Public Review Mitigated Negative Declaration

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant

County of San Benito

October 2, 2026







Prepared by

EMC Planning Group

PUBLIC REVIEW MITIGATED NEGATIVE DECLARATION

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant

County of San Benito

PREPARED FOR

County of San Benito

Michael Kelly, Senior Planner

2301 Technology Pkwy

Hollister, CA 95023

Tel 831.902.2287

mkelly@countyofsanbenitoca.gov

PREPARED BY

EMC Planning Group Inc.

601 Abrego Street

Monterey, CA 93940

Tel 831.649.1799

Fax 831.649.8399

Shoshana Lutz, Senior Planner

lutz@emcplanning.com

www.emcplanning.com

October 2, 2026

This document was produced on recycled paper.

MITIGATED NEGATIVE DECLARATION

In Compliance with the California Environmental Quality Act (CEQA)

Project Name	2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant
Lead Agency	County of San Benito
Project Proponent	Don Chapin
Project Location	2751 San Juan Hollister Road Unincorporated San Benito County
Project Description	The project includes relocation of an existing concrete ready-mix batch plant currently operating approximately 3.6 miles north of the project site. The proposed, new facility would produce approximately 40,000 cubic yards of concrete annually, requiring approximately 5,500 inbound loads of raw materials and 4,000 outbound loads of finished concrete per year. The concrete ready-mix batch plant area includes a permanent 550 square foot building that has a restroom for employees. The project also includes on-site recycling operations and a precast concrete facility.
Public Review Period	October 16, 2026 – November 16, 2026
Written Comments To	Michael Kelly, Senior Planner County of San Benito mkelly@countyofsanbenitoca.gov
Proposed Findings	The County of San Benito is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based. The initial study indicates that the proposed project has the potential to result in significant adverse environmental impacts. However, the mitigation measures identified in the initial study would reduce the impacts to a less than significant level. There is no substantial evidence, in light of the whole record before the lead agency County of San Benito that the project, with mitigation measures incorporated, may have a significant effect on the environment. See the following project-specific mitigation measures:

Mitigation Measures

Air Quality

AQ-1 Prior to issuance of grading or construction permits, the applicant shall prepare a project-specific health risk assessment in accordance with California Air Resources Board guidance and applicable air district CEQA guidelines. The health risk assessment shall evaluate potential health risks to nearby sensitive receptors, including the residence located approximately 473 feet west of the project site, from construction-related TAC emissions, including diesel particulate matter.

The health risk assessment shall quantify cancer risk, non-cancer health impacts, and $PM_{2.5}$ concentrations using current modeling tools, emission factors, and project-specific construction assumptions. If the health risk assessment identifies that applicable health risk thresholds would be exceeded, the applicant shall implement additional feasible mitigation measures (e.g., use of Tier 4 Final equipment, electrification, construction phasing, or other emission reduction strategies) to reduce impacts below significance thresholds, subject to review and approval by the San Benito County Director of Planning, Building, and Code Enforcement and the air district.

AQ-2 The applicant shall prepare a Construction Management Plan for review and approval by the San Benito County Director of Planning, Building, and Code Enforcement. The Construction Management Plan shall include the following measures to reduce TAC emissions during construction:

a. Heavy-duty diesel vehicles shall have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation;

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

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

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

Biological Resources

BIO-1 California Red-Legged Frog and California Tiger Salamander. The project proponent shall obtain Incidental Take Permits from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife for potential project impacts to California red-legged frog and California tiger salamander, and implement all avoidance, minimization, and compensatory mitigation measures required by these permits.

Take permit conditions would be determined by the applicable resource agency (CDFW or USFWS) and may include, but not be limited to, the avoidance and minimization measures identified below to minimize the potential for "take" of California red-legged frog and California tiger salamander.

- Qualified project biologists approved by the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife shall supervise and/or implement all species protection measures. Construction supervisors shall attend a training session regarding the protection measures, as described in Mitigation Measure BIO-2. Construction contracts shall expressly include language requiring compliance with the protection measures.

- At least 15 days prior to ground disturbance, the project proponent shall submit the name and credentials of the project biologists who would conduct activities specified in this measure. No project activities shall begin until the project proponent has received written approval from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife that the project biologists are qualified to conduct the work.

- The project biologists shall have the authority to halt construction work at any time to prevent harm to California red-legged frog and California tiger salamander or when any of the permit-specified protection measures have been violated. Work shall re-commence only when authorized by the project biologists. If work is stopped due to potential harm to protected species, the project biologists shall contact the U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife by telephone or email on the same day to communicate the event and coordinate appropriate action.

- A project biologist shall be present during all initial ground disturbance activities; the biologist shall conduct biological construction monitoring in all work areas with potential to impact California red-legged frog or California tiger salamander. Before the start of work each day, a project biologist shall check for wildlife under any equipment such as vehicles and stored pipes within active construction zones that are fenced. A project biologist shall also check all excavated steep-walled holes or trenches greater than one foot deep for trapped animals. If California red-legged frog or California tiger salamander is observed within an active construction zone, a project biologist shall be notified immediately and all work within 100 feet of the individual animal shall be halted and all equipment turned off until the biologist has captured and removed the individual from the work area. California red-legged frog and California tiger salamander shall be relocated to a U.S. Fish and Wildlife Service/California Department of Fish and Wildlife -approved off-site location according to permit specifications.

- Special-status species shall be excluded from the project site and off-site improvements area by installing exclusionary fencing (i.e., silt fencing or other appropriate fencing). This will prevent construction from expanding into natural areas and prevent any special status species that are may migrate through the site from becoming harmed during ground disturbing work. A U.S. Fish and Wildlife Service and California Department of Fish and Wildlife- approved biologist will conduct weekly exclusionary fence inspections to ensure that any breaks in the fencing are repaired.

BIO-2 Worker Environmental Awareness Program (WEAP). Before construction activities begin, a qualified biologist(s) shall conduct a worker environmental awareness training session for all construction personnel. At a minimum, the training shall include a description of protected biological resources, species descriptions and habitat requirements, and general measures being implemented to protect sensitive resources during construction. Informational handouts with photographs clearly illustrating species appearances shall be used in the training session.

- Training topics shall include special-status species with potential to occur on the project work sites as determined by final site plan impact boundaries and results of focused surveys. Species discussed shall include California red-legged frog, California tiger salamander, American badger, western burrowing owl, western spadefoot, Crotch's bumble bee, monarch butterfly, San Joaquin coachwhip, San Joaquin kit fox, special-status bats, and nesting birds and raptors.

- The training session shall include information about steps to take if a special-status species is encountered, including contact information for the biological monitoring staff and measures to protect species during construction. All new construction personnel shall undergo this mandatory worker environmental awareness training when they start work on the project. Training shall occur prior to the start of construction and periodically, as needed, if new construction personnel begin work at the project site. Each worker shall sign a statement that they received training and the statement shall be posted or easily available for viewing at the project site. The biologist will document evidence of completion of this training by a letter report and submit it to the San Benito County Director of Planning, Building & Code Enforcement, where it will be kept on file.

BIO-3 American Badger. Not more than 14 days prior to the commencement of ground-disturbing construction activities, a qualified wildlife biologist shall conduct surveys of the grassland habitat on site to identify any potential American badger burrows/dens. If the survey results are negative (i.e., no badger dens observed), a letter report confirming absence shall be prepared and submitted to the San Benito County Director of Planning, Building & Code Enforcement and no further mitigation is required.

If the results are positive (badger dens are observed), the qualified biologist shall determine if the dens are active by installing a game camera for three days and three nights to determine if the den is in use.

- If the biologist determines that a den may be active, coordination with the California Department of Fish and Wildlife shall be undertaken to develop a suitable strategy to avoid impacts to American badger. The strategy may include the following: the biologist shall install a one-way door in the den opening and continue use of the game camera. Once the camera captures the individual exiting the one-way door, the den can be excavated with hand tools to prevent badgers from reusing them. If the biologist determines that the den is a maternity den, construction activities shall be delayed during the maternity season (February to August), or until the badgers leave the den on their own accord or the biologist determines that the den is no longer in use.

- If the game camera does not capture an individual entering/exiting the den, the den can be excavated with hand tools to prevent badgers from reusing them.

- After dens have been excavated and the absence of American badger confirmed, a letter report shall be prepared and submitted to the to the San Benito County Director of Planning, Building & Code Enforcement, prior to project initiation.

