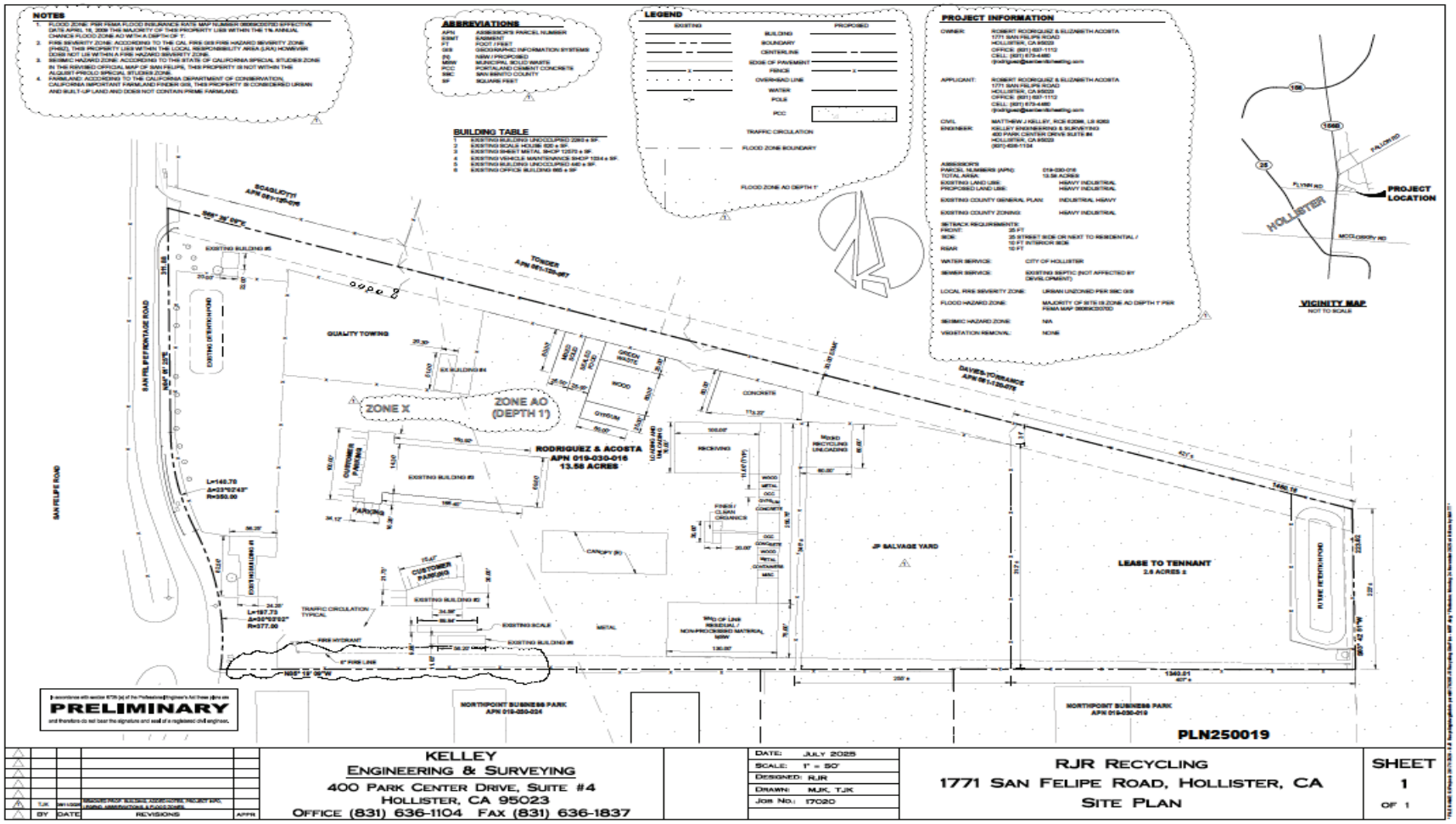


Figure 1-5: RJR Facility Photos

## 1.2.2 Permit History

The RJR Facility has been operational since 2014 under various notifications and permits issued by CalRecycle as the Solid Waste Enforcement Agency for San Benito County. A sequential summary of enforcement agency (EA) Notifications and Registration Tier Permit actions issued is in Table 1-1, Summary of RJR Facility Permit History (2015 to Present), below.

Table 1-1: Summary of the RJR Facility Permit History (2015 to Present)

| Year | Notification/Permit | Action |
|---|---|---|
| 2015 | Enforcement Agency Notification (35-AA-0030) | On March 20, 2015, the operator filed an EA Notification with the CALRECYCLE to receive Construction & Demolition (C&D) debris, Concrete, Drywall, and other solid similar materials, which allowed for the processing and handling of up to 24.99 tons per day of C&D materials. |
| 2017 | Registration Permit (35-AA-0030) | On 06/13/2017, the operator applied for a registration permit to conduct operations as a Medium Volume Transfer/Processing Facility. |
| 2017 | Registration Permit (35-AA-0030) | On 12/26/2017, CalRecycle issued the Registration Permit (35-AA-0030), which allowed for the transfer and processing of 99.99 tons per day of construction and demolition debris, green material, mixed recycling, and solid waste and established traffic volumes at 27 incoming vehicles and 4 outgoing vehicles hauling material per day. |
| 2018 | Registration Permit (35-AA-0030) | On 06/10/2018, Operator revised permit to increase traffic and include the sort line operation plan and a redesign of the facility. |
| 2019 | Registration Permit (35-AA-0030) | On 6/27/2019, CalRecycle Issued the Registration Permit (35-AA-0030), with updated facility plan and established traffic volumes at 75-100 incoming vehicles |

*Notes: Registration permits are reviewed every 5 years.*
*Source: CalRecycle Solid Waste Information System*

The 2019 Registration Permit is found in Appendix A.

## 1.2.3 Existing Operations

The operators of the facility are Robert Rodriguez, Sr., 1771 San Felipe RD, Hollister CA, 831-636-7756 and Elizabeth Acosta, 1771 San Felipe RD, Hollister CA, 831-636-7756. The Site Supervisor/Record Keeper is Luis Montero, 1771 San Felipe RD, Hollister CA, 831-636 7756. The Operator/Site Supervisor will always be Robert Rodriguez, Sr., or Elizabeth Acosta. In the absence of both, Luis Montero will be the active supervisor.

The RJR Facility is open to the public to receive material between 7:00 a.m. and 5:00 p.m. Monday through Saturday, 9 a.m. – 3 p.m. on Sunday. All Facility processing and sorting operations, cleaning, and maintenance activities occur during operating hours Monday through Sunday.

The RJR Facility currently operates under the permit and CalRecycle-approved facility plans, as defined under 14 CCR 18221.5 and 18223, which include guidance for ongoing operations and maintenance activities.

The facility has a scale house attendant that the public must check in with to be directed to the appropriate location in the yard. To stay within the daily limits, facility personnel will reject loads and monitor rental containers. Spotters are also located throughout the facility. An operator constantly walks through the facility and stays in contact with the yard manager.

All loads are checked by an RJR employee to make sure only acceptable material is unloaded. In addition, load make up and associated documentation is checked by supervisory staff on a regular basis to ensure compliance with load receiving protocol. An operator or supervisor will randomly check at minimum one load per day.

For existing operations, the number of full-time equivalent positions required to meet operational demands is 12. Personnel assigned to the operation or facility are trained in subjects pertinent to site solid waste operations and maintenance, hazardous materials recognition and screening, use of mechanized equipment, environmental controls, emergency procedures and the applicable regulatory requirements. Training is done by in-house personnel or by a certified organization. Records of training and certification are stored on file in the head office.

Additional records are maintained for incoming weights or volumes and outgoing salvage or residual weights or volumes in a form and manner approved by the EA. Such records are submitted to the EA or CalRecycle upon request and must be adequate for overall planning and control purposes; and be as current and accurate as practicable. All records required are kept in one location and are accessible for three (3) years. They are available for inspection by the EA and other duly authorized regulatory agencies during normal working hours.

The facility maintains a daily logbook or file of special occurrences encountered during operations and methods used to resolve problems arising from these events, including details of all incidents that required implementing emergency procedures. Such incidents include fires, injury and property damage, accidents, explosions, receipt or rejection of prohibited wastes, lack of sufficient number of personnel pursuant to section 17410.2, flooding, earthquake damage and other unusual occurrences. In addition, the facility designee will notify the EA by telephone within 24 hours of all incidents requiring the implementation of emergency procedures, unless the EA determines that a less immediate form of notification will be sufficient to protect public health and safety and the environment.

Any written public complaints received by the operator are kept on record, including: (1) The nature of the complaint, (2) The date the complaint was received, (3) if available, the name, address, and

telephone number of the person or persons making the complaint, and (4) any actions taken to respond to the complaint.

In addition to the Transfer/Processing operation, RJR is also a Certified Beverage container recycling center, Metal Recycling, and Paper/Plastic Recycler which is separate from the Transfer/Processing Operation.

Material Management. Currently waste and recyclable materials arrive in various size vehicles currently operated by RJR Recycling or in containers rented to contractors, businesses, homeowners, and other customers. Food materials are loaded into sealed transfer containers for transfer to offsite composting or anaerobic digestion facilities. Green materials are segregated, loaded, and taken to the appropriate facility for composting or anaerobic digestion. Other Recyclable Materials such as beverage containers and cardboard are unloaded and processed for market. These materials are placed in a temporary storage location on site until such time that there is enough to haul for transport to market. Residual solid waste is loaded into transfer vehicles and disposed of at the John Smith Road Landfill, southeast of Hollister. To mitigate any potential odor issues, organic materials and solid waste are removed from the site within 48 hours of acceptance. RJR has designed the operations of its site to include an 11-station sorting system to increase diversion and minimize stockpiling.

Each material is separated to prevent mixing with other materials. Materials will be stored in front of existing building #2 within the outlined operation area. Removal of salvaged material will be through sales. All unprocessed material is removed within 15 days. All processed materials are removed within 90 days. The intent is to minimize accumulation to prevent any potential nuisance. Materials are removed frequently to ensure they do not create a nuisance, attract vectors, or create a hazard.

The make-up of materials that can be currently processed at the facility is estimated to be up to 30 tons per day of Agricultural By-Product Material, up to 25 tons per day of Recyclable Materials, up to 30 tons per day of Green Material and the remainder will be up to 30 tons per day of Mixed Construction and Demolition Materials which include wood, metal, gypsum, and concrete. It must be noted that although these numbers exceed the current 99.9 tons per day, the mix of materials processed will not exceed that amount per day as required by the facility's permit.

Scavenging is not allowed. Signage and spotters will ensure scavenging does not occur. Salvaging of any items, if applicable, will only be conducted by approved RJR facility staff. Upon approval, salvaged items are transferred to an area away from the operating area.

Security is provided by an eight-foot cyclone fencing with privacy slats that completely encircle the facility and a gate that is locked every evening. In addition, areas have large concrete blocks placed in a manner that discourages the public from entering. Signage, barrier blocks, fencing, railings, and spotters keep unauthorized persons from entering prohibited areas. This combination of facility and employee resources reduces the risk of the public encountering waste.

### 1.2.4 Existing Equipment

RJR Facility equipment that would continue to be utilized for operational activities associated with the new Full Solid Waste Facility Permit include the following:

- 3 excavators
- 3 loaders
- 1 Forklifts
- 4 Roll-off trucks
- 2 End dump trailers
- 1 Skip loader
- 1 Walking floor trailer

All equipment is checked daily to ensure it is in working order and for leaks and cracks. If leaks are detected or equipment requires service before planned maintenance, equipment is put out of service and repairs are performed.

RJR has multiple sets of equipment in the event a piece of equipment requires maintenance or breaks down. All equipment is maintained on a regular schedule. RJR does not utilize long-term equipment rentals. Given there are multiples of each piece of equipment, if a piece of equipment breaks down, the backup piece of equipment is utilized. If both pieces of equipment break down, RJR will either cease the operation(s) affected or arrange for short-term rental equipment to continue operations until the original equipment is repaired. Old equipment that is no longer needed is either sold or scrapped and in either case, is removed from the property. All waste tires are stored and received in accordance with California Code of Regulations Title 14, Sections 17350 – 17359.

## 1.3 Project Description

### 1.3.1 Proposed Full Solid Waste Facility Permit

RJR proposes expanding their daily waste and recyclable materials acceptance up to a maximum of 350 tons per day (tpd) requiring a Full Solid Waste Facility permit from CalRecycle. Although currently permitted for up to 99.99 tpd (35,500 tons per year), the current as-built facility capacity is in excess of 350 tpd.

The proposed expansion will generate additional truck traffic. The current CalRecycle permit has incoming waste material traffic at 27 trucks per day, with outgoing material traffic at 4 trucks per day, based on 99.99 tons per day of waste and recyclable materials. Expanding to a maximum of 350 tons per day (tpd) would potentially result in an increase to 68 incoming trucks and 10 outgoing trucks.

The following tables represent the material currently being processed.

