DRAFT

Initial Study/Mitigated Negative Declaration 5201 Airline Highway and 111 Best Road Project

Prepared for:

County of San Benito
2301 Technology Parkway
Hollister, California 95023

September 2026

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Draft Initial Study/Mitigated Negative Declaration
5201 Airline Highway and 111 Best Road Project

Prepared for:

County of San Benito
2301 Technology Parkway
Hollister, CA 95023

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September 2026

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LIST OFACRONYMS AND ABBREVIATIONS

3CE	Central Coast Community Energy
AB	Assembly Bill
AP	Agricultural Productive
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
BMP	Best Management Practices
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CHRIS	California Historical Resources Information System
CO	carbon monoxide
CRPR	California Rare Plant Rank
dB	decibels
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
FIRM	Flood Insurance Rate Maps
GHG	Greenhouse gas
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
ITP	Incidental Take Permit
Ldn	Day-Night Average Level
MBARD	Monterey Bay Air Resources District
NAHC	Native American Heritage Commission
NETR	Nationwide Environmental Title Research
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
RR	Residential Rural
RWQCB	Regional Water Quality Control Board
SB	Senate Bill

SWPPP	Stormwater Pollution Prevention Plan
USFWS	US Fish and Wildlife Service
VMT	vehicle miles traveled
Williamson Act	California Land Conservation Act

1 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the County of San Benito to evaluate potential environmental effects resulting from 5201 Airline Highway and 111 Best Road Project, herein referred to as the proposed project. Section 2 "Project Description" presents the detailed project information.

This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). An initial study is prepared by a lead agency to determine if a project may have a significant effect on the environment (State CEQA Guidelines Section 15063[a]), and thus to determine the appropriate environmental document. In accordance with State CEQA Guidelines Section 15070, a "public agency shall prepare…a proposed negative declaration or mitigated negative declaration…when: (a) The Initial Study shows that there is no substantial evidence…that the project may have a significant impact on the environment, or (b) The Initial Study identifies potentially significant effects but revisions to the project plans or proposal are agreed to by the applicant and such revisions would reduce potentially significant effects to a less-than-significant level." In this circumstance, the lead agency prepares a written statement describing its reasons for concluding that the project would not have a significant effect on the environment and, therefore, does not require the preparation of an Environmental Impact Report (EIR). By contrast, an EIR is required when the project may have a significant environmental impact that cannot clearly be reduced to a less-than-significant effect by adoption of mitigation or by revisions in the project design.

1.2 WHY THIS DOCUMENT?

As described in the environmental checklist (Chapter 3), the project would not result in any unmitigated significant environmental impacts. Therefore, an IS/MND is the appropriate document for compliance with the requirements of CEQA. This IS/MND conforms to these requirements and to the content requirements of State CEQA Guidelines Section 15071.

Under CEQA, the lead agency is the public agency with primary responsibility over approval of the project. The County of San Benito is the CEQA lead agency because they are responsible for approval of the project. The purpose of this document is to present to decision-makers and the public information about the environmental consequences of implementing the project. This disclosure document is being made available to the public for review and comment. This IS/MND will be available for a minimum 30-day public review period from October 1, 2026, to November 2, 2026.

Supporting documentation referenced in this document is available for review at:

Resource Management Agency
County of San Benito
2301 Technology Parkway
Hollister, CA 95023

Comments should be addressed to:

Abraham Prado, Director of Planning and Building Services
Resource Management Agency
County of San Benito
2301 Technology Parkway
Hollister, CA 95023

E-mail comments may be addressed to: aprado@sanbenitocountyca.gov

If you have questions regarding the IS/MND, please call Abraham Prado, Director of Planning and Building Services, at: (831) 902-2273. If you wish to send written comments (including via e-mail), they must be postmarked by November 2, 2026.

After comments are received from the public and reviewing agencies, the County of San Benito Board of Supervisors may (1) adopt the MND and approve the project; (2) undertake additional environmental studies; or (3) abandon the project. If the project is approved, the project proponent may proceed with the project.

1.3 SUMMARY OF FINDINGS

Chapter 3 of this document contains the analysis and discussion of potential environmental impacts of the project.

Based on the issues evaluated in that chapter, it was determined that the project would have either no impact or a less-than-significant impact related to most of the issue areas identified in the Environmental Checklist, included as Appendix G of the State CEQA Guidelines. These include the following issue areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Wildfire

Potentially significant impacts were identified for biological resources, cultural resources, noise, and tribal cultural resources; however, mitigation measures included in the IS/MND would reduce all impacts to a less-than-significant level.

1.4 DOCUMENT ORGANIZATION

Chapter 1: Introduction. This chapter provides an introduction to the environmental review process. It describes the purpose and organization of this document as well as presents a summary of findings.

Chapter 2: Project Description. This chapter describes the purpose of and need for the proposed project, identifies project objectives, and provides a detailed description of the project.

Chapter 3: Environmental Checklist. This chapter presents an analysis of a range of environmental issues identified in the CEQA Environmental Checklist and determines if project actions would result in no impact, a less-than-significant impact, a less-than-significant impact with mitigation incorporated, or a potentially significant impact. If any impacts were determined to be potentially significant and unavoidable, an EIR would be required. For this project, however, none of the impacts were determined to be significant after implementation of mitigation measures.

Chapter 4: References. This chapter lists the references used in preparation of this IS/MND.

Chapter 5: List of Preparers. This chapter identifies report preparers.

2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The project site is located at 111 Best Road and 5201 Airline Highway, in unincorporated San Benito County, California approximately 1.1 miles east from the City of Hollister (Figure 2-1). The properties comprising the project site are identified as Assessor's Parcel Number (APN) 025-190-033, 025-190-032, 025-200-001, and 025-200-002. Combined, the project site consists of approximately 433 acres. The project site, including the property boundaries for the four parcels comprising the site, are shown on Figure 2-2.

2.2 EXISTING SETTING

2.2.1 General Plan Designation

The project site is designated as Residential Rural (RR) in the San Benito County 2035 General Plan (County of San Benito 2015). The purpose of the RR designation is to allow for large-lot rural residential homes within areas of the County that are generally unsuitable for productive agriculture because of existing small property sizes, multiple property owners, and proximity to other more intensive residential development. The maximum allowable density in the RR designation is 2 dwelling units per acre.

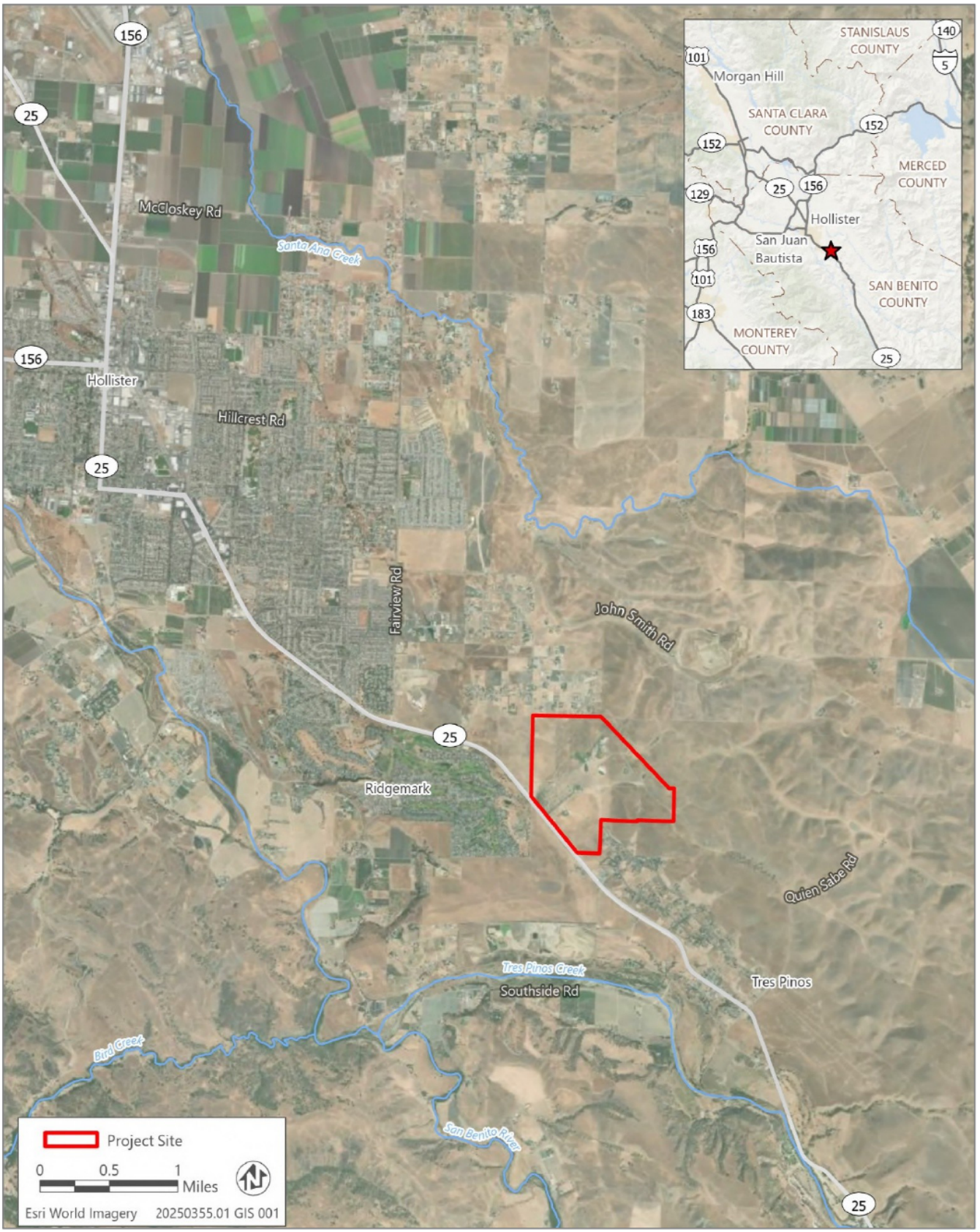
2.2.2 Zoning

The project site is zoned as Agricultural Productive (AP) in the County's zoning ordinance, which is found in Title 25 of the San Benito County Code. The intent of the AP zoning district is to provide for areas within the County to be used for agricultural production of any type as set forth in the general plan, including agriculture support uses, vineyards, wineries and winery supporting land uses, low-density residential uses, and the preservation of prime farmland. Farmworker housing is also permitted. Single-family dwelling units are permitted in the AP zoning district, consistent with the density requirements of the General Plan.

2.2.3 Site Conditions and Surrounding Land Uses

The project site is in a rural setting predominately characterized by undeveloped and agricultural land, though there are four existing residential structures on the project site. The project site is relatively hilly, with elevations ranging from approximately 524 feet to 753 feet above mean sea level. The site generally slopes from east to west with the highest elevation occurring in the southeast corner of the property, and the lowest elevation in the flatter, western area of the project site. Most of the site is upland and contains disturbed vegetation from grazing and the existing residential and agricultural uses. However, the site contains emergent wetlands and drainage swales.

The existing residential structures on the project site are accessed from driveways on Best Road and include associated septic systems and wells. Two of the driveways are lined with trees, which are generally the only trees on the project site except for remnants of a recent orchard area near the intersection of Best Road and Airline Highway. Until recently the orchard area was approximately 25 acres of the site, but was reduced to approximately 1 or 2 acres and now serves primarily as privacy screen between Airline Highway and the existing on-site residents. Numerous unpaved roads traverse the project site, and there is also an existing telecommunications facility on-site. In addition to the telecommunications facility, there are existing utility easements on the project site, including easements for buried gas utilities and overhead pole utilities.



Source: adapted by Ascent in 2026.

Figure 2-1 Project Vicinity



Source: adapted by Ascent in 2026.

Figure 2-2 Project Site

Land to the east of the project site is hilly and undeveloped. There are unpaved roads that traverse there, but little to no existing development other than utility infrastructure. Land to the north and south of the project site are developed with low-density residential uses, which is characteristic within the project area. However, the Ridgemark Golf Club and Resort is west of the project site, on the opposite side of Airline Highway. The golf club includes a typical 18-hole golf course with accompanying residential development (Figure 2-2).

2.3 DESCRIPTION OF PROJECT

The County of San Benito received two separate applications for approval of Tentative Maps of Subdivision. One of the subdivision applications (County Planning file PLN250035) would subdivide approximately 235 acres of the project site (APN 025-190-033 and 025-190-032) located at 111 Best Road in unincorporated San Benito County. These properties would be subdivided into four parcels and one remainder parcel, consisting of two parcels of approximately 26.60 acres each, one parcel of approximately 45.50 acres, one parcel of approximately 72.60 acres, and a remainder parcel of 63.50 acres (Figure 2-3). No new construction is proposed on the created parcels, but the project would retain the existing residences, and communications tower.

The other subdivision application (County Planning file PLN250046) would subdivide approximately 198 acres of the project site (APN 025-200-001 and 025-200-002) located at 5201 Airline Highway, adjacent to the other proposed subdivision. These properties would be subdivided into four parcels and one remainder parcel. The four parcels would measure approximately 174.82 acres, 5.84 acres, 5.84 acres, and 5.00 acres. The remainder parcel would be approximately 6.14 acres (Figure 2-4). This subdivision would also include an approximately 0.36-acre dedication for a San Benito County Water District easement. No new construction is proposed on the created parcels.

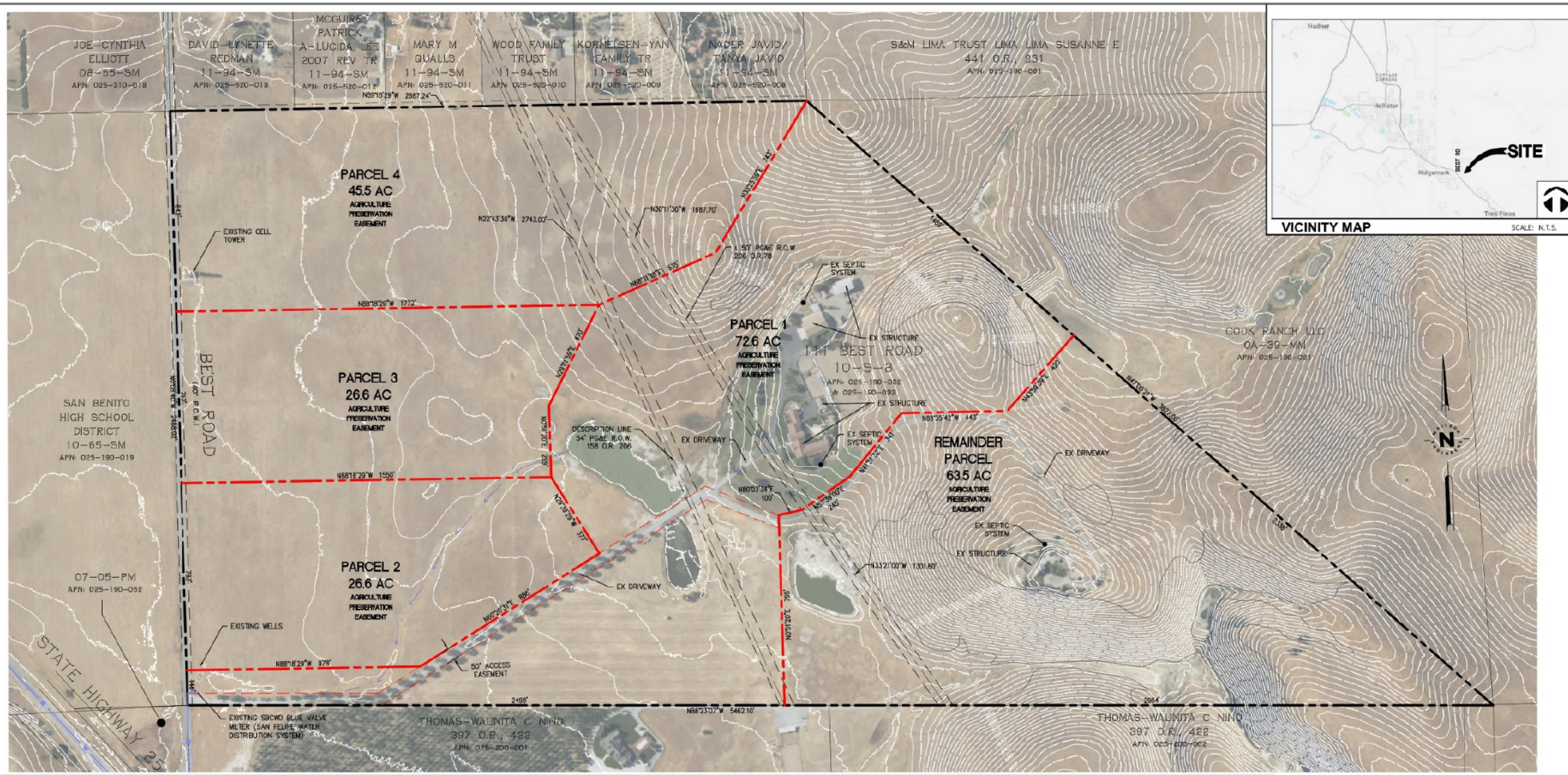
The County is considering these two subdivisions, combined, to be the proposed project evaluated in this Initial Study. Combing these two applications into a single project is reasonable not only given they are both subdivisions without construction and are adjacent, but because all four parcels involved (i.e., the project site) contain similar existing conditions (see Figure 2-2). Therefore, the potential environmental impacts of both applications, and any mitigation measures, would be common and can be considered a single proposed project for purposes of CEQA.

As proposed, the project would subdivide the project site into 10 parcels. Four of these parcels would contain the four existing residential structures on the project site. The other six parcels would not have existing residential structures within their boundary. As described in Sections 2.2.1 and 2.2.2, single-family dwelling units are a permitted use in the RR land use designation and AP zoning district. Therefore, although the proposed project does not include construction and consists only of the subdivision of land, this Initial Study evaluates the potential for up to six new single-family dwelling units on the project site, one for each of the six vacant lots that would be created by the proposed project consistent with the zoning.

2.4 REQUIRED ACTIONS

The project would require the following approval:

- County of San Benito: approval of tentative parcel map.



SUBDIVISION DATA

PROPERTY DATA

ASSESSORS PARCEL NO.:	025-190-032 AND 025-'90-033
LOCATION OF PROPERTY:	111 BEST ROAD, HOLLISTER, CA 95023
EXISTING/PROPOSED GENERAL PLAN LAND USE:	RESIDENTIAL RURAL (RR)
EXISTING/PROPOSED ZONING:	AGRICULTURE PRODUCTIVE
FIRE ZONE:	MODERATE/HIGH FIRE HAZARD SEVERITY ZONE (IN LOCAL RESPONSIBILITY AREA)
LANDSLIDE ZONE:	VARRYING BETWEEN CLASS 3-10
FLOOD ZONE:	ZONE X
ALQUIST-PRIOLO ACT ZONE:	NO

AREA:

PARCEL 1	72.6	AC
PARCEL 2	26.6	AC
PARCEL 3	26.6	AC
PARCEL 4	45.5	AC
REMAINDER PARCEL	63.5	AC
TOTAL AREA:	234.8	AC

BEST ROAD UTILITIES:

STORM DRAINAGE	PRIVATE
SANITARY SEWER	SEPTIC SYSTEMS
WATER	WELLS/SAN BENITO COUNTY SAN FELIPE SYSTEM (IRRIGATION)
GAS & ELECTRIC	PG&E
TELEPHONE	SPECTRUM

PROJECT TEAM

OWNER/SUBDIVIDER

THE MIKE AND TRACY NINO FAMILY REVOCABLE TRUST
PO BOX 1180
TRES PINOS, CA 95075

MICHAEL J. NINO
(831)902-0566

GEOTECHNICAL ENGINEER

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(831) 240-4624

CIVIL ENGINEER

WHITSON ENGINEERS
6 HARRIS COURT
MONTEREY, CA 93940

ANDREW P. HUNTER, RCE 67730
(831) 649-5225

NOTES:

1. GROUND CONTOURS ARE APPROXIMATE, BASED ON LIDAR-BASED TOPOGRAPHIC DATA BY USGS (2017).
2. FUTURE SITE IMPROVEMENTS SHALL MITIGATE CONCENTRATED OR INCREASED STORMWATER RUNOFF RESULTING FROM IMPERMEABLE SURFACES. NO NEW IMPROVEMENTS ARE CURRENTLY PROPOSED WITH THIS SUBDIVISION.
3. NEW SUBDIVISION INCLUDES THE ADDITION OF AN AGRICULTURE PRESERVATION EASEMENT.