BIO-4 Burrowing Owl Preconstruction Surveys. To avoid/minimize impacts to burrowing owls occurring within the project site, a biologist qualified in ornithology shall conduct surveys for burrowing owl prior to ground disturbance or vegetation removal. The qualified biologist shall conduct a two-visit (i.e., morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to the project site boundary, with one survey no less than 14 days prior to the start of construction or ground disturbance activities and the second survey occurring no more than 48 hours prior to initiating construction activities. Surveys shall be conducted according to the methods described in protocols accepted by California Department of Fish and Wildlife (the qualified biologist shall contact California Department of Fish and Wildlife for up-to-date guidance). If no burrowing owls are found, a letter report confirming absence shall be prepared and submitted to San Benito County and the California Department of Fish and Wildlife. If burrowing owls are observed, implementation of seasonal no-disturbance buffers is required (see BIO-5).

BIO-5 Burrowing Owl Avoidance. To avoid loss of or harm to burrowing owl and known overwintering habitat, seasonal no-disturbance buffers, as outlined in the Burrowing Owl Survey Protocol and Mitigation Guidelines (CBOC 1993) and the Staff Report on Burrowing Owl Mitigation (CDFG 2012), shall be in place around known and/or occupied habitat prior to and during any ground disturbance activities.

The following buffer recommendations are based on the time of year and level of disturbance (CDFG 2012), unless a qualified biologist approved by the California Department of Fish and Wildlife verifies through non-invasive measures that either: 1) birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

- From April 1 through August 15: 200-meter buffer for low level of disturbance, 500-meter buffer for medium and high levels of disturbance;
- From August 16 through October 15: 200-meter buffer for low and medium levels of disturbance, 500-meter buffer for high level of disturbance; and
- From October 16 through March 31: 50-meter buffer for low level of disturbance, 100-meter buffer for medium level of disturbance, and 500-meter buffer for medium and high level of disturbance.

If avoidance through implementation of the required buffers is not possible, consultation with the California Department of Fish and Wildlife shall occur to interpret survey results and develop a project-specific avoidance and minimization approach.

BIO-6 Burrowing Owl Take Permitting. If avoidance of burrowing owl habitat or nesting sites is not possible, permanent direct impacts to active burrowing owl overwintering and/or nesting sites shall be offset through an incidental take permit with the California Department of Fish and Wildlife, pursuant to the same permitting process required under BIO-1, which may include, but is not limited to, onsite and/or offsite preservation of burrowing owl habitat demonstrated to support, at a minimum, the number of active burrowing owl nest sites impacted by construction. Lands to be conserved as mitigation for direct impacts shall include:

- Sufficient acreage to support the number of burrowing owl individuals impacted, including adequate territory size and foraging habitat, with fossorial mammals (e.g., California ground squirrel) present;
- Permanent protection through a conservation easement or similar protective instrument for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use;
- Preparation and implementation of a Mitigation Land Management Plan to address long-term ecological sustainability, enhancement of conserved lands, and maintenance of the site for burrowing owls; and
- Funding for the long-term maintenance and management of the mitigation land through the establishment of a long-term funding mechanism, such as an endowment. The applicant shall comply with any additional measures (e.g., avoidance, conservation) incorporated into any permits or authorizations issued by the regulatory agencies with jurisdiction over these resources.

BIO-7 Western Spadefoot. The project applicant shall implement the following measures for the protection of western spadefoot:

- Within 24 hours prior to vegetation removal or ground-disturbing activities within 200 feet of aquatic habitat, the project applicant shall retain a qualified biologist to conduct a pre-construction survey of the area in and adjacent to the development area for western spadefoot. If any western spadefoot are found in or adjacent to the development area, ground disturbing activities shall not commence until the individuals have left the area or the qualified biologist relocates the western spadefoot to nearby suitable habitat a minimum of 300 feet from the development areas. Western spadefoot relocation shall only be conducted with California Department of Fish and Wildlife authorization.

- During all initial ground-disturbing activities within 200 feet of aquatic habitat, the qualified biologist shall monitor construction activity to assess the potential impacts to spadefoot, if present. Relocation of western spadefoot shall only be conducted with California Department of Fish and Wildlife authorization.

- Disturbance to aquatic vegetation shall be avoided to the extent possible. Placement of all staging areas, access roads, and other construction related facilities shall be located a minimum of 100 feet away from aquatic habitat.

- Within 200 feet of aquatic habitat, all construction-related holes shall be covered at the end of each workday to prevent entrapment of amphibians.

- The qualified biologist shall prepare a report documenting the results of the preconstruction survey for submittal to San Benito County Director of Planning, Building & Code Enforcement prior to initial ground disturbance.

BIO-8 Crotch's Bumble Bee. If Crotch's bumble bee remains a candidate species or its status becomes elevated to a listed species under the California Endangered Species Act prior to project implementation, one of the following options shall be implemented prior to vegetation removal:

Option 1: Seasonal Avoidance

Between September and March prior to construction, clear vegetation and conduct ground-disturbing activities outside of the colony active period (April through August) to avoid peak flight season. A qualified bee biologist with a Memorandum of Understanding to perform surveys for Crotch's bumble bee shall conduct a habitat assessment to identify the project site as a potential Crotch's bumble bee overwintering habitat. If the project site is identified as potential Crotch's bumble bee overwintering habitat, the following measures shall be implemented during the overwintering season:

- A qualified biological monitor that has received the Crotch's bumble bee training and is in possession of the training materials shall monitor the staking of limits, clearing and grubbing, and removal of stockpiled vegetation from the site until the site no longer provides potential Crotch's bumble bee habitat.
- The biological monitor shall be responsible for monitoring Crotch's bumble bee when they are detected and shall ensure active foraging patches are not removed until the Crotch's bumble bee(s) leave the area on their own volition.
- The biological monitor shall monitor the slow and methodical removal of vegetation in patches and by hand where necessary should Crotch's bumble bee nesting or overwintering behavior be observed (scanning the ground instead of targeting flowering resources, seen entering a burrow or disappearing into thick vegetation and no re-emerging, sitting on the open ground), until it is confirmed that a Crotch's bumble bee nest or overwintering site is not present.
- Should the project result in unpermitted take of a Crotch's bumble bee individual or nest, work shall immediately halt and the California Department of Fish and Wildlife shall be immediately notified by the qualified Crotch's bumble bee biologist. If determined necessary during consultation, an Incidental Take Permit may be required.

Option 2: Assume Presence of Crotch's Bumble Bee

Assume presence and obtain Incidental Take Authorization from the California Department of Fish and Wildlife (Section 2081 of the Fish and Game Code). Avoidance measures identified in the permit will be implemented. Compensatory mitigation, such as land acquisition and habitat restoration or enhancement would be required.

Option 3: Conduct Focused Surveys for Crotch's Bumble Bee

If seasonal avoidance is not possible, consultation with the California Department of Fish and Wildlife should occur at least one flight season (March to September) prior to ground disturbance to evaluate potential impacts and other feasible avoidance measures, including habitat assessments and/or surveys.

Surveys should occur during the colony active period for the Crotch's bumble bee (April through August) prior to vegetation clearing, grading, or the initiation of any construction activity in the staging areas/entry nodes or where fencing is proposed.

A qualified bee biologist with a Memorandum of Understanding should be retained to perform surveys for Crotch's bumble bee. Protocol-level surveys for Crotch's bumble bee should be conducted in accordance with the *Considerations for Conserving Crotch's Bumble Bee (*Bombus crotchii*), Franklin's Bumble Bee (*Bombus franklini*), Western Bumble Bee (*Bombus occidentalis*), and Suckley's Cuckoo Bumble Bee (*Bombus suckleyi*)* (CDFW 2026). Surveys should be conducted during the appropriate flying season where suitable habitat occurs in

direct impact area(s). Any modification to the Crotch's bumble bee survey protocol should be submitted to California Department of Fish and Wildlife for review and approval prior to survey implementation. If the survey results are negative (i.e., no bumble bee activity observed), a letter report confirming absence should be prepared and submitted to San Benito County Director of Planning, Building & Code Enforcement and the California Department of Fish and Wildlife, and no further mitigation is required.

If Crotch's bumble bees or bumble bee nests are detected and if direct or indirect impacts to Crotch's bumble bee suitable habitat will occur, the applicant shall consult with the California Department of Fish and Wildlife. If take of Crotch's bumble bee is expected, no construction activities with the potential to result in direct or indirect adverse impacts on Crotch's bumble bee shall occur until the California Department of Fish and Wildlife has authorized such take through an Incidental Take Permit under Section 2081(b) of the California Fish and Game Code for unavoidable impacts.