Table 1-2: Station Sort Line with 2-inch Minus Screen

| Area | Material | W (ft.) | L (ft.) | H (ft.) | Cu. Ft. | Cu. Yd. | Tons/Cu. Yd | Tonnage Cap. |
|---|---|---|---|---|---|---|---|---|
| Processing area | | 60 | 60 | 8 | 28800 | 1067 | 0.175 | 187 |
| Bay 1 | Wood | 11 | 25 | 17 | 4675 | 173 | 0.165 | 28 |
| Bay 2 | Metal | 11 | 25 | 17 | 4675 | 173 | 0.165 | 28 |
| Bay 3 | Old Corrugated Containers (OCC) | 11 | 25 | 17 | 4675 | 173 | 0.115 | 20 |
| Bay 4 | Gypsum | 11 | 25 | 17 | 4675 | 173 | 0.5 | 87 |
| Bay 5 | Concrete | 11 | 25 | 17 | 4675 | 173 | 0.927 | 160 |
| Bay 6 | OCC | 11 | 25 | 12 | 3300 | 122 | 0.115 | 14 |
| Bay 7 | Concrete | 11 | 25 | 12 | 3300 | 122 | 0.927 | 113 |
| Bay 8 | Wood | 11 | 25 | 12 | 3300 | 122 | 0.165 | 20 |
| Bay 9 | Metal | 11 | 25 | 12 | 3300 | 122 | 0.165 | 20 |
| Bay 10 | Recycling containers | 11 | 25 | 12 | 3300 | 122 | 0.09 | 11 |
| Bay 11 | Misc/extra/overflow | 11 | 25 | 12 | 3300 | 122 | 0.115 | 14 |
| Fines | 2 minus aggregate | 20 Yard Roll Off | | | | 20 | 0.464 | 9 |
| Fines | 2 minus organic | 30 Yard Roll Off | | | | 30 | 0.232 | 7 |
| End of Line | Residual | 40 | 25 | 8 | 8000 | 296 | 0.145 | 43 |
| **Total** | | | | | | | | **761** |

Table 1-3: Material Storage Area

| Area | W (ft.) | L (ft.) | H (ft.) | Cu. Ft. | Cu. Yd. | Tons/Cu. Yd | Tonnage Cap. |
|---|---|---|---|---|---|---|---|
| Wood Storage | 60 | 130 | 8 | 62400 | 2311 | 0.165 | 381 |
| Concrete Storage | 20 | 35 | 8 | 5600 | 207 | 0.927 | 192 |
| Gypsum Storage | 20 | 35 | 8 | 5600 | 207 | 0.5 | 103 |
| Green Material | 20 | 35 | 8 | 5600 | 207 | 0.165 | 34 |
| Mixed Solid | 20 | 35 | 8 | 5600 | 207 | 0.175 | 30 |
| **Total** | | | | | | | **740** |

## 1.3.2 Proposed Construction Activities

No new structures or changes to existing structures will take place at the project site. There will be the placement of a 60 by 60 concrete pad, and the paving of the onsite unpaved access road.

### 1.3.3 Proposed Operational Activities

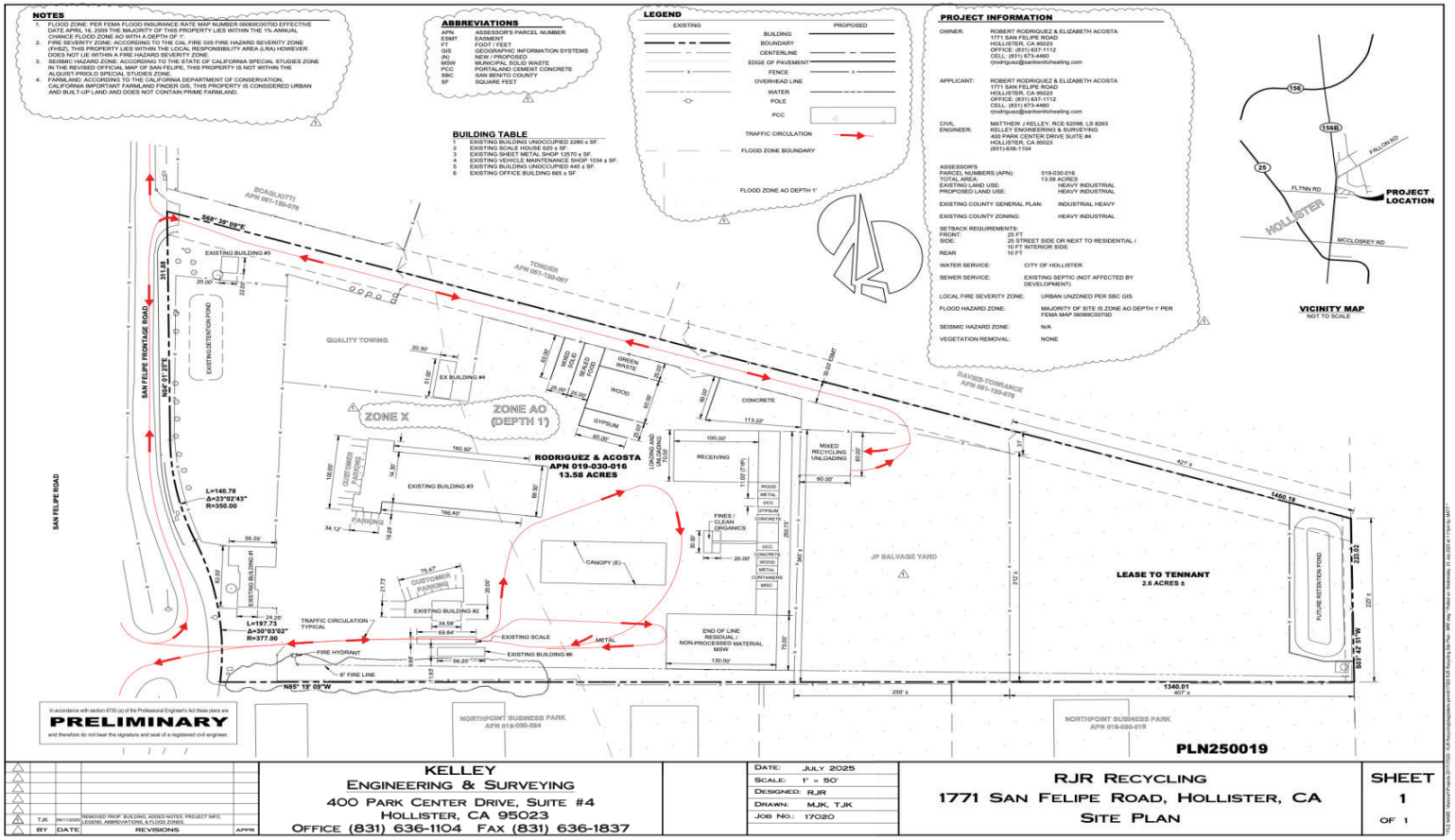
The RJR Facility is open to the public to receive material between 7:00 a.m. and 5:00 p.m. Monday through Saturday, 9 a.m. – 3 p.m. on Sunday. All Facility processing and sorting operations, cleaning, and maintenance activities occur during operating hours Monday through Sunday.

It will continue to have a scale house attendant that the public must check in with to be directed to the appropriate location in the yard. Spotters are located throughout the facility constantly walking the facility and staying in contact with yard manager for security and assistance with traffic circulation. Materials arrive in various sized vehicles currently operated by RJR Recycling or in containers that have been rented to contractors, businesses, homeowners, and other customers.

Green Materials will be segregated, loaded, and taken to the appropriate facility for composting or anaerobic digestion. Other Recyclable Materials such as beverage containers and cardboard will be unloaded and processed for market. They will be placed in a temporary storage location on site until such time that there is enough to haul for transport to market. Residual solid waste will be loaded into transfer vehicles and disposed of at the landfill. To mitigate any potential odor issues, organic materials and solid waste will be removed from the site within 48 hours of acceptance. Please refer to Figure 4 - Site Plan for specifics on the operational areas for unloading, processing, and storage of materials. In addition to the Transfer/Processing operation, RJR is also a Certified Beverage container recycling center, Metal Recycling, and Paper/Plastic Recycler which is separate from the Transfer/Processing Operation.

The RJR Facility operations will continue to operate, and the amount of material increases will commence following approval of the proposed new Full Solid Waste Facility. Quantities of incoming materials would not exceed the proposed Full Solid Waste Facility Permit limits of 350 tpd. A material hauler would drive through the main entrance and drive onto the scale at the scale house for weighing. The hauler would then be directed to the RJR Resource Transfer Station's (RTS) material processing facility for delivery and processing on the tipping floor (refer to Figure 1-4, Site Plan: Existing Facilities).

Figure 1-6 - Traffic Flow through Project Site



## 1.4 Project Objectives

The objectives of the proposed project are to increase existing maximum daily tonnage of materials permitted for processing and handling at the RJR Facility from 99 tpd to 350 tpd.

## 1.5 Required Permits and Agency Approval

This Initial Study provides environmental information and analysis in compliance with the CEQA, which is necessary for San Benito County decision makers to be able to adequately consider the effects of the proposed project. San Benito County Planning Department, as the lead agency, has approval authority and responsibility for considering the environmental effects of the project. This Initial Study will be used for the approval of a new Full Solid Waste Facility Permit as a Large Volume Transfer/Processing Facility by CalRecycle.

Pursuant to Public Resources Code (PRC) Section 44012, the extent of CalRecycle's permitting authority extends to imposing conditions on the "design and operation" of the facility to protect public health, safety, and the environment. Under these limitations, the solid waste facility permit does not permit or control the construction of facility improvements. Moreover, under PRC Sections 43020, 43021 and 43101, CalRecycle is prohibited from regulating air or water quality issues and permit conditions may not address such impacts. As such, the discussion of mitigation measures for identified significant effects on the environment will be limited to those measures that may be enforced under the authority of CalRecycle or appropriate Responsible Agencies such as the relevant Regional Water Quality Control Board or Air Pollution Control District consistent with PRC Section 21004 and 14 CCR 15040(e).

Other Agency Permits:

- Central Coast Regional Water Quality Control Board - Construction and Industrial Stormwater General Permits
- MBARD Permit to Operate the Construction Debris and Demolition Sort Line

# 2. Environmental Checklist Form

## 2.1 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 Environmental 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/Traffic | ☐ Tribal Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☐ Mandatory Findings |

## 2.2 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 (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) 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.

M. Abraham Prado
Printed name

Signature

8/26/2026
Date

# 3. Evaluation of Environmental Impacts

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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

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.

"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 (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

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 Analysis 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.

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.

Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

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.

## 3.1 Aesthetics

| Aesthetics | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| 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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | ☐ | ☐ | ☒ | ☐ |
| d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☒ | ☐ |

### 3.1.1 Setting

The project site is in a flat, developed, industrial area in San Benito County, California. The project site is in northern Hollister and is bordered by industrial uses to the north and south, San Felipe Road, Amazon distribution center and Hollister Airport to the west, and farmland to the east.

There are two designated State Scenic Highways in the vicinity of the project site – State Route (SR) 156 from the junction at SR 152 to SR 1 near San Juan Bautista and SR 25 from SR 198 to SR 156 near Hollister. The nearest is about 1 mile distant from the project site. Visibility from SR 152 is blocked by the Hollister Municipal Airport, San Benito County jail and juvenile hall, and a recently constructed Amazon Delivery Facility.

The project site is developed with the existing RJR Facility and ancillary facilities and is surrounded by other commercial and industrial uses or farmland uses. The Facility has been in operation since 2004 and currently includes ongoing processing operations associated with construction and demolition and inert debris, green material, and some commingled residential and commercial recyclables.

### 3.1.2 Impact

a) The proposed project would include the expansion of on-going operations, with a total daily tonnage of 350 tpd permitted for processing. Operation of the proposed project is expected to be similar with existing conditions at the site and surrounding areas and would not obstruct or degrade a scenic vista in the area; therefore, no impact on scenic vistas.

b) The nearest designated State Scenic Highway is located about 1 mile from RJR from the project site – State Route (SR) 25 from SR 198 to SR 156 near Hollister. Visibility of the RJR facility from SR 25 is blocked by several industrial related activities and trees located on the western boundary of the RJR site. However, there are no scenic resources within the project site or its adjacent vicinity; therefore, no impact to scenic resources or state scenic highways would occur because of the proposed project.

c) Refer to Impact Discussion 3.1(a) above. There will be no physical changes associated with the proposed project.

   All operational activities would continue to be performed with existing RJR equipment or rented equipment. Operation of the proposed project would be consistent with the existing land uses and the visual character of the site; therefore, impacts would be less than significant.

d) Refer to Impact Discussion 3.1(a) above. There will not be any physical changes associated with the proposed project that would significantly increase physical sources of glare.

   Operational activities would occur within the existing permitted daytime hours of operation described in Section 1.2.3, While increased operations would include an increase in the existing number of permitted hauling vehicle trips to/from the RJR, this will not result in new night sources

of light. However, there might be slight increases in the amount of glare due to the increased number of trucks. This would result in a less than significant impact.

### 3.1.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.1.4 Conclusion

Based on the impact discussion above, potential impacts associated with aesthetics would be less than significant; therefore, no mitigation is required.

## 3.2 Agriculture and Forest Resources

| Agriculture and Forest Resources Less Than Significant With Mitigation Incorporated | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| In determining whether impacts to agricultural resources are significant environmental effects, 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: | | | | |
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| 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))? | ☐ | ☐ | ☐ | ☒ |

| Agriculture and Forest Resources Less Than Significant With Mitigation Incorporated | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| 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 non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |

### 3.2.1 Setting

The project site is in an industrial area in the County of San Benito County and is immediately adjacent to the City of Hollister, bordered by commercial, farm and industrial land uses. The project site is entirely developed with RJR properties. Its facilities have been operational since 2004. The project site is not designated for, nor does it support agriculture or forest resources or land uses.