ABBREVIATIONS/LEGEND

(100)	GROUND CONTOUR
	TRACT BOUNDARY
	EASEMENT LINE
	ADJACENT PROPERTY LINE
	PROPOSED PROPERTY LINE
	PROPOSED EASEMENT LINE
	FENCE
W	SAN FELIPE WATER DISTRIBUTION SYSTEM
	SIGN
UP	UTILITY POLE SHOWING ARMS AND GUY WIRE
	30% SLOPE OR GREATER
AC	ACRES
EX	EXISTING
ROW	RIGHT-OF-WAY

LEGAL DESCRIPTION

THE SOUTH HALF OF SECTION 8, TOWNSHIP 13 SOUTH, RANGE 6 EAST, MOUNT DIABLO BASE AND MERIDIAN.

EXCEPTING THEREFROM THAT PORTION THEREOF WHICH IS BOUNDED BY A LINE PARTICULARLY DESCRIBED AS BEGINNING AT THE SOUTHERLY CORNER COMMON TO SECTIONS 8 AND 9 AND RUNNING THENCE NORTH 45 DEGREE 07' WEST, 3758 FEET TO THE CENTER OF SAID SECTION 8, THENCE ALONG THE QUARTER SECTION LINE RUNNING EAST AND WEST THROUGH SAID SECTION 8 SOUTH 89 DEGREE 45' EAST 2640 FEET, MORE OR LESS, TO THE EASTERLY QUARTER SECTION CORNER OF SECTION, THENCE ALONG THE LINE COMMON TO SECTIONS 8 AND 9, SOUTH 0 DEGREE 30' EAST 2640 FEET, MORE OR LESS TO THE POINT OF BEGINNING.

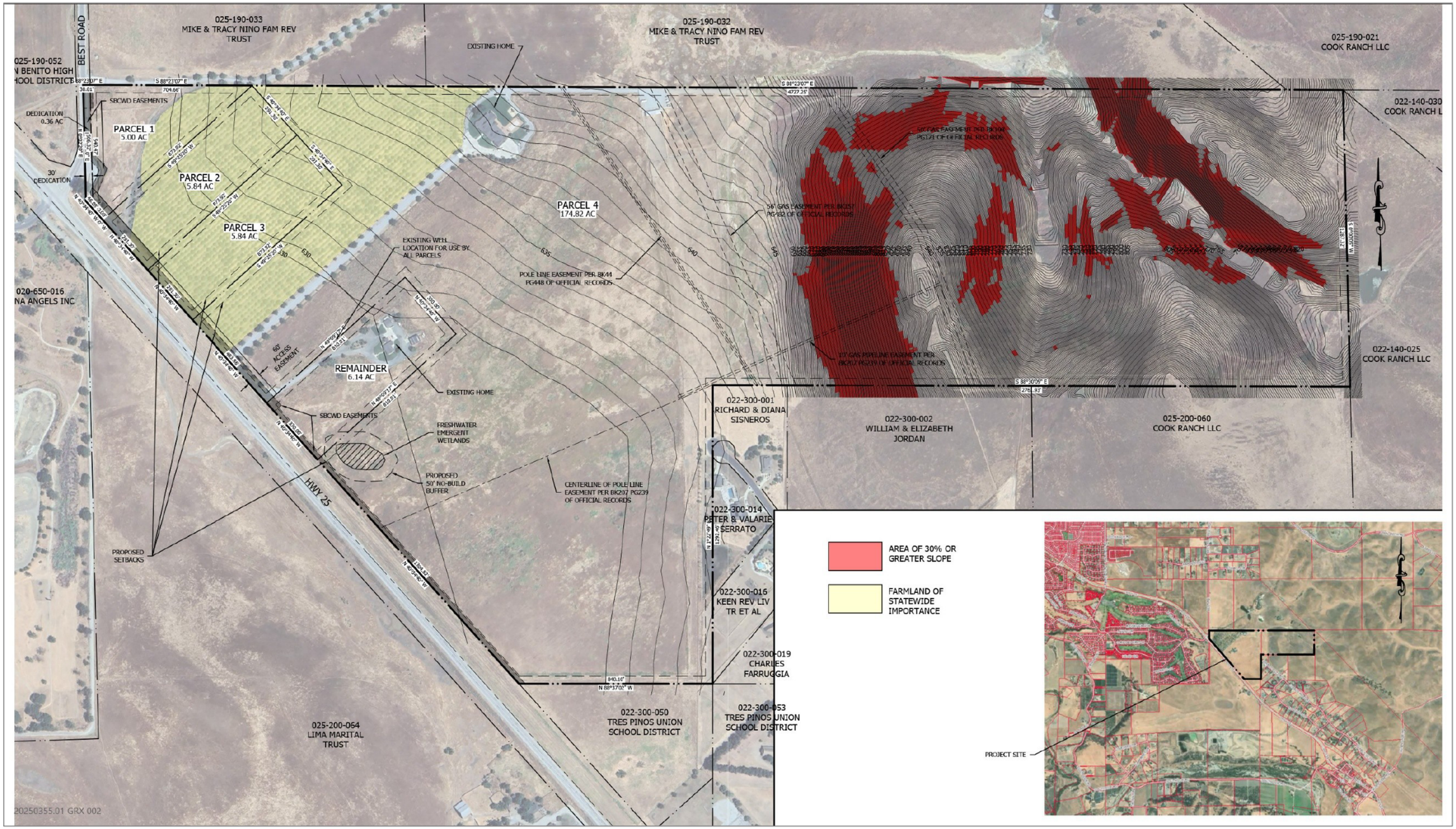
APNs: 025-190-032 AND 025-190-033 (111 BEST ROAD, HOLLISTER, CA 95023)

0 250 500 FEET

20250355.01 GRX 001

Source: Source: Image produced and provided by Whitson Engineers in 2025; adapted by Ascent in 2026.

Figure 2-3 Proposed Tentative Map of Subdivision: PLN250035



Source: Image produced and provided by Whitson Engineers in 2025; adapted by Ascent in 2026.

Figure 2-4 Proposed Tentative Map of Subdivision: PLN250046

3 ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

1. **Project Title:**

   5201 Airline Highway and 111 Best Road Project

2. **Lead Agency Name and Address:**

   County of San Benito
   2301 Technology Parkway Hollister, CA 95023-2513

3. **Contact Person and Phone Number:**

   Abraham Prado, Director of Planning and Building Services
   (831) 902-2273

4. **Project Location:**

   5201 Airline Boulevard and 111 Best Road, San Benito County

5. **Project Sponsor's Name and Address:**

   Mike Nino
   P.O. Box 1180
   Tres Pinos, CA 95075

6. **General Plan Designation:**

   Residential Rural (RR)

7. **Zoning:**

   Agricultural Productive (AP)

8. **Description of Project:**

   See Chapter 2, "Project Description," for detailed information

9. **Surrounding Land Uses and Setting:**

   See Chapter 2, "Project Description," for detailed information.

10. **Other public agencies whose approval is required:**

    The project requires no approvals from other public agencies.

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

    See Section 3.18, "Tribal Cultural Resources," for detailed information regarding tribal consultation.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. Where noted below with a "Y" for yes, the topic with a potentially significant impact will be addressed in an environmental impact report.

- ☐ Aesthetics
- ☐ Agriculture and Forest Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology / Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards / Hazardous Materials
- ☐ Hydrology / Water Quality
- ☐ Land Use / Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population / Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities / Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance
- ☐ None
- ☒ None with Mitigation Incorporated

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.

Signature _____ Date _____

Printed Name_____ Title_____

Agency _____

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-than-significant impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a) Earlier 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.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a) the significance criteria or threshold, if any, used to evaluate each question; and
    b) the mitigation measure identified, if any, to reduce the impact to less than significance.

3.1 AESTHETICS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics. Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), 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 non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

3.1.1 Environmental Setting

The project site is in a rural setting predominately characterized by undeveloped and agricultural land, though there are four existing residential structures on the project site and other residential development in the surrounding area. The project site is relatively hilly and generally slopes from east to west with the highest elevation occurring in the southeast corner of the property. The lowest elevation is in the flatter, western area of the project site. Most of the site is upland and contains disturbed vegetation from grazing and the existing residential and agricultural uses. However, the site contains emergent wetlands and drainage swales. Two driveways on the project site are lined with trees, which are generally the only trees on the project site except for an orchard area. The orchard area is approximately 1 to 2 acres of the site and located in the western area of the site, near the intersection of Best Road and Airline Highway.

Land to the east of the project site is hilly and undeveloped. There are unpaved roads that traverse there, but little to no existing development other than utility infrastructure. Land to the north and south of the project site are developed with low-density residential uses, which is characteristic are the project area. However, the Ridgemark Golf Club and Resort is west of the project site, on the opposite side of Airline Highway. The golf club includes a typical 18-hole golf course with accompanying residential development

According the adopted 2035 San Benito County General Plan, the county's scenic views and resources are not located within proximity to the project site (San Benito County 2015). The project site is not among the scenic views identified in the General Plan EIR.

There are no officially designated state scenic highways in proximity to the project site. However, State Route 25, also known as Airline Highway, is an eligible state scenic highway and located directly along the southwest border of the project site, where the proposed subdivisions in the South Site are located. Views of the project site would be accessible from Airline Highway. The nearest officially designated state scenic highway is a segment of State Route

156 in Monterey County, approximately 8.2 miles west of the project site (Caltrans 2026). The project site is not within the viewshed of State Route 156, given the distance and topography.

Existing light sources in the vicinity of the project site are minimal, as is typical of a rural environment, and include light from nearby residential buildings and lights from motor vehicles traveling along Airline Highway and other less traveled roads in the area. Existing sources of glare in the vicinity of the project site are also minimal and include light reflected from building windows and vehicles, as well as roof-top solar panels.

3.1.2 Discussion

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

No Impact. There are no scenic vistas designated at the project site or in the project area. Views of scenic vistas from and through (or across) the project site are limited by topography and vegetation. Because the project site is not part of a scenic vista, and no scenic vistas are visible from or through the project site, the project would have no 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?

Less-than-significant impact. As discussed in Section 3.1.1, the project site is not within the viewshed of an officially designated state scenic highway. However, Airline Highway is an eligible state scenic highway and is adjacent to the project site. The proposed subdivision of the project site would not have physical effects on the landscape or appearance of the project site. However, this analysis considered the potential for a single-family house to be constructed on six of the newly created parcels in the future. These houses would be visible from Airline Highway, but would be characteristic of the existing viewshed from Airline Highway. The segment of Airline Highway adjacent to the project site is also adjacent to the Ridgemark Golf Club and Resort, which contains residential structures. There is also residential development immediately south of the project site and adjacent to Airline Highway. For this reason, the addition of six houses on the project site would not substantially alter scenic resources along Airline Highway. Additionally, Airline Highway is not an officially designated state scenic highway. Impacts would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less-than-significant impact. The project site is in a non-urbanized area characterized by undeveloped and agricultural land with dispersed residential development and roads. The proposed subdivision of the project site would not alter the physical conditions or appearance of the project site. However, potential future residential development at the project site would add up to six single-family homes to the viewshed. At six units on lots equal to or exceeding five acres, the density would be similar to that of surrounding properties, such as the property adjacent to the south, and would occur in accordance with County requirements, which would ensure that the visual character and quality of new development is compatible with surrounding land uses. The new houses would be seen in context with other similar types of development and would not substantially degrade the existing visual character or quality of public views, such as from Airline Highway or Best Road. Impacts would be less than significant.

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

Less-than-significant impact. As discussed in Section 3.1.1, existing sources of light and glare within and surrounding the project site are minimal, consisting of interior and exterior building lights from nearby residential structures, lights from motor vehicles traveling on Airline Highway, and small amounts of glare from light reflected

from windows on houses and vehicles. The proposed subdivision of the project site would not introduce new sources of light and glare. However, potential future development on the new parcels would introduce a small amount of new lighting and glare associated with potential for six new residential structures. Future development would be required to comply with the San Benito County Code, such as Section 25.07.012 that requires the shielding or reducing the illumination level of lights to avoid light pollution into neighboring areas. Additionally, six new homes would not be a substantial source of light or glare in the area, given that there are numerous other existing houses in the area, including more than 100 single-family homes at the Ridgemark Golf Club and Resort. Therefore, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant.

3.2 AGRICULTURE AND FOREST RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agriculture and Forest Resources. 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, as updated) 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))?	☐	☐	☐	☒
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 Environmental Setting

The entire project site is zoned AP for agricultural production, and according to the California Department of Conservation, Farmland of Statewide Importance occurs in the western areas of the project site, including the entire approximately 1- to 2-acre orchard area on the project site. The project site also includes areas of Farmland of Local Importance (California Department of Conservation 2026).

According to the California Division of Land Resource Protection, the project site is not subject to a Williamson Act contract. However, land adjacent to the east and southeast of the project site is subject to a Williamson Act contract (California Division of Land Resource Protection 2024).

The project site is mostly undeveloped and consists of grazing land with no tree cover other than a small orchard and landscaping. Forest and forest land do not occur on the project site or surrounding area.

3.2.2 Discussion

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?

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

Less-than-significant impact. There are no forest lands on the project site or adjacent to the site. However, the proposed subdivision of the project site would include new parcel lines bisecting areas of the project site that are mapped as Farmland of Statewide Importance and Farmland of Local Importance. The proposed subdivision maps are consistent with the intent of the Rural Residential (RR) General Plan designation and the Agricultural Productive (AP) zoning district, which allows low-density residential development while protecting Important Farmland. The subdivision proposes large parcels ranging from 5 acres to 174.8 acres, which would allow for existing agricultural activities to continue without constraint. All created by the proposed subdivision would remain commercially viable for agricultural production and would retain sufficient lot area to qualify as agricultural preserves under San Benito County Code Chapter 19.01, which establishes minimum parcel size standards for participation in the California Land Conservation Act (Williamson Act) program.

Although no construction or development is proposed, this analysis considers the potential for a single-family home to be constructed on six of the parcels created through the proposed subdivision. Residential development at the density that could potentially occur under this subdivision would be consistent with the density permitted under the existing AP zoning designation. While each residence and its associated driveway and infrastructure, such as septic tanks, would permanently convert a portion of the land area from agricultural use, the project would retain hundreds of acres of land available to agricultural uses. This would sustain the long-term availability of the site's agricultural potential.

Because if future residential development were to occur it would be consistent with AP zoning, which protects Farmland while allowing limited residential uses, and much of the site would not be developed, impacts would be less than significant.

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

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

No Impact. The project site is not zoned as forest land, timberland, or Timberland Production. Additionally, the proposed project does not include rezoning or a change in zoning of the project site, which is agricultural production (AP). No forest land occurs on the project site or adjacent to the project site. Therefore, the project would not result in the loss of forest land or conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. The proposed project would have no impact.

3.3 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations. Are significance criteria established by the applicable air district available to rely on for significance 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 Environmental 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 (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, sulfur dioxide, nitrogen oxides (NO_x), particulate matter less than 10 microns in diameter (PM_{10}), lead, and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). The United State EPA administers the National Ambient Air Quality Standards under the Federal Clean Air Act. The United States EPA sets the National Ambient Air Quality Standards 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 project site is located within the North Central Coast Air Basin, which is comprised of Santa Cruz, San Benito, and Monterey counties, and is regulated by the Monterey Bay Air Resources District (MBARD), which was formerly known as the Monterey Bay Unified Air Pollution Control District. The North Central Coast Air Basin is in attainment for all National Ambient Air Quality Standards and for all California Ambient Air Quality Standards except PM_{10} (MBARD 2024). The primary source of PM_{10} in the NCAAB is from automobile engine combustion. To address exceedance of this California Ambient Air Quality Standards, 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. The North Central Coast Air Basin Attainment Status with National and California Ambient Air Quality can be found in Table 3.3-1 below.

Table 3.3-1 North Central Coast Air Basin Attainment Status

Pollutant	State Attainment Status	National Attainment Status
Ozone	Attainment	Attainment
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment

Note: The state attainment status applies to the entire North Central Coast Air Basin. The national status applies to San Benito County only.

Source: MBARD 2024; US EPA 2026.

Sensitive receptors are more susceptible to the adverse effects of air pollution than the general population. Land uses considered sensitive receptors include residences, schools, and health care facilities. The closest existing residence to the project site includes the four residences within the project site. The nearest school to the project site is the Tres Pinos Union Elementary School, approximately 0.5 miles southeast of the site.

3.3.2 Discussion

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

Less-than-significant impact. State CEQA Guidelines Section 15125.b requires an evaluation of project consistency with applicable regional plans, including the Air Quality Management Plan. As stated above, MBARD has developed and implemented several plans to address exceedance of State air quality standards, including the 2012-2015 AQMP (MBARD 2017). The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments and other indicators. The proposed project would not result in any increase in employment because the subdivision of land would not generate jobs. The proposed project does not include construction. This analysis considers the potential for future residential development of up to six new single-family dwelling units. The potential construction of these units would not create substantial employment growth, and employment opportunities would likely be fulfilled by the local workforce. Additionally, six units would result in a minimal increase in population growth. The proposed project would be consistent with the MBARD 2012-2015 AQMP. In addition, as noted below, the proposed project would not result in a significant increase in emissions. For these reasons, implementation of the proposed project would not result in a substantial increase in either direct or indirect emissions that would conflict with or obstruct implementation of the AQMP. The impact of the project would be less than significant.

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

Less-than-significant impact. The proposed project consists of the subdivision of the project site through approval of two tentative subdivision maps. The subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not result in increases of criteria pollutant emissions.

Potential Construction

As described in Chapter 2, "Project Description," although the project does not include construction, this analysis considered the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision, which would be the density allowable under the current zoning.

Construction activities associated with these potential dwelling units, including grading and excavation, could result in short-term impacts to air quality. Site disturbance activities could result in short-term, localized decrease in air quality due to the generation of particulate emissions (PM_{10}).

According to MBARD's criteria for determining construction impacts (as updated February 2008), a project would result in a potentially significant impact if it would result in 8.1 acres of minimal earthmoving per day or 2.2 acres per day of grading and excavation (MBARD 2008). While the maximum acreage of grading for six units is unknown because this is not proposed, the construction of a single-family dwelling unit on a parcel as small as 5 acres total would not require 2.2 acres of grading per day. As a result, the proposed project would be below the threshold of 2.2 acres per day of grading and excavation.

In addition, if residential development were to occur, MBARD's standard construction Best Management Practices (BMPs) for dust suppression would be implemented. These BMPs include:

- Watering active construction areas;
- Prohibiting grading activities during periods of high wind;
- Covering trucks hauling soil; and
- Covering exposed stockpiles.

Implementation of these BMPs would further ensure that potential construction-related emissions would be minimized. Since the project is under the threshold for construction air quality impacts, the impact from potential future construction would be less than significant.