Direct impacts to Crotch's bumble bee occupied habitat shall be mitigated through an incidental take permit with the California Department of Fish and Wildlife, with a revegetation plan and plant palette of locally native nectar sources that are weed and pest free (e.g., Argentine ants), pathogen-free, and have not been treated with pesticides. Mitigation that satisfies the fully mitigated standard may occur through one or more of the following: onsite and/or offsite habitat creation, restoration, and/or enhancement; acquisition and preservation of onsite and/or offsite lands demonstrated to be occupied by the species; and/or purchase of mitigation credits at an approved mitigation bank. The applicant would comply with any additional measures (e.g., avoidance, conservation) incorporated into any permits or authorizations issued by regulatory agencies with jurisdiction over this resource.

BIO-9 Monarch Host Plants. If work is planned to occur during the breeding season (March 16–October 30), a qualified biologist shall survey the disturbance area? for monarch host plants (Asclepias sp.). If host plants are found within the project site, the qualified biologist will survey each plant for monarch eggs, caterpillars, and chrysalises within the work area two weeks prior to the start of initial ground disturbance. If monarch eggs, caterpillars, or chrysalises are observed, no work shall occur within 25 feet of the host plant until the monarch egg, caterpillar, or chrysalis is no longer present. If an exclusion buffer is not feasible, the applicant shall contact the U.S. Fish and Wildlife Service for further guidance. The results of the survey shall be provided to the County of San Benito Director of Planning, Building & Code Enforcement prior to initial project activities.

BIO-10 Preconstruction Surveys for San Joaquin Coachwhip. A qualified biologist shall complete a preconstruction survey for San Joaquin coachwhip within 48 hours prior to the start of initial grading. If San Joaquin coachwhip is observed, it shall be allowed to leave on its own volition and the observation submitted to the California Natural Diversity Database. The results of the survey shall be provided to the County of San Benito Director of Planning, Building & Code Enforcement within one (1) week of survey completion.

BIO-11 Preconstruction Surveys and Avoidance Measures for San Joaquin Kit Fox. The U.S. Fish and Wildlife Service *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) will be implemented prior to initiation of and during any grading activity on the project site to avoid unintended take of individual San Joaquin kit foxes.

A qualified biologist will conduct preconstruction/pre-activity surveys for San Joaquin kit fox no less than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity that may impact San Joaquin kit fox. The surveys will include all work areas and a minimum 200-foot buffer of the project site. The preconstruction surveys will identify kit fox habitat features on the project site, evaluate use by kit fox and, if possible, assess the potential impacts of the proposed activity. The status of all dens will be determined and mapped. If no dens are found, a letter report confirming absence will be prepared and submitted to the County of San Benito Director of Planning, Building & Code Enforcement and no further mitigation is required.

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

In addition, the following measures will be observed:

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

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

- Kit foxes are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods will be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is

discovered inside a pipe, that section of pipe will not be moved until the U.S. Fish and Wildlife Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.

- All food-related trash items such as wrappers, cans, bottles, and food scraps will be disposed of in closed containers and removed at least once a week from the project site.
- No firearms will be allowed on the project site during earth-moving and construction activities.
- To prevent harassment, mortality of kit foxes or destruction of dens by dogs or cats, no pets will be permitted on site during earth-moving and construction activities.
- Use of rodenticides and herbicides on the project site and off-site improvements area during construction will be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and Federal legislation, as well as additional project-related restrictions deemed necessary by the U.S. Fish and Wildlife Service. If rodent control must be conducted, zinc phosphide will be used because of proven lower risk to kit fox.
- In the case of trapped animals, escape ramps or structures will be installed immediately to allow the animal(s) to escape.
- Any contractor, employee, or agency personnel who inadvertently kills or injures a San Joaquin kit fox shall immediately report the incident to the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service.

BIO-12 Nesting Birds. To avoid impacts to white tailed kite and other nesting birds during the nesting season (January 15 through September 15), all construction activities will be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for raptors), then a qualified biologist shall conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project grading and construction activities.

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

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

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

BIO-13 Preconstruction Surveys and Avoidance Measures for Special-Status Bat Species. Approximately 14 days prior to construction activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees or buildings within 50 feet of the construction boundary. These surveys will include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the project site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an "Anabat" unit. Potential roosting features found during the survey shall be flagged or marked.

If no roosting sites or bats are found, a letter report will be prepared by the biologist and submitted to the County of San Benito Director of Planning, Building & Code Enforcement, and no further measures are required.

If bats or roosting sites are found, bats will not be disturbed without specific notice to and consultation with California Department of Fish and Wildlife.

The bat nursery season is generally considered May 1 to October 1. If bats are found roosting outside of the nursery season, California Department of Fish and Wildlife will be consulted prior to any eviction or other action. If avoidance or postponement is not feasible, a Bat Eviction Plan will be submitted to California Department of Fish and Wildlife for written approval prior to project implementation. A request to evict bats from a roost includes details for excluding bats from the roost site and monitoring to ensure that all bats have exited the roost prior to the start of activity and are unable to re-enter the roost until activity is completed. Any bat eviction will be timed to avoid lactation and young-rearing. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) will be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

BIO-14 Sensitive Habitat Fencing. Prior to project implementation, the boundaries of Menzies' golden bush scrub located near project work areas or access roads shall be delineated with clearly visible flagging or fencing, or otherwise marked for avoidance. The flagging, fencing, and/or other marking shall be maintained in place for the duration of construction at each location until work is completed at the site. Fencing shall be checked weekly by the qualified biologist or designated site representative and repaired as needed.

BIO-15 Avoidance and Mitigation for Menzies' Golden Bush. Impacts to Menzies' golden bush scrub shall be avoided to the maximum extent feasible. If complete avoidance is not feasible, the extent of impacts shall be quantified, and the applicant shall coordinate with the California Department of Fish and Wildlife to develop and implement a mitigation plan that provides no net loss of this sensitive natural community. Mitigation may include restoration, enhancement, and/or preservation at ratios acceptable to the California Department of Fish and Wildlife and shall be incorporated into project plans prior to ground-disturbing activities that could affect Menzies' golden bush scrub.

BIO-16 Prior to initiation of construction, the applicant will retain a qualified biologist to determine the extent of potential wetlands and waterways regulated by the Regional Water Quality Control Board (RWQCB) within or adjacent to the grading/development footprint. If the RWQCB claims jurisdiction, the applicant shall obtain a Clean Water Act Section 401 Water Quality Certification.

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

- A Wetland Mitigation and Monitoring Plan (Plan) shall be prepared to outline the mitigation and monitoring requirements for temporary impacts to wetlands and other waters resulting from construction activities. The Plan will describe measures to minimize surface disturbance; reseed and mulch disturbed areas with certified weed-free native seed mixes; and utilize native, noninvasive species for erosion control plantings. The Plan will also define thresholds of success, monitoring and reporting requirements, and site-specific mitigation to compensate for any wetland losses associated with the project. The Plan shall be submitted to the appropriate regulatory agencies for review and approval during the permit application process.

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

  For improvements on the project site, the applicant shall comply with terms and conditions of the permits, including measures to protect and maintain water quality, restore work sites, and mitigation to offset temporary and/or permanent wetland impacts. The applicant shall be responsible for implementation of this mitigation measure prior to issuance of a grading permit.

BIO-17 Water Quality Protection Measures. Prior to ground disturbance or construction activities, the applicant shall protect all protected aquatic features within 50 feet of project related activities through the use of best management practices for erosion control and vehicle/equipment fueling. This will include the installation of silt fencing between the project site and adjacent waterways. The silt fencing will prevent soil from washing off the project site into waterways and exclude construction activities from the drainage channels.

Potential fuel spills and leaks from construction vehicle/equipment fueling operations shall be prevented from entering waterways. Designated fueling areas shall be on a level grade and must be at least 50 feet from any waterway. The fueling area shall be protected by a berm to prevent any runoff from leaving the fueling area.

BIO-18 Wildlife Movement. Prior to issuance of a grading permit, the applicant shall submit lighting and fencing plans to the County of San Benito Director of Planning, Building & Code Enforcement for review and approval to ensure consistency with wildlife movement protection standards. To maintain and enhance wildlife movement opportunities within the developed parcel, the applicant shall implement the following measures:

- Replace or modify any new or existing fencing within the parcel to ensure permeability for small- to medium-sized wildlife.