### 3.2.2 Impact

a) The project site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as designated by the Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation (DOC). The nearest designated farmland includes Prime Farmland located adjacent to the eastern boundary of the project site, and Farmland of Statewide Importance, located 0.4-mile northeast of the project site (DOC 2022). The proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as designated by the FMMP, to non-agricultural use. Therefore, no impact will occur.

b) There are no active Williamson Act contracts in place on or adjacent to the project site. The project site is in an area consisting of industrial development. All the parcels surrounding the project site, except on the east side, are designated for commercial and industrial land use. The parcel (APN 0190500050) directly to the east of the RJR facility is currently cultivated but not under a Williamson Act contract.

   The proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impact would occur.

c) The project site is in an area consisting of commercial and industrial development, except to the east, which is farmland. The project site is currently designated for industrial land uses (refer to Figure 3, Land Use Map) and is developed with existing commercial and industrial land uses associated with the RJR Recycling Facility. The operation of the proposed project would be

consistent with designated and existing land uses and would not result in the rezoning of forest land or timberland. Therefore, no impact would occur.

d) Refer to Impact Discussion 3.2(c), above. The project site is not located within or adjacent to forest land and would not result in the loss or conversion of forest land. Therefore, no impact will occur.

e) Refer to Impact Discussions 3.2(a-d), above. As discussed previously, the proposed project would not result in the conversion of farmland or forest land. Therefore, no impact would occur.

### 3.2.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.2.4 Conclusion

Based on the impact discussion above, the proposed project would have no impact on agricultural or forest resources; therefore, no impact will occur, and no mitigation is required.

## 3.3 Air Quality

| Air Quality | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| 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 non-attainment 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? | ☐ | ☐ | ☒ | ☐ |

### 3.3.1 Setting

The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of certain air pollutants. Under these Acts, the United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for specific "criteria" pollutants. These pollutants are carbon monoxide (CO), ozone (O3), sulfur dioxide (SO2), nitrogen oxides (NOX), particulate matter less than 10 microns in diameter (PM10), lead, and particulate matter less than 2.5 microns in diameter (PM2.5).

The project site is located within the North Central Coast Air Basin (NCCAB), which is comprised of Santa Cruz, San Benito, and Monterey Counties, and is regulated by the Monterey Bay Air Resources District (MBARD), which was formally known as the Monterey Bay Unified Air Pollution Control District.

The U.S. EPA administers the National Ambient Air Quality Standards (NAAQS) under the Federal Clean Air Act. The U.S. EPA sets the NAAQS and determines if areas meet those standards. Violations of ambient air quality standards are based on air pollutant monitoring data and evaluated for each air pollutant. Areas that do not violate ambient air quality standards are considered to have attained the standard. The NCCAB is in attainment for all NAAQS and for all California Ambient Air Quality Standards (CAAQS) except O3 and PM10.

The primary sources of ozone and PM10 in the NCAAB are from automobile and truck engine combustion. To address exceedance of these CAAQS, MBARD has developed and implemented several plans including the 2005 Particulate Matter Plan, the 2007 Federal Maintenance Plan, and the 2012-2015 Air Quality Management Plan (AQMP), a revision to the 2012 Triennial Plan.

Plans to attain these standards already accommodate the future growth projections available at the time these plans were prepared. Any development project capable of generating air pollutant emissions exceeding regionally established criteria is considered a significant impact for purposes of CEQA, whether such emissions have been accounted for in regional air planning.

Any project that would directly cause or substantially contribute to a localized violation of an air quality standard would generate substantial air pollution impacts. The same is true for a project that generates a substantial increase in health risks from toxic air contaminants. Sensitive receptors are more susceptible to the effects of air pollution than the general population. Land uses that are considered sensitive receptors include residences, schools, and health care facilities. There are no sensitive receptors in the vicinity of the project site.

### 3.3.2 Impact

a) Under the new proposed Full Solid Waste Facility Permit, the proposed project would include the continuation of all existing operations, facilities, and equipment associated with construction and demolition and inert debris, green material, green material mixed with residential food material, and source-separated commingled residential and commercial recyclables. The existing and future

operations would be surrounded by other commercial, industrial and agricultural uses. Operation of the proposed project is consistent with the general level of development anticipated and projected in the MBARD Clean Air Plan and the County of San Benito General Plan. The proposed project would not conflict with or otherwise obstruct implementation of the MBARD Clean Air Plan; therefore, impacts would be less than significant.

b) San Benito County is a non-attainment area for the state standards for ozone and suspended particulate matter. APCD administers a permit system to ensure that stationary sources do not collectively generate emissions, which would cause local and state standards to be exceeded. Implementation of the proposed project has the potential to generate emissions during operation of the project (long-term emissions) in the form of equipment operation and vehicle trips associated with the collection and transport of materials permitted for processing and handling at the RJR facility. Operational emissions associated with the proposed project are discussed in further detail below.

- Combustion Emissions (ROG and NOx). Based on proposed estimates, construction emissions would not result in an exceedance of significance thresholds for reactive organic gases (ROG) or nitrogen oxide (NOX) (refer to Table 3-2); therefore, no mitigation is required.

- Diesel Particulate Matter. The project site is in an industrial area near the community of Hollister surrounded by similar industrial land uses. There are no identified sensitive receptors as defined by CARB in the vicinity of the project site that would have the potential for exposure to DPM; therefore, no mitigation is required.

- Materials Containing Asbestos. All loads are checked by RJR employees to insure that asbestos containing material (ACM) is not accepted by the facility. Any loads containing ACM will be rejected and returned to the originator of the ACM. Consequently, operational activities are not expected to result in the release of or exposure to ACM; therefore, no mitigation is required.

- Fugitive Dust. There will be no increase from fugitive dust emissions, which should not cause a public nuisance or exacerbate the existing PM10 non-attainment status in the Hollister areas of the county. Therefore, no mitigation is required.

- Operational Emissions. Long-term emissions associated with the proposed project are primarily associated with vehicle trips associated with hauling material approved to and from processing site at the RJR Facility. A discussion of project details related to the assessment of project operational emissions is provided below.

- Schedule of Operations. The project proponent proposes to make the RJR Facility open to the public to receive material between 7:00 a.m. and 5:00 p.m. Monday through Saturday and 9 a.m. – 3 p.m. on Sunday, which are its current hours of operation. All facility processing and sorting operations, cleaning, and maintenance activities will occur during the existing hours Monday through Saturday under the new Full Solid Waste Facility Permit.

- Equipment. Under the proposed project, all existing equipment would continue to be utilized for project operations during normal processing hours.

- Employees and Employee Trips. The existing RJR Facility currently supports 12 full-time equivalent employees to support ongoing operations. This number was reduced from 24 employees when the owner purchased a new electric automated sorting machine (in addition to the electric grinder, bailer, and conveyors). Under proposed operations, the facility would continue to operate with 12 full-time employees; no additional employees will be necessary. All employees live in or near Hollister. The average round-trip distance for employees is twelve miles. This would not change under the proposed project; therefore, no new employee trips are included in project operational emissions.

- Hauling Trips. Under the existing RJR permits, the facility has 27 incoming trips and 4 outgoing trips. Incoming hauling trips can come from anywhere in the region including Northern San Benito County, Monterey County, and Santa Clara County. As discussed in the Initial Study, the average number of vehicle miles between RJR and the major business centers in the Hollister region (where hauling trips are expected to originate from most frequently) was utilized. The average trip distance was calculated by identifying the mean trip distance between RJR and the Gilroy area to the north (12 miles), the eastern county border (13 miles), the end of populated area to the south (to the Paicines area - 16 miles), and the Salinas area to the southwest (25 miles). The major business center for the county is Hollister. Based on estimated actual operations, the proposed project traffic of 72 incoming trips minus the current baseline of 27 trucks equals a new total of 45 truck trips at 16.5 miles each way would equate to 1,485 miles per day for incoming trips.

- These same assumptions and the difference between maximum permitted operations and baseline operations were utilized for proposed operations. Under the proposed project, the RJR would be permitted to process up to 350 tons per day (tpd) of material which would be transported in 7-ton trucks. Although unlikely, the RJR facility operating at maximum permitted capacity, 350 tons of material could be processed in 72 7-ton truck trips. These 72 truck trips could originate from anywhere in the San Benito County area; therefore, the average incoming trip distance of 16.5 miles each way is consistent.

- Should the RJR operate at maximum permitted capacity, outgoing project trips required under proposed conditions are estimated to be the maximum permitted capacity (10 outgoing trips). Maximum permitted capacity (10 outgoing trips) minus project baseline (4 outgoing trips) results in 6 new outgoing trips. Approximately 75% (4.5 trips) are expected to be one-way and 25% (1.5 roundtrips) are expected to be roundtrip (6 total trips), resulting in 10.5 total trips at an average of 16.5 miles per trip. Therefore, new outgoing trips associated with the proposed project could result in up to 174 miles per day.

- Fleet Mix. The fleet mix associated with project operations is projected by RJR facility management to be as follows:

- Light duty truck: 5%
- Medium duty trucks: 5%
- Light-heavy duty trucks: 0%
- Medium-heavy duty trucks: 90%
- Heavy-heavy duty trucks: 0%

The air quality impacts of the proposed project are primarily related to the operations of the Facility although there is some construction (a concrete pad and paving of an onsite road). The results of the CalEEMod are included as Appendix C and the results of the unmitigated estimated operational emission calculations for the proposed project are shown in Table 3-1, CalEEMod Results: Estimated Operational Emissions (Unmitigated), below. The results are based on conservative estimations provided by the project proponent and by the CalEEMod defaults where project-specific data were not available.

The threshold criteria established by MBARD to determine the significance and appropriate mitigation level for long-term operational emissions (i.e., vehicle and area source emissions) from the project are presented in Table 3-2. Emissions that equal or exceed the designated threshold levels are considered potentially significant and should be mitigated. As shown in Tables 3-1 and 3-2, the level of analysis and mitigation recommended follows a tiered approach, based on the overall amount of emissions generated by the project. For projects requiring air quality mitigation, MBARD has developed a list of both standard and discretionary mitigation strategies tailored to the type of project being proposed (i.e., residential, commercial, or industrial).

Table 3-1: CalEEMod Results: Estimated Operational Emissions (Unmitigated)

| | | | **Estimated Operation Emissions (Unmitigated)** | |
|---|---|---|---|---|
| Pollutant | ARD Threshold Daily (lbs./day) | ARD Quarterly Tier 1 (tons/quarter) | Project Maximum Daily Emission (lbs/day) | Project Quarterly Emission (tons/quarter) |
| ROG | 25 lbs | 0.02 | 0.48 | 0.02 |
| NOx | 25 lbs | 0.13 | 3.2 | 0.13 |
| ROG + NOx (combined) | 25 lbs | 0.15 | 3.68 | 0.15 |
| Diesel Particulate Matter (DPM) | 1.25 lbs | - | 9.7 | 0.38 |

| | | | | |
|---|---|---|---|---|
| Carbon monoxide (CO) | 550 lbs | - | 3.8 | 0.15 |
| Fugitive Particulate Matter (PM10), Dust | 25 lbs | - | 0.13 | <0.01 |

*Notes: ROG = reactive organic gases; NOx = Nitrogen oxide*
*1 Showing estimated operational emissions for mobile sources only because those are the only emission impacts above the baseline conditions.*
*Source: CalEEMod 2016.3.11*

Table 3-2 presents the construction emission impacts for the project. These impacts are based on construction of a 60 by 60-foot mixed recycling unloading area and paving 1000 feet of unpaved onsite roadway. Construction emissions estimates were based on CalEEMod default values. Construction for the 60 by 60-foot concrete pad assuming one-half foot of gravel base with one-quarter foot of sand. Road paving assumes 1,000 of road, 32 feet wide assuming one-half foot of gravel base with one-quarter foot of sand. No soil export expected.

Table 3-2: CalEEMod Results: Estimated Construction Emissions (Unmitigated)

| | | **Estimated Operation Emissions (Unmitigated)** |
|---|---|---|
| Pollutant | Threshold Daily (lbs./day) | Project Maximum Daily Emission (lbs/day) |
| Volatile Organic Compounds | 137 | 1.1 |
| Oxides of Nitrogen | 137 | 9.2 |
| Carbon Monoxide | 550 | 10 |
| Fine Particulate Matter ($PM_{2.5}$) | 55 | 5.6 |
| Fugitive Particulate Matter $PM_{10}$) | 82 | 54 |

The project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Increases will be minor and are accounted for. Thus, the impacts would be less than significant.

c) Based on the results shown in Table 3-1, even under the worst-case scenario conditions, estimated operational emissions generated by the project would comply with MBARD thresholds for all pollutants. Operational emissions and activities are not anticipated to create a nuisance for sensitive receptors. As discussed above, operational emissions associated with the proposed project would comply with MBARD thresholds for all pollutants. During operation of the proposed project, dust will be controlled as described in the RJR Transfer Processing Report (TPR) (see Appendix B) including:

- Dust generated by processing operations in other areas on the RJR property outside of the industrial building will continue to be controlled through the use of the RJR motorized "street sweeper" and application of well and recycled water maintained through the on-site water

recycling system. The use of the street sweeper and application of water for dust suppression shall be implemented on an as-needed basis to reduce impacts to insignificant.