Potential Operation

The project site is currently used for agricultural activities and low-density residential uses; these uses could still occur on the site following the proposed project. If up to six single-family dwelling units are constructed on-site in the future, operation (i.e., occupancy) of these residences would produce air pollutant emissions associated with vehicle trips to and from the new residential units. Energy sources include natural gas for uses such as lighting and other uses related to residential and agricultural activities. Mobile emissions would result mainly from vehicle trips by residents. However, the proposed project would not to generate substantial vehicle trips during operation due to the small scale of the potential future development. This amount of vehicle travel would not generate emissions exceeding the MBARD threshold of 550 pounds per day of CO. There would no truck trips associated with operation of single-family residences and the six parcels that could potentially contain these residences are adjacent to paved roads. Therefore, the proposed project would not generate PM10 emissions in excess of 82 lbs/day, which is MBARDs threshold of significance (MBARD 2008). In addition, the proposed project consists of a small subdivision and would generate oxides or sulfur emissions. As a result, impacts resulting from operation of the proposed project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less-than-significant impact. MBARD's 2008 CEQA Air Quality Guidelines state that a project would have a significant impact to sensitive receptors if it would cause a violation of any CO, PM10 or toxic air contaminant standards at an existing or reasonably foreseeable sensitive receptor. The proposed subdivision of the project site would not generate pollutant emissions and therefore would not expose sensitive receptors to substantial concentrations of pollutants.

The potential for six new single-family dwelling units on the project site used for this analysis would generate short-term construction emissions and long-term emissions from operation (i.e., occupancy). If residential development were to occur in the future, the project would implement standard air quality BMPs based on MBARD's 2008 CEQA Air Quality Guidelines (MBARD 2008). New trips generated by the proposed project would be minimal due to the six new total units. Additionally, the proposed project would not exceed any MBARD thresholds under this development scenario, including CO and PM10. For these reasons, the proposed project would have a less-than-significant impact on sensitive receptors during construction and operation.

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

Less-than-significant impact. Approval of the proposed tentative subdivision maps would not generate odors. The potential for six new single-family dwelling units on the project site used for this impact analysis would generate short-term construction emissions from diesel-powered construction equipment and potentially from laying of asphalt for driveways. Any construction related diesel and asphalt odors would be temporary and would cease upon the completion of construction. Single-family residential land uses are not typically associated with odor-producing activities. In addition, the project site is currently utilized for agriculture, which generates more odors compared to residential uses. Therefore, the project would not result in substantial emissions (such as those leading to odors) adversely affecting a substantial number of people, and the impact would be less than significant.

3.4 BIOLOGICAL RESOURCES

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

The project site is characterized primarily by ruderal grassland areas. Generally, ruderal grassland areas are those areas which have been subject to historic and ongoing disturbance by human activities and are dominated by nonnative and/or invasive plant species or devoid of vegetation. Ruderal grassland areas on the project site include areas that have been farmed and grazed regularly, and existing dirt roads. There are six ponds on the project site, including several stock ponds for grazing.

Two existing driveways on the project site are lined with trees, which are generally the only trees on the project site except for landscaping in the lawns of the existing residences on-site, and except for an orchard area. The orchard area is approximately 1 to 2 acres of the site and located in the western area of the site.

STATE AND FEDERALLY PROTECTED WETLANDS

There are six ponds of the project site that are jurisdictional aquatic resources as open waters. Three of these ponds are mapped as wetlands by the US Fish and Wildlife Service (USFWS) as part of the National Wetlands Inventory (USFWS 2026b). The USFWS National Wetlands Inventory also identifies two drainage swales connecting the ponds as a riverine-type wetland, as well as an emergent wetland along the western boundary of the project site, just south of the orchard area. Additionally, according to vernal pool mapping last updated in 2025, the southern approximately half of the project site contains vernal pool habitat (Holland 2025). The vernal pool habitat overlaps one of the swales mapped by the USFWS, and vernal pool hydrology likely comes from overflow of the ponds located along the swale.

SPECIAL-STATUS SPECIES

Special-status species are defined as species that are legally protected or that are otherwise considered sensitive by federal, state, or local resource agencies. Special-status species are species, subspecies, or varieties that are in one or more of the following categories, regardless of their legal or protection status:

- officially listed by California or the federal government as endangered, threatened, or rare;
- a candidate for state or federal listing as endangered or threatened;
- taxa (i.e., taxonomic category or group) that meet the criteria for listing, even if not currently included on any list, as described in State CEQA Guidelines Section 15380;
- species identified by the California Department of Fish and Wildlife (CDFW) as species of special concern;
- species listed as fully protected under the California Fish and Game Code;
- species afforded protection under local planning documents; and
- taxa considered by the CDFW to be "rare, threatened, or endangered in California" and assigned a California Rare Plant Rank (CRPR). The CDFW system includes six rarity and endangerment ranks for categorizing plant species of concern, summarized as follows:
  - CRPR 1A - Plants presumed to be extinct in California;
  - CRPR 1B - Plants that are rare, threatened, or endangered in California and elsewhere;
  - CRPR 2A – Plants presumed extirpated in California but common elsewhere;
  - CRPR 2B - Plants that are rare, threatened, or endangered in California but more common elsewhere;
  - CRPR 3 - Plants about which more information is needed (a review list); and
  - CRPR 4 - Plants of limited distribution (a watch list).

To determine if special-status species have been observed or are otherwise known to occur on or proximate to the project site, Ascent queried the California Natural Diversity Database on May 12, 2026. The query included a list of all special-status species either reported or known to occur within the mapped extent of the United States Geological Survey 7.5-Minute Quadrangle for Tres Pinos, which is the USGS topographic map containing the project site. The USFWS Information for Planning and Consultation was also queried for records of specifics officially listed or candidates for listing at the federal level.

According to the CNNDB, there are 36 special-status species known to occur within the extent of the Tres Pinos 7.5 Minute Quadrangle. The USFWS Information for Planning and Consultation identified some of these same species, plus three additional species not identified by the CNNDB. Of these 39 species, 25 have the potential to occur on the project site based on the species preferred habitat characteristics and conditions present on the project site. These species are described in Table 3.4-1.

Table 3.4-1 Special-Status Species Known to Occur in the Vicinity of the Project Site

Species	Federal Status	State Status	CRPR	Habitat	Potential for Occurrence
Plants					
Halls tarplant (*Deinandra halliana*)	None	None	1B.2	Shadscale scrub, foothill woodland, valley grassland communities; elevation range of 460 to 6,135 feet; soils that are clay, silty clay loam, clay loam, sandy-clay loam, loam, sandy loam, bedrock	**May occur.** The project site contains loam and clay loam soils, grassland cover, and is within the elevation range of the species.
Jepsons woolly sunflower (*Eriophyllum jepsonii*)	None	None	4.3	Occurs in dry oak woodlands; elevation range of 885 to 5,380 feet; soils that are silty clay loam, loam, or bedrock	**Not expected to occur.** The project site is below the known elevation range of the species and also does not contain dry oak woodlands.
Satans goldenbush (*Isocoma menziesii* var. *diabolica*)	None	None	4.2	Foothill woodland, wetland-riparian communities; elevations ranging from 310 to 3,250 feet; open slopes and cliffs; soils that are clay, silty clay loam, clay loam, silt loam, loam, sandy loam, sand, bedrock, variable	**May occur.** The project site contains suitable soil types and also has open slopes within the elevation range of the species.
San Joaquin spearscale (*Extriplex joaquinana*)	None	None	1B.2	Shadscale scrub and valley grassland communities, usually in meadow habitats; from sea level up to 2,855 feet; on soils that are alkaline and clay, silty clay, clay loam, sandy loam, bedrock, variable	**May occur.** The project site contains loam and clay loam soils that are alkaline, grassland cover, and is within the elevation range of the species.
Indian Valley bushmallow (*Malacothamnus aboriginum*)	None	None	1B.2	Foothill woodland and chaparral communities; soils that are silty clay loam, clay loam, sandy clay loam, loam, sandy loam, loamy sand, bedrock, rocky; at elevations between 425 and 3,870 feet.	**May occur.** The project site contains loam and clay loam soils, grassland cover, and is within the elevation range of the species.
Serpentine leptosiphon (*Leptosiphon ambiguus*)	None	None	4.2	Northern coastal scrub, foothill woodland, valley grassland, at elevations between 360 and 4,890 feet, often on grassy areas generally on serpentine soils.	**May occur.** The project site contains grassland cover and is within the elevation range of the species. However, while there is potential for occurrence, the potential is low given the general absence of serpentine soils on the project site.
Elegant wild buckwheat (*Eriogonum elegans*)	None	None	4.3	Sandy to gravelly flats and slopes, mixed grassland communities, oak and pine woodlands; elevations between 180 and 3,805 feet; coastal mountains of Fresno, Monterey, San Benito, San Luis Obispo, Santa Barbara, Santa Clara, and Ventura counties, sand and gravel.	**Not expected to occur.** The project site lacks the sand and gravel substrate preferred by the species. Soils on the project site are loam and clay loam.

Species	Federal Status	State Status	CRPR	Habitat	Potential for Occurrence
Western Heermanns buckwheat (*Eriogonum heermannii* var. *occidentale*)	None	None	1B.2	Associated with foothill woodland vegetation community. At elevations between 1,380 to 3,345 feet, on gravel bars, steep, clay slopes, often serpentine.	**Not expected to occur.** The project site is below the known elevation range of the species, and the project site does not contain the associated vegetation community type, gravel bars, or steep clay slopes.
Amphibians and Reptiles					
California tiger salamander - central California DPS (*Ambystoma californiense* pop. 1)	Threatened	WL	--	Lives in vacant or mammal-occupied burrows throughout most of the year; in grassland, savanna, or open woodland habitats. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	**May occur.** The project site is within designated Critical Habitat for California tiger salamander.
Foothill yellow-legged frog (*Rana boylii*)	Threatened	Endangered	--	Lives in foothill and mountain streams from the Pacific Coast to the western slopes of the Sierra Nevada and Cascades mountains, up to approximately 5,000 feet in elevation. Breeding stream habitat is typically shallow, rocky and at least partially exposed to direct sunlight.	**Not expected to occur.** The project site does not contain rocky streams.
California red-legged frog (*Rana draytonii*)	Threatened	SSC	--	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	**May occur.** The project site contains ponds providing deep-water habitat.
Western spadefoot (*Spea hammondii*)	Proposed	SSC	--	Western spadefoots can breed in different types of water bodies, but they are particularly reliant on vernal pools. Grasslands with shallow temporary pools are optimal habitats for the western spadefoot.	**May occur.** Vernal pool habitat is mapped in the southern area of the project site.
Northwestern pond turtle (*Actinemys marmorata*)	Proposed	SSC	--	Ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 0.3 miles from water for egg-laying.	**May occur.** The project site contains ponds and other open water and wetland habitats.

Species	Federal Status	State Status	CRPR	Habitat	Potential for Occurrence
Insects and Crustaceans					
Crotch's bumble bee (*Bombus crotchii*)	None	Candidate	--	Found primarily in California: mediterranean, Pacific coast, western desert, Great Valley, and adjacent foothills through most of southwestern California. Habitat includes open grassland and scrub. Nests underground.	**May occur.** The project site is in a foothill area and contains open grassland.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	Threatened	SSC	--	Valley and foothill grassland, vernal pool, wetland. Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone depression pools and grassed swales, earth slump, or basalt-flow depression pools.	**May occur.** Vernal pool habitat is mapped in the southern area of the project site.
Monarch butterfly (*Danaus plexippus*)	Proposed	None	--	Closed-cone coniferous forest. Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Along migration routes and within summer ranges, monarch butterflies require two suites of plants: (1) host plants for monarch caterpillars, which are primarily milkweeds (*Asclepias* spp.) within the family Apocynaceae upon which adult monarchs lay eggs; and (2) nectar-producing flowering plants of many other species that provide food for adult butterflies. Having both host and nectar plants available from early spring to late fall and along migration corridors is critical to the survival of migrating pollinators.	**May occur.** The project site is outside of the overwintering range of this species. The project site does not contain forests or tree groves of suitable species. However, the project site contains flowering plants that may provide foraging opportunities for monarchs and may contain milkweed plants.

Species	Federal Status	State Status	CRPR	Habitat	Potential for Occurrence
Fish					
Central California roach (*Hesperoleucus symmetricus symmetricus*)	None	SSC	--	Generally found in small streams and well adapted to intermittent watercourses; dense populations are frequently observed in isolated pools. Roach are most abundant in mid-elevation streams in the Sierra Nevada foothills and in lower reaches of some San Francisco Bay streams. Central California roach are found in tributaries to the Sacramento and San Joaquin rivers and tributaries to San Francisco Bay	**May occur.** There are ponds with down gradients swales and intermittent streams on the project site.
Southern coastal roach (Hesperoleucus venustus subditus)	None	SSC	--	Warm, intermittent coastal streams, with deep pools and overhanging vegetation.	**Not expected to occur.** The project site contains intermittent streams, but these streams are not coastal.
Monterey hitch (*Lavinia exilicauda harengus*)	None	SSC	--	Prefers the lower, sandy to muddy, slow-moving stretches of rivers or the quiet pools of creeks, generally in fairly warm water.	**May occur.** There are ponds with down gradients swales and intermittent streams on the project site.
Steelhead - south-central California coast DPS (*Oncorhynchus mykiss irideus* pop. 9)	Threatened	SSC	--	Cold-water tributaries of the Pacific Ocean in Asia and North America.	**Not expected to occur.** The project site does not contain cold water habitat. Additionally, the streams on the project site are intermittent, and do not contain a continuous channel to the Pacific Ocean, San Francisco Bay, or Monterey Bay.
Birds					
Golden eagle (*Aquila chrysaetos*)	None	FP/WL	--	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	**May occur.** The project site is within the geographic range of this species. Nesting habitat is not present in the project site; however, foraging habitat suitable for this species is present throughout the project site.
Ferruginous hawk (*Buteo regalis*)	None	WL	--	Requires large, open tracts of grasslands, sparse shrub, or desert habitats with elevated structures for nesting. Nests in foothills or prairies; on low cliffs, buttes, cut banks, shrubs, trees, or in other elevated structures, natural or human-made.	**May occur.** The project site is within the geographic range of this species. Nesting and foraging habitat suitable for this species (including agricultural land cover) is present in and adjacent to the project site.

Species	Federal Status	State Status	CRPR	Habitat	Potential for Occurrence
Swainsons hawk (*Buteo swainsoni*)	None	Threatened	--	Adapted to the open grasslands, it has become increasingly dependent on agriculture, especially alfalfa crops, as native communities are converted to agricultural lands. Swainson's Hawks often nest peripheral to riparian systems. They will also use lone trees in agricultural fields or pastures and roadside trees when available and adjacent to suitable foraging habitat.	**May occur.** The project site is within the geographic range of this species. Nesting and foraging habitat suitable for this species (including agricultural land cover) is present in and adjacent to the project site.
Northern harrier (*Circus hudsonius*)	None	SSC	--	Coastal salt and freshwater marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	**May occur.** The project site is within the geographic range of this species. Nesting habitat is limited to margins of ponds and streams on the project site. Foraging habitat potentially suitable for this species is present in most of the project site.
White-tailed kite (*Elanus leucurus*)	None	FP	--	Grasslands and savannas. They tend to avoid heavily grazed areas. White-tailed Kites typically nest in the upper third of trees.	**May occur.** The project site is within the geographic range of this species. Nesting and foraging habitat suitable for this species (including agricultural land cover) is present in and adjacent to the project site.
Bald eagle (*Haliaeetus leucocephalus*)	Delisted	Endangered /FP	--	Typically nest in forested areas adjacent to large bodies of water, staying away from heavily developed areas when possible. Bald eagles are tolerant of human activity when feeding. For perching, they prefer tall, mature coniferous or deciduous trees that afford a wide view of the surroundings. In winter, bald eagles can also be seen in dry, open uplands if there is access to open water for fishing.	**May occur.** Suitable nesting habitat is not present, as tall trees and forest do not occur on or adjacent to the project site. However, there is marginal foraging habitat, particularly around the ponds on site.
Yellow-billed cuckoo (*Coccyzus americanus*)	Threatened	Endangered	--	Use wooded habitat with dense cover and water nearby, including woodlands with low, scrubby, vegetation, overgrown orchards, abandoned farmland, and dense thickets along streams and marshes.	**Not expected to occur.** The project site does not contain wooded habitat with dense cover. There is an orchard area on the project site, but it is not overgrown and also not along a stream or marsh.
Least Bell's vireo (*Vireo bellii pusillus*)	Endangered	Endangered	--	Inhabits dense, low-elevation riparian woodlands, primarily in Southern California and northern Baja California. They breed specifically in thickets of willow, mulefat, and cottonwood near water sources, typically nesting in early successional shrubbery.	**Not expected to occur.** Although the project site is in the known range of this species, it is far removed from critical habitat in Southern California. Additionally, the project site does not contain riparian woodlands or willow thickets.

Species	Federal Status	State Status	CRPR	Habitat	Potential for Occurrence
California horned lark (*Eremophila alpestris actia*)	None	WL	--	Grasslands, coastal dunes, agricultural land, grazed pastures, and arid, open ground where trees are absent.	**May occur.** The project site contains grassland and agricultural land, including grazed pastures. Trees are generally absent across most of the project site.
Great blue heron (*Ardea herodias*)	None	None	--	Primarily occupy wetlands, including marshes, riverbanks, lake edges, coastal lagoons, and mangrove swamps, relying on shallow water for hunting fish, amphibians, and invertebrates.	**May occur.** The project site does not contain trees near the existing on-site ponds. The ponds do not contain islands. Therefore, nesting habitat for this species is not present on the project site. However, suitable foraging habitat is present, generally proximate to the ponds and intermittent streams.
California condor (*Gymnogyps californianus*)	Endangered	Endangered /FP		Rugged shrubland, coniferous forests, and oak savannah, specifically requiring large, open spaces for foraging and steep rocky cliffs or large trees for nesting.	**Not expected to occur.** The project site is within the geographic range of this species; however, the project area does not contain nesting habitat for this species and foraging habitat in the area is marginal.
Prairie falcon (*Falco mexicanus*)	None	WL		Prefer grasslands, shrub-steppe deserts, and alpine tundra, relying on cliffs or bluffs for nesting sites.	**May occur.** There is no suitable nesting habitat on or adjacent to the project site. However, the project site is primarily open grassland and could be used for foraging.
American peregrine falcon (*Falco peregrinus anatum*)	Delisted	None	--	Open areas near high cliffs, mountains, or coastal bluffs for nesting, often close to water. They are highly adaptable, inhabiting environments ranging from arctic tundra to deserts, forests, and now, extensively in cities.	**Not expected to occur.** The project site is not near high cliffs or bluffs.
Tricolored blackbird (*Agelaius tricolor*)	None	Threatened/ SSC	--	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	**May occur.** The project site is within the geographic range of this species. Nesting habitat is not present in the project site; however, foraging habitat suitable for this species is present, especially in association with the on-site ponds.
Loggerhead shrike (*Lanius ludovicianus*)	None	SSC	--	Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub and washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	**May occur.** The project site is within the geographic range of this species. Nesting habitat (e.g., Russian thistle) is marginal given that most of the site is grassland and not dense brush, but foraging habitat suitable for this species is present throughout the project site.