- Install wildlife friendly, downward-directed lighting. Motion sensors or timing controls shall be used in areas adjacent to designated movement pathways to minimize nighttime illumination.

- Along entrance road, install wildlife crossing signage and reduced speed limits.

BIO-19 Tree and Woodland Protection. Prior to project implementation, the boundaries of oak woodlands and/or protected trees located adjacent to or within the vicinity of project work areas or access roads shall be clearly delineated for avoidance using highly visible flagging, fencing, and/or other approved markers. All flagging, fencing, and/or other markers shall be installed before construction begins and shall remain in place and be maintained for the duration of construction activities at each location until work is completed. The fencing and/or markers shall be inspected at least weekly by a qualified biologist or designated site representative and repaired or replaced as necessary.

If removal of protected trees or oak woodland is required, the applicant shall obtain the appropriate tree removal permit for individual protected trees and/or a discretionary permit for the removal of oak woodland, in accordance with applicable local regulations, prior to tree removal activities.

BIO-20 Invasive Species Management. The following measures shall be implemented to reduce the spread of non-native invasive species:

- All construction equipment, vehicles, and tools arriving at the project site, and when moving from areas with known invasive plant populations to uninfested areas, shall will be cleaned of mud or other debris that may contain invasive plants and/or seeds.

- Revegetation, erosion control, and landscaping shall use locally appropriate native species and certified weed-free mulch, seed, and soil.

- Bare and disturbed soils shall be revegetated using a California Department of Fish and Wildlife recommended seed mix or plantings composed of locally native species, to minimize the establishment and spread of invasive and noxious weeds within the project site.

Geological Resources

GEO-1The following language shall be included on all grading permits: "If paleontological resources are discovered during earthmoving activities, work shall stop within 100 feet of the find until a paleontologist can assess if the find is unique and, if necessary, develop appropriate treatment measures in consultation with the San Benito County Resource Management Agency."

Noise

N-1 Operation of the concrete ready-mix batch plant and the recycling facility shall not occur simultaneously between the hours of 10:00 p.m. and 7:00 a.m. If nighttime operations are necessary for either facility, only one facility (either the concrete ready-mix batch plant or the recycling facility) may operate at a time during nighttime hours. Concurrent nighttime operation of both facilities is expressly prohibited.

The San Benito County Resource Management Agency shall ensure that this requirement is reflected on all applicable operational plans, lease agreements, and permits. The project applicant shall be responsible for ensuring on-going compliance with this requirement for the life of the project.

Transportation

TR-1 Prior to the issuance of a grading or building permit, the applicant shall prepare and submit a driveway design analysis to the County of San Benito Public Works Division for review and approval. The analysis shall include truck-turning templates for the largest truck type anticipated to access the facility and shall demonstrate that all turning movements into and out of the project driveway can be completed without encroaching into opposing traffic lanes on San Juan Hollister Road. If the analysis identifies insufficient turning capacity or safety concerns, the applicant shall revise the driveway design—such as by widening the driveway approach or modifying internal circulation—to ensure adequate and safe ingress and egress for all vehicle types. The final, approved driveway design shall include a driveway approach with a minimum width of 21 feet and be incorporated into the project's improvement plans and implemented prior to occupancy.

TR-2 Prior to commencement of operations, the applicant shall coordinate with the San Benito County Public Works Division to install roadway signage along San Juan Hollister Road consistent with the recommendations of the traffic analysis prepared by Hexagon Transportation Consultants (December 2025) for the proposed project. Required signage shall include (1) regulatory speed limit signs establishing the County-approved speed limit in both directions, and (2) cross-traffic warning signage to alert approaching drivers to the project driveway and limited sight-distance conditions. All signage shall be installed in accordance with the California Manual on Uniform Traffic Control Devices and any additional County standards as directed by the Public Works Division. Verification of installation shall be provided to the County Public Works Division prior to occupancy.

Tribal Cultural Resources

TCR-1 Cultural Awareness Training Program. Prior to and during ground-disturbing activities, a Cultural Awareness Training Program shall be provided to all construction personnel at the project site. The training shall be prepared and conducted by a qualified archaeologist to the satisfaction of the San Benito County Director of Planning, Building, and Code Enforcement. The training shall be a length of time adequate to explain applicable

statues, regulations, enforcement provisions; the pre-contact and historic environmental setting and context; local tribal groups; show sample artifacts; and to discuss what pre-contact and historic archaeological deposits look like at the surface and when exposed during construction. The training may be discontinued to new workers at the site when ground disturbance is completed. Construction personnel shall not be permitted to operate equipment within the construction area unless they have attended the training. A list of the names of all personnel who attended the training and copies of the signed acknowledgement forms shall be submitted to the San Benito County Director of Planning, Building, and Code Enforcement for their review and approval.

TCR-2 Cultural Resources Construction Monitoring. During ground disturbance activities, a qualified archaeologist and/or tribal monitor shall be present before groundbreaking activities to observe disturbance areas. Monitoring services will no longer be required after fresh excavation has finished. The monitor shall submit a written report to the San Benito County Director of Planning, Building, and Code Enforcement at the end of monitoring activities to document the process and whether any resources were discovered.

This side intentionally left blank.

PUBLIC REVIEW INITIAL STUDY

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant

County of San Benito

PREPARED FOR

County of San Benito

Michael Kelly, Senior Planner

2301 Technology Pkwy

Hollister, CA 95023

Tel 831.902.2287

mkelly@countyofsanbenitoca.gov

PREPARED BY

EMC Planning Group Inc.

601 Abrego Street

Monterey, CA 93940

Tel 831.649.1799

Fax 831.649.8399

Shoshana Lutz, Senior Planner

lutz@emcplanning.com

www.emcplanning.com

October 2, 2026

This document was produced on recycled paper.



TABLE OF CONTENTS

A. BACKGROUND 1

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 17

C. DETERMINATION 18

D. EVALUATION OF ENVIRONMENTAL IMPACTS 19

1. Aesthetics 21
2. Agriculture and Forest Resources 23
3. Air Quality 25
4. Biological Resources 31
5. Cultural Resources 68
6. Energy 72
7. Geology and Soils 74
8. Greenhouse Gas Emissions 78
9. Hazards and Hazardous Materials 79
10. Hydrology and Water Quality 83
11. Land Use and Planning 89
12. Mineral Resources 90
13. Noise 91
14. Population and Housing 95
15. Public Services 96
16. Recreation 98
17. Transportation 99
18. Tribal Cultural Resources 103
19. Utilities and Service Systems 105
20. Wildfire 108
21. Mandatory Findings of Significance 111

E. SOURCES 113

Appendices

Appendix A Conceptual Plans

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

Appendix C CNDDB Field Survey Form

Appendix D Noise Assessment (WJV Acoustics, Inc. 2026)

Appendix E Traffic Analysis (Hexagon Transportation Consultants, Inc. 2025)

Figures

Figure 1 Location Map 7

Figure 2 Aerial Photograph 9

Figure 3 Site and Vicinity Photographs 11

Figure 4 Existing and Proposed Facility Locations 13

Figure 5 Conceptual Layout 15

Figure 6 Habitat Map 33

Figure 7 Potentially Jurisdictional Aquatic Features 37

Figure 8 Special-Status Species in the Project Vicinity 41

Tables

Table 1 Typical Vibration Levels During Construction 94

A. BACKGROUND

Project Title	2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant
Lead Agency Contact Person and Phone Number	Michael Kelly, Senior Planner County of San Benito 831-902-2287
Date Prepared	October 2, 2026
Study Prepared by	EMC Planning Group Inc. 601 Abrego Street Monterey, CA 93940
Project Location	2751 San Juan Hollister Road Unincorporated San Benito County
Project Sponsor Name and Address	Don Chapin 560 Crazy Horse Cyn Road Salinas, CA 93907
General Plan Designation	Industrial Light (IL)
Zoning	Light Industrial (M-1)

Setting

The 43.92-acre project site is located at 2751 San Juan Hollister Road (Assessor's Parcel Number 021-030-017) in unincorporated San Benito County, approximately 0.3 miles west of the City of Hollister and approximately 0.12 miles south of State Route 156. The site lies within the northern portion of the San Juan Valley on an eastern sloping site with a hill summit on the western side of the project site. The area generally functions as a transition between Hollister's more developed urban edge and the rural industrial and agricultural lands of San Benito County. The site is currently used for cattle grazing.