- All equipment is maintained in proper tune according to manufacturer's specifications by RJR staff. All heavy maintenance of equipment, such as lube and oil changes are completed as necessary, while more frequent maintenance activities, such as maintenance of the grinder, are performed daily.

- Compliance with the new TPR is expected to further reduce operational emissions and dust generated by the proposed project. The proposed project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation; therefore, impacts would be less than significant.

- Refer to Impact Discussion 3.3(a) above. Operation of the proposed project has the potential to result in a cumulatively minor net increase of respirable particulate matter (PM10), for which San Benito County is in non-attainment. Compliance with the dust control measures included above and in the TPR would reduce respirable particulate matter generated by operational activities associated with the project. Therefore, impacts would be less than significant.

- As discussed previously, the project site is designated for industrial land uses and is in an industrial area in the community of Hollister surrounded by industrial and commercial land uses. There are no identifiable sensitive receptors, as defined by CARB, in the vicinity of the project site. The nearest sensitive receptor to the project site would be the County Jail and Juvenile Hall located .8 mile west of the project site on the west side of U.S. Highway 101. The nearest residence to the project site is located approximately 0.5 mile west of the project site. As discussed above, operational emissions associated with the proposed project would comply with MBARD thresholds for all pollutants during operational years. The project would not expose sensitive receptors, as defined by CARB, to substantial pollutant concentrations; therefore, impacts would be less than significant.

d) An odor characteristically has three significance thresholds. The first threshold is the detection threshold, which is the minimum amount of odor-free dilution air needed to prevent an individual from detecting the odor. The detection threshold is the point where an individual detects an odor; this threshold varies for each individual. The second, the recognition threshold, occurs at lower dilutions (higher concentrations). At the recognition threshold, other odor parameters, such as odor character and relative pleasantness, are noticeable. The third is called the annoyance threshold. The annoyance threshold is at or above the recognition threshold. At the annoyance threshold, people complain about an odor; this can even occur when the odor is pleasant. For example, a person passing by an industrial bakery or chocolate factory may experience the odor as pleasant; however, individuals living near these facilities and constantly subjected to the odor may consider it a nuisance.

   As discussed in the project description, the proposed project includes the continuation of all existing operations and facilities at the RJR with a maximum daily tonnage of 350 tpd. Under the

new Full Solid Waste Facility Permit, the project proponent would continue to operate in compliance with applicable state minimum standards under the proposed project.

If an objectionable odor is detected by staff at any point during processing activities or hours of operation, the source of that odor shall be immediately treated or removed from the site and transported to an approved landfill or composting facility, as appropriate. If staff receives a complaint from a neighbor or member of the public regarding an objectionable odor detected at RJR, staff shall locate the source of the objectionable odor and ensure that it is immediately removed from the site and transported to an approved landfill or composting facility, as appropriate. The proposed project would not create objectionable odors affecting a substantial number of people; therefore, impacts would be less than significant.

### 3.3.3 Mitigation

RJR will continue the use of its street sweeper and application of water for dust suppression.

If RJR staff detect an objectionable odor at any time during operations, they shall promptly identify the source and immediately treat it or remove it from the site for transport to an approved landfill or composting facility, as appropriate. Upon receiving a complaint from a neighbor or member of the public regarding an odor at RJR, staff shall locate the source and ensure its immediate removal and transport to an approved landfill or composting facility, as appropriate.

### 3.3.4 Conclusion

Based on the impact discussion above, potential impacts associated with air quality would be less than significant.

## 3.4 Biological Resources

| Biological Resources | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. 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, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☒ | ☐ |
| c. | Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, 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? | ☐ | ☐ | ☐ | ☒ |

## 3.4.1 Setting

The project site is in an industrial area adjacent to the City of Hollister. The project site is entirely developed with the existing RJR and associated facilities. The project site is entirely composed of developed and disturbed areas and does not support natural habitat aside from landscaped trees along the perimeter of the property.

Based on a review of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB), the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Conservation (IPaC) mapping database, and the California Native Plant Society's (CNPS) rare plant inventory online mapping service, one special-status plant species, 10 special-status animal species (including 4 bird species), and no sensitive habitats were identified with the potential to occur in the project area (attached in Appendix G). The report further indicated that there are no critical habitats within the project area.

The result is that no special-status plants or wildlife are expected to occur within the project site due to the built, paved, and disturbed conditions of the site, the absence of natural vegetation and suitable habitat, and the existing level of disturbance associated with ongoing RJR operations. It may be

possible for migratory birds to occur as transients within the ornamental trees and shrubs located along the perimeter of the property; however, due to the lack of habitat and high intensity of existing disturbance from the ongoing operations at the project site and on the surrounding road network, it is unlikely that migratory birds would breed or nest in this area.

No jurisdictional surface water resources, wetlands, sensitive habitats, or designated critical habitat are located within or adjacent to the project site. The nearest surface water resource is a small creek containing runoff from irrigation and rainfall located approximately two thousand feet east of the project site. It flows to the north for about five miles until it connects to Santa Ana Creek. The Santa Ana Creek flows into San Felipe Lake 2-3 miles further north.

### 3.4.2 Impact

a) As discussed above, the project site is entirely composed of developed and disturbed surfaces and does not support natural vegetation or habitat that would be suitable for special-status plant or animal species. Migratory birds may occur as transients within the ornamental trees and shrubs located along the perimeter of the project site. However, due to the lack of habitat and high intensity of existing disturbance from the ongoing operations at the project site and on the surrounding road network, it is unlikely that migratory birds would breed or nest in this area.

   Operational activities for the proposed project will align with current operations at the site, confined to developed areas within the RJR facility. Operational runoff will be controlled through project design and the existing RJR Industrial Activities Storm Water Pollution Prevention Plan (SWPPP - See Appendix F)[1]. Due to the absence of suitable habitat and existing level of ongoing disturbance within the RJR property, implementation of the proposed project will not result in an adverse effect, directly or indirectly, on any special-status species; therefore, impacts would be less than significant.

   There is no riparian habitat located on the project site. As discussed previously, the project site is entirely disturbed and developed with the existing RJR facility. It is located between existing industrial and commercial development. The project design will prevent runoff.

b) Following the existing Industrial Activities SWPPP should minimize impacts on surface water and riparian habitats for the proposed project. The proposed project would not result in direct or indirect impacts to riparian habitat; therefore, impacts would be less than significant.

c) Refer to Impact Discussion 3.4(b), above. There are no jurisdictional wetlands located on or near the project site. As discussed previously, the project site is entirely disturbed and developed with

[1] A Storm Water Pollution Prevention Plan (SWPPP) is a site-specific document that identifies potential sources of pollutants that could be carried off a property by rainwater runoff and describes the measures used to prevent that pollution.

the existing RJR facilities and is located between existing industrial development. Adhering to the existing Industrial Activities SWPPP should minimize impacts on surface water and habitat. The proposed project would not result in direct or indirect impacts to jurisdictional wetlands or other waters with compliance with the measures included in the existing Industrial Activities SWPPP; therefore, impacts would be less than significant.

d) Refer to Impact Discussion 3.4(a), above. The project site does not support natural vegetation, habitat, or wildlife corridors as it is fenced and entirely developed or substantially disturbed with existing RJR facilities. Migratory birds may occur within the project site as transients or within ornamental landscaping present along the perimeter of the property. Implementation of the proposed project would not interfere 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; therefore, no impact would occur as a result of the proposed project.

e) Refer to Impact Discussion 3.4(a), above. The project site is fully developed or substantially disturbed and does not contain natural vegetation or habitat. Ornamental trees and shrubs are present along the public roadside perimeter of the property. The proposed project's operational activities will align with current operations and be confined to developed areas. Implementation of the proposed project would not result in a change in land use or conflict with any local policies or ordinances protecting biological resources; therefore, no impact would occur as a result of the proposed project.

f) The project site is not located within an existing Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan area. Additionally, the entire project site is disturbed or developed with the existing RJR property site and does not support natural habitat; therefore, no impact would occur as a result of the proposed project.

### 3.4.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.4.4 Conclusion

Based on the impact discussion above, potential impacts to biological resources associated with the proposed project would be less than significant: therefore, no mitigation is necessary or required.

# 3.5 Cultural Resources

| Cultural Resources | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | ☐ | ☐ | ☐ | ☒ |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | ☐ | ☐ | ☐ | ☒ |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries? | ☐ | ☐ | ☐ | ☒ |

## 3.5.1 Setting

The project site is entirely disturbed, being developed with the existing RJR facilities since 2004, and is surrounded by highly developed industrial, farm and commercial land uses. No cultural or historic resources have been identified on the project site or in the immediate vicinity. The project site is not associated with any significant event or trend in American history, nor has it been directly associated with persons significant in our past. The buildings and structures on the project site were constructed after 2003 and are utilitarian resources that are common to industrial operations associated with RJR. Lastly, the project site is not expected to yield important information about prehistory or history. Therefore, the project site is not considered a historic property, as defined in Section 106 of the National Historic Preservation Act (NHPA), nor does it qualify as a historical resource under CEQA.

The California Historical Resources Information System, Northwest Information Center was contacted and a records search was requested for the project site. The records search found no cultural resources study or recorded archaeological resources in the project area. However, the Northwest Information Center did opine that there was a moderate to high potential for Native American archaeological resources at the project and recommended an archaeological field survey of the project site. An archaeologist that met the U.S. Secretary of the Interior's Standard for such a survey was retained by the project applicant.

A cultural resource evaluation of the site was conducted by a qualified archaeologist, Archeological Resource Management, in January 2023. Their research included an archival search in the State records and a surface survey of the proposed project area. The archival research revealed that no previously recorded cultural resources are located within the proposed project area. No significant

cultural materials, prehistoric or historic, were noted during surface reconnaissance. Therefore, it is concluded that the proposed project will have no impact on cultural resources.

Both the recommendations letter from the Northwest Information Center and the cultural resources consultant's field survey report are found in Appendix E.

### 3.5.2 Impact

a) As discussed above, the project site is not associated with any significant event or trend in American history, nor has it been directly associated with persons significant in our past. The buildings and structures on the project site were constructed after 2003 and are utilitarian resources that are common to industrial operations associated with RJR. Prior to that, the land was used for farmland. The project site is not expected to yield important information about prehistory or history; therefore, the project site is not considered a historic property, as defined in Section 106 of the NHPA, nor does it qualify as a historical resource under CEQA. Implementation of the proposed project would not result in impacts to a historical resource, if present. Therefore, no impact would occur.

b) No known archaeological resources have been identified on the project site or in the immediate vicinity; therefore, archaeological resources are not anticipated to be present with the continuation and increase of commodities associated with the proposed project. Without any construction of new facilities, no impacts on historical resources would occur and the potential for impacts to archaeological and paleontological resources should not exist. Therefore, implementation of the project would have no impact on archaeological resources, if present, and the potential for resources to be present is considered very low.

c) The project site is entirely disturbed and developed with existing RJR facilities, which were developed after 2003. No human remains are known or expected to be present at the project site due to existing developed conditions of the project area and lack of known archaeological resources in the vicinity. The proposed project would not require ground disturbance within native soils beneath the existing layer of developed surfaces and fill material within RJR property. Therefore, the project would have no impact on human remains and the potential for human remains to be present is considered very low.

### 3.5.3 Mitigation

In the event that prehistoric traces (human remains, artifacts, concentrations of shell/bone/rock/ash) are encountered, all construction within a fifty-meter radius of the find should be stopped, the Planning Department notified, and an archaeologist retained to examine the find and make appropriate recommendations.

No other mitigation measures are proposed by RJR.

### 3.5.4 Conclusion

Based on the impact discussion above, no impact on cultural resources would occur as a result of the proposed project.

## 3.6 Energy

| Energy | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Result in 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? | ☐ | ☐ | ☐ | ☒ |

### 3.6.1 Setting

During operation, the facility will utilize heavy equipment and transfer vehicles consistent with standard industry practices for solid waste management. Energy consumption will also occur through employee and customer vehicle trips.

All on-site operations will use electricity supplied by Pacific Gas and Electric (PG&E), that derives 35% of its electricity from renewable sources such as solar, wind, geothermal, small hydroelectric, and bioenergy. PG&E met California's 2020 renewable energy targets (33% renewable electricity) ahead of schedule and is on track to exceed the 60 percent renewable mandate by 2030, in accordance with Senate Bill 100.[2]

The project will not interfere with state or local renewable energy or efficiency plans. The site will use only electric power—no natural gas—while all lighting, electrical systems, and equipment will meet the latest California Energy Code (Title 24, Part 6) standards. PG&E supplies electricity, with 35%

[2] https://www.renewableenergyworld.com/energy-business/new-project-development/pge-exceeds-california-rps-with-35-renewable-energy-delivered-in-2020/?utm_source=chatgpt.com

coming from renewable sources is also on track to exceed California's goal of 60% renewable energy by 2030.

### 3.6.2 Impact

a) The facility provides essential public waste and recycling services, so its energy use is necessary and reasonable. Standard operational practices and compliance with energy standards ensure that the project does not cause inefficient or excessive energy consumption.

b) The project is consistent with energy standards and uses renewable energy, so it does not conflict with plans or policies for energy efficiency or renewable energy.

### 3.6.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.6.4 Conclusion

The project would have a less than significant impact on the consumption of energy.

The project would result in no impact on state or local renewable energy or energy efficiency plans.