Species	Federal Status	State Status	CRPR	Habitat	Potential for Occurrence
Burrowing owl (*Athene cunicularia*)	None	Candidate/SSC	--	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	**May occur.** The project site includes open grasslands and burrows suitable for nesting.
Mammals					
San Joaquin kit fox (*Vulpes macrotis mutica*)	Endangered	Threatened	--	Chenopod scrub, valley and foothill grassland. Annual grasslands or grassy open stages with scattered shrubby vegetation. Need loose textured sandy soils for burrowing, and suitable prey base.	**May occur.** The project site is within designated Critical Habitat for the species.
Salinas kangaroo rat (*Dipodomys heermanni goldmani*)	None	None	--	Prefers annual grassland on gentle slopes with sandy soils. However, most remaining populations are on poorer, marginal habitats which include shrub communities on a variety of soil types and steeper slopes. Ciervo-Panoche in western Fresno and eastern San Benito counties.	**Not expected to occur.** The project site does not contain sandy soils. The project is more than 30 miles away from the Ciervo-Panoche area of San Benito County.
Santa Cruz kangaroo rat (*Dipodomys venustus venustus*)	None	None	--	Common, permanent resident of chaparral and foothill woodland habitats in the mountain ranges of the central coast, and have a mutual relationship with manzanita. There are three disjunct populations. One population occurs in the Santa Cruz Mountains, another occupies the Gabilan Range, and the third population occurs in the Santa Lucia Mountains. These kangaroo rats use burrows in well-drained loam, or sandy loam.	**Not expected to occur.** The project site is grassland and does not contain manzanita or woodland/chaparral habitats. The project site also does not contain sandy soils.
American badger (*Taxidea taxus*)	None	SSC	--	Occurs primarily in grasslands, parklands, farms, and other treeless areas with friable soil and a supply of rodent prey. They are also found in forest glades and meadows, marshes, brushy areas, hot deserts, and mountain meadows.	**May occur.** The project site contains grassland and farm land.

Sources:

The list of species provided in this table is compiled from two sources: CDFW 2026b; USFWS 2026a.

The description of habitat preferences are largely from CDFW's life history and range maps (2026a) and Calflora (2026).

Descriptions of soils on the project site are from the Web Soil Survey (Natural Resources Conservation Service 2026)

WILDLIFE MOVEMENT CORRIDORS

The project site is bound by State Route 25 (Airline Highway) to the west, and the Ridgemark Golf Club and Resort west of that. Additionally, there is residential development to the north and south of the project site. These features limit wildlife movement across the project site. However, areas to the east of the project site are more mountainous and undeveloped except for dispersed unpaved roads. Wildlife likely use this area for movement and may use drainage swales connecting this area to the ponds on the project site for a water source.

HABITAT CONSERVATION PLANS AND NATURAL COMMUNITY CONSERVATION PLANS

The County has initiated the development of a multi-species and multi-phased county-wide joint Habitat Conservation Plan and Natural Community Conservation Plan called the San Benito County Conservation Plan (County of San Benito 2026). The San Benito County Conservation Plan is not yet adopted.

3.4.2 Discussion

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 the U.S. Fish and Wildlife Service?

Less than significant with mitigation incorporated. The proposed subdivision of the project site would not have physical effects on biological resources, including special-status species.

As described in Chapter 2, "Project Description," although the project does not include construction, this analysis considers the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision that do not contain an existing residence. This would be the density allowable under the current zoning. Construction activities associated with these potential dwelling units, including grading and excavation, could result in impacts to special-status species with potential to occur on the project site (see Table 3.4-1). Construction equipment could inadvertently crush special-status plants and wildlife or wildlife burrows. Construction activities could also damage nests of migratory birds or result in adult birds abandoning their nest or young. Once constructed, the dwelling units would permanently convert a portion of the project site into residential use, such as buildings, driveways, and lawns, which would no longer be foraging, nesting, or denning habitat for special-status species.

Because no construction is proposed currently, the location of any potential future dwelling units is unknown. However, the six parcels that would be created by the proposed subdivision are located in the western area of the project site, closest to Airline Highway and Best Road and removed from the steeper, more hilly areas in the eastern areas of the project site. Three of the six parcels are within areas mapped as vernal pool habitat. Residential construction on these three parcels would have the potential to impact vernal pool fairy shrimp and Western spadefoot, if present, as both species are associated with vernal pool habitat.

Several of the special-status species with potential to occur on the project site are closely associated with streams and open water and adjacent riparian zones, including Satan's goldenbush, California red-legged frog, Northwestern pond turtle, Central California roach, and Monterey hitch. Although the specific location of any future residences is unknown, riparian habitat would be avoided through mandatory compliance with Section 19.17.005 of the San Benito County Code. Section 19.17.005 prohibits grading from occurring within 50 feet from the top of the bank of a stream, creek, river or within 50 feet of a wetland or body of water.

Additionally, while potential future construction could result in loss of individual monarchs and loss of foraging and breeding habitat for the species, the project site is not expected to support large numbers of monarch butterflies due to the lack of documented occurrences nearby and the disturbed and actively grazed nature of the project site. As a result, potential future residential development is not expected to substantially reduce the number of monarchs, restrict the

range of the species, or cause the population to drop below self-sustaining levels. Further, the project site is relatively small compared to natural habitat areas surrounding the project site, and development of the site is not expected to result in a substantial loss of foraging or breeding habitat for the local and statewide populations of monarchs.

Overall, any potential future residential development on the project site would have the potential to result in the harm or mortality of special-status plant and wildlife species. The project could also result in destruction of migratory bird nests, including the eggs or unfledged young. Impacts would be potentially significant and mitigation is required.

Mitigation Measure 3.4-1a Conduct Special-Status Plant Surveys and Implement Avoidance

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- Prior to commencement of any potential future construction activities and during the blooming period for the special-status plant species with potential to occur in the development area, a qualified botanist shall conduct protocol-level surveys for special-status plants within the development area following survey methods from CDFW's *Protocols for Surveying and Evaluating Impacts on Special-Status Native Plant Populations and Natural Communities* (CDFW 2018 or most recent version). The qualified botanist shall: 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW 2018, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and 5) be familiar with federal and state statutes and regulations related to plants and plant collecting.
- If special-status plants are not found, the botanist shall document the findings in a report to the applicant and San Benito County, and no further mitigation shall be required.
- If special-status plants are found during special-status plant surveys and cannot be avoided, the applicant shall, in consultation with CDFW, develop and implement a site-specific mitigation strategy to compensate for loss of occupied habitat or individuals. Mitigation measures shall include, at a minimum, preserving and enhancing existing populations (e.g., offsite), establishing populations through seed collection or transplantation from the site that is to be affected, and/or restoring or creating habitat in sufficient quantities to offset loss of occupied habitat or individuals. Potential mitigation sites could include suitable locations within or outside of the development area. Habitat and individual plants lost (e.g., direct removal, trampling, root damage) shall be mitigated at a minimum 1:1 ratio through implementation of the above measures, considering acreage as well as function and value. Success criteria for preserved and compensatory populations shall include:
  - The extent of occupied area and plant density (number of plants per unit area) in compensatory populations shall be equal to or greater than the affected occupied habitat.
  - Compensatory and preserved populations shall be self-producing. Populations would be considered self-producing when:
    - plants reestablish annually for a minimum of five years with no human intervention such as supplemental seeding; and
    - reestablished and preserved habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types in the project vicinity.
    - If off-site mitigation includes dedication of conservation easements or other off-site conservation measures, the details of these measures shall be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, success criteria such as those listed above and other details, as appropriate to target the preservation of long-term viable populations.

Mitigation Measure 3.4-1b Implement Conservation Measures for California Red-Legged Frog and California Tiger Salamander and Consult with CDFW and USFWS

Compliance with this mitigation measure commences at submittal of applications for building permits. Prior to and during any future construction, the following measures shall be implemented to minimize the likelihood of take of California red-legged frogs and California tiger salamanders. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

Conservation Measures

- A biologist approved by CDFW and USFWS (approved biologist) shall supervise and implement all conservation measures. All construction contracts shall expressly include language requiring compliance with the conservation measures.
- At least 30 days prior to the start of any construction activities, the project applicant shall submit to CDFW and USFWS the names and credentials of all biologists proposed to work on the project for approval. No project work shall begin until the project applicant has received approval from CDFW and USFWS that biologists are qualified to implement the proposed conservation measures.
- The approved biologist shall provide mandatory worker awareness training for all project construction personnel before work begins, that shall include, at a minimum, the biology, identification, and habitat needs of California red-legged frogs and California tiger salamanders and the conservation measures required to protect them.
- Amphibian exclusion fencing shall be installed around the entire perimeter of the development area under the direction of the approved biologist. The exclusion fencing shall be maintained through the life of the construction and shall be inspected by the biologist at least once per week.
- The approved biologist shall survey the development area for California red-legged frogs and California tiger salamander no more than 48 hours before the start of project construction work. If California tiger salamanders are detected during the survey, all project construction activities shall cease, and CDFW and USFWS shall be notified.
- Each morning before work begins, the approved biologist shall inspect all vehicles, heavy equipment, and stored pipes for the presence of California red-legged frogs and California tiger salamanders.
- The approved biologist shall be present at work areas during all ground disturbing activities and shall be available to visit work areas at all other times in the event a California red-legged frog or California tiger salamander is encountered.
- The approved biologist may designate biological monitors to oversee on-site compliance with all conservation measures. The approved biologist shall ensure that monitors receive appropriate training, including identification of California red-legged frogs and California tiger salamanders. If these species are encountered in work areas, biological monitors shall be authorized to stop any construction activities which may pose a threat to the animal, all equipment shall be turned off, and the approved biologist shall be notified immediately. Work shall not continue until the biologist has contacted CDFW and USFWS for guidance.
- Project construction activities shall not occur during the rainy season when California red-legged frogs and California tiger salamanders may be active (typically November through March), unless the entire development area has been graded and has been completely enclosed with amphibian exclusion fence prior to the onset of winter rains. For any work activities occurring after the onset of winter rains (i.e., usually mid-November, but variable from year to year), the approved biologist or biological monitor trained by the approved biologist shall be present at all times, even if ground disturbing activities have been completed.
- No construction work shall be performed during rain. If a rain even results in accumulation of less than 0.2 inch in a 24-hour period, work may resume after precipitation ceases. If a rain event results in accumulation of 0.2 inch

or greater in a 24-hour period, work may resume after precipitation ceases, a drying-out period of 24 hours is observed, and the approved biologist inspects all work areas to verify the absence of California red-legged frogs and California tiger salamanders.

- Nighttime construction work shall not occur.
- All food-related trash items shall be disposed of in secure, closed containers and removed regularly to reduce the potential to attract predators. After construction, all trash and construction debris shall be removed from work areas for construction and operation of the project.

Wildlife Agency Consultation

- Prior to implementation of project construction activities, the project applicant shall initiate consultation with CDFW and USFWS. If it is determined, in consultation with CDFW and USFWS, that take of either of these species could occur after implementation of the conservation measures described above, then the project applicant may be required to obtain incidental take authorization through the through Section 7 consultation or a Section 10 permit pursuant to ESA and through Section 2081 of California Fish and Game Code pursuant to CESA. Additional conservation measures may be recommended by CDFW or USFWS during the consultation process and these measures shall be implemented by the project applicant.

Mitigation Measure 3.4-1c: Conduct Take Avoidance Survey for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- A qualified biologist shall conduct a focused survey for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet (500 meters) of the any residential development area no less than 14 days prior to initiating ground disturbance activities using survey methods described in Appendix D of the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012).
- If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to the applicant and San Benito County, and no further mitigation shall be required.
- If an active burrow is found within 1,500 feet of pending construction activities that would occur during the nonbreeding season (September 1 through January 31), the applicant shall establish and maintain a minimum protection buffer of 164 feet (50 meters) around the occupied burrow throughout construction. The actual buffer size shall be determined by the qualified biologist based on the time of year and level of disturbance in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer would not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan shall be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls shall not be excluded from occupied burrows until the project burrowing owl exclusion plan is approved by CDFW. The exclusion plan shall include a compensatory habitat mitigation plan (see below).
- If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows shall not be disturbed and shall be provided with a protective buffer at a minimum of 164 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW Staff Report. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to

CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted, and the burrow can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW Staff Report.

- If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of any construction activities, the applicant shall mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW Staff Report, which states that permanent impacts on nesting, occupied and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) shall be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. The applicant shall retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards:
  - Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range.
  - If feasible, mitigation lands shall be provided adjacent or proximate to the development area so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the development area depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity.
  - If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the development area, mitigation lands can be secured offsite and shall aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW.
  - If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW Staff Report, shall include site tenacity, number of adult owls present and reproducing colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

Mitigation Measure 3.4-1d: Conduct Focused Surveys for Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, and structural framing. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- To minimize the potential for loss of special-status bird species, raptors, and other native birds, any potential construction activities (e.g., tree removal, vegetation clearing, ground disturbance, staging) shall be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist), if feasible. If construction activities are conducted during the nonbreeding season, no further mitigation shall be required.
- Within 14 days before the onset of project construction activities during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with birds of

California and with experience conducting nesting bird surveys shall conduct focused surveys for special-status birds, other nesting raptors, and other native birds. Surveys shall be conducted in accessible areas within 0.25 miles of the development area for white-tailed kite, within 500 feet of the development area for other raptor species and special-status birds, and within 50 feet of the development area for non-raptor common native bird nests.

- If no active nests are found, the qualified biologist shall submit a report documenting the survey methods and results to the applicant and San Benito County, and no further mitigation shall be required.
- If active nests are found, impacts on nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during focused surveys to prevent disturbance to the nest. Construction activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Buffers typically shall be 0.25 mile for white-tailed kite, and 500 feet for other raptors. Buffer size for non-raptor bird species shall be determined by a qualified biologist. Factors to be considered for determining buffer size shall include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and construction activities. Generally, buffer size for these species shall be at least 20 feet. The size of the buffer may be adjusted if a qualified biologist, determines that such an adjustment shall not be likely to adversely affect the nest. Any buffer reduction for a special-status species shall require consultation with CDFW. Periodic monitoring of the nest by a qualified biologist during project activities shall be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist.

Mitigation Measure 3.4-1e: Conduct Focused American Badger Survey and Establish Protective Buffers

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- Within 30 days before commencement of any potential construction activities, a qualified wildlife biologist with familiarity with American badger and experience using survey methods for the species shall conduct focused surveys of habitat suitable for the species within the development area to identify any American badger dens.
- If occupied dens are not found, the qualified biologist shall submit a letter report summarizing the results of the survey to the project applicant and San Benito County, and further mitigation shall not be required.
- If occupied dens are found, impacts on active badger dens shall be avoided by establishing exclusion zones around all active badger dens, the size of which shall be determined by the qualified biologist. No construction activities (e.g., vegetation removal, ground disturbance, staging) shall occur within the exclusion zone until the den is abandoned, as confirmed by a qualified biologist. The qualified biologist shall monitor each den once per week to track the status of the den and to determine when it is no longer occupied. Other methods, including but not limited to remote cameras, may be used to determine that the den is no longer occupied. When the den is no longer occupied, the den may be collapsed, and project activities within the exclusion zone may occur.

Mitigation Measure 3.4-1f: Implement Limited Construction Period, Conduct Focused Surveys, and Implement Avoidance Measures for Crotch's Bumble Bee

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- Initial ground-disturbing work (e.g., grading, vegetation removal, staging) associated with potential future construction in grassland habitat or edges of agricultural areas that contain grasses or forbs shall take place between August 15 and March 15, if feasible to avoid impacts on nesting Crotch's bumble bees.
- If the above limited construction period is not feasible (i.e., if limiting ground disturbance to the period between August 15 and March 15 would preclude achieving most of all of the project objectives) as determined by the applicant, with concurrence from the County, a qualified biologist approved by the CDFW or the County, familiar with bumble bees of California and experienced using survey methods for bumble bees, shall conduct a habitat assessment and focused survey for Crotch's bumble bee before the start of any ground-disturbing activities in grassland habitat or edges of agricultural areas that contain grasses or forbs. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from April through August (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). Surveys shall be conducted during the colony active period the same year as the start of construction activities.
- The applicant shall submit a survey report to the CDFW and the County within 1 month of survey completion and shall notify the CDFW and the County within 24 hours if Crotch's bumble bees are detected.
- If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:
  - Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with the CDFW, shall determine the appropriate buffer size to protect nesting colonies.
  - If nesting colonies are detected, avoidance areas shall be implemented in areas near the colony location that contain significant floral resources for the colony, if present. A qualified biologist shall determine the appropriate avoidance area size to protect foraging resources.
  - If project activities involving temporary disturbance (e.g., staging) would occur where a nesting colony was detected after the nesting colony is no longer active, the area shall be restored to original conditions after the temporary disturbance is complete such that habitat for Crotch's bumble bee would be available.
- If take of Crotch's bumble bee cannot be avoided, the applicant shall obtain an Incidental Take Permit (ITP) from the CDFW and shall implement all avoidance measures included in the ITP. The CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of Crotch's bumble bees such that impacts on the species would be fully mitigated. These measures would include but not be limited to:
  - specifications for construction timing and sequencing requirements to avoid impacts on nesting Crotch's bumble bees;
  - pre-construction surveys conducted within 30 days prior to the start of ground-disturbing activities;
  - establishment of seasonal no-disturbance buffers around nest sites;
  - construction monitoring;
  - restrictions associated with construction practices, equipment, or materials that may harm bumble bees (e.g., BMPs to minimize the spread of invasive plant species); and
  - provisions to avoid Crotch's bumble bees or potential Crotch's bumble bees if observed away from a nest during project activity (e.g., ceasing of project activities until the animal has left the work area).
- Documentation of compliance with this mitigation measure and any required coordination with the CDFW or acquisition of an ITP shall be provided to the County before commencement of any potential future construction activities.

Mitigation Measure 3.4-1g: Conduct Focused Surveys and Implement Avoidance Measures for San Joaquin Kit Fox

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- Prior to the initiation of ground-disturbing activities associated with any future construction in grassland habitat suitable for foraging and denning, a qualified biologist shall conduct pre-construction surveys of the proposed construction area for San Joaquin kit fox.
- If San Joaquin kit fox dens are present, their disturbance and destruction shall be avoided. Exclusion zones for kit fox shall be implemented following USFWS procedures (USFWS 1999) or the latest USFWS procedures. The radius of these zones shall follow current standards or shall be determined on a case-by-case basis in coordination with the USFWS and CDFW. Maternity dens shall be avoided during pup-rearing season (February 15 through July 1) and a minimum 200-foot buffer established.
- If dens are located within the construction area and cannot be avoided during construction, qualified biologists shall determine if the dens are occupied. If unoccupied, the qualified biologist shall remove these dens by hand-excavating them in accordance with USFWS procedures for kit fox (USFWS 1999). If occupied, work activities shall be delayed until the den is determined to no longer be active.

Mitigation Measure 3.4-1h: Conduct Focused Surveys and Implement Avoidance Measures for Vernal Pool Fairy Shrimp

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- Prior to the initiation of ground-disturbing activities associated with any future construction on areas of the project site recorded as existing APN 025-200-001 and 025-200-002, a qualified biologist shall conduct pre-construction surveys of the proposed construction area to determine if vernal pool habitat is present.
- If vernal pool habitat is present in the construction area or adjacent to the limits of construction, ground disturbance will be avoided from the first day of the first substantial rain (1 inch or greater) until June 1, or until pools remain dry for 72 hours and no substantial rain is forecast on the day of such ground disturbance.

Mitigation Measure 3.4-1i: Conduct Focused Surveys and Implement Avoidance Measures for Western Spadefoot

Compliance with this mitigation measure commences at submittal of applications for building permits. The requirements of this mitigation measure shall apply during site preparation, grading, excavation, utility trenching installation and backfill, foundation construction, structural framing, and any landscaping involving ground disturbance. This mitigation measure shall not apply to interior construction activities conducted within completed or substantially enclosed buildings or to the exterior surfaces of buildings, such as painting buildings, roofing, etc.

- Prior to the commencement of any future construction activities, focused surveys shall be conducted, per USFWS and CDFG guidelines, by a qualified biologist in areas of potential species habitat (vernal pool). Surveys for spadefoot toad shall be conducted in accordance with USFWS guidelines and should be conducted during the months of May through November.
- If western spadefoot toad is not found in the construction area, no further mitigation is required.
- If this species is positively identified during the focused survey, then a detailed mitigation plan shall be prepared, in consultation with the USFWS and CDFG, that includes measures to avoid or minimize adverse effects of development on this species and its associated habitat. The mitigation plan shall incorporate a monitoring plan

for these species during the period of construction. Potential mitigation measures include working in the breeding habitat outside of the breeding season, replacement and/or restoration of disturbed habitat, and monitoring of the construction site to ensure that no spadefoot are present in the work area.