The project site is the former Whittaker Ordnance Facility consisting of an open grassland hillside; existing, abandoned on-site structures; one bunker; an existing paved, degraded roadway along the northern portion of the site; and a disturbed, unpaved roadway along the southern portion of the site. The project site is also actively regulated under Waste Discharge Requirement Resolution Number R3-2009-0115 (issued December 12, 2011) due to historic operations associated with the former Whittaker Ordnance Facility (California State Water Resources Control Board 2025). The site is identified as requiring cleanup for groundwater contamination, including perchlorate, volatile organic compounds, and hexavalent chromium.

The site is currently accessed through an equipment storage area on San Juan Hollister Road that connects to an existing paved, degraded roadway leading to the project site. This represents the off-site improvements area.

Land uses surrounding the project site are primarily rural residential and industrial in nature. Industrial uses and State Route 156 are present to the north, rural residential uses to the west and south, and open grassland to the east. Under the *San Benito County 2035 General Plan* ("General Plan"), the project site is currently designated Industrial Light (IL). The property is zoned Light Industrial (M-1) under the County's zoning ordinance. Surrounding parcels are similarly designated for agricultural or light industrial use, with a mix of Agriculture, Light Industrial, and Heavy Industrial zoning in the immediate vicinity.

Figure 1, Location Map, presents the regional location of the project site. Figure 2, Aerial Photograph, presents the project site and surrounding land uses and features. Figure 3, Site and Vicinity Photographs, shows pictures of the project site and surrounding areas.

Description of Project

The proposed project involves the relocation of an existing concrete and materials operation currently located approximately 3.6 miles north of the project site at 2735 Bolsa Road immediately northwest of the airport in Hollister. Figure 4, Existing and Proposed Facility Locations, shows the location of the existing facility and the proposed project site. Figure 5, Conceptual Layout, illustrates the conceptual layout of the project components.

The following outlines the proposed improvements and uses at the project site. Appendix A, Conceptual Plans, includes the conceptual plans and improvements.

Requested Entitlements

The project requires the following discretionary approvals:

General Plan Amendment: Redesignate the 43.92-acre project site from Industrial Light (IL) to Industrial Heavy (IH);

Zoning Map Amendment: Rezone the project site from Light Industrial (M-1) to Heavy Industrial (M-2); and

Use Permit: Authorize operation of the proposed ready-mix batch plant, precast facility, and recycling operations, as well as repurposing of existing on-site buildings.

Proposed Uses

Concrete Ready-Mix Batch Plant

The project includes relocation of an existing concrete ready-mix batch plant currently operating approximately 3.6 miles north of the project site. The proposed, new facility would produce approximately 40,000 cubic yards of concrete annually, requiring approximately 5,500 inbound loads of raw materials and 4,000 outbound loads of finished concrete per year. The concrete ready-mix batch plant area includes a permanent 550 square foot building that has a restroom for employees.

Recycling Operations

The project would include on-site recycling of waste asphalt and concrete into recycled aggregate products, and processing of soils into topsoil, bio-soils, and other reusable products. Recycling operations would occur periodically, for approximately four months each year, with an estimated 40,000 tons of materials recycled and off-hauled annually (approximately 1,600–1,800 outbound truck trips per year).

Precast Facility

A precast concrete facility would manufacture precast products such as tanks, barrier rails, and concrete boxes. The operation would average two to four truck round trips per day. The precast facility includes a temporary approximately 550 square foot building that has a restroom for employees.

Employment and Operations

The existing operations employ up to 50 employees, who would move to the proposed new facility, including:

- 15 truck drivers;
- 5 ready-mix plant workers;
- 10 precast facility employees;
- 5 recycling operation employees (seasonal);
- 4 maintenance and support staff (intermittent);
- 1 full-time scale attendant; and
- 10 additional employees for future reuse of existing on-site buildings.

The facility would operate up to six days per week, generally from 5:00 a.m. to 5:00 p.m., with most activities concluding by early afternoon. Precast and recycling operations would not occur on Saturdays. Occasional nighttime, early morning, or late evening operations may occur as needed to meet project demands, including limited activity during dark hours.

Traffic and Circulation

Hexagon Transportation Consultants, Inc. prepared the *Trip Generation and Operations Analysis for the Chapin Concrete Plant and Recycling Facility in San Benito County* ("traffic analysis") (December 2025). According to the traffic analysis, truck traffic associated with the project is anticipated to average approximately 32 round trips per day, equivalent to 64 total inbound and outbound truck trips. Project operations would generally occur between 5:00 a.m. and 12:00 p.m.; however, evening deliveries could occur between 8:00 p.m. and 6:00 a.m. Based on the proposed shift schedule, employee arrivals and departures would typically occur outside of weekday peak traffic periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.). The traffic analysis conservatively assumed that up to 50 percent of employee trips could occur during peak-hour periods.

The precast facility is estimated to generate approximately four truck round trips per day, or eight total inbound and outbound trips. Assuming an eight-hour work shift, this equates to an average of one truck trip per hour; therefore, one truck trip is conservatively assumed to occur during each of the AM and PM peak hours.

Recycling operations would generate approximately six truck round trips per day, or 12 total inbound and outbound trips. Based on an eight-hour work shift, this would result in an average of two truck trips per hour; accordingly, one truck trip is conservatively assumed to occur during each of the AM and PM peak hours.

Utilities and Infrastructure

Water service for the project would be provided by the City of Hollister public water system through a new connection to the existing main line along San Juan Hollister Road. This new water line would be placed within the existing roadway located on- and off-site that connects the project site to San Juan Hollister Road. Total water demand for all operations is estimated at approximately five to six acre-feet per year. The ready-mix concrete process would require about 35 to 40 gallons of water per cubic yard of concrete produced. Process water would be captured, clarified, and reused on site, and rainwater or site runoff would be collected and recycled for use in concrete production where feasible.

Wastewater service for the proposed project would be provided by the City of Hollister sanitary sewer system through an existing sewer line located within the existing roadway located on- and off-site that connects the project site to San Juan Hollister Road. Wastewater generated by the project would be minimal and limited to sanitary uses such as restrooms and handwashing within the two proposed structures (one permanent in the concrete batch plant area and one temporary in the precast facility area). No process wastewater would be generated because washing operations would not occur on-site.

Stormwater management features would be incorporated into the project design in accordance with applicable regional and local standards to control runoff, prevent off-site discharge, and minimize erosion. Where practicable, collected rainwater would be reused in plant operations.

Physical Improvements

- Site Grading: Earthmoving activities totaling approximately 42,155 cubic yards of cut and 97,805 cubic yards of fill to reshape the site near the hilltop (western portion of the site) and to accommodate the new facility footprint and access drive;
- Paving and Dust Control: Primary roadways and parking areas within the site would be paved (asphalt concrete and/or Portland cement concrete surface); areas around the plant would be surfaced with base rock and watered for dust suppression; the proposed project includes creating and/or replacing 77,759 square feet of impervious surfaces;
- Roadway Improvements: Construction and reconstruction of internal and off-site roadways to facilitate truck access and circulation;

- Off-Site Driveway Access: Installation of a new off-site driveway entry from San Juan Hollister Road to improve access and visibility;
- Stormwater Drainage Features: Construction of engineered ponds and bio-retention systems to collect rainwater; and
- Installation of water infrastructure within the existing roadway on- and offsite connecting the project site to the existing main on San Juan Hollister Road.

CEQA Approach and Assumptions

The activities at the existing plant on Bolsa Road will cease and any new operations at that location in the future will require a new permit and CEQA compliance documentation. The proposed activities at the new plant (i.e., the project site) will not include any increase or decrease in activities over the existing operations on Bolsa Road.

Many operational characteristics and associated environmental impacts at the project site are anticipated to be similar to those at the existing site on Bolsa Road. Differences in potential impacts would primarily result from physical improvements and site modifications necessary to accommodate the proposed uses at the new location, including construction of new and redevelopment of existing, access roads and driveway; internal circulation; utility connections; and site grading.

The existing buildings at the project site will be remodeled and repurposed in the future to allow for future reuse of the facilities; however, use of the buildings is undetermined. Therefore, the future physical changes to these existing on-site buildings will not be evaluated in this initial study. When such physical changes are proposed, supplemental CEQA compliance would be necessary to permit reuse of the buildings.