## 3.7 Geology and Soils

| Geology and Soils | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | ☐ | ☐ | ☐ | ☒ |

| | | | | | |
|---|---|---|---|---|---|
| | ii. Strong seismic ground shaking? | ☐ | ☐ | ☐ | ☒ |
| | iii. Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☐ | ☒ |
| | iv. 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, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | ☐ | ☐ | ☐ | ☒ |
| e. | Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | ☐ | ☐ | ☐ | ☒ |
| f. | Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☐ | ☒ |

## 3.7.1 Setting

San Benito County is geologically complex and seismically active. The project is in the Coast Ranges Geomorphic Province, featuring elongated mountain ranges and valleys stretching six hundred miles along California's coast from Oregon to Santa Barbara County.

The Hollister area is located in the Gilroy Hollister Valley within the Diablo and Gabilan Ranges. The project area encompasses an urban landscape in the northern portion of San Benito County immediately adjacent to the community of Hollister at an elevation of approximately 289 feet above mean sea level.

The project site is underlain by Recent Alluvium consisting of interbedded sand, silt clay and gravel. The U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) has mapped one soil within the project area: Pacheco Silty Clay, with 0 to 2 percent slopes with no frequency of ponding and with low to medium runoff.

Groundwater depth about 1.6 miles south of the proposed project is around seventy feet below ground. The inferred direction of groundwater flow is towards the northwest.

## 3.7.2 Impact

a) Will the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a Known Earthquake Fault. The project site is in the seismically active Monterey Bay region. Earthquake faults nearest the project site are the Calaveras Fault and the Pacines Fault, about a mile due west of the project, and adjacent to the western border of Hollister Airport. Also, in the vicinity of the proposed project are the San Andreas Fault, located about nine miles southwest if the site; the Quien Sabe Fault, located four miles east of the site; and the Sargent Fault, located about 4 miles southwest of the site. An earthquake of moderate to high magnitude generated within Northern California region could cause considerable ground shaking at the site, like that which has occurred in the past. Potential seismic hazards include surface ground rupture and strong seismic shaking.

Since fault traces are near the property, the potential for surface ground rupture at the site exists. In addition, due to the proximity of the nearby faults, there is potential for strong seismic shaking at the site during the design life of the proposed project. Given that there will be no new construction of facilities, the potential for fault rupture and exposure of persons or new constructed property to seismic hazards associated with the proposed project is considered to have no impact.

ii. Strong Seismic Ground Shaking. Refer to Impact Discussion 3.6(a.i), above. The project site is not located within an active fault zone. The existing project site complies with the California Building Code and an approved County Building Permit. Therefore, impacts associated with strong seismic ground shaking are considered to have no impact.

iii. Seismic-Related Ground Failure. Refer to Impact Discussion 3.6(a.i), above. The project site is not located within an active fault zone. The proposed project will not include any new construction. Therefore, no impacts associated with seismic-related ground failure are anticipated.

iv. Landslides. The project site is flat and not at risk for landslides. Therefore, there will be no impacts associated with landslides.

b) The project site is underlain by Recent Alluvium consisting of interbedded sand, silt clay and gravel. This soil type is well-drained, with a water table depth over 80 inches and low-to-medium runoff (NRCS 2015). The project site is entirely composed of developed and disturbed surfaces. Operational activities would be consistent with existing operational activities and would occur on existing developed surfaces within RJR properties. Therefore, due to existing drainage and improved surfaces of the facility, no impact would occur.

c) The project site has been used for recycling operations since 2004. The site does not have a geologic unit or soils that are unstable, or that would become unstable as a result of the project.

Geologic studies of the site indicate that the project will not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Therefore, no impact would occur.

d) The project's site has non-expansive soils. Operational activities would be consistent with existing operational activities and would occur on existing developed surfaces within the RJR. Operational activities associated with the proposed project would not be located on a geologic unit or soil that is considered to be expansive. Therefore, no impact would occur.

e) The project will not include new septic tanks or wastewater systems. Therefore, no impact would occur.

f) The project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The land is fully developed with industrial uses, and it has a relatively flat surface. Therefore, no impact would occur.

### 3.7.3 Mitigation

The project is anticipated to neither directly nor indirectly harm any unique paleontological resources, sites, or geologic features. Therefore, mitigation proposed by RJR is not necessary.

### 3.7.4 Conclusion

Based on the impact discussion above, the project would not have an impact on geology and soil resources. Consequently, no mitigation measures are necessary.

## 3.8 Greenhouse Gas Emissions

| Greenhouse Gas Emissions | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

### 3.8.1 Setting

Greenhouse gas emissions result in an increase in the earth's average surface temperature, a process commonly referred to as global warming. The rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, a process also known as climate change. These changes are broadly attributed to greenhouse gas emissions, particularly those emissions that result from human production and use of fossil fuels.

The passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act (2006), recognized the need to reduce greenhouse gas emissions and establish a greenhouse gas emissions reduction goal for the State of California into law. The law required that by 2020, state emissions must be reduced to 1990 levels. This was actually achieved in 2014[3]. The AB 32 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279[4]

The project site is located within the North Central Coast Air Basin comprised of Santa Cruz, San Benito, and Monterey Counties. Activities in the basin are regulated by the Monterey Bay Air Resources District (MBARD), which was formally known as the Monterey Bay Unified Air Pollution Control District.

Currently the MBARD has not adopted thresholds for greenhouse gas emission impacts. However, its staff recommends relying on the Bay Area Air Quality Management District (aka Bay Area Air District) as guidance.

Projects that generate less than the above-mentioned thresholds will also participate in emission reductions because air emissions, including greenhouse gas emissions, are under the purview of CARB (or other regulatory agencies) and will be "regulated" by CARB, the federal government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions, large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources. Other programs that will reduce the overall greenhouse gas emissions include Low Carbon Fuel Standards, Renewable Portfolio Standards, and the Clean Car standards.

Under CEQA, an individual project's greenhouse gas emissions will generally not result in direct significant impacts. This is because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have

[3] See https://calepa.ca.gov/climate-dashboard

[4] See https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan

greenhouse gas emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

- California has passed several pieces of legislation in the past few years aimed at dealing with greenhouse gas emissions and climate change. Executive Order S-3-05 set a goal to reduce California's greenhouse gas emissions to: (1) 2000 levels by 2010; (2) 1990 levels by 2020; and (3) 80% below 1990 levels by 2050. These goals were reinforced in 2006 with the passage of AB 32, which set forth the same emission reduction goals and further mandated that CARB create a plan, including market mechanisms, and develop and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases." Executive Order S-01-07 set forth California's low carbon fuel standard, which required the carbon intensity of the state's transportation fuels to be reduced by 10% by 2020. In addition, SB 97 required amendments to the CEQA Guidelines to address greenhouse gas emissions. The amendments went into effect on March 18, 2010. More recently, AB 1279 (the California Climate Crisis Act of 2022) declared as state policy to 1) Achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, and then maintain net negative emissions thereafter; and 2) Ensure that by 2045, statewide anthropogenic GHG emissions are at least 85% below 1990 levels[5]

## 3.8.2 Impact

a) As discussed in Section 3.3 Air Quality, the CalEEMod was used to calculate estimated project construction and operational emissions. Based on the results of the CalEEMod, as shown in Table 3-3, CalEEMod Results: Estimated Operational Emissions (Unmitigated), below, operation of the proposed project is expected to have a maximum annual CO2e emission (unmitigated) of approximately 2,197 MT CO2e/year. This estimate includes the current operational emissions (2,192 MT CO2e/year)). Therefore, operational emissions are not expected to generate greenhouse gas emissions that would exceed the established APCD bright-line numerical value threshold of 10,000 MT CO2e/year adopted for stationary source (industrial) projects. Therefore, impacts would be less than significant.

b) Refer to Impact Discussion 3.7(a), above. The proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases; therefore, impacts would be less than significant.

## 3.8.3 Mitigation

Mitigation proposed by RJR is not necessary.

[5] See https://calmatters.org/environment/2022/09/california-climate-change-legislature/?utm_source=chatgpt.com

### 3.8.4 Conclusion

Following the impact discussion outlined above, the potential impacts associated with greenhouse gases to be less than significant; thus, no mitigation measures are required or necessary.

## 3.9 Hazards and Hazardous Materials

| Hazards and Hazardous Materials | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| 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 § 65962.5 and, as a result, would it 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 public use airport, would the project 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? | ☐ | ☐ | ☐ | ☒ |

### 3.9.1 Setting

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed of, or otherwise managed. A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. Hazardous materials and waste can result in public health hazards if improperly handled by a release into the soil or groundwater, or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer.

The California Department of Toxic Substance Control's (DTSC) uses databases such as EnviroStor GeoTracker to map the location of hazardous waste sites including sites that have been remediated, sites currently undergoing remediation, and sites that require cleanup. Also, the State Water Resources Control Board's (SWRCB) has its Geotracker system (California Environmental Protection Agency [Cal/EPA] 2015). Based on a search for the above databases, no hazardous materials contamination was documented within the project site.

In 2008, a detailed hazardous materials study was conducted for the existing RJR facilities and property. No hazardous materials contamination was found within the project site.

The receipt of hazardous liquid and special waste at the RJR, including medical waste, is prohibited by law. However, an incidental risk of hazardous materials may occur if RJR inadvertently receives this material commingled with other materials approved for processing and handling. As incoming loads of various materials are tipped for sorting, RJR staff are required by law to implement a load checking program to inspect the materials for any contaminants, including hazardous waste, in accordance with 14 CCR 17409.5.

The existing load checking program is expected to eliminate this risk. If hazardous wastes are discovered, then the proper documentation is completed, and the waste is loaded back on the hauling vehicle to be returned to the sender or stored in the hazardous waste locker located on-site. An agreement is in place with the San Benito County Integrated Waste Management to remove any hazardous waste inadvertently received at the RJR. Additionally, the RJR currently implements the following practices for the control of hazardous materials:

- All employees are trained to properly identify, handle, and document hazardous waste inadvertently received at the RJR;
- The entire property is screen-fenced to restrict unauthorized access.
- On-site records of hazardous waste loads and their dispositions are kept for a minimum of one year. A copy of the load-checking program and copies of load checking records for the current calendar year are maintained in the scale house's operating record. Prior years' load- checking

records are kept in the administrative office. All these records are available for review by the appropriate regulatory agencies;

- Training records for recognizing, handling, and disposing of prohibited waste are kept in the business office.
- The RJR implements an Injury, Illness, and Prevention Program, which includes requirements for employees to wear personal protective equipment to ensure safety when handling hazardous waste; and,
- The RJR operates in compliance with the existing Fire Safety Plan approved by the County.

## 3.9.2 Impact

a) The RJR is prohibited by law from handling or disposing of hazardous material and this project does not involve the transportation of hazardous materials. The proposed project would not directly introduce new forms of hazardous materials during operation of the RJR. However, there is an incidental risk that always exists with solid waste facilities of inadvertently receiving hazardous materials, which are commingled with other materials. Because of this possibility, the RJR would continue to implement the regulatory requirements for load checking in accordance with 14 CCR 17409.5 and for training to discover and control incidental hazardous materials received at the RJR under the new Facility Permit. The involvement of hazardous materials is, to the extent such materials are inadvertently brought to the facility, incidental rather than routine. Moreover, existing regulatory controls are in place to manage any incidental receipt. Therefore, impacts would be less than significant.

b) Refer to Impact Discussion 3.9(a), above. The receipt and handling of hazardous materials at this facility is prohibited by law. Any receipt of hazardous materials would be inadvertent, incidental, and is expected to be controlled by existing regulatory requirements for load checking and training. While operation activities associated with the proposed project would include the use of heavy equipment, some currently require regular maintenance and the use of fuel and petroleum-based lubricants, any risk of fuel or lubricant leakage or spillage would foreseeably be incidental, of minor volume, and RJR would continue to operate in compliance with the existing applicable state regulations, which would ensure that potential impacts from accidental leaks or spills are less than significant.

c) The RJR is not located within 0.25 mile of any school. The nearest school is the Meadowlark Preschool, located approximately 1.5 miles southeast of the project site. Implementation of the proposed project would not emit hazardous emissions nor handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Therefore, no impact would occur.

d) The project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (DTSC Hazardous Waste and Substances Site List – Site Cleanup [Cortese

List] Cal/EPA; accessed December 9, 2015). Therefore, no impact would occur because of the proposed project.

e) The project site is located within the Hollister Airport Land Use Plan (HALUP). It is located 0.6 miles from the Hollister Municipal Airport and within the Existing and Ultimate Departure Service. The existing facilities are consistent within the HALUP. Both RJR and the airport have restricted access to their facilities. Therefore, no impact would occur because of the proposed project.

f) San Benito County has prepared a Multi-Jurisdiction Local Hazard Mitigation Plan (LHMP) with the cities of Hollister and San Juan Bautista, and with two water agencies - the San Benito County Water District, and the Sunnyslope County Water District. The LHMP designates certain roadways in the County for primary evacuation routes. Panoche Road is the primary evacuation roadway for the County. While San Felipe Road is a designated evacuation road for the County, the project site is located on the secondary San Felipe Road and would not impair implementation of or physically interfere with designated evacuation routes or otherwise conflict with an adopted emergency response plan or emergency evacuation plan.

g) The proposed project would comply with the Municipal Code and Fire Department standards for emergency vehicle access and would not conflict with the approved LHMP. The project would not interfere with any emergency response or evacuation plans. There would be no impact in connection with the proposed project. As discussed under the Summary of Proposed Operations Section, the property supports only two access locations and routes through the site to allow for safe ingress and egress by vehicles hauling material (refer to Figure 1-2, Location Map, and Figure 1-4, Site Plan: Existing Facilities). The increased operations would be consistent with existing land use designations and on-site operations.