Significance after Mitigation

Implementation of Mitigation Measures 3.4-1a through 3.4-1i would reduce potentially significant impacts on special-status species because actions would be taken to identify the presence of species and their habitat, avoid these resources, or otherwise treat the resource appropriately, such as avoiding construction during times of the year when the species is active or potentially present. Therefore, the impacts to special-status species would be **less than significant with mitigation incorporated**.

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

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

Less than significant with mitigation incorporated. The proposed subdivision of the project site would not have physical effects on biological resources, including riparian habitat or other sensitive natural community, or on protected wetlands.

As described in Chapter 2, "Project Description," although the project does not include construction, this analysis considers the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision that do not contain an existing residence. The six parcels that would be created by the proposed subdivision without existing residences are located in the western area of the project site and overlap area mapped as protected wetlands, including streams, emergent wetlands, and vernal pools. Therefore, potential future construction could result in grading or filling within protected wetlands, some of which are sensitive natural communities, such as vernal pools. However, construction activities in wetlands and other sensitive natural communities would be avoided through mandatory compliance with Section 19.17.005 of the San Benito County Code. Section 19.17.005 prohibits grading from occurring within 50 feet from the top of the bank of a stream, creek, river or within 50 feet of a wetland or body of water. Some of the aquatic features on the project site are obvious to the layperson, such as perennial ponds. However, the layperson may not easily recognize certain wetland types, such as vernal pools or intermittent streams, and could commence activities in these areas. For this reason, impacts would be potentially significant.

Mitigation Measure 3.4-2a: Conduct Wetland Delineation and Comply With San Benito County Code

Compliance with this mitigation measure commences at submittal of applications for building permits.

- Prior to the commencement of any future construction activities, a focused wetland delineation shall be conducted by a qualified biologist in areas where construction or development would occur using methodology approved by the U.S. Army Corps of Engineers.
- If wetlands, including riparian zones and vernal pools, are identified in the delineation, mandatory compliance with San Benito County Code Section 19.17.005 is required.

Significance after Mitigation

Implementation of Mitigation Measures 3.4-2a would reduce potentially significant impacts on riparian habitat, sensitive natural communities, and protected wetlands because actions would be taken to identify the presence and extent of these resources prior to the commencement of construction. Any identified resources must be avoided by no less than 50 feet pursuant to San Benito County Code Section 19.17.005. Therefore, the impacts to riparian habitat, sensitive natural communities, and protected wetlands would be **less than significant with mitigation incorporated**.

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

Less-than-significant impact. The proposed subdivision of the project site would not have physical effects on biological resources, including migratory wildlife corridors or native wildlife nursery sites.

Although no construction is proposed, this analysis considers the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision that do not contain an existing residence. Because no construction is proposed currently, the location of any potential future dwelling units on these parcels is unknown. However, no portion of the project site contains modeled essential connectivity areas or natural landscape blocks (CDFW 2023). While the project site contains some natural habitat (e.g., grassland), most of the project site is disturbed from grazing. Additionally, the six parcels that this analysis assumes could be developed in the future are in the western area of the site and located adjacent to State Route 25 (Airline Highway), as well as Best Road and residential development, which is a substantial barrier to wildlife movement west of the project site. Wildlife moving through the vicinity of the project site would likely use the existing riparian corridors and drainage swales, which would not be developed with residential uses pursuant to San Benito County Code Section 19.17.005.

The project site has limited potential as a native wildlife nursery, because the site is actively grazed and also has existing residential uses and neighboring residences and urban development. However, most of the project site is suitable nesting habitat for one or more migratory bird species, particularly those that nest in grasslands or on towers, both of which occur on the site. While implementation of any potential future construction could affect nesting migratory birds or their nests, mitigation measure 3.4-1d, including preconstruction surveys and avoidance of active bird nests, would be implemented to reduce impacts to less than significant. Accordingly, this impact would be less than significant.

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

Less-than-significant impact. The proposed subdivision of the project site would not have physical effects on biological resources, including trees or tree preservation ordinances.

Although no construction is proposed, this analysis considers the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision that do not contain an existing residence. Three of these parcels occur within an orchard area. Construction of a residential dwelling unit on any of these three parcels would require removal of some of the orchard trees. However, pursuant to San Benito County Code Section 19.33.004, cultivated trees are not subject to the San Benito County Interim Woodlands Management Ordinance (San Benito County Code Chapter 19.33). The San Benito County Interim Woodlands Management Ordinance provides for the preservation of woodlands within the unincorporated areas of the County. Accordingly, any potential tree removal for future construction on the project site would not conflict with the County's tree preservation ordinance. Impacts would be less than significant.

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

No impact. The project site is not located within the plan area of any adopted habitat conservation plan or natural community conservation plan, or other approved local, regional, or state habitat conservation plan. The San Benito County Conservation Plan is in development; however, this plan has not been adopted. Therefore, proposed project would have no impacts related to conflicts with habitat conservation plans or natural community conservation plans.

3.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☒	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Substantially disturb human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

3.5.1 Environmental Setting

REGIONAL PRECONTACT HISTORY

Archaeological research in San Benito County and surrounding central coast and interior valley regions identifies several major precontact cultural periods, although the County itself remains relatively understudied. Evidence of the earliest human occupation dates to the Paleo-Indian period (10,000 years before present), represented primarily by isolated fluted projectile points that suggest human presence between approximately 13,000 and 10,000 years ago (San Benito County 2014).

The Millingstone or Early Archaic period (10,000-5,500 years before present) is characterized by handstones, milling slabs, cobble tools, and large projectile points, reflecting a subsistence strategy focused on plant processing. Numerous sites from this period have been identified.

The Hunting Culture period (5,500/5000 - 1000/750 years before present) reflects increasing reliance on hunting technologies and is divided into Early, Middle, and Late phases comparable to Central Valley chronologies. Archaeological evidence from sites such as Little Pico documents this transition.

The Late Period (750 years before present until European contact) is marked by smaller midden sites, bedrock mortars, and occupations associated with the Costanoan/Ohlone and Chumash peoples prior to Spanish contact. This period ended with the arrival of the Portolá expedition in 1769 (San Benito County 2014).

HISTORIC ERA SETTING

San Benito County was established on February 12, 1874, after separating from Monterey County. The region's history began with the establishment of Mission San Juan Bautista in 1797 near an Indigenous settlement, initiating major changes in land ownership and Native lifeways. Under Spanish and later Mexican rule, mission lands were redistributed into large ranchos through land grants, including Rancho San Justo (Benito Link 2024).

Following the U.S. acquisition of California in 1848, land ownership became uncertain due to federal land claim requirements, prompting many Mexican landowners to sell or subdivide their properties. Rancho San Justo was purchased in 1855 by William Welles Hollister and partners, who used the land primarily for sheep ranching. After the partnership dissolved, Hollister retained land west of the San Benito River, which later became the site of the City of Hollister.

Hollister grew rapidly due to its strategic location, expanding economy, proximity to the New Idria mercury mines, and ability to develop beyond the constraints of older land grants. As commerce and population shifted toward Hollister, residents increasingly supported separating from Monterey County for economic and political reasons.

Assemblyman Edward Chaffin Tully introduced legislation in 1874 to create San Benito County, arguing that the eastern portion of Monterey County had sufficient population, taxable wealth, and economic independence to govern itself. Despite political opposition and controversy, the bill passed the legislature and was signed into law by Governor Newton Booth on February 12, 1874. Hollister was designated as the interim county seat and quickly became the region's primary economic and civic center (Benito Link 2024).

RECORDS SEARCH RESULTS AND OTHER SOURCES

On July 3, 2026, a California Historical Resources Information System (CHRIS) records search was conducted at the Northwest Information Center (NWIC) at California State University, Sonoma (NWIC 2026). The records search revealed that no archaeological sites have been previously recorded within the project site. In contrast, the records search identified that one previously recorded built environment feature, P-35-000144, has been recorded within the project site. However, P-35-000144, the William Noble Ranch property, no longer exists because it was destroyed by a fire approximately 20 years ago. Additional research included a review of aerial images available online from Nationwide Environmental Title Research, LLC (2026). The aerial imagery indicates that residential structures were present as early as 1953 and remained present through 2024 (NETR 2026). However, the project would retain existing residences.

3.5.2 Discussion

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

Less-than-significant impact. The records search revealed a built environment feature (P-35-000144) within the project site, but this property was destroyed during a fire approximately 20 years ago. Review of aerial imagery identified residential structures as early as 1953 (NETR 2026), that have not yet been evaluated for historical significance. However, the project would retain the existing residences, and existing buildings would not be altered. Because the project would avoid existing structures, regardless of age, there would be no substantial adverse changes in historic resources. Therefore, the impact on historical resources would be **less than significant**.

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

Less than significant with mitigation incorporated. The records search did not reveal previously recorded archaeological sites within the project site. However, future residential development activities that includes project-related ground-disturbing activities (e.g., grading and/or excavation) could result in discovery or damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. Therefore, this impact would be **potentially significant**.

Mitigation Measure 3.5-2a Conduct Archaeological Level Surveys
Compliance with this mitigation measure commences at submittal of applications for building permits.

Prior to construction on the project site, the applicant/developer shall define the area of effect for archaeological resources in consultation with a qualified archaeologist, as defined by the Secretary of Interior. Once the exact locations of project-specific areas have been determined and before commencement of earth-disturbing activities, a records search shall be conducted to determine if there are any known archaeological resources located in the disturbance area. A pedestrian survey shall also be conducted for archaeological resources. In the event of a surface find, materials will be evaluated and recorded on standard Department of Parks and Recreation primary record forms

(DPR 523) in accordance with national and state criteria. Avoidance of archaeological resources shall be the preferred alternative to reduce impacts to unknown archaeological resources. A recommendation of eligibility/ineligibility to the NRHP and CRHR shall be completed for any surface finds and for any resources identified by the records search. The survey and report shall be completed by a qualified archaeologist who meets the Secretary of the Interior's professional qualifications for Archaeology. The report shall include recommendations for minimizing potential adverse effects to any significant resources identified. The developer shall follow recommendations identified in the report, which may include activities such as subsurface testing, implementing a Worker Environmental Awareness Program, avoidance of sites, construction monitoring by a qualified archaeologist, or notification of the geographically and culturally affiliated Native American tribe to extend an invitation for construction monitoring.

Mitigation Measure 3.5-2b Protect Known Unique Archaeological Resources

Compliance with this mitigation measure commences at submittal of applications for building permits.

For an archaeological site that has been determined by a qualified archaeologist to qualify as a unique archaeological resource through the process set forth under Mitigation Measure 3.5-2a, and where it has been determined under Mitigation Measure 3.5-2a that avoidance or preservation in place is not feasible, a qualified archaeologist, in consultation with San Benito County, and Native American tribes as applicable, shall:

- Prepare a research design and archaeological data recovery plan for the recovery that shall capture those categories of data for which the site is significant and implement the data recovery plan before or during development of the site.
- Perform appropriate technical analyses, prepare a full written report and file it with the appropriate information center, and provide for the permanent curation of recovered materials.
- If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion on the CRHR, the applicant shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the project that would allow the site to be preserved intact, such as project redesign, placement of fill, or project relocation or abandonment.

Mitigation Measure 3.5-2c Halt Ground Disturbance Upon Discovery of Archaeological Features

Compliance with this mitigation measure commences at submittal of applications for building permits.

If archaeological materials (e.g., locally darkened soils [i.e., midden], stone tools, chipped stone, baked clay, or concentrations of shell, bone, charcoal, glass, metal, or ceramics) are inadvertently discovered during ground-disturbing activities, the contractor shall cease all work within 100 feet (30.5 meters) of the find and San Benito County shall immediately retain the services of a qualified professional archaeologist. At that time, San Benito County shall coordinate any necessary investigation of the site with the archaeologist as needed to evaluate the significance of the resource pursuant to Public Resources Code Sections 5024.1 and 21083.2(g) and provide proper management recommendations. Possible management recommendations for significant resources could include resource avoidance or data recovery excavations. If the qualified archaeologist determines the archaeological material to be Native American in nature, San Benito County shall contact the appropriate Native American tribe(s) for their input on the preferred treatment of the find. San Benito County shall implement any measures deemed necessary by the archeologist and/or tribe for the protection of the cultural resources. Work within 100 feet (30.5 meters) of the discovery shall not resume until permitted so the archaeologist. This requirement shall be included in building permits issued for the project.

Significance after Mitigation

Implementation of Mitigation Measures 3.5-2a through 3.5-2c would reduce impacts to archaeological resources by requiring a pedestrian survey to identify previously unrecorded archaeological sites if present, evaluate the archaeological site at the state and/or national to determine if these quality as unique archaeological resources, and that steps be taken in the event that archaeological resources are encountered during project construction to avoid

direct impacts to the resource. Therefore, the impacts to archaeological resources would be **less than significant with mitigation incorporated**.

c) Substantially disturb human remains, including those interred outside of formal cemeteries?

Less-than-significant impact. Based on the NWIC results, no evidence suggests that any precontact or historic era marked or un-marked human interments are present within the project site or in the vicinity of the project site. However, unmarked and previously unknown Native American or other graves could be present within the project site and could be uncovered by ground disturbing construction activities, should residential development happen in the future.

California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains, and discovery of any human remains, are contained in California Health and Safety Code Section 7050.5 and PRC Section 5097.

These statutes require that, if human remains are discovered, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the San Benito County coroner shall be notified immediately. If the remains are determined by the coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the NAHC-designated most likely descendants and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments, if present, are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.

Compliance with California Health and Safety Code Section 7050.5 and PRC Section 5097, would avoid or minimize the disturbance of human remains, and require the appropriate treatment of any remains that are discovered. Therefore, impacts would be **less than significant**.

3.6 ENERGY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy. 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 Environmental Setting

Starting in 2018, all Pacific Gas & Electric household customers within Santa Cruz, Monterey, and San Benito counties were automatically enrolled in Central Coast Community Energy (3CE). Formed in February 2017, 3CE is a joint powers authority, and is based on a local energy model called community choice energy. 3CE partners with Pacific Gas & Electric, which continues to provide billing, power transmission and distribution, customer service, grid maintenance services and natural gas services to San Benito County. 3CE's standard electricity offering as of 2024 is carbon free and is classified as 56 percent renewable (3CE 2024).

Currently, energy use at the project site is associated with existing agricultural activities, such as combustion of fuel for maintenance of the orchard area, and energy associated with the four existing residences, such as heating and cooling.

3.6.2 Discussion

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

Less-than-significant impact. There is no construction proposed as part of the project, and the current energy consumption rate at the project site would not be affected. Even with the addition of six residential units, which would be the maximum entitlement granted by the proposed subdivision, the energy use would be minimal. Six units would not require substantial construction energy or unnecessary consumption of energy resources. The project would comply with existing state energy standards and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, such as Senate Bill 100. Senate Bill 100 requires that all retail sales of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and/or zero-carbon resources by the end of 2045. If constructed, as residential uses, each of the new single-family residential units would automatically be enrolled with 3CE, which sources the majority of its power from renewable sources and is working towards a 100-percent renewable portfolio (3CE 2024). For these reasons, impacts would be less than significant.

3.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey 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, as updated), 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 Environmental Setting

SEISMIC AND GEOLOGIC HAZARDS

Like nearly all of California, the project site is subject to seismic ground shaking during an earthquake, which could be strong depending on the epicenter and magnitude of the earthquake. However, the project site is not within a mapped Alquist-Priolo Fault Zone. Although the site is not with a mapped zone, an Alquist-Priolo Fault Zone

associated with Tres Pinos Fault is located approximately 700 feet west of the project site (California Department of Conservation 2006c).

The project site is not within a mapped area of liquefaction potential (California Department of Conservation 2026). Landslide risk mapping is not readily available for the project site. However, the project site contains slopes, including steep slopes in the eastern area of the site, that could be susceptible to landslides.

SOILS

The Natural Resources Conservation Service maintains a map database on soils for California and the larger United States (Natural Resources Conservation Service 2026). According to the Natural Resources Conservation Service, soil map units within the project site include:

- Antioch loam, 2 to 5 percent slopes
- Antioch clay loam, 9 to 15 percent slopes, eroded
- Rincon silty clay loam, 2 to 9 percent slopes
- San Benito clay loam, 15 to 30 percent slopes, eroded
- San Benito clay loam, 30 to 50 percent slopes, eroded
- Sorrento silty clay loam, 2 to 9 percent slopes
- Water (corresponds with on-site ponds)

Expansive soils are typically very fine-grained with a high to very high percentage of clay, typically montmorillonite, smectite, or bentonite clay. The project site includes soil map units with soil horizons (layers) characterized by clay. Therefore, the potential for expansive soils occurs on the project site.

According to the Natural Resources Conservation Service, the soil map units on the project site are rated as "very limited" for septic tank absorption fields (Natural Resources Conservation Service 2026).

GEOLOGIC UNITS AND PALEONTOLOGY

Three sedimentary geologic units have been mapped within the project site (Dibblee 1979): Holocene-aged alluvial sediments and Cretaceous-aged micaceous clay shale (Kp), and conglomerate with cobbles of porphyritic igneous rocks and of plutonic rocks (Kps). The Kp and Kps geologic units are associated with the steeper slopes in the eastern areas of the project site. The western half of the project site is a Holocene-aged alluvial sediment geologic unit. The Holocene sediments are generally considered too young to contain scientifically significant fossils if they are less than 5,000 years old (middle and late Holocene) (Society of Vertebrate Paleontology 2010).

3.7.2 Discussion

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 California Geological Survey Special Publication 42.)

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

Less-than-significant impact. The project site is not within a mapped Alquist-Priolo Fault Zone or liquefaction zone (DOC 2026). The proposed project consists of the subdivision of the project site through approval of two tentative subdivision maps. The subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not result increased risk involving rupture of a known earthquake fault or strong seismic ground shaking.

As described in Chapter 2, "Project Description," although the project does not include construction, this analysis considered the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision, which would be the density allowable under the current zoning. These potential future dwelling units would be located in an area subject to strong seismic ground shaking, which could include the risk of loss, injury, or death. However, San Benito County Code Section 21.01.021 adopts by reference the 2022 edition of the California Building Code, as well as any subsequent versions. The current 2025 California Building Code incorporates by reference and amends requirements in the 2024 International Building Code pertaining to geologic hazards, including seismically resistant construction and foundation and soil investigations prior to construction. The California Building Code, and thus San Benito County Code, also require a project-specific geotechnical investigation for structures in areas with potential geologic effects, including seismic effects. The geotechnical report must evaluate soil strength under seismic loading, and the potential for liquefaction, lateral spreading, settlement, and related seismic hazards. Chapter 18 of the California Building Code requires that where geotechnical hazards are identified, structural designs must account for seismic site response, soil instability under earthquake loading.

Mandatory compliance with the San Benito County Code and California Building would substantially reduce the risks associated with strong seismic ground shaking and liquefaction. Impacts would be less than significant.

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

iv) Landslides?

Less-than-significant impact. The proposed project consists of the subdivision of the project site through approval of two tentative subdivision maps, which would have no physical changes or impacts to existing environmental conditions at the project site.