This initial study is, however, evaluating the anticipated increase in employment (ten employees) associated with the future repurposing of the existing on-site buildings. Therefore, this initial study is addressing vehicle miles traveled, air quality, greenhouse gas emissions, water use, and sewer generation associated with the ten employees anticipated from the future use of these existing on-site buildings.

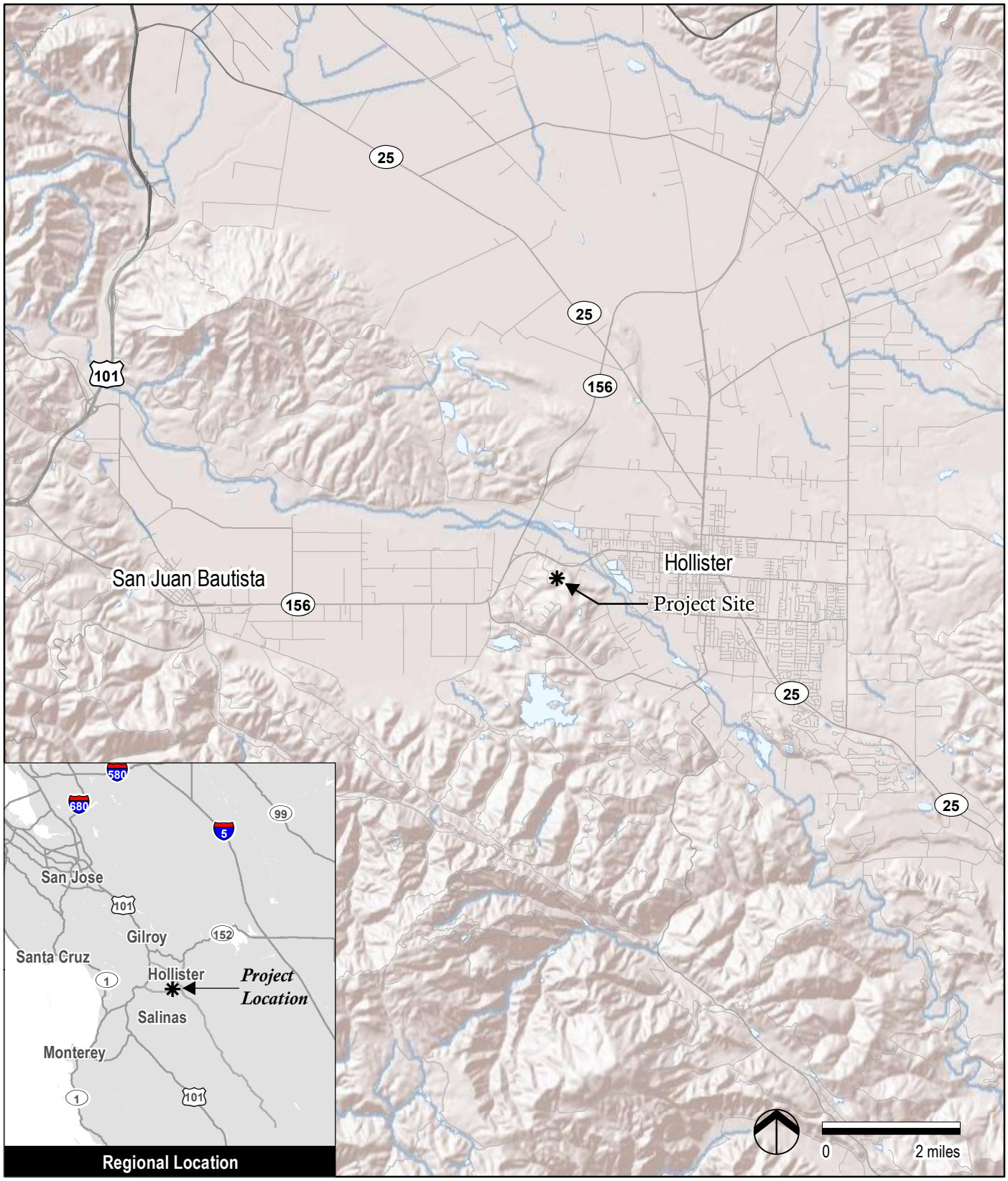
Other Public Agencies Whose Approval May Be Required

- City of Hollister (utilities connections);
- U.S. Fish and Wildlife Service (Incidental Take Permits);
- California Department of Fish and Wildlife (Incidental Take Permits);
- Regional Water Quality Control Board (Clean Water Act Section 401 Water Quality Certification);
- California State Water Resources Control Board (Waste Discharge Requirements); and
- Monterey Bay Air Resources Board (air quality permits).

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.?

County staff sent out letters offering tribal consultation to Native American Tribes traditionally and culturally affiliated with the project area on July 3, 2025 pursuant to AB52 and SB18. One response was received from the Indian Canyon Band of Costanoan Ohlone People. The County agreed to the terms recommended by the tribe, but consultation is not yet complete (Michael Kelly, email message, July 16, 2026).

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



Source: ESRI 2014

Figure 1

Location Map

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant Initial Study

This side intentionally left blank.



0 650 feet

Project Site

Off-Site Improvements

Source: ESRI 2025, Google Earth 2025

Figure 2

Aerial Photograph

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant Initial Study

This side intentionally left blank.



① View looking south from entrance gate located off San Juan Hollister Road.



② View looking southeast at off-site driveway planned for improvement.



③ View of the on-site roadway looking southeast toward the proposed development area.



Project Site

Off-Site Improvements

Source: Google Earth 2025

Photographs: EMC Planning Group 2025



④ View looking southeast at the existing on-site facility.



⑤ View looking west at on-site berms immediately west of existing on-site facility.

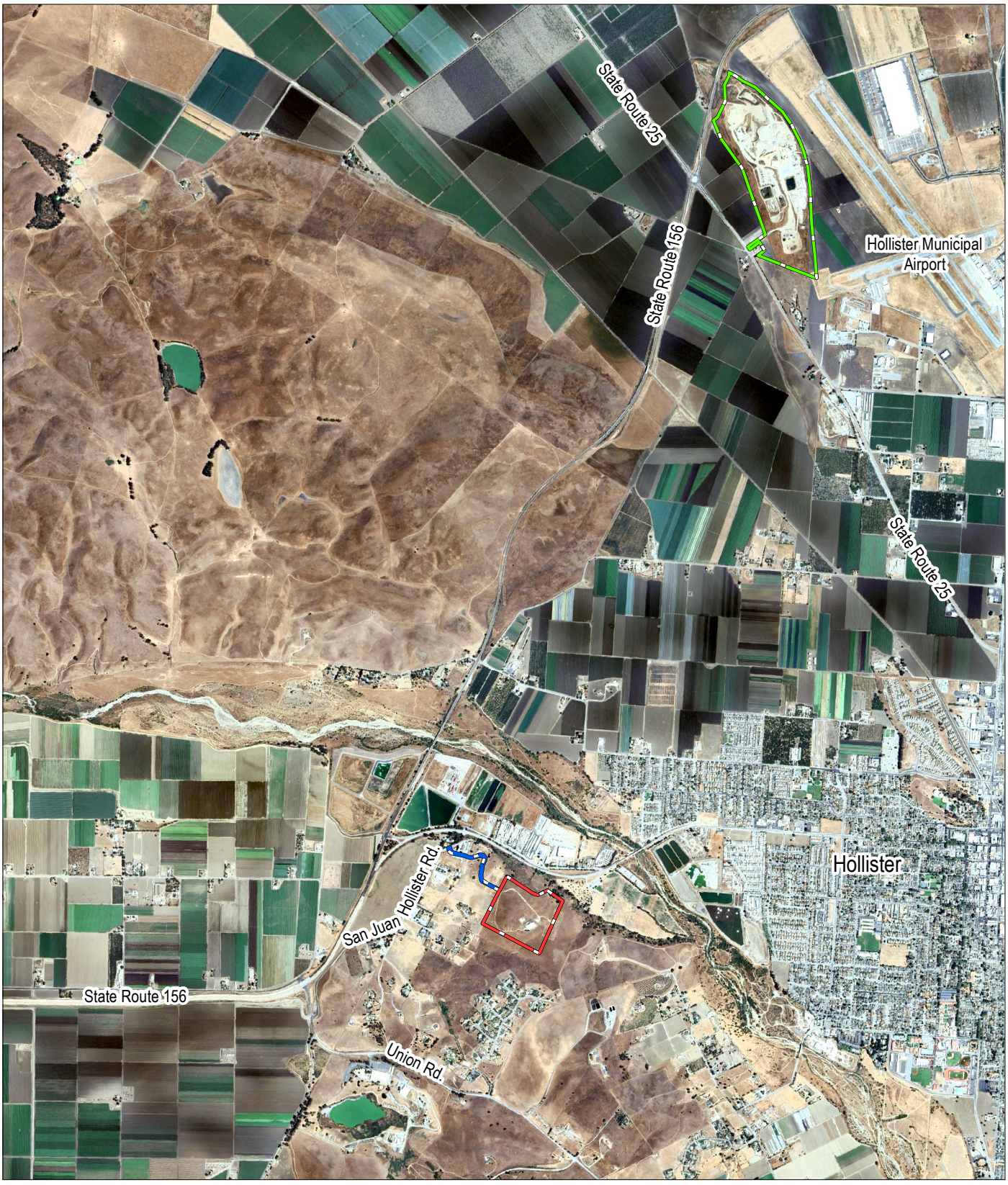


⑥ View looking northwest at the existing on-site facility.