The project site is in an urbanized area of San Benito County and is not located within or adjacent to a designated wildland fire hazard area (California Department of Forestry and Fire Protection [CAL FIRE] 2006). The existing project facilities comply with the applicable fire safety provisions of the California Building Code as well as standard conditions of approval, thereby reducing the risk of damage from fire to the maximum extent practicable. The nearest fire station is the Hollister Fire Department Station #3 located approximately 1.2 miles northwest of the project site. The RJR follows a Fire Safety Plan approved by the Hollister Fire Department and the County when the processing facility's building permit was issued. The entrance gate does have a Knox Box for fire (a small, wall-mounted safe that holds building keys for fire departments, emergency medical services, and sometimes police to retrieve in emergency situations.). The system is connected to an alarm system that alerts the Hollister Fire Department.

There is a fire hydrant located near the existing main entrance and one near east side of the existing facility. There are two wharf hydrants at the beginning and middle of the sort line. On wharves and piers there is no practical ability to install a "hydrant bury" complete with foot valves and thrust blocks and the name has stuck to all hydrants that are basically just hydrant tops screwed onto vertical pipes.

The RJR is equipped with fire extinguishers located throughout the site every seventy-five feet for employee use. Fire safety and fire drills are a part of regular training conducted on-site with all RJR staff. The RJR would continue to operate in compliance with the existing Fire Safety Plan during and following implementation of the proposed project. The project site is not located within or adjacent to a designated wildland fire hazard area and is not expected to expose people to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur because of the proposed project.

### 3.9.3 Mitigation

Mitigation proposed by RJR is not necessary beyond the facilities and practices currently in effect.

### 3.9.4 Conclusion

Based on the impact discussion above, potential impacts associated with hazards and hazardous materials would be less than significant. No mitigation is needed.

## 3.10 Hydrology and Water Quality

| Hydrology and Water Quality | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| 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:<br>i. result in a substantial erosion or siltation on- or off-site; | ☐ | ☐ | ☐ | ☒ |

| | | | | | |
|---|---|---|---|---|---|
| | ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | ☐ | ☐ | ☐ | ☒ |
| | iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | ☐ | ☐ | ☐ | ☒ |
| | iv. 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? | ☐ | ☐ | ☐ | ☒ |

## 3.10.1 Setting

San Benito County has a moderate California coastal climate with a hot and dry summer season lasting May through October. Average annual rainfall ranges from seven inches in the drier eastern portion of the County, to twenty-seven inches per year in high elevations to the south. The majority of the annual rainfall takes place in the fall, winter, and to a lesser extent, spring, between November and April (San Benito County, 2015). Groundwater is the major source of water supply in the County. Groundwater is available throughout. The project is located on the Hollister management area or sub-basin of the North San Benito Basin. The North San Benito Basin is not critically over-drafted under SGMA and has a medium priority status. This status is due to imports from the Central Valley Project. (Sustainable Groundwater Management, North San Benito Groundwater Basin, 12/2020)

The project area is located within the North San Benito Groundwater Basin (Groundwater Basin Number 3-4) in the Hollister East Area Subbasin (Groundwater Subbasin Number 3-3.03). This area subbasin encompasses 32,700 acres (51 square miles) in San Benito County (California Department of Water Resources [DWR] Bulletin 118, 2004). The Federal Emergency Management Agency (FEMA) Flood Map Service Center indicates the project area is located within a FEMA designated floodplain, Zone AO (San Benito County Unincorporated Areas, 06069C0070D, effective 4/16/2009, FEMA) and will flood to a depth of 1-3 feet. It is a river or stream flood hazard area, and areas with a 1% or greater chance of shallow flooding each year, usually in the form of sheet flow, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. It also means that this is an area that is typically characterized by an annual chance of flooding of at least 1%, often referred to as a "100-year flood."[6]

[6] FEMA Zone AO | FEMA.gov

Development and road construction have only altered the project site's hydrology in minor ways. There are no water resources, such as rivers, streams, lakes, reservoirs, impoundments, bays, inlets, estuaries, wetlands, drainage sloughs, vernal pools, swales, or Clean Water Act (CWA) Section 303d impaired water bodies within the project site. The nearest surface water resource is Santa Ana Creek, located approximately 0.4 mile east of the project site. This creek is dry much of the year especially during May – October. Within the RJR property, the driveway and parking area drain into a storm drain system located throughout the existing facility to the retention pond located in the northwestern portion of the property. There are ten drainage inlets on the existing RJR site together with two sumps and a water retention pond.

The RJR currently operates under an approved Industrial Activities SWPPP (included as Appendix F), which includes Best Management Practices (BMPs) for the control of stormwater and erosion.

## 3.10.2 Impact

a) As discussed in Section 1.3, Project Description, no physical changes to the project site are associated with the proposed project (other than the concrete pad and paving of an onsite access road). The operation of the proposed project would include the continuation of all existing RJR operations. The RJR would continue to operate in accordance with the existing approved Industrial Activities SWPPP (included as Appendix F), which includes BMPs for the control of erosion and surface water runoff during construction and operation of the project. Compliance with the existing Industrial Activities SWPPP is expected to minimize potential impacts to water quality associated with the proposed project and to ensure compliance with State minimum standards. Therefore, the impacts would be less than significant.

b) Refer to Impact Discussion 3.10(a), above. Potable water supplied by the City of Hollister Department of Public Works is utilized in office spaces, restrooms, eye-washing stations, and drinking fountains, after which it is directed to the municipal sewer system. It is used for dust control, landscaping, wash-down, and ground-height dust control purposes. Implementation of the proposed project would include the continuation of existing operations. Any water runoff will be diverted to the one existing retention pond. Implementation of the proposed project would not interfere with ground water recharge or significantly deplete groundwater supplies. Therefore, the impacts would be less than significant.

c) The proposed project does not propose the construction of any new structures. Construction activities will be limited to the construction of the concrete pad and paving of the onsite access road. This will involve some limited grading, and result in an increase of 36,000 square feet (0.82 acres) of impervious surfaces at the 13.58-acre project site. However, here will be no changes which might alter the existing drainage system. There isn't a stream or river coursing through the project site. Therefore, no impact would occur.

    i) No impact on the possible erosion at the project site is expected as the existing drainage system will not be altered.

ii) No changes will be made to the existing site that might result in an increase of the rate or amount of surface runoff.

iii) No changes will be made to the structures or the operations of the project site that would exceed the capacity of the existing drainage system or provide additional sources of polluted runoff.

iv) The project site is located within a designated flood hazard area. This type of flooding is shallow, usually a sheet flow moving across the surface rather than ponding in low spots. Implementation of the proposed project would not affect existing flood patterns and would not expose people or structures to an additional significant risk of loss, injury, or death. Therefore, no impact would occur.

d) The project site is not located in a coastal zone where there would be risk of tsunami, nor is it located near a large body of water where there would be risk of seiche. The landslide/mudflow risk is considered low due to the flat topography and developed conditions of the project site and vicinity. Implementation of the proposed project would not expose people or structures to the risk of inundation by seiche, tsunami, or mudflow. Therefore, no impact would occur because of the proposed project.

e) The project will not conflict or obstruct implementation of the San Benito Urban Areas Water Supply and Treatment Master Plan (2023), the Groundwater Sustainability Plan for San Benito County (2022) or the Hollister Urban Area Water and Wastewater Master Plan (2008). The project is not expected to impact either water quality or groundwater supply.

### 3.10.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.10.4 Conclusion

The analysis above indicates that the potential impacts on hydrology and water quality would be less than significant; therefore, no mitigation is required.

## 3.11 Land Use and Planning

| Land Use and Planning | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |

| Land Use and Planning | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| a. Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☐ | ☒ |

## 3.11.1 Setting

The project site is located at 1771 San Felipe Road in the unincorporated San Benito County, California. It and the adjacent property to the south are surrounded on three sides by the City of Hollister, California. The project site encompasses one parcel (APN 040-153-020,) located in the 2035 San Benito County General Plan, 2015, designated for heavy industrial land uses (refer to Figure 1-3, Land Use Map).

The RJR currently holds an approved land use permit through the County (PMT2014-01011), which allows for the existing facility and its operations. The project facilities are the same as the existing RJR facilities, which have been in operation since 2004.

On the north side of the RJR facility property, within the Hollister city limits, and within a Light Industrial Zone, are various commercial enterprises such as a cannabis cultivation supply facility, a paving stone manufacturer and a window shutter manufacturing facility. West of the RJR facility, across San Felipe Road, lies Hollister Municipal Airport, a public general aviation airport that also hosts CalFire's Hollister Air Attack Base for regional wildfire response. Also, an Amazon Distribution Center is now operational at the southwest corner of San Felipe Road and Flynn Road.

On east side, agricultural cultivation is ongoing on land that is zoned Agricultural Productive by San Benito County. The southern properties bordering RJR facility are zoned either Heavy or Light Industry by San Benito County and are a mix of primarily commercial and industrial uses such as auto repair, offices, and a biotechnology testing laboratory.

The property is within the Hollister Airport Land Use Comprehensive Plan – Hollister Airport Safety Zone 2 (2012, Map 71) and the High Noise/Risk Zone (Aviation Easement (P. 74). According to Federal Aviation Regulations (FAR) Part 77, Subpart B, it requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and 1 foot upward (slope of 100 to 1) for a distance of 20,000 feet from the nearest point of any runway.

### 3.11.2 Impact

a) Under a new proposed Full Solid Waste Facility Permit, the proposed project would include the continuation of all existing RJR operations, facilities, and equipment with variable and unknown increases annually for the materials received. Implementation of the proposed project would not physically divide an established community. The project will also not result in any new construction, thus being in accord with FAA height restrictions. Therefore, no impact would occur because of the proposed project.

b) Refer to Impact Discussion 3.11.2(a) above. All proposed operational activities would be consistent with all existing land use designations, local land use plans, policies, and regulations under a new Full Solid Waste Facility Permit subject for approval by CalRecycle. Therefore, no impact associated with a land use conflict would occur because of the proposed project.

### 3.11.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.11.4 Conclusion

According to the analysis, the proposed project will not affect land use; thus, no mitigation measures are necessary.

## 3.12 Mineral Resources

| Mineral Resources | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☒ |

### 3.12.1 Setting

There are no known mineral resources within the project site or immediate vicinity (USGS 2015).

### 3.12.2 Impact

a) There are no known mineral resources within the project site or immediate vicinity; therefore, implementation of the proposed project would not result in the loss of availability of a known mineral resource. Therefore, there will be no impact on mineral resources because of the proposed project.

b) Refer to Impact Discussion 3.12(a), above. There are no mineral resources identified within the project site or immediate vicinity. The proposed project would not result in the loss of availability of a locally important mineral resource recovery site. Therefore, no impact on a locally important mineral resource recovery site would occur because of the proposed project.

### 3.12.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.12.4 Conclusion

Based on the impact discussion above, no impact associated with mineral resources would occur because of the proposed project. No mitigation is needed.

## 3.13 Noise

| Noise | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☐ | ☒ | ☐ |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |

| Noise | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

## 3.13.1 Setting

The County of San Benito County General Plan Noise Element (County of San Benito, 2015) provides a policy framework for addressing potential and existing noise impacts during the planning process. The Noise Element requires land uses to be compatible with each other and with existing and future noise environments. The County of San Benito General Plan Noise Element standards are provided in Table 3-3, below.

Table 3-3: Maximum Permissible Sound Pressure Levels Hourly Average Noise Level Limits at the Property Line Noise Level (dBA)

| Land Use Designations | Day | Night |
|---|---|---|
| Ag Rangeland, Ag Productive, Rural, Rural Transitional, Rural Residential | 45 | 35 |
| Single-Family Residential, Residential Multiple, Planned Unit Development | 50 | 40 |
| Commercial Thoroughfare and Neighborhood Commercial | 65 | 55 |
| Controlled Manufacturing, Light Industrial, Heavy Industrial | 70 | 60 |

*Source: San Benito County 2013a, §19.39.030, Table 1*

San Benito County Noise Ordinance Sections 23.06.044–050 establish standards for acceptable exterior and interior noise levels in the county. Applicable exceptions to this noise ordinance include the following:

- Noise sources associated with the collection of waste or garbage from property devoted to other than residential uses listed in Table O, Framework for Planning of the Land Use Element.
- Traffic on public roadways, railroad line operations, aircraft in flight, and any other activity to the extent regulation thereof has been preempted by state or federal law.
- Noise-sensitive land uses typically include residences, schools, and parks. There are no identifiable noise-sensitive land uses, as defined above, in the vicinity of the project site. The project site is located within an industrial district with commercial, agriculture and industrial operations

surrounding the project site. The project site is located between San Felipe Road to the west and farmland to the east. The Hollister Airport is located on the west side of San Felipe Road.

- The existing ambient noise environment is characterized by intermittent vehicle and aircraft noise from San Felipe Road, in addition to various industrial land uses surrounding the project site. According to the San Benito County Noise Contour Map (County of San Benito 2012), existing community equivalent noise levels at the project site range between less than 55 and 65 A-weighted decibels (dBA). Projected intermittent aircraft noise is expected not to exceed 65 dBA, which is within the safety limits of commercial thoroughfare and light industrial activity.