The potential for future residential development of up to six dwelling units would be located in the western areas of the project site. Western areas of the project site are gently sloping to nearly flat, which reduces the potential landslide risk. One of the parcels where potential future residential development would occur contains sloping land at its eastern end, but slopes are not steep in this area. Additionally, construction would be required to comply with San Benito County Code Section 21.01.021 adopts by reference the 2022 edition of the California Building Code, as well as any subsequent versions. As described earlier in this section, the California Building Code requires a geotechnical investigation, which would identify landslide hazards and provide design recommendations to reduce landslide risks. With mandatory compliance with the San Benito County Code, impacts related to landslides would be less than significant.

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

Less-than-significant impact. The proposed project consists of the subdivision of the project site through approval of two tentative subdivision maps. The subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not result in increased erosion or erosion potential.

The potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision would involve construction activities, such as grading and excavation. These activities would increase the potential for erosion. Construction projects that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or

more acres, are required to obtain coverage under the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. As part of the General Permit, the project applicant and/or construction contractor must development and implement a Stormwater Pollution Prevention Plan (SWPPP), which includes Best Management Practices (BMPs) to reduce and prevent erosion. However, because no construction is proposed, it is unknown if disturbance at the project site would exceed 1 acre if residential development does occur in the future. However, if construction does occur in the future and require grading, Section 19.17.009 of the San Benito County Code requires grading permit applications to include methods to control erosion and drainage such that it does not leave the project site. The grading permit application must also include an erosion and drainage control plan. Therefore, with mandatory compliance with the San Benito County Code, any potential future construction on the project site would not result in substantial soil erosion or loss of topsoil. Impacts would be less than significant.

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?

Less-than-significant impact. The proposed project consists of the subdivision of the project site through approval of two tentative subdivision maps. The subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not result increased risk involving geologic units or soils that are unstable.

As described in Chapter 2, "Project Description," although the project does not include construction, this analysis considered the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision, which would be the density allowable under the current zoning. The project site is not within a mapped liquefaction zone (DOC 2026), and potential units would be in areas without steep slopes, reducing the potential for landslide risks. However, potential future dwelling units could be subject to soil collapse if constructed improperly and depending on final design of the dwelling unit. The San Benito County Code Section 21.01.021 adopts by reference the 2022 edition of the California Building Code, as well as any subsequent versions. The current 2025 California Building Code incorporates by reference and amends requirements in the 2024 International Building Code pertaining to geologic hazards, including foundation and soil investigations prior to construction. The California Building Code, and thus San Benito County Code, also require a project-specific geotechnical investigation for structures in areas with potential geologic effects, which would also address soils. For example, the geotechnical report must evaluate soil strength under seismic loading, and the potential for liquefaction, lateral spreading, and settlement. Chapter 18 of the California Building Code requires that where geotechnical hazards are identified, structural designs must account for soil instability.

Mandatory compliance with the San Benito County Code and California Building would substantially reduce the risks associated with geologic and soil instabilities. Impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

Less-than-significant impact. The proposed project consists of the subdivision of the project site through approval of two tentative subdivision maps. The subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not result in risks associated with expansive soils.

The potential for future residential development of up to six dwelling units would be located in areas where clay or clayey soils are mapped, and expansive soils are most often associated with high clay content. Expansive soils could shrink and swell based on moisture content, resulting in structure damage to the potential future dwelling units. However, San Benito County regulates expansive soils through its subdivision ordinance (San Benito County Code Title 23) and its geotechnical reporting requirements and enforcement of the California Building Code through San Benito County Code Section 21.01.021. Section 21.01.021 requires site-specific engineering measures where expansive soils are present. Therefore, with mandatory compliance with the San Benito County Code, any potential future

construction on the project site would not result in substantial risks associated with expansive soils. Impacts would be less than significant.

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?

Less-than-significant impact. The proposed project consists of the subdivision of the project site through approval of two tentative subdivision maps. The subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not result in wastewater.

The potential for future residential development of up to six dwelling units would generate wastewater. The project site is not served by sanitary sewer or other wastewater treatment utilities, such as a central wastewater treatment plant. Therefore, this analysis assumes that each dwelling unit could have a septic system for wastewater treatment. A septic system treats wastewater by separating solids in a tank, where they settle and partially decompose, while the liquid effluent flows into a drainfield for further treatment. In the drainfield, soil acts as a natural filter, removing pathogens, nutrients, and contaminants as the water percolates downward. Soil characteristics, such as permeability, texture, and depth, are critical because they determine how effectively wastewater is treated and whether it can safely infiltrate without causing groundwater contamination. According to the Natural Resources Conservation Service, the soil map units on the project site are rated as "very limited" for septic tank absorption fields (Natural Resources Conservation Service 2026).

San Benito County administers septic permitting through its Environmental Health Division under California's Onsite Wastewater Treatment Systems/Local Agency Management Program framework. New septic systems require County Environmental Health permits. Soil percolations testing is part of the technical review process of obtaining the permit, and soils must be demonstrated suitable for septic disposal prior to issuance of the septic permit. Accordingly, before any potential septic system could be installed at the project site, a permit would be required, which would require soils that can support the system. If existing soils are found not supportive through percolation testing, other options would be available, such as importing soils that do percolate well or installing an alternative effluent dispersal system.

Because soils must be tested and demonstrated as capable of supporting a septic system prior to issuance of permit to construct the septic system, impacts would be less than significant.

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

Less-than-significant impact. The potential for future residential development of up to six dwelling units would be located in the western areas of the project site. The western approximately half of the project site is a Holocene-aged alluvial sediment geologic unit. The Holocene sediments are generally considered too young to contain scientifically significant fossils if they are less than 5,000 years old (middle and late Holocene) (Society of Vertebrate Paleontology 2010). Therefore, potential future residential development would not destroy a unique paleontological or geological feature. Impacts would be less than significant.

3.8 GREENHOUSE GAS EMISSIONS

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

3.8.1 Environmental Setting

Greenhouse gas (GHG) emissions are associated with activities that result in the release of gases such as carbon dioxide, methane, and nitrous oxide, primarily from energy consumption, transportation, solid waste generation, and water use. At the state level, GHG emissions are regulated under California's climate policy framework, including Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and related CARB Scoping Plan strategies (the 2022 Scoping Plan Update is the most current version). These policies establish statewide targets for reducing GHG emissions and are implemented through a combination of regulatory programs, including building energy efficiency standards (Title 24), CALGreen building code requirements, and vehicle emissions standards. In addition, CEQA requires lead agencies to evaluate the extent to which a project may generate GHG emissions and whether those emissions would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions (State CEQA Guidelines Section 15064.4). In 2026, San Benito County developed the "Climate Roadmap," which focuses on local strategies to advance climate sustainability and resilience in San Benito County (County of San Benito 2026).

Existing and ongoing agricultural activities at the project site are the primary source of GHG emissions at the site currently. Additionally, the four existing residences and the communications tower on-site also generate emissions, such as from routine vehicle trips associated with the residences or occasional maintenance trips for the communications tower.

3.8.2 Discussion

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

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

Less-than-significant impact. The proposed project consists of two adjacent tentative maps that would subdivide the project site into a total of 10 parcels. No construction is proposed as part of the subdivision approvals. Because the proposed project does not include construction activities, there would be no construction-related GHG emissions associated with grading, building development, or on-site infrastructure improvements. However, four parcels would contain existing residences and one parcel contains an existing communications tower. The GHG emissions from these residences and the communications tower, as well as GHG emissions from ongoing agricultural activities on-site, would continue at current levels.

This analysis assumes that the six parcels that do not currently contain residential structures could potentially support up to six new single-family dwelling units in the future, based on allowable uses under the applicable Rural Residential (RR) land use designation and AP zoning district. Potential GHG emissions from construction of these residential units would be associated with the use of off-road construction equipment, worker and vendor vehicle trips, and material delivery. Construction emissions are typically short-term in duration and would cease upon completion of each individual dwelling unit. Any potential future construction activities would be required to comply with applicable state regulations, including CARB off-road diesel engine standards and idling restrictions, which reduce emissions from construction equipment and associated activities.

Operational GHG emissions would primarily result from potential future residential development on the newly created parcels (up to six single-family dwelling units), as well as continued use of existing residences and the communications tower and agricultural activities. These emissions would be associated with typical household activities, including vehicle trips, energy consumption, water use, and solid waste disposal. Any future residential development would be required to comply with applicable state regulations, including the California Building Energy Efficiency Standards (Title 24) and CALGreen Code requirements, which are designed to reduce building energy consumption and associated GHG emissions through efficiency measures and, increasingly, electrification of building systems. In addition, vehicle emissions associated with household travel are subject to statewide mobile source emissions standards and ongoing transition to cleaner vehicle technologies under CARB regulations. Increasing the electrification of building systems while reducing GHG emissions through efficiency and reduced VMT are consistent with the goals and actions of the 2022 Scoping Plan and County's Climate Roadmap. For example, the County's Climate Roadmap states that building electrification is one of the most effective ways to reduced GHG emissions from buildings.

Given the limited scale of potential future development (up to six single-family dwelling units), the predominantly rural setting, and the requirement for future development to comply with current state energy and emissions regulations, the project would result in a negligible increase in long-term GHG emissions. Furthermore, the project would not conflict with applicable state or regional plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hazards and Hazardous Materials. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, 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 Environmental Setting

The California Health and Safety Code, Chapter 6.95, Section 25501(n)(1), defines a hazardous material as "any material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Thus, the term "hazardous material" is a broad term for all substances that may be hazardous, specifically including hazardous substances and hazardous waste. Substances that are flammable, corrosive, reactive, oxidizers, radioactive, combustible, or toxic are considered hazardous.

CORTESE LIST

The California Cortese List is a statewide planning tool that identifies known or suspected hazardous substance release sites across California. It is required by California Government Code §65962.5 and is compiled from multiple state databases that track sites such as leaking underground storage tanks, hazardous waste cleanup sites, and Superfund-related locations. Examples of databases include the Department of Toxic Substances Control's EnviroStor database and the State Water Resources Control Board's Geotracker database. The project site is not included on the Cortese List (Department of Toxic Substances Control 2026; State Water Resources Control Board 2026).

AIRPORT HAZARDS

No public or private airports are within 2 miles of the project site, and the project site is outside of an Airport Land Use Plan. The closest airport is the Christensen Ranch Airport, approximately 3.75 miles north of the project site, and no private airstrips are within the immediate vicinity.

3.9.2 Discussion

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

Less-than-significant impact. The proposed project consists of two adjacent tentative maps that would subdivide the project site into a total of 10 parcels. No construction is proposed as part of the subdivision approvals. Because the proposed project does not include construction activities, the project would not involve use of hazardous materials.

However, this analysis assumes that the six parcels that do not currently contain residential structures could potentially support up to six new single-family dwelling units in the future, based on allowable uses under the applicable Rural Residential (RR) land use designation and AP zoning district. Residential use of the project site would not involve the routine transport, use, or disposal of hazardous materials in large quantities. Some household products, such as cleaning products or oil-based paint, are considered hazardous materials and could be stored or used at the residences. Likelike, portable containers of gasoline would be stored on-site in connection with landscaping equipment, such as lawn mowers and string trimmers. However, these substances would be stored in small quantities, generally within manufacturer-provided containers (e.g., bottles, cans, etc.) or in containers manufactured specifically for the substance and consistent with state and federal regulations, such as gasoline cans. There are programs in San Benito County for the safe disposal of household hazardous waste, such as a monthly disposal program offered at the John Smith Road Landfill in Hollister.

Given the limited scale of potential future development (up to six single-family dwelling units) and that only small quantities of household hazardous materials and waste would be part of residential uses, the proposed project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

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

Less-than-significant impact. The proposed subdivision of the project site would not involve activities at the project site, including any activities involving hazardous materials. Therefore, the proposed project would not create a significant hazard related to hazardous materials.

Construction of any potential dwelling units in the future would involve the use of materials that are generally regarded as hazardous, such as gasoline, hydraulic fluids, paint, and other similar materials. The project would prepare and implement a Stormwater Pollution Prevention Plan if construction disturbance exceeds 1 acre (see Section 3.7, Geology and Soils). The Stormwater Pollution Prevention Plan must include appropriate Best

Management Practices to minimize the impact on water quality from release of hazardous materials during construction. Examples of Best Management Practices include proper secondary containment for fuels and spill prevention and cleanup materials. In the event that construction is minimal and does not require a Stormwater Pollution Prevention Plan, construction must still comply with San Benito County Environmental Health Department requirements for storage of bulk hazardous materials, in its role as the Certified Unified Program Agency.

As described above, following construction, any potential residential development would involve the routine use of small quantities of household hazardous materials, such as clearing products and paint. However, these materials would be present in small quantities, generally indoors, and therefore would not create significant hazards to the public of environment if accidentally released.

Therefore, the project would not 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. Impacts would be less than significant.

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

Less-than-significant impact. The proposed project would not emit hazardous emissions or handle acutely hazardous materials, because the proposed project consists only of a tentative subdivision map to divide the project site into parcels. Any potential future residential construction on the site would involve the use of materials that are generally regarded as hazardous, such as gasoline, hydraulic fluids, paint, and other similar materials. Heavy equipment, such as a dozer or dump truck, would emit diesel exhaust, which is hazardous to human health. However, the nearest parcel on which residential development could occur in this analysis scenario is approximately 0.5 mile from the Tres Pinos Elementary School, the nearest to the site. Additionally, given the limited scale of potential future development (up to six single-family dwelling units) construction emissions would be minimal and brief. For these reasons, impacts would be less than significant.

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?

No Impact. According to EnviroStor (Department of Toxic Substances Control 2026) and GeoTracker (State Water Resources Control Board 2026), the project is not located on a hazardous materials site pursuant to California Government Code, Section 65962.5. In addition, the project would involve the subdivision of the project site and does not propose any construction. Therefore, the proposed project along with potential for future construction would not result in a significant hazard to the public or the environment due to the presence of hazardous materials sites identified pursuant to California Government Code, Section 65962.5. The proposed project would have no impact.

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?

No Impact. No public or private airports are within 2 miles of the project site, and the project site is outside an Airport Land Use Plan. The closest (airport is the Christensen Ranch Airport, approximately 3.75 miles north of the project site, and no private airstrips are within the immediate vicinity. In addition, the project proposes the subdivision of the current project site and does not propose any construction. Any potential future residential occupancy of the site would not reside within airport safety zones. Therefore, the proposed project would have no impact.

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

Less-than-significant impact. The project consists of a subdivision of the project site and no construction is proposed as part of the subdivision approvals. The potential construction of six new single-family dwelling units in the future would be designed in conformance with state law and local regulations and in coordination with the City of Hollister Fire Department. The parcels with potential for future residential development would be accessed through from Best Road, which is not a through road providing for evacuation. Up to six new dwelling units would not add a substantial number of vehicles to State Route 25 in the event the project area was included as part of an emergency evacuation. Therefore, the project would not substantially impair an adopted Emergency Response Plan or Emergency Evacuation Plan, and impacts would be less than significant.

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

Less-than-significant impact. The proposed subdivision of the project site would not increase the number of people or structures present at the project site. Therefore, the proposed project would not expose people or structures to risk of loss, injury, or death involving wildland fires.

The potential construction of six new single-family dwelling units in the future as a result of the proposed subdivision would be located within the six proposed new parcels on the western portion of the project site, which is designated as a Medium Fire Hazard Severity Zone in the State Responsibility Zone by the California Department of Forestry and Fire. Eastern areas of the project site as mapped High Fire Hazard Severity Zone (California Department of Forestry and Fire 2026). Any potential future dwelling unit must be constructed compliant with applicable standards and requirements set forth in Public Resources Code Section 4291 and San Benito County Code Section 21.01.021. San Benito County Code Section 21.01.021 adopts by reference the 2022 edition of the California Building Code, as well as any subsequent versions. The California Building Code requires buildings to be constructed using noncombustible, fire-resistant, and ignition-resistant materials for roofing, exterior coverings, exterior windows and doors, and decking. Therefore, with mandatory compliance with existing regulations, the proposed project, including any potential future residential development, would not expose people or structures to a significant risk from wildland fires. Impacts would be less than significant.

3.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Hydrology and Water Quality. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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:	☐	☐	☒	☐
i) Result in substantial on- or offsite erosion or siltation;	☐	☐	☒	☐
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 Environmental Setting

San Benito County has a moderate California coastal climate with a hot and dry summer season lasting May through October. In Hollister, just northwest of the project site, the average annual precipitation is approximately 13.9 inches. Most of the annual rainfall occurs in the fall, winter, and to a lesser extent, spring, generally between November and April (Western Regional Climate Center 2016).

There are six ponds of the project site that are jurisdictional aquatic resources as open waters. As described in Section 3.4, *Biological Resources*, the USFWS National Wetlands Inventory also identifies two drainage swales connecting the ponds, as well as an emergent wetland along the western boundary of the project site, just south of the orchard area.

Groundwater is the major source of water supply in the County. Groundwater is generally available throughout the County. The project is located on the Bolsa sub-basin of the North San Benito Basin (San Benito County Water District 2021). The North San Benito Basin is not critically over-drafted, as defined by the Sustainable Groundwater

Management Act and has been marked as medium priority. Nearly all of the project site is undeveloped and pervious, allowing for precipitation to infiltrate the ground surface.

WATER QUALITY CONTROL PLANS

The Central Coast Regional Water Quality Control Board (RWQCB) prepares the Water Quality Control Plan for the Central Coastal Basin, or Basin Plan, to improve and protect the quality of surface water and groundwater in the Central Coast Region, which is where the project site is located. The Basin Plan describes prohibitions on certain discharges to surface waters and groundwater. For example, unless authorized, or exempt by the California Water Code or the Basin Plan, the discharge of sediment or construction dewatering water, to waters of the State in a manner causing or threatening to cause a condition of pollution, contamination, or nuisance is prohibited by the Basin Plan. The Basin Plan also prohibits the discharge of treated or untreated sewage to waters of the State or to a stormwater conveyance system, for example (Central Coast RWQCB 2024).

FLOODPLAINS AND INUNDATION

The Federal Emergency Management Agency identifies the locations of special flood hazard areas, including the 100-year flood zone, on its Flood Insurance Rate Maps (FIRMs). The project site appears on two FIRM panels: 06069C0205D and 06069C0215D. According to these FIRM panels, the project site is not within a special flood hazard area, including a 100-year floodplain (Federal Emergency Management Agency 2009a; 2009b).

Tsunamis or "tidal waves" are seismic waves created when displacement of a large volume of seawater occurs as a result of movement on seafloor faults. A seiche is a standing wave in an enclosed or partially enclosed body of water. Seiches are triggered by earthquake waves and have been observed on lakes, reservoirs, swimming pools, bays, harbors, and seas. The project site is not subject to inundation from tsunami or seiche, because the project site is inland, away from the ocean, and on-site ponds are small and shallow, lacking substantial volumes of water.

3.10.2 Discussion

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

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

Less-than-significant impact. The proposed project consists of the subdivision of the project site, which would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not violate any water quality standards or waste discharge requirements or substantially degrade surface or groundwater quality.

The potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision would involve construction activities, such as grading and excavation. These activities would increase the potential for erosion. Discharge of sediment from construction activities would be a violation of water quality standards in the Basin Plan. However, construction projects that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. As part of the General Permit, the project applicant and/or construction contractor must development and implement a Stormwater Pollution Prevention Plan (SWPPP), which includes Best Management Practices (BMPs) to reduce and prevent erosion. However, because no construction is proposed, it is unknown if disturbance at the project site would exceed 1 acre if residential development does occur in the future. However, if construction does occur in the future and require grading, Section 19.17.009 of the San Benito County

Code requires grading permit applications to include methods to control erosion and drainage such that it does not leave the project site. The grading permit application must also include an erosion and drainage control plan. Additionally, Section 19.17.005 of the San Benito County Code prohibits grading from occurring within 50 feet from the top of the bank of a stream, creek, river or within 50 feet of a wetland or body of water. Therefore, with mandatory compliance with the San Benito County Code, any potential future construction on the project site would not result in substantial soil sedimentation and violations of water quality standards or the Basin Plan.