Figure 3

Site and Vicinity Photographs

This side intentionally left blank.



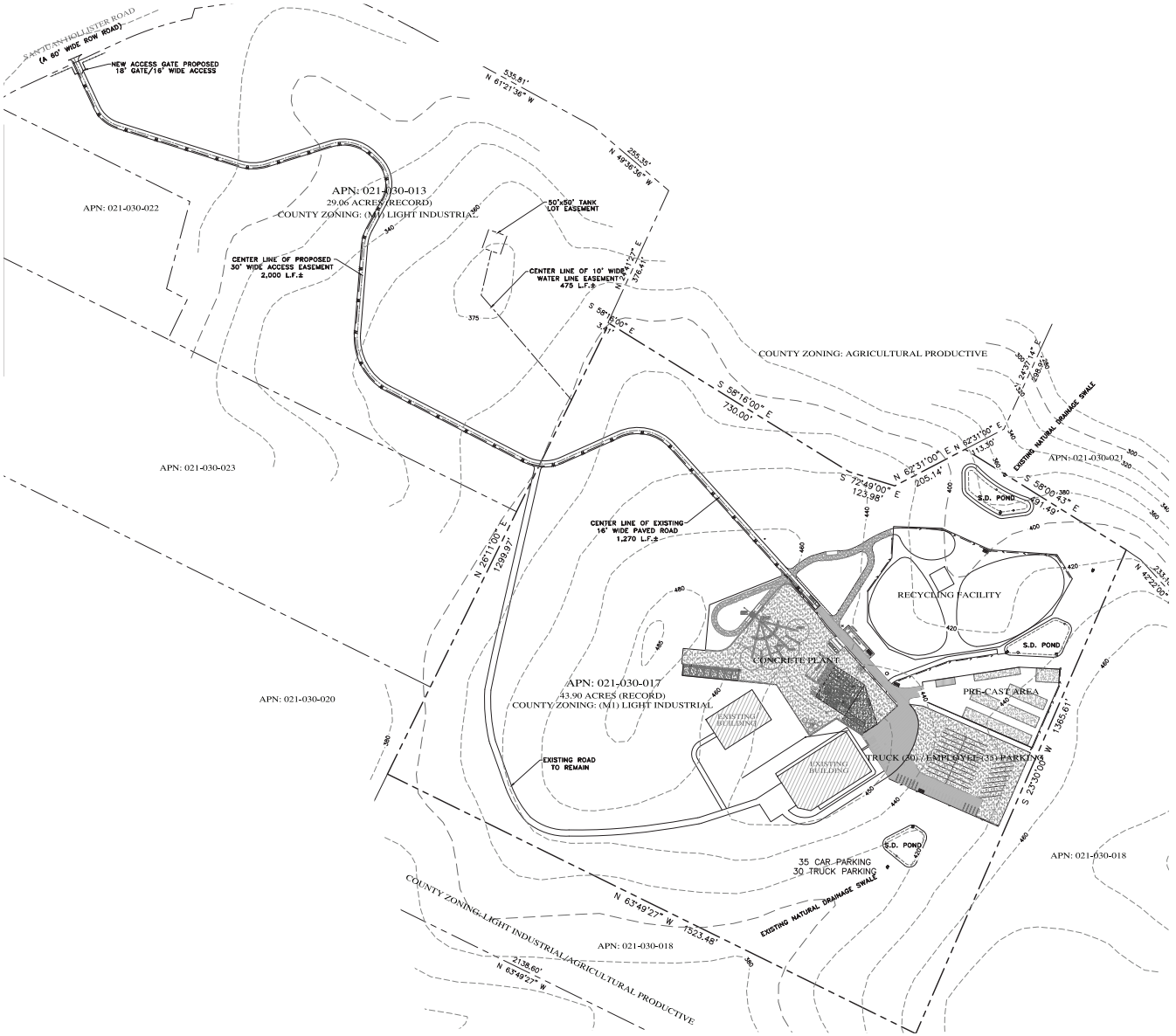
Source: ESRI 2025, Google Earth 2025

Figure 4

Existing and Proposed Facility Locations

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant Initial Study

This side intentionally left blank.



Source: Landset Engineers 2025

Figure 5

Conceptual Layout

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant Initial Study

This side intentionally left blank.

B. Environmental Factors Potentially Affected

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

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

C. DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

_____ _____

Michael Kelly, Senior Planner Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

1. AESTHETICS

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

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b.	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d.	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Comments:

a. The General Plan states that views of mountains, undeveloped rangelands, large agricultural fields and croplands, natural ridgelines along the Diablo and Gabilan Ranges, and annual grasslands make up some of the prominent elements of the county's scenic landscape (San Benito County 2015).

The project site sits at the lower end of an eastern sloping hilltop with the surrounding area also containing small hills. Due to its location, the natural topography of the area blocks any public views of the development area proposed on the project site. Therefore, the project would not have a substantial adverse effect on a scenic vista.

b. The General Plan identifies U.S. Highway 101 and State Routes 129 and 146 as County-designated scenic highways (San Benito County 2015a). The project site, however, is not located near these roadways. State Route 156, which is eligible for a state scenic highway designation, is located approximately 0.8 miles west of the project site. Therefore, there are no officially designated state scenic highways in the vicinity of the project site (California Department of Transportation 2025). The proposed project would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.

c. The project site is located within a non-urbanized area of San Benito County that has historically supported an ordnance facility and contains existing industrial buildings, paved access routes, and disturbed unpaved areas. Public views of the site are primarily of the hilltop, which are available from San Juan Hollister Road, because of the existing hillsides, mature tree cover, and natural landscaping obscuring the development area proposed on the site. As a result, the proposed development area would not be visible from any significant public viewpoint.

Because the project is not visible from any public viewpoint, the project would not substantially degrade public views or the visual character of the area.

d. There are no existing sources of light and glare at the project site because, according to the application materials, the existing structures on-site have been abandoned for years.

Implementation of the proposed project would introduce new sources of light or glare associated with the concrete batch plant operations and parking area. Therefore, the project would be required to comply with San Benito County Code Section 25.07.012 (Outdoor Lighting), which establishes requirements for lighting design to minimize off-site light spill and glare and Chapter 19.31 (Development Lighting), which includes provisions to reduce light pollution (County of San Benito 2025). Compliance with and enforcement of these San Benito County Code provisions would ensure that any potential new sources of light or glare are minimized. Therefore, impacts related to light and glare would be less than significant.

2. AGRICULTURE AND FOREST RESOURCES

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

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Comments:

a. The project site is designated by the California Department of Conservation as Other Land and Grazing Land (California Department of Conservation 2025a). Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

b. The project site is currently zoned Light Industrial (M-1) and the project proposes to rezone the site to Heavy Industrial (M-2), of which neither permit agricultural uses. According to the California Department of Conservation, the site is not enrolled in a Williamson Act contract (California Department of Conservation 2025b). The nearest land under a Williamson Act contract is located approximately 0.6 miles southeast of the project site. Therefore, implementation of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract.

c-d. There are no areas designated as forest land, timberland, or Timberland Production Zone within San Benito County (San Benito County 2015). Therefore, the proposed project would not conflict with existing zoning for, or result in the rezoning of, forest land (Public Resources Code §12220[g]), timberland (Public Resources Code §4526), or timberland zoned Timberland Production (Government Code §51104[g]). Accordingly, the project would not result in the loss of forest land or conversion of forest land to non-forest use.

e. As stated under checklist items "c-d" above, there are no areas designated as forest land within San Benito County; therefore, the project would not involve other changes in the existing environment which, due to their location or nature, would result in the conversion of forest land to non-forest use.