The RJR currently implements the following practices for the control of noise generated by on-site operations:

- Heavy equipment engine exhausts are properly muffled and maintained.
- Grinding will be conducted inside a building to minimize off-site noise and,
- All staff monitor for nuisances (i.e., excessive noise) and will respond immediately to mitigate problems detected.

## 3.13.2 Impact

a) The project site is designated for industrial use in an existing industrial area in San Benito County, near Hollister. It is surrounded by industrial land on two sides, ~~and~~ farmland on the third, and San Felipe Road and a frontage road to the west There are no known sensitive receptors within 500 feet of the project site. The nearest sensitive receptor to the project site, located about ¼ mile from the Hollister Airport, is located approximately 0.5 mile west of the project site on Briggs Road. Other sensitive receptors near the project site would be Meadowlark Preschool and a suburban residential development located southeast of the project site over 1 mile away on McCloskey Road. Implementation of the proposed project would generate noise during increased operational activities. Implementation of additional solid waste processing operations is anticipated to maintain ambient noise levels of between 60-65 dB at the boundary of the RJR site. These operations will align with the current operational standards. Therefore, the impacts would be less than significant.

   The noise generated from hauling vehicle trips associated with the proposed project is not expected to exceed existing levels as hauling vehicles already haul material to and from RJR. The daily quantities of incoming materials at RJR will vary to ensure compliance with the permitted limit for hauling vehicle trips and the proposed maximum daily tonnage rate of 350 tpd. The operation of the proposed project is anticipated to meet local noise regulations.

b) The proposed project would not result in the exposure of persons to or the generation of excessive groundborne vibration or groundborne noise levels. RJR will not be accepting waste from haulers using larger or heavier trucks. Therefore, the impacts would be less than significant.

c) The project site is located within an airport land use plan or within two (2) miles of a public airport or public use airport. The nearest airport is the City of Hollister Airport, the entrance to which is located approximately .5 mile west of the project site. Existing operations have been in place for several years without affecting the public airport or being affected by aircraft noise generated from takeoffs and landings. Therefore, the project will not have an impact on airport operations.

The project site is not located within the vicinity of a private airstrip. Therefore, no impact would occur.

### 3.13.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.13.4 Conclusion

Based on the impact discussion above, potential impacts associated with noise would be less than significant. No mitigation needed.

## 3.14 Population and Housing

| Population and Housing | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☐ | ☒ |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

### 3.14.1 Setting

The City of Hollister had a recorded population of 43,346. It supports 11,438 households (U.S. Census Bureau 2021, est.). RJR is in an industrial area and is not within or adjacent to residences or residential uses. The nearest suburban residential development is the located south of Highway 25 about a mile

south from the RJR site. The nearest residence to the project site is located approximately 0.5 mile west and southwest of the project site.

### 3.14.2 Impact

a) The proposed project does not include the construction of a new residential development or a new business. As described in Section 1.2.3, Existing Site Operations, the number of full-time equivalent positions required to meet current and future operational demands is twelve. Thus, no impact would occur.

b) All expanded project operations will occur using the existing RJR facilities. The nearest residential development is located approximately 1 mile south of the project site with the nearest residence located .5 mile to the southwest of the project site. The proposed project would not displace existing housing. Therefore, no impact would occur.

### 3.14.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.14.4 Conclusion

Based on the impact discussion above, no impact associated with population and housing would occur. As a result, mitigation measures are unnecessary.

## 3.15 Public Services

| Public Services | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or | | | | |

| | | | | | |
|---|---|---|---|---|---|
| | other performance objectives for any of the public services: | | | | |
| i. | Fire protection? | ☐ | ☐ | ☒ | ☐ |
| ii. | Police protection? | ☐ | ☐ | ☐ | ☒ |
| iii. | Schools? | ☐ | ☐ | ☐ | ☒ |
| iv. | Parks? | ☐ | ☐ | ☐ | ☒ |
| v. | Other public facilities? | ☐ | ☐ | ☐ | ☒ |

The RJR property receives public services mostly from the City of Hollister. The City is responsible for providing parks and recreation and fire and police protection.

**Fire Protection:** Fire protection is provided by the City of Hollister, a full-time, paid service. The nearest fire station is located at the City of Hollister Airport, about a mile away.

**Police Protection:** The City of Hollister Police Department provides police protection.

**Schools:** The Hollister School District provides public educational services to the city and nearby areas. RJR is not located within 0.25 mile of a public or private school. The nearest school is Meadowlark Preschool, located approximately 1.5 miles southeast of the project site.

**Parks:** The City of Hollister Parks and Recreation Department or the Hollister School District provide and maintain numerous parks and other recreational facilities.

## 3.15.1 Impact

a) Public Services

i. Fire Protection. The City of Hollister Fire Department currently serves and would continue to serve RJR facilities following implementation of the proposed project. The nearest station is located approximately one mile west of the project site at the airport. The RJR site is connected to an alarm system that alerts the Hollister Fire Department by phone. There are two fire hydrants located on the project site together with fire extinguishers located throughout the site every 75 feet for employee use. Fire safety and fire drills are part of regular training conducted on-site with all RJR staff. RJR would continue to operate in compliance with the requirements of the Hollister Fire Department during and following implementation of the proposed project. Compliance with the Hollister Fire Department requirements is expected to reduce potential impacts associated with the provision of fire protection services. Therefore, the impacts would be less than significant.

ii. Police Protection. Police protection is currently provided to RJR by the Hollister Police Department and will continue following implementation of the proposed project. Implementation of the proposed project would not result in a change in existing land use that would result in an increased demand for police protection. Therefore, no impact would occur.

iii. Schools. RJR is not located within a 0.25-mile radius of a school. The nearest school is Meadowlark Preschool, located approximately one mile southeast of the project site. The proposed project would not place an increased demand on or result in impacts to local schools. Therefore, no impact would occur.

iv. Parks. There are no parks located within a 0.5-mile radius of the project site. There is a dog park approximately 0.5 miles north of the project site. The proposed project is not anticipated to increase demand for, nor adversely affect, local or regional park resources. Therefore, no impact would occur.

v. Other Public Facilities. Implementation of the proposed project is not expected to result in impacts because the project site will not require any additional public facilities. Therefore, no impact would occur.

### 3.15.2 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.15.3 Conclusion

Based on the impact discussion above, impacts associated with public services would be less than significant.

## 3.16 Recreation

| Recreation | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |

| | | | | | |
|---|---|---|---|---|---|
| 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. | 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? | ☐ | ☐ | ☐ | ☒ |

## 3.16.1 Setting

San Benito County has more than 144,000 acres of federal, state, and county parks and recreational areas. A list of these sites is in the 2035 San Benito County General Plan. There are also several private recreational facilities. The County adopted a standard of 5 acres of parks for every 1000 residents. The current ratio is 16.2 acres of parkland for 1000 people, not including private sources.

Within the City of Hollister, there are multiple recreational opportunities including 9 parks, seven school recreational sites, and several County facilities totaling 169 acres. This provides a level of service of 4.6 acres per 1000 residents (Hollister Park Facility Plan, 2019).

## 3.16.2 Impact

a) The proposed project would not create a new use that would generate population growth or increase demand for existing or new recreational facilities. Therefore, deterioration of existing facilities would not occur because of the proposed project. The proposed project would not include recreational facilities or require the expansion of existing recreational facilities. Therefore, no impact would occur.

b) The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact would occur.

## 3.16.3 Mitigation

Mitigation proposed by RJR is not necessary.

## 3.16.4 Conclusion

Based on the impact discussion above, no impact associated with recreational facilities would occur; therefore, no mitigation is required.

# 3.17 Transportation and Traffic

| Transportation and Traffic | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| 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 §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? | ☐ | ☐ | ☐ | ☒ |

## 3.17.1 Setting

Regulatory Background – Vehicle Miles Traveled. Senate Bill 743 (Steinberg, 2013), which was codified in Public Resources Code (PRC) §21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, §15000 et seq.) regarding the analysis of transportation impacts.

Pursuant to PRC §21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Id., subd. (b)(1); see adopted CEQA Guidelines, §15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].)

Consequently, the California Governor's Office of Planning and Research (OPR) proposed, and the California Natural Resources Agency certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. With the California Natural Resources Agency's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by "level of service" and other similar metrics, no longer constitutes a significant environmental effect under CEQA (Pub. Resources Code, §21099, subd. (b)(3)).

Local Roadway Network. The project site is located directly east of the intersection of Flynn Road and San Felipe Frontage Road, both of which are two lane roadways. Flynn Road, which terminates at the

project entrance, provides the primary access to the project site. The San Felipe Frontage Road boarders the project site's western boundary. The San Felipe Frontage Road parallels State Route 156B/San Felipe Road, which is a separated, four-lane highway located directly to the west. The State Route 156B/San Felipe Road intersection with Flynn Road is located approximately 100 feet west of the Flynn Road/San Felipe Frontage Road intersection. Vehicles traveling to the project site primarily travel northbound on State Route 156B/San Felipe Road and turn right at the Flynn Road intersection. Departing vehicles use the same route, turning left from Flynn Road onto State Route 156B/San Felipe Road.

Bicycle and Pedestrian Network. No sidewalks or marked crosswalks are located within the project area. A one-way Class II bike lane extends along the western side of the San Felipe Frontage Road. This bike lane consists of a striped lane and signage that accommodates bicycles traveling southbound on the San Felipe Frontage Road. The bike lane extends south from a Class II bike lane on Fallon Road to its terminus at McCloskey Road. No bus stops or transit routes are located within the project vicinity.

Construction Traffic. There will be no new construction for the proposed project.

Operational Traffic. The project would increase vehicle trips on local roadways, which could minimally contribute to increased travel delays for local roadway users. However, with the California Natural Resources Agency's certification and adoption of the changes to the CEQA Guidelines mandated by Senate Bill 743, automobile delay no longer constitutes a significant environmental effect under CEQA (Pub. Resources Code, § 21099, subd. (b)(3)).

## 3.17.2 Impact

a) The project will not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. CEQA Guidelines Section 15064.3(b) applies to land use and transportation projects that would be expected to increase vehicle miles driven during their operations. Section 15064.3(b)(3) requires land development projects to evaluate Vehicle Miles Travelled (VMT) instead of the delay and level of service (LOS) at streets and intersections. The December 2018 "Technical Advisory on Evaluating Transportation Impacts in CEQA" issued by the Governor's Office of Planning and Research, suggests that certain types of projects may be screened out from VMT impacts or analysis as they may generally be assumed to cause less than significant VMT impacts. One of these screening criteria is small projects that generate less than 110 average daily trips (ADT). The facility currently receives a peak of 27 incoming vehicles delivering recyclable materials to the site and 4 outgoing vehicles transporting recovered recyclable materials to their end users.

   The proposed project would increase the number of incoming vehicles by 45 vehicles per day and the number of outgoing vehicles by 10.5 per day. As a result, the project would add a total of 55.5 vehicle trips, which is under the 110 ADT screening threshold and will therefore result in a less than significant impact.

b) The proposed project is not VMT generating like a residential or commercial project of similar acreage. As such, for purposes of VMT, it would be considered a small project. Therefore, the proposed project would not be expected to conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

CEQA does not require that heavy-duty trucks be included in the VMT analysis. As noted in OPR's "Technical Advisory on Evaluating Transportation Impacts in CEQA," "For this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." As the Technical Advisory explains, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks (SUVs and pick-up trucks). In changing from LOS to VMT as the metric by which transportation impacts are analyzed for CEQA, SB 743 focused on passenger vehicles with a goal to reduce VMT through the use of public transit, walkable communities, biking, mixed use development, and other development strategies that reduced passenger travel to and from residences, workplaces, and commercial opportunities.

With a project, such as a recycling facility, that would create conflicts if placed adjacent to heavily developed communities and thereby reduce VMT of haul trucks, analysis under the principles and goals of SB 743 does not provide meaningful information. Therefore, the inclusion of medium heavy-duty trucks for VMT would not be consistent with SB 743. Instead, the environmental impacts from the medium heavy-duty trucks are analyzed in the Air Quality, Greenhouse Gas and Climate Change, and Noise sections of this Initial Study. This impact would be less than significant.

c) Access to the site is directly from San Felipe Frontage Road, which is perpendicular to the main facility entrance. For vehicles exiting the main entrance, there are clear site distance views to the north and south with no intervening vegetation or other visual obstructions. Similarly, for vehicles that continue west across the San Felipe Frontage Road to access State Route 156B/San Felipe Road, no visual obstructions are present in either direction along this straight roadway. Also, the roadways near the main site entrance do not include any topographic variation that would obstruct views or contribute to hazardous geometric design features.

For northbound vehicles accessing the site from State Route 156B/San Felipe Road, a short deceleration area of approximately 100 feet is available as the vehicles approach the stop sign controlling the Flynn Road/San Felipe Frontage Road intersection. This deceleration area allows vehicles turning right onto Flynn Road to reduce their speed without substantially slowing northbound traffic flows. For southbound vehicles turning left onto Flynn Road to access the site, State Route 156B/San Felipe Road contains an existing 150-foot left-turn pocket, which minimizes conflicts with southbound through traffic.