The project site is partially within the North San Benito Basin, a subbasin of the Gilroy-Hollister Groundwater Basin. The San Benito County Water District adopted the North San Benito Groundwater Sustainability Plan for the basin in November 2021 to protect groundwater levels and quality (San Benito County Water District 2021). Potential future residences would generate wastewater. The project site is not served by sanitary sewer or other wastewater treatment utilities, such as a central wastewater treatment plant. Therefore, this analysis assumes that each dwelling unit could have a septic system for wastewater treatment. A septic system treats wastewater by separating solids in a tank, where they settle and partially decompose, while the liquid effluent flows into a drainfield for further treatment. In the drainfield, soil acts as a natural filter, removing pathogens, nutrients, and contaminants as the water percolates downward. Soil characteristics, such as permeability, texture, and depth, are critical because they determine how effectively wastewater is treated and whether it can safely infiltrate without causing groundwater contamination. New septic systems require County Environmental Health permits. Soil percolations testing is part of the technical review process of obtaining the permit, and soils must be demonstrated suitable for septic disposal prior to issuance of the septic permit. This permitting process would ensure that wastewater from potential future residential uses would be treated and not adversely impact groundwater quality and conflict with the North San Benito Groundwater Sustainability Plan. Impacts would be less than significant.

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

Less-than-significant impact. The proposed project consists of the subdivision of the project site, which would not result in physical activities at the project site or changes to existing conditions at the project site other than property line configurations. Therefore, the proposed subdivision would not affect groundwater recharge.

Although not proposed, the potential for six new dwelling units in the future would potentially affect groundwater recharge by increasing impervious surface. Increases in pervious surfaces, such as the dwelling units themselves, but also associated landscaping and features, such as potential paved driveways, would incrementally decrease the amount of land on the project site available for precipitation to infiltrate the ground surface and potentially reach underlying aquifers. However, because the entire project site is approximately 433 acres and mostly pervious, and due to the density requirements of the RR and AP designation and zoning, most of the area within each lot accommodating potential future development would remain undisturbed. Therefore, the proposed project would not substantially interfere with groundwater recharge.

Potential future residential development would require groundwater for water supply. However, the proposed project would not substantially decrease groundwater because the scale of development (up to six units) and because the project must adhere to San Benito County Code Article I, Groundwater Aquifer Protections, which limits extraction of groundwater. Therefore, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level at the site. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial on- or offsite erosion or siltation;

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

Less-than-significant impact. The proposed project consists of the subdivision of the project site, which would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Therefore, the proposed subdivision would not substantially alter the existing drainage pattern of the site or area.

The potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision would involve construction activities, such as grading and excavation. These activities would increase the potential for erosion and siltation. However, potential future development would not result in substantial erosion or siltation because construction activities would comply with Section 19.17.009 of the San Benito County Code requires grading permit applications to include methods to control erosion and drainage such that it does not leave the project site. The grading permit application must also include an erosion and drainage control plan. Additionally, if construction disturbance exceeds one or more acres, the project would be required to implement a SWPPP, including BMPs to prevent substantial erosion. Following any potential future construction, the area would be landscaped typical of residential development, which would stabilize soils and prevent erosion and siltation.

Any potential future construction would not involve the alteration of the course of a stream or river because Section 19.17.005 of the San Benito County Code prohibits grading from occurring within 50 feet from the top of the bank of a stream, creek, river or within 50 feet of a wetland or body of water. The project would incrementally increase the amount of impervious surface on the site. However, because the entire project site is approximately 433 acres and mostly pervious, and due to the density requirements of the RR and AP designation and zoning, most of the area within each lot accommodating potential future development would remain undisturbed. This would allow for infiltration of precipitation across hundreds of acres of pervious surfaces on the project site, preventing substantial increases in the rate or amount of runoff. Impacts would be less than significant.

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:

iv) Impede or redirect flood flows?

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

No Impact. The project site is not within a designated flood hazard area (Federal Emergency Management Agency 2009a; 2009b). Additionally, any potential future development on the project site would not occur proximate to streams or surface waters due to mandatory compliance with Section 19.17.005 of the San Benito County Code. Section 19.17.005 of the San Benito County Code prohibits grading from occurring within 50 feet from the top of the bank of a stream, creek, river or within 50 feet of a wetland or body of water. As a result, the proposed project would not redirect or impede flood flows, as the site is located outside of the flood hazard area. The project site is not within other areas at risk of inundation, such as tsunami zones or seiche zones. Therefore, there would be no impact.

3.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Land Use and Planning. Would the project:				
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 Environmental Setting

The project site is located in unincorporated San Benito County, approximately 1.1 miles east from the City of Hollister. As previously discussed, the project site is designated as Residential Rural (RR) in the San Benito County General Plan and zoned as Agricultural Productive (AP) in the County's zoning ordinance.

3.11.2 Discussion

a) Physically divide an established community?

Less-than-significant impact. The proposed project consists of the subdivision of the project site, which would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. The existing single-family houses on the project site are typical of rural residential uses and would remain on their own separate parcels following subdivision of the project site. Therefore, the proposed subdivision would not divide an established community.

The potential for up to six residential dwelling units in the future would not divide an established community. The six parcels where each of these units could be located are adjacent to existing Best Road, precluding the need for a road or other linear access that could divide communities. Additionally, there is no established community on the project site or nearby that crosses through the project site. Therefore, the project would not physically divide an established community, and impacts would be less than significant.

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?

Less-than-significant impact. The proposed project consists of two adjacent tentative maps that would subdivide the project site into a total of 10 parcels. No construction is proposed as part of the subdivision approvals. Therefore, the proposed subdivision would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation.

Although not proposed, the potential for six new dwelling units in the future would be consistent with the existing general plan land use designation and zoning district. Single-family residential uses are permitted under the existing AP zoning district for lots a minimum of 5 acres in size, and all lots proposed in the subdivision would be a minimum of 5 acres.

Construction of any potential future residences would result in physical effects at the project site, such as removal of vegetation cover from grading, excavation for foundations, and construction noise. Additionally, following

construction, occupancy (i.e., operation) of any potential future dwelling units would also have physical effects, such as wastewater treatment through a septic system and storage of household quantities of hazardous materials (e.g., paint, cleaning products, etc.). The potential environmental impacts of these construction and occupancy effects are evaluated throughout this Initial Study. Generally, as discussed in this IS/MND, given the small scale of potential future development and mandatory compliance with regulatory requirements, including the San Benito County Code, the proposed project would not conflict with any land use plan, policy, or regulation, such that a significant environmental impact would result. Mitigation measures are identified throughout this Initial Study, as applicable, to ensure that potential adverse impacts associated with the proposed project would be minimized to a less than significant level. Therefore, the proposed project would not 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. Impacts would be less than significant.

3.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☒	☐	☐	☒
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 Environmental Setting

The County uses its "MR" zoning district to identify mineral resource areas determined to require a special level of protection as an additional method of avoiding land use conflicts between mineral extraction and other incompatible uses with the following criteria:

- Lands classified as MRZ-2 or SZ by the State of California Division of Mines and Geology qualify for the "MR" zoning designation and/or;
- Evidence of the location, extent, and depth, and quality of mineral resources shall be submitted as part of the MR overlay zoning application (San Benito County 2015).

The project site does not contain MR zoning district.

3.12.2 Discussion

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?

No Impact. There are no known mineral resources or locally important mineral resource recovery sites on or adjacent to the project site. According to the County's zoning map, the nearest MR zoning district to the project site is approximately 5.5 miles northwest, on the opposite side of Hollister. Therefore, the proposed project would not result in impacts to known mineral resources or result in the loss of availability of a locally important resource recovery site.

3.13 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. Noise. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, or a substantial temporary or permanent increase in noise levels above existing ambient levels that could result in an adverse effect on humans?	☒	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

3.13.1 Environmental Setting

The noise element of the general plan establishes land use compatibility criteria for transportation noise sources in terms of the Day-Night Average Level (Ldn) to describe noise exposure for noise compatibility planning purposes. The guidelines define an outdoor level of 60 decibels (dB) Ldn as being "normally acceptable" for residential uses. The noise element of the County's General Plan requires that interior noise levels for all new residential construction not exceed 45 dB Ldn (San Benito County 2015b).

The project site is mostly undeveloped agricultural land in a rural area with low ambient noise levels. The predominant source of noise in the area is from vehicle traffic on State Route 25 (Airline Highway). According to the EIR prepared for the County's 2035 General Plan, traffic on State Route 25 generates noise levels up to 64 decibels (A-weighted, or dBA) at the western end of the project site, closest to State Route 25. Most of the project site has noise levels below 55 dBA (San Benito County 2015a).

3.13.2 Discussion

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, or a substantial temporary or permanent increase in noise levels above existing ambient levels that could result in an adverse effect on humans?

Less than significant with mitigation incorporated. The proposed project consists of the subdivision of the project site, which would not result in physical activities at the project site or changes to existing conditions at the project site other than property line configurations. Therefore, the proposed subdivision would not affect noise levels.

Although not proposed, the potential for six new dwelling units in the future would require construction activities that involve the use of heavy machinery and equipment, such as backhoes, excavators, and dump trucks. The Federal Transit Administration publishes typical noise levels for common pieces of heavy construction equipment. The noise levels published by the Federal Transit Administration are based on a distance of approximately 50 feet from the equipment. According to the Federal Transit Administration, noise levels will attenuate (i.e., decrease) approximately 6 dBA each time the distance from the noise source is doubled (Federal Transit Administration 2018). The nearest sensitive receptor to one of the six parcels that could be developed with a residential dwelling unit in the future is an existing on-site residential unit approximately 400 feet away. Table 3.13-1 shows the noise levels at this receptor based on the reported noise levels at 50 feet and attenuation over 400 feet.

Table 3.13-1 Estimated Construction Noise Levels

Equipment	Typical Noise Level at 50 Feet from Source (dBA)	Noise Level at 400 Feet (dBA)
Air Compressor	80	62
Backhoe	80	62
Concrete Mixer	85	67
Dozer	85	67
Generator	82	64
Grader	85	67
Loader	80	62
Paver	85	67
Scraper	85	67
Shovel	82	64
Truck	84	66

Note: Noise levels assumed to attenuate by 6 dBA each time the distance from the source is doubled.

Source: Noise levels at 50 feet are from Federal Transit Administration 2018.

San Benito County Code Section 19.39.030 prohibits daytime noise levels from exceeding 45 dBA at properties zoned AP, as well as rural residential zoning. As shown in Table 13.3-1, construction noise levels would range from approximately 62 dBA to 67 dBA, depending on the equipment being operated. However, temporary construction between the hours of 7:00 a.m. and 7:00 p.m. are exempt from the daytime noise requirements, except for when construction occurs on Sundays and federal holidays (San Benito County Code Section 19.39.051). Because no construction is proposed and details of any potential future construction is unknown, it is possible that construction could occur before 7:00 a.m. or after 7:00 p.m., hours when most people would be most sensitive to noise, such as when sleeping. Therefore, construction impacts would be potentially significant and mitigation is required.

During operation of the project, noise would be typical of residential uses. Examples of potential noise would be lawn maintenance, such as lawn mowers and string trimmers, children playing outside, and minimal vehicle use. Given the

small scale of development and that these are the noises that characterize existing ambient noise in the project area, operational impacts would be less than significant.

Mitigation Measure 3.13-1 Construction Noise Control

To reduce potential future construction-related noise, the applicant and contractors of any potential construction on the project site shall restrict construction to the hours of 7:00 am. through 7:00 p.m. on weekdays and from 8:00 am. through 5:00 p.m. on Saturdays. No construction shall be allowed on Sundays or federal holidays.

Significance after Mitigation

Implementation of Mitigation Measures 3.13-1 would reduce potentially significant impacts of potential construction noise because construction equipment would only operate during daytime hours when people are generally less sensitive to noise. Any potential future construction would also occur consistent with San Benito County Code Section 19.39.051 with implementation of Mitigation Measure 3.13-1. Therefore, the impacts related to noise would be **less than significant with mitigation incorporated**.

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

Less-than-significant impact. The proposed subdivision of the project site would not generate vibration. The potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision would involve typical or standard single-family residential construction methods, and these methods do not involve excessive vibration-causing activities. Vibration levels generated during project construction activities may at times be perceptible at neighboring land uses, but vibration levels would not be excessive causing cosmetic or structural damage to buildings. Long-term operational activities associated with the proposed project would not involve the use of any equipment or processes that would result in potentially significant levels of ground vibration. Therefore, this impact would be less than significant.

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

No Impact. No public or private airports are within 2 miles of the project site, and the project site is outside an Airport Land Use Plan. The closest airport is the Christensen Ranch Airport, approximately 3.75 miles north of the project site, and no private airstrips are within the immediate vicinity. Therefore, the proposed project would not expose any potential future residents or workers to excessive noise levels from airport or airstrip operations.

3.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Population and Housing. 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 Environmental Setting

The project site is located within the County of San Benito and designated as RR in the County's general plan. The County of San Benito is estimated to have a population of 70,082 in as of July 2025. The average household size in San Benito County in 2024 was 3.25 persons per household (US Census Bureau 2026).

3.14.2 Discussion

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

Less-than-significant impact. The proposed project is a subdivision of property which would increase the number of parcels on the project site. Although there is no construction proposed as part of the project, this analysis assumes that the six parcels that do not currently contain residential structures could potentially support up to six new single-family dwelling units in the future, based on allowable uses under the applicable RR land use designation and AP zoning district. With an average household size of 3.25 people, six new dwelling units would increase County population by approximately 20 people. Twenty people would represent less than 0.1 percent of the total population of the County. Therefore, the potential population growth resulting from the proposed subdivision of the project site would not result in substantial population growth. The project does not include extension of roads or other infrastructure. Therefore, impacts would be less than significant.

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

No Impact. The proposed subdivision of the project site does not include demolition of existing residences. The four existing residences on the remaining portions of the project site would maintain their own parcels and would not be displaced. The six parcels that could potentially support up to six new single-family dwelling units in the future are currently vacant and undeveloped and would not displace people or housing if ever developed. Therefore, the proposed project would not displace existing people or housing, necessitating the construction of replacement housing elsewhere, and there would be no impact.

3.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

3.15.1 Environmental Setting

FIRE PROTECTION

The City of Hollister Fire Department provides fire protection services to San Benito County (City of Hollister 2026b). The City's Fire Department has four stations and a training tower, in addition to numerous fire engines and water tenders (City of Hollister 2026a). Station 2 is the nearest fire station, located at 2240 Valley View Road, Hollister, CA 95023, approximately 2.2 miles northwest of the project site.

POLICE PROTECTION

Police protection services are provided to the project site by the San Benito County Sheriff's Office. The County operates one (1) Sheriff's Office located at 2301 Technology Parkway in the City of Hollister, which is located approximately 5.9 miles northwest of the project site. The Sheriff's Office divides the County into Responsibility Areas, and a Deputy is assigned to each Responsibility Area. The project site is in Responsibility Area 6: Fairview from Fallon to Airline Highway (County of San Benito 2026).

SCHOOLS

The project is located within the San Benito High School District. The closest school to the proposed project is Tres Pinos Elementary School, which is located approximately 0.1 miles southeast of the southern border of the project site. Although elementary schools are often associated with kindergarten through fifth grades, the Tres Pinos Elementary School's grade span is kindergarten through eight grade. Tres Pinos Elementary School has been

experiencing declining enrollment, and at the start of the 2023/2024 school year, enrollment was at 43 students (Tres Pinos Elementary School 2024).

PARKS

County owned parks include the County Historical and Recreational Park and Veterans Memorial Park, and San Justo Reservoir (currently closed), which is operated by the County. While most County facilities offer "passive" recreation (picnic areas, trails, historic appreciation), Veterans Memorial Park primarily facilitates "active" recreation, such as baseball and soccer. More active recreational facilities are found in city parks, primarily in the City of Hollister (County of San Benito 2010). The closest park to the proposed project is Quail Hollow Park, which is located approximately 1.5 miles northwest of the project site. The recommended County standard for parks is 5 acres of parkland per 1,000 population (County of San Benito 2010).

OTHER PUBLIC FACILITIES

Other public facilities near the project site include the San Benito County Free Library. The library is located in Hollister, approximately 4 miles northwest of the project site.

3.15.2 Discussion

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:

Fire protection?

Police protection?

Less-than-significant impact. The proposed project consists of two adjacent tentative maps that would subdivide the project site into a total of 10 parcels. No construction is proposed as part of the subdivision approvals. Because the proposed project does not include construction activities, the project would not increase the number of structure or people requiring fire and police protection services.

This analysis assumes that the six parcels that do not currently contain residential structures could potentially support up to six new single-family dwelling units in the future, based on allowable uses under the applicable Rural Residential (RR) land use designation and AP zoning district. The addition of up to six potential new residences could require fire and police protection services. However, this increase in service would be minimal and would not require additional police staff and vehicles such that new or expanded fire or police facilities would need to be constructed. The City of Hollister Fire Department and San Benito County Sheriff already serve adjacent properties, including the existing residences on the project site and the surrounding neighborhoods. In addition, the proposed project would be required to pay the fire protection and law enforcement impact fees to the County prior to the issuance of building permits. The proposed project would not include a substantial population increase that would trigger the need to construct new stations or expand existing services. Impacts would be less than significant.

a) **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:**

Schools?

Less-than-significant impact. The proposed subdivision of the project site would not result in new residents at the project site, including school-aged children. The potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision could be occupied by up to approximately 20 people, based on the average household size in San Benito County (see Section 3.14, Population and Housing). Each of the potential six dwelling units assumed in this analysis would contain at least one guardian, resulting in no more than 14 total school-aged children residing at the site, again based on average household size. Increased enrollment of 14 school-aged children at San Benito High School and Tres Pinos Elementary School would not require the construction of new or expanded school facilities, especially considering the Tres Pinos Elementary School has reported declining enrollment. Additionally, any potential future residential construction at the project site would be subject to the developer fees imposed by the San Benito High School District at the time of development. For these reasons, impacts would be less than significant.

Parks?

Other public facilities?

Less-than-significant impact. The six proposed parcels as a result of the subdivision that do not currently contain residential structures could potentially support up to six new single-family dwelling units in the future. The project does not include new or physically altered schools, parks or other public services or facilities. The addition of up to six potential new residences would not require any additional public services such as parks or other public facilities, as the population increase associated with up to six single-family residences would be minimal and would not put a significant burden on public services such as parks and libraries. Impacts would be less than significant.

3.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation. Would the project:				
a) 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) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

3.16.1 Environmental Setting

County owned parks include the County Historical and Recreational Park and Veterans Memorial Park, and San Justo Reservoir (currently closed), which is operated by the County. While most County facilities offer "passive" recreation (picnic areas, trails, historic appreciation), Veterans Memorial Park primarily facilitates "active" recreation, such as baseball and soccer. More active recreational facilities are found in city parks, primarily in the City of Hollister (County of San Benito 2010). The closest park to the proposed project is Quail Hollow Park, which is located approximately 1.5 miles northwest of the project site. Valley View Park is also close by, located approximately 1.7 miles northwest of the project site. The recommended County standard for parks is 5 acres of parkland per 1,000 population (County of San Benito 2010).

3.16.2 Discussion

a) 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) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less-than-significant impact. Although the proposed project consists only of a tentative subdivision map and would not include construction of recreational facilities or dwelling units that increase population and use of recreational facilities, this analysis assumes that up to six dwelling units could be constructed in the future. Given the limited scale of up to six potential single-family dwelling units, and the average household size in San Benito County, population at the project site could increase by up to approximately 20 people (see Section 3.14, Population and Housing). The addition of 20 residents would not increase park and recreational facilities such that substantial deterioration would occur or be accelerated. The proposed project does not include recreational facilities. Accordingly, impacts would be less than significant.