For outbound vehicles turning right or left from Flynn Road onto State Route 156B/San Felipe Road, no acceleration lane is present. To accommodate the right turn movement, vehicles must identify gaps in the northbound traffic and quickly accelerate up to speed and merge with the traffic flow. To accommodate the left turn movement, vehicles must cross two lanes of northbound traffic and quickly merge into the southbound traffic. However, the signalized intersection of State Route 156B/San Felipe Road and McCloskey Road to the south and State Route 156B/San Felipe

Road and Fallon Road to the north create gaps in the traffic flow that can accommodate these movements. Also, outbound vehicles can travel less than a quarter mile to the north to the intersection of State Route 156B/San Felipe Road and Fallon Road to turn left or right onto the highway at a signal. The project does not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures.

Farm equipment may use the San Felipe Frontage Road to access agricultural fields in the local area. However, due to the straight alignment of the road, the presence of farm equipment on this roadway would not represent an unusual hazard. Vehicles passing slow moving farm equipment would have a clear line of sight to any oncoming vehicles. The proposed project would not change these existing conditions. Also, the project will not result in any public or private roadway changes. Consequently, there will be no increase in hazards due to a new design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, this impact would be less than significant.

The proposed facility will not be changing any ingress and egress from/to San Felipe Road. It will continue to use the same routes that is using for the existing. Hazards will not be substantially increased due to no new road work is contemplated for the facility. Therefore, there would be no impact.

d) The project site would include multiple access points for emergency vehicles. These include the main entrance access at the eastern end of Flynn Road and the access driveway on the gravel road located along the north side of the project site. The roadways that provide access to the project site include San Felipe Frontage Road from the north and the south, State Route 156B/San Felipe Road from the north and south, and Flynn Road from the west. Because the project site would be accessible to emergency vehicles from multiple locations and would not impair emergency response; Therefore, there would be no impact.

## 3.17.3 Mitigation

Mitigation proposed by RJR is not necessary.

## 3.17.4 Conclusion

Based on the impact discussion above, potential impacts associated with traffic and transportation would be less than significant; therefore, no mitigation is required.

## 3.17.5 References

Governor's Office of Planning and Research (OPR). 2018 (December). Technical Advisory on Evaluating Transportation Impacts in CEQA. Available at: https://opr.ca.gov/docs/20190122- 743_Technical_Advisory.pdf.

# 3.18 Tribal Cultural Resources

| Tribal Cultural Resources | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| a. 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)? | ☐ | ☐ | ☐ | ☒ |
| b. 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. | ☐ | ☐ | ☐ | ☒ |

## 3.18.1 Setting

The proposed project is within the historic territory of the Obispeño Chumash and Salinan-speaking Native Americans. These Native Americans established a sophisticated system of horticulture, using seed scattering, harrowing, selective harvesting, coppicing (cutting back a tree or shrub to stimulate growth) and spot burning to produce crops of acorns, grass, and wildflower seeds. They also hunted wildlife and foraged for juncus, willow, redbud, and elderberry for basket making. The founding of Santa Margarita de Cortona Asistencia in 1787 and Mission San Miguel Arcángel in 1797 led to the gradual depopulation of native communities in this area. The State Route 41/46 corridor has historically served as a traveling route between the coastal areas and the Central Valley. These same routes were used by indigenous peoples for the movement of people and goods as well.

The project site is entirely disturbed, has been developed with the existing RJR since 2004, and is surrounded by highly developed industrial, farm and commercial land uses. No cultural or historic resources have been identified on the project site or in the immediate vicinity. A search of the Sacred Lands File was conducted for the project by the Native American Heritage Commission (NAHC) with negative results (NAHC 2022).

The project site is not associated with any significant event or trend in American history, nor has it been directly associated with persons significant in our past. The buildings and structures on the project site were constructed after 2003 and are utilitarian resources common to industrial operations associated with RJR. Lastly, the project site is not expected to yield information about prehistory or history. Therefore, the project site is not a historic property, as defined in Section 106 of the NHPA, nor does it qualify as a historical resource under CEQA.

## 3.18.2 Impact

a) As discussed above, the project site is not associated with any significant event or trend in American history, nor has it been directly associated with persons significant in our past. The buildings and structures on the project site were constructed after 2003 and are utilitarian resources that are common to industrial operations associated with the RJR. The project site is not expected to yield information about prehistory or history; therefore, the project site is not a historic property, as defined in Section 106 of the NHPA, nor does it qualify as a historical resource under CEQA. Implementation of the project would not result in impacts to resources 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). Therefore, no impact would occur.

b) A Sacred Lands File search was performed for the project area by the NAHC with negative results. This complies with Public Resources Code Sections 21080.3.1 and 21080.3.2, requiring public agencies, such as the San Benito County Planning Department to consult with California Native American tribes identified by NAHC for the purpose of mitigating impacts to tribal cultural resources. There are no known tribal or other cultural resources within the project site or vicinity. There will not be any construction associated with this proposal. Therefore, implementation of the project would have no impact on 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.

c) On September 18, 2025, pursuant to Assembly Bill 52 (Public Resources Code §21080.3.1), the lead agency provided formal notice of the project to all California Native American Tribes that are traditionally and culturally affiliated with the project area. No requests for consultation were received.

## 3.18.3 Mitigation

Mitigation proposed by RJR is not necessary.

## 3.18.4 Conclusion

Based on the impact discussion above, no impact on tribal cultural resources would occur as a result of the proposed project.

# 3.19 Utilities and Service Systems

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

## 3.19.1 Setting

The project site is served potable water by the San Benito Water District. Water for this area of the Hollister vicinity comes from the West Hills Water Treatment Plant. There is a water well on-site that will provide water in case of an emergency.

The existing RJR facilities use about 500 gallons per day for cleaning work areas. The industrial building located on the project site is equipped with trench drains that collect water from washing and dust control operations. Water is then processed through a 2,500-gallon water clarifier and pumped through a filter system before being stored in a 5,000-gallon holding tank for reuse, as part of the on-site water reclamation and recycling system. RJR disposes of its domestic waste water to an onsite underground septic system.

Other areas on the project site, including the driveway, parking area, and outside tipping floor, drain into a storm drain system at the northern and southeastern portions of the property. Prior to entering the storm drain inlet, water is filtered through a straw wattle perimeter to remove dirt, mud, and contaminants. Wattles are regularly inspected and replaced on an as-needed basis. Wattles are tubular rolls made from natural or synthetic fibers, designed to prevent soil erosion and to filter water runoff.

The RJR facility currently hauls residual trash to the John Smith Road Landfill, located at 2650 John Smith Road Highway. The landfill is located about 6.5 miles from the project. It is a 95-acre landfill facility with a permitted acceptance rate of 1000 tpd and a design capacity of approximately 9.4 million cubic yards. (CalRecycle 2013). A planned expansion of landfill capacity of 190 acres will provide an expected 80+ years of additional capacity.

## 3.19.2 Impact

a) Under the new Full Solid Waste Facility Permit, RJR would continue to receive water services. The project is expected to generate only negligible additional wastewater and water use as staffing and equipment needs are not expected to increase demand. Implementation of the proposed project would not alter existing drainage patterns. It will not require or result in the construction of public new stormwater drainage facilities. Therefore, impacts would be less than significant.

b) As described in Section 1.3.3 Operational Activities, implementation of the proposed project would result in a minor change in existing water demand. The continuation of existing operations at the RJR will result in the continuation of existing San Benito Water District potable water use in the offices, restrooms, eye-washing stations, drinking fountains, landscaping, wash-down and ground-height dust control purposes. The proposed project is expected to be a minor increase in RJR's demand for water supply and would not require or result in the construction of new water facilities. Therefore, impacts would be less than significant.

c) The City of Hollister Water Services, which serves the project, has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Refer to Impact Discussion 3.19.1 above. As discussed previously, the proposed project might result in a negligible increase in the generation of wastewater placing a minor increase in demand on the existing municipal wastewater treatment provider. Therefore, impacts will be less than significant.

d) RJR is proposed to have a combined permitted capacity of 350 tons per day, all of which is either hauled off-site to other locations for reuse as part of the compost operation (such as the GreenWaste Z-Best Composting Facility in Gilroy), reuse for manufacturing other products (various and appropriate facilities), or taken to the John Smith Road Landfill operation (i.e., residual trash inadvertently received with source-separated commingled residential and commercial recyclables or construction and demolition and inert debris).

Under the new Full Solid Waste Facility Permit as a Large Volume Transfer/Processing Facility through CalRecycle, RJR does not propose to recycle any new types of material. Once on-site processing activities are complete, municipal solid waste would be loaded onto a transfer trailer where it would be transported off-site to the John Smith Road Landfill. This landfill is expected to have sufficient permitted capacity to accommodate the proposed project's continuation of residuals processing in addition to the proposed municipal solid waste operations. Expanding RJR will reduce the impact on public solid waste facilities by reducing the amount of material currently taken to that facility. Therefore, there will not be no impact.

e) The existing RJR facilities and property are subject to all applicable federal, state, and local regulations. The proposed project would comply with all applicable federal, state, and local regulations. Therefore, impacts would be less than significant.

### 3.19.3 Mitigation

Mitigation proposed by RJR is not necessary.

### 3.19.4 Conclusion

Based on the impact discussion above, potential impacts associated with utilities and service systems would be less than significant; therefore, no mitigation is required or necessary.

## 3.20 Wildfire

| Wildfire | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☐ | ☒ |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate | ☐ | ☐ | ☐ | ☒ |

| | | | | | |
|---|---|---|---|---|---|
| | fire risk or that may result in temporary or ongoing impacts to the environment? | | | | |
| d. | Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | ☐ | ☐ | ☐ | ☒ |

## 3.20.1 Setting

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. According to the Fire Hazard Severity Zone Viewer effective April 1, 2024, the project location is not in a Fire Hazard Zone of a State Responsibility Area.

In addition, the geographic center of this parcel is located in an area that the State Fire Marshal has identified as having no Fire Hazard Severity Zone in Local Responsibility Area, per Government Code section 51178.[7] For a Local Responsibility Area the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of a local agency. For the project site, this service is provided by the City of Hollister.

## 3.20.2 Impact

a) The project would have no impact on any adopted emergency response plan or emergency evacuation plan as the project site or the surrounding area is not in a Fire Hazard Severity Area. Therefore, there would be no impact.

b) Given that a substantial area around the project site is not in a Fire Hazard Area, the project will not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors, increasing wildfire risks. Therefore, there would be no impact.

c) The project will not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may increase fire risk or that may result in temporary or ongoing impacts to the environment. No construction activities are planned for the project, and increased operations are not expected to affect infrastructure on or off the project site. Therefore, there would be no impact.

d) The project will not 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

[7] Fire Hazard Severity Zones | OSFM

changes. The project site is flat and will not involve any drainage changes. Therefore, there would be no impact.

### 3.20.3 Mitigation

Mitigation is not necessary.

### 3.20.4 Conclusion

Based on the impact discussion above, there will be no impacts associated with potential wildfires; therefore, no mitigation is required or necessary.

## 3.21 Mandatory Findings of Significance

| Mandatory Findings of Significance | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less-Than-Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project: | | | | |
| a. Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |

### 3.21.1 Impact

a) Under the new proposed Full Solid Waste Facility Permit, the proposed project would include the continuation of all existing operations, facilities, and equipment associated with construction and demolition and inert debris, green material, green material mixed with residential food material, and source-separated commingled residential and commercial recyclables.

   As described throughout the impact analysis in Section 3.0, Evaluation of Environmental Impacts, through project design, as well as compliance with the existing RJR Industrial Activities SWPPP and the TPR, the proposed project would not result in any significant impacts to the environment. The RJR property is designated for industrial land uses and is entirely disturbed and developed with existing RJR facilities and operations. Implementation of the proposed project would not significantly degrade the quality of the environment, 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant.

b) As described throughout the impact analysis in Section 3.0, Evaluation of Environmental Impacts, through project design, as well as compliance with the existing SWPPP and TPR, the proposed project would not result in any individually limited or cumulatively considerable impacts to the environment. Operation of the proposed project, including the continuation of existing operations and its expansion are not expected to significantly contribute to cumulative impacts in the project area.

   As discussed in Sections 3.3, Air Quality, and 3.7, Greenhouse Gas Emissions, impacts associated with air quality and greenhouse gas emissions resulting from the proposed project would not exceed established thresholds and would be less than significant. As described in Section 3.16, Transportation and Traffic, vehicle trips within existing permitted trip limits are considered negligible. As discussed in Sections 3.14, Public Services, 3.15, Recreation, and 3.18, Utilities and Service Systems, the proposed project would not place a new demand on public services, facilities, or utilities that could result in cumulative impacts. Therefore, impacts associated with the proposed project are not considered cumulatively considerable and would be less than significant.

c) The proposed project is not expected to result in environmental effects that would cause substantial adverse effects on human beings indirectly or directly. Implementation of the proposed project would continue to operate in compliance with the solid waste handling State minimum standards in 14 CCR, the TPR, and the existing Fire Safety Plan approved by the City of Hollister Fire Department, which are expected to sufficiently manage and prevent adverse effects on human beings. Therefore, impacts are less than significant.

### 3.21.2 Mitigation

~~a)~~ Existing law and regulations address whatever mitigation of impacts is required. Therefore, no further mitigation by RJR is required.

~~b)~~ Existing law and regulations address whatever mitigation of impacts is required. Therefore, no further mitigation by RJR is required.

~~c)~~ Existing law and regulations address whatever mitigation of impacts is required. Therefore, no further mitigation by RJR is required.

### 3.21.3 Conclusion

Based on the impact discussion above, potential impacts associated with the proposed project would be less than significant; therefore, no additional mitigation provided by RJR is required.