3.17 TRANSPORTATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Transportation. 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 section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

3.17.1 Environmental Setting

CIRCULATION SYSTEM

Regional access to the project site is from State Route 25, also known as Airline Highway. State Route 25 is aligned in a general north-south direction, and the segment in the project area is two lanes with no bicycle lanes or pedestrian sidewalks. The project site is accessed from Best Road, at its intersection with State Route 25. Portogese Way also provides access to the project site via its intersection with Best Road. Portogese Way is a dead-end street, while Best Road continues north of the project site, passing through rural and residential areas before ending at an intersection with John Smith Road, east of Hollister. Neither Best Road nor Portogese Way have bicycle lanes or pedestrian sidewalks.

Bicycle facilities in San Benito County are generally concentrated in and around Hollister. A Class I bikeway is located approximately parallel with State Route 25 from near the southern limits of Hollister to near the center of Hollister (Association of Monterey Bay Area Governments 2025). Class I bikeways are paths or trails, separated from roadways, for the exclusive use of bicycle and pedestrian modes of travel.

There are no public transit facilities in the area of the project site.

VEHICLE MILES TRAVELED

The basic measure of the amount of roadway transportation generated is vehicle miles traveled (VMT). VMT is calculated by the number of vehicles times the miles traveled in an area or on a given roadway during a specified time period. According to the Environmental Impact Report prepared for the Metropolitan Transportation Plan for the Monterey, San Benito, and Santa Cruz counties, daily VMT in the tri-county region is 20.9 miles per capita in 2022 (Association of Monterey Bay Area Governments 2025).

3.17.2 Discussion

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

Less-than-significant impact. The proposed subdivision of the project site would not result in new residents or land uses at the project site, nor would existing uses change. Therefore, the proposed subdivision would result in no new vehicle, bicycle, or pedestrian trips on circulation facilities in the project area or region. The proposed subdivision of the project site would not conflict with programs, plans, ordinances, or policies addressing the circulation system.

This analysis considers the development potential resulting from the subdivision, which could include up to six single-family dwelling units in the future. Based on trip generation rates provided by the Institute of Transportation Engineers ("ITE") 2021 Trip Generation Manual, a single-family dwelling unit generates 9.43 daily trips (Institute of Transportation Engineers 2021). Therefore, six single-family units would result in approximately 57 daily trips (6 units X 9.43 trips). A total of 57 daily trips would not conflict with the circulation system, as nearly all these trips would use State Route 25, a highway designed to carry substantially more capacity than 57 trips. There are no transit, bicycle, or pedestrian facilities in the project area. Therefore, impacts would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less-than-significant impact. Section 15064.3 (b)(1) of the CEQA Guidelines identifies that VMT exceeding an applicable threshold of significance may indicate that a project has a significant transportation related effect. The proposed project is a subdivision of land, which itself does not generate any vehicle trips or VMT. Assuming that up to six new single-family dwelling units could be constructed on vacant parcels created by the subdivision in the future, and based on the ITE Trip Generation Manual, as described in this section, up to 57 daily trips could be created in the future. Fifty-seven trips would be a small, incremental increase in miles traveled on area roadways, especially given how close the project site is to the City of Hollister, where most goods and services are located in the project area. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) because VMT impacts would be less than significant.

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

Less-than-significant impact. The proposed project consists of two adjacent tentative maps that would subdivide the project site into a total of 10 parcels. No construction, including new roads or intersections, is proposed as part of the subdivision approvals. Therefore, the proposed subdivision of the project site would not substantially increase hazards due to geometric design features or incompatible uses. If in the future, new single-family residences are constructed on parcels created by the subdivision, their driveways would provide ingress and egress from either Best Road or Portogese Way. Both of these roads are rural collector roadways with low traffic volumes, especially Portogese Way because it is a dead-end street. Additionally, the driveways would be designed to comply with all current design and safety criteria. The proposed project would not increase hazards or introduce incompatible uses onto a public roadway, and impacts would be less than significant.

d) Result in inadequate emergency access?

Less-than-significant impact. The proposed subdivision of the project site would not change roadway configurations or access to the site. This analysis assumes that six parcels created from the proposed subdivision that do not currently contain residential structures could potentially be developed with a single-family dwelling unit in the future. Each of these six parcels have frontage on either Best Road or Portogese Way, providing direct access for emergency response. Therefore, the proposed project would not result in inadequate emergency access. Impacts would be less than significant.

3.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?				
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 Environmental Setting

ETHNOGRAPHIC SETTING

San Benito County was traditionally occupied by Native American groups collectively referred to during the Historic Period as the Costanoans (Spanish "Costanos" or "coast people"), now more commonly known as the Ohlone. These groups consisted of multiple politically independent tribelets speaking several related languages and occupying permanent villages in valley areas, along with seasonal camps in surrounding mountains. Linguistic and archaeological evidence suggests that the Ohlone migrated from the Sacramento-San Joaquin Delta region during the Late Horizon period (San Benito County 2015).

Several tribelets occupied portions of San Benito County and surrounding region, including the Mutsun, Pagsin, Chalon, Tamarron, Ausaima, and Salinan. The Ohlone relied heavily on acorns and other gathered plant resources, supplemented by hunting and trade. They constructed dome-shaped dwellings and assembly houses, and maintained extensive trade networks for materials such as obsidian and cinnabar.

Spanish exploration and missionization between 1769 and 1797, including establishment of Missions Soledad and San Juan Bautista, had severe impacts on Ohlone communities. Disease, displacement, and forced assimilation during the mission period led to dramatic population decline and disruption of traditional lifeways. Despite these impacts, descendants of the Ohlone persisted, and in 1971 organized as the Ohlone Indian Tribe to preserve and protect their heritage (San Benito County 2014).

TRIBAL CONSULTATION

This section focuses on the contemporary tribal communities and tribal cultural resources as they pertain to Assembly Bill 52. This section analyzes and evaluates the potential impacts of the project on tribal cultural resources, both identified and undiscovered. Tribal cultural resources, as defined by Assembly Bill 52, Statutes of 2014, in PRC Section 21074, are sites, features, places, cultural landscapes, sacred places and objects, with cultural value to a Tribe. A tribal cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

Assembly Bill 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "tribal cultural resources," defined in PRC Section 21074. Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation before the release of an EIR, negative declaration, or mitigated negative declaration.

On May 4, 2026, the County sent notification letters that the project was being addressed under CEQA, as required by PRC Section 21080.3.1, to the Native American tribes that are on the NAHC list. Notifications were sent to 11 tribal representatives from the Amah Mutsun Tribal Band, Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Ohlone Rumsen-Mutsen Tribe, Indian Canyon Mutsun Band of Costanoan, and Wuksachi Indian Tribe/Eshom Valley Band. No tribes responded in writing. Copies of correspondence with the tribes is provided as Appendix A to this IS/MND. The County has a recurring meeting with the Amah Mutsun Tribal Band that is not specific to any project. During one of these meetings on May 27, 2026, the Amah Mutsun Tribal Band informed the County that it is unaware of tribal cultural resources at the project site. However, the Amah Mutsun Tribal Band also indicated areas of the County are under-surveyed for resources, and that the project site should be subject to a cultural resources survey.

Additionally, as described in Section 2.5, Cultural Resources, the County completed a search of cultural resources records for the project area at the Northwest Information Center (NWIC) at California State University, Sonoma on July 3, 2026 (NWIC 2026). The records search revealed that no archaeological sites have been previously recorded within the project site.

3.18.2 Discussion

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)?

No Impact. No CRHR listed or eligible for listing tribal cultural resources such as sites, features, places, or cultural landscapes are located within the project site (NWIC 2026). Similarly, no tribal cultural resources such as sites, features, places, or cultural landscapes that are listed in a local register of historical resources are located within the project site. Thus, even though the proposed project does not include construction or excavation at the site, if such activities were to occur in the future, there would be no potential to impact resources that are eligible or listed in the CRHR. Therefore, the proposed project would have no impact.

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?

Less than significant with mitigation incorporated. As described above, San Benito County sent Assembly Bill 52 notifications letters to 11 Tribal representatives listed in the NAHC list. No Tribes replied to the Assembly Bill 52 notification letters. However, representatives from the Amah Mutsun Tribal Band addressed the proposed project in a recurring meeting with the County. The Amah Mutsun Tribal Band indicated that they are unaware of tribal cultural resources at the project site. However, the Amah Mutsun Tribal Band also said that parts of San Benito County may not have sufficient survey work completed to be fully informed of resources. The Amah Mutsun Tribal Band requested that a cultural resources survey be completed for the project site. The County completed a cultural resources records search for the project area on July 3, 2026. The records search revealed that no archaeological sites have been previously recorded within the project site.

The proposed project is a subdivision of land, which itself would not include ground disturbance or other site activities with potential to encounter tribal cultural resources, if present. Assuming that up to six new single-family dwelling units could be constructed on vacant parcels created by the subdivision in the future, construction activities, such as grading and excavation, would have the potential to encounter previously undiscovered tribal cultural resources on the project site. These activities could damage or destroy tribal cultural resources if present. Impacts would be potentially significant and mitigation is required.

Mitigation Measure TCR-1: Unanticipated Discovery of Tribal Cultural Resources

If any suspected tribal cultural resources or resources of cultural significance to a California Native American Tribe including features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities (e.g., grading and/or excavation), all work shall pause immediately within 100 feet of the find. San Benito County, in coordination with the geographically affiliated Tribe(s), shall implement any measures deemed necessary for the protection of the tribal cultural resource, with preservation in place being the preferred treatment. The construction contractor shall not resume work in the area of the discovery until directed to do so by San Benito County and the Tribe(s).

Significance after Mitigation

Implementation of Mitigation Measure TCR-1 would reduce impacts on tribal cultural resources by requiring appropriate treatment and proper care of significant tribal cultural resources, in the case of a discovery. Additionally, Mitigation Measure 3.5-2a in Section 3.5, Cultural Resources, would be required before potential future construction. Mitigation Measure 3.5-2a requires a cultural resources survey to be completed within the area of effect for potential future construction on the project site. Completing this survey would identify any previously unknown tribal cultural resources, consistent with the request of the Amah Mutsun Tribal Band. Impacts would be **less than significant with mitigation incorporated.**

3.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems. Would the project:				
a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☒	☐
b) Have insufficient 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 wastewater treatment provider that serves or may serve the project that it has inadequate 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) Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.19.1 Environmental Setting

The project site is in a rural area without existing storm drainage or sanitary sewer system utilities. There is very little impervious surface area in the project site or surrounding area, allowing precipitation to infiltrate the ground surface or flow into surface waters. Wastewater generated from existing residential uses on the project site are treated with private septic systems. Water supply for existing uses on the project site are from private groundwater wells.

Other dry utilities, such as electricity and natural gas and telecommunications are available on or adjacent to the project site. Natural gas and electricity are provided by Pacific Gas & Electric. Spectrum provides telecommunications services in the project area.

3.19.2 Discussion

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

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

Less-than-significant impact. The proposed project would reconfigure and subdivide the project site into 10 parcels. No new construction is proposed, but existing utilities on-site would remain in place and operational. The existing telecommunications tower on the project site would not be affected by the proposed subdivision.

As described in Chapter 2, "Project Description," although the project does not include construction, this analysis considers the potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision that would not contain an existing residence. The six parcels that would be created by the proposed subdivision without existing residences are located in the western area of the project site and would be accessed through Best Road and State Route 25.

The proposed new houses would connect to the existing dry utility infrastructure, including electricity, along Best Road. New septic systems would be installed for each house and therefore would not increase wastewater treatment demand at existing wastewater treatment plans. The potential construction impacts of these utilities, including septic systems, are evaluated throughout this Initial Study as a future development scenario that is not currently proposed but could be permissible under current zoning after subdivision of the property. With implementation of the mitigation measures identified in this Initial Study, impacts would be less than significant. Impacts of the proposed project would be less than significant.

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

Less-than-significant impact. The proposed project would reconfigure and subdivide the project site into 10 parcels. No new construction is proposed, but existing agricultural and residential uses on the project site would continue. These existing uses would continue to use water at current levels.

The potential future development of up to six single-family dwelling units on the project site would generate demand for water. Each house would be served by a new groundwater well. The addition of six dwelling units would not generate substantial demand for groundwater supplies. Impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-significant impact. The proposed project would reconfigure and subdivide the project site into 10 parcels, which would not generate solid waste. Existing agricultural and residential uses on the project site would continue to generate solid waste at current levels.

The potential future development of up to six single-family dwelling units on the project site would generate household quantities of solid waste. The solid waste generated by six dwelling units would not be substantial such that the capacity of local infrastructure would be exceeded. Impacts would be less than significant.

3.20 WILDFIRE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Wildfire. Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones? 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 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 Environmental Setting

The project site is designated as a High Fire Hazard Severity Zone and Moderate Fire Hazard Severity Zone within the State Responsibility Area, meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of the state (California Department of Forestry and Fire Protection 2026). The High Fire Hazard Severity Zone within the project site is located primarily on the eastern, hilly portion of the site. The remainder of the project site is designated as a Moderate Fire Hazard Severity Zone.

3.20.2 Discussion

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-significant impact. As described in Section 3.9, Hazards and Hazardous Materials, the project would not substantially impair an adopted Emergency Response Plan or Emergency Evacuation Plan. The proposed subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Additionally, the potential future six new single-family dwelling units on six of the parcels created through the subdivision would be designed in conformance with state law and local regulations including emergency access requirements. These residences would be on either Best Road or Portogese Way, neither of which are through roads designated for evacuation. As describe in Section 3.17, Transportation, six single-family vehicles would generate approximately 57 vehicle trips per day, which would be an incremental increase on State Route 25. In the event of an evacuation, residents evacuated from the project site would not cause substantial congestion or delays on evacuation routes. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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?

Less-than-significant impact. As described above, the proposed subdivision would not result in physical activities at the project site or changes to existing conditions other than changing parcel lines on recorded maps, such as tax maps. Although the eastern portion of the project site contains areas of 30 percent or greater slope, the potential future six new single-family dwelling units considered in this analysis would be located on the six parcels of the subdivision that would not contain an existing residence. These parcels would be on the relatively flat, western half of the project site, outside of the areas with 30 percent or greater slope. Fire typically moves faster (i.e., more uncontrolled) on sloping terrain, as the fire heats and dries the vegetation upslope, allowing for faster ignition. Additionally, the six parcels where future development is considered in this Initial Study are adjacent to Best Road and Portogese Way, and next to State Route 25, which would allow for quick departure of the site in a fire emergency.

Additionally, any potential future residential dwelling units must be designed and constructed in accordance with the California Building Code and California Fire Code, which include requirements for the provision of defensible space, flammable vegetation clearance, and the use of ignition-resistant building materials for properties near High Fire Hazard Severity Zones in State Responsibility Areas. The degree of wildland fire hazard, including the exposure of future occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope or prevailing winds, would not substantially change with the project compared to existing conditions. Therefore, the project would not exacerbate wildfire risk and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

c) Require the installation 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?

Less-than-significant impact. The proposed subdivision of the project site would not involve construction or require the installation of new infrastructure. Any potential future residential construction on subdivision parcels would be served by existing utilities in the area, such as existing electric along Best Road. No new roads would be required. Impacts would be less than significant.

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?

Less-than-significant impact. The potential for future residential development of up to six new single-family dwelling units on six of the parcels created through the subdivision would occur on the relatively flat, western portion of the project site. Although the eastern portion of the project site contains areas of 30 percent or greater slope, the potential future six new single-family dwelling units would be located outside of the areas with 30 percent or greater slope. No development is proposed to occur in the areas of high slope within the project site. In addition, the six parcels with potential for future residential development are not located in a High Fire Hazard Severity Zone and are located substantial distances from the steeper slopes in the eastern area of the project site. Therefore, the project would not substantially expose people or structures to significant risks as a result of runoff, post-fire instability, or drainage changes, and impacts would be less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

3.21.1 Environmental Setting

Refer to the "Environmental Setting" discussion in Sections 3.1 through 3.20 of this Initial Study for a summary of the existing environmental conditions in the project site and vicinity.

3.21.2 Discussion

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

Less than significant with mitigation incorporated. As discussed in Section 3.4, Biological Resources, although the project site contains some residential development and a telecommunications tower, and is used for agriculture, the project site project site supports habitat for special-status species and migratory nesting birds. The proposed project in itself would have no impact on this habitat or special-status species because the project would not involve physical activities at the site, including construction. However, the analysis in this Initial Study considers the potential for the parcels that would be vacant following the proposed subdivision to be developed with a single-family dwelling unit. As discussed in Section 3.4, Biological Resources, potential future residential development, although not currently proposed, could have potentially significant impacts on special-status species. With implementation of mitigation

measures identified in Section 3.4, Biological Resources, impacts on special-status species would be reduced to less than significant.

Similarly, as described in Section 3.5, Cultural Resources, any potential future residential construction on the project could include grading and excavation, which could encounter and then damage or destroy archaeological cultural resources. However, implementation of Mitigation Measures 3.5-2a, 3.5-2b, and 3.5-2c would reduce potential impacts to less than significant by requiring the performance of professionally accepted and legally compliant procedures for the discovery of previously undocumented significant archaeological resources.

As such, effects to biological and cultural resources and potential for project-related activities to degrade the quality of the environment would be less than significant with incorporation of mitigation measures.

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

Less than significant with mitigation incorporated. As described throughout this Initial Study, the proposed project is the subdivision of the project site, changing four existing parcels into 10 parcels. No construction or physical changes to the project site are proposed. Therefore, the proposed project would not have cumulative impacts.

As also described throughout this Initial Study, the proposed subdivision of the project site would increase the residential development density allowed for under the existing AP zoning of the site. This analysis considers up to six new single-family dwelling units could be constructed in the future, corresponding to six of the 10 parcels that would not contain an existing residence. Given the limited scale of the potential development, the construction of six dwelling units would not have cumulatively considerable contributions towards significant cumulative effects. Mitigation measures have been identified throughout this Initial Study to reduce potentially significant impacts of the project, should any future residential development occur in the future. Furthermore, the analyses presented in Section 3.3, "Air Quality," Section 3.8, "Greenhouse Gas Emissions," and Section 3.17, "Transportation," considers potential cumulative impacts associated with the potential for future residential development of the project site. The analyses determined that cumulative air and GHG emails impacts would be less than significant and cumulative VMT impact would be less than significant. Therefore, implementation of identified mitigation measures throughout Section 3.1 through Section 3.20 would ensure that environmental effects associated with the project would not combine with effects from reasonably foreseeable future development in the project vicinity to cause cumulatively considerable significant impacts. For these reasons, cumulative impacts would be less than significant with mitigation incorporated. No further mitigation is required.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less than significant with mitigation incorporated. Environmental effects which can have substantial adverse effects on human beings include effects on aesthetics, air quality, hazards and hazardous materials, hydrology and water quality, noise, and public services. As described in Section 3.1, Aesthetics; Section 3.3, Air Quality, Section 3.9, Hazards and Hazardous Materials; Section 3.10 Hydrology and Water Quality; and Section 3.15, Public Services, impacts of the proposed project would be less than significant.

As described in Section 3.13, Noise, if residential construction were to occur at the project site in the future, construction equipment could generate noise that affects the nearest existing residence. This would be adverse, especially at nighttime or on holidays when people are at home and most sensitive to noise. However, as described in Section 3.13, Noise, implementation of Mitigation Measure 3.13-1 would be required, which would restrict construction during nighttime and prohibit construction on federal holidays. The project would not exceed significance thresholds or result in significant impacts for the other environmental categories typically associated with indirect or direct effects to human beings. As such, direct or indirect adverse impacts on human beings would be less than significant with mitigation incorporated. No further mitigation is required.

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3.21 Mandatory Findings of Significance

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