According to the California Important Farmland Finder, the project site is surrounded by areas designated as Grazing Land, Built-Up Land, Other Land, and Unique Farmland (California Department of Conservation 2025a). The nearest area of Unique Farmland is located approximately 0.15 miles northeast of the project site. Development of the proposed project would occur entirely within the existing disturbed site and would not extend into, or otherwise affect, nearby agricultural lands. Therefore, the proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use, to nonagricultural use.

3. AIR QUALITY

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

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

Comments:

San Benito County is within the North Central Coast Air Basin ("air basin"), which is under the jurisdiction of the Monterey Bay Air Resources District ("air district"). The discussion in this section is based primarily on the air district's *CEQA Air Quality Guidelines* (2008) ("CEQA guidelines") guidance, the air district's *2012 – 2015 Air Quality Management Plan* (2017) ("air quality management plan").

a. A consistency determination is a process by which the lead agency demonstrates that the population associated with a proposed project is accommodated by the Association of Monterey Bay Area Governments' regional growth forecasts. The regional growth forecasts for population and dwelling units are embedded in the emission inventory projections used in the air quality plan. Projects within the regional growth forecasts have been accommodated in the air quality plan and are therefore consistent with the air quality plan. The proposed project is not population generating and would not conflict with or obstruct implementation of the air quality management plan (Monterey Bay Unified Air Pollution Control District, p. 5-10).

b. The six most common and widespread air pollutants of concern, known as criteria pollutants, are ground-level ozone, nitrogen dioxide, particulate matter, carbon monoxide, sulfur dioxide, and lead. In addition, reactive organic gases, also referred to as volatile organic compounds, are key precursors in the formation of ground-level ozone. Prolonged exposure to these pollutants is associated with adverse health effects such as asthma, bronchitis, chest pain, coughing, and cardiovascular disease.

The air district is the agency primarily responsible for assuring that national and state ambient air quality standards are attained and maintained within the air basin. It conducts air quality monitoring and enforces air pollution control regulations. MBARD continues to be in attainment for the federal and state ozone and PM $_{2.5}$ ambient air quality standards, and the federal PM_{10} standard, but in nonattainment for the state 24-hour PM_{10} standard (MBARD 2026).

State ambient air quality standards are established by the California Air Resources Board pursuant to the California Clean Air Act, while federal standards are set by the U.S. Environmental Protection Agency under the Clean Air Act. The air district has developed criteria pollutant emissions thresholds that are used to evaluate whether a proposed project would violate an air quality standard or contribute to an existing violation during construction or operation.

According to the air district's CEQA guidelines, a project would result in a significant air quality impact if it would:

> Emit 137 pounds per day or more of an ozone precursor air pollutant (volatile organic compounds or nitrogen oxides);
>
> Directly emit 550 pounds per day or more of carbon monoxide;
>
> Generate traffic that significantly affects levels of service (results in a significant localized source of emission of carbon monoxide);
>
> Emit 82 pounds per day or more of suspended particulate matter onsite, which is equivalent to general construction activity over an area of at least 8.1 acres per day, or grading/excavation over an area of at least 2.2 acres per day; or
>
> Emit 82 pounds per day or more of suspended particulate matter from vehicle travel on unpaved roads.

Operational Emissions

As discussed in the project description, the proposed project involves the relocation of an existing concrete and materials operation from its current facility located approximately 3.75 miles north of the proposed project site. The proposed facility would continue operations similar in type and scale to those currently occurring at the existing site. The same operational air quality impacts currently occurring at the existing facility are expected to occur at the proposed project site. Therefore, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, there would be no change in the existing impacts.

Construction Emissions

The project description indicates that site grading/earthmoving activities totaling approximately 42,155 cubic yards of cut and 97,805 cubic yards of fill would be required to reshape the site near the hilltop (western portion of the site) and to accommodate the new facility footprint and access drive. The application also indicates that primary

roadways within the site would be paved, and areas around the plant would be surfaced with base rock and watered for dust suppression. Improvements would also be made to the access road.

Construction activities are temporary sources of air pollutant emissions that may occur intermittently throughout the construction period, depending on the size and duration of the project. These emissions have the potential to affect local air quality and, in some cases, pose localized health risks. Localized health risks are further discussed under checklist question "c" of this section. Construction-related emissions are typically generated by off-road equipment exhaust, fugitive dust from grading and earthmoving, and ozone precursor emissions (volatile organic compounds and oxides of nitrogen) associated with activities such as architectural coating and asphalt paving.

According to the air district's CEQA guidelines, construction projects that use conventional equipment such as dump trucks, scrapers, bulldozers, compactors, and front-end loaders emit ozone precursors that are already accounted for in the emission inventories of state and federally required air quality plans. Therefore, such projects would not have a significant impact on regional ozone attainment or maintenance.

The air district's CEQA guidelines Table 5-2, Construction Activity with Potentially Significant Impacts, identifies levels of construction activity that could generate significant temporary fugitive dust emissions if not mitigated. Specifically, grading and excavation activities that disturb more than 2.2 acres per day or construction activities with minimal earthmoving that disturb more than 8.1 acres per day are assumed to generate more than 82 pounds of particulate matter per day, which would exceed the threshold of significance.

The project plans state that approximately 12.6 acre-feet of land would be disturbed during implementation of the proposed project and it is likely that grading and construction activities would disturb more than 2.2 acres of land per day, which could result in temporary fugitive dust emissions that exceed the air district's construction activity threshold.

The proposed project is subject to compliance with general plan Policy HS-5.4 requiring the control of PM_{10} emissions during construction consistent with air district control measures. Compliance is required as a condition of project approval and as part of the County's review process for grading and improvement plans. Air district control measures for construction emissions and fugitive dust are as follows:

Dust control measures shall be employed to reduce visible dust leaving the project site. The following measures or equally effective substitute measures shall be used:

a. Use recycled water to add moisture to the areas of disturbed soils twice a day, every day, to prevent visible dust from being blown by the wind;

b. Apply chemical soil stabilizers or dust suppressants on disturbed soils that will not be actively graded for a period of four or more consecutive days;

c. Apply non-toxic binders and/or hydro seed disturbed soils where grading is completed, but on which more than four days will pass prior to paving, foundation construction, or placement of other permanent cover;

d. Cover or otherwise stabilize stockpiles that will not be actively used for a period of four or more consecutive days, or water at least twice daily as necessary to prevent visible dust leaving the site, using raw or recycled water when feasible;

e. Maintain at least two feet of freeboard and cover all trucks hauling dirt, sand, or loose materials;

f. Install wheel washers at all construction site exit points, and sweep streets if visible soil material is carried onto paved surfaces;

g. Stop grading, and earth moving if winds exceed 15 miles per hour;

h. Pave roads, driveways, and parking areas at the earliest point feasible within the construction schedule;

i. Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours of receiving the complaint. The phone number of the Monterey Bay Air Resources District shall also be visible to ensure compliance with Rule 402 (Nuisance); and

j. Limit the area under construction at any one time.

As noted in the CEQA Guidelines Table 8-2, these various fugitive dust reduction approaches range from 34 to 90 percent effective (Monterey Bay Unified Air Pollution Control District 2008). For example, watering the site would reduce dust from wind erosion by about half, and use of stabilizers or binders would reduce wind erosion by up to 80 percent. Two feet of freeboard and truck covers would reduce dust from trucking operations by about 90 percent. These measures, although not additive, would reduce overall dust emissions significantly, ensuring that the proposed project would not exceed the threshold for fugitive dust emissions during construction. Compliance with general plan policies requiring the implementation of these measures during construction would reduce impacts to ambient air quality from construction fugitive dust emissions to less than significant.

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

According to the air district's CEQA guidelines, a sensitive receptor is generally defined as a location where human populations, especially children, seniors, and sick persons, are located where there is reasonable expectation of continuous human exposure. These typically include residences, hospitals, and schools. The nearest sensitive receptor is a single-family residence located approximately 473 feet west of the project site, which is within the 500-foot screening distance recommended by the California Air Resources Board for evaluating potential health risks. Within this screening distance, a health risk assessment is warranted to evaluation potential exposure to TAC emissions, including diesel exhaust from construction equipment and heavy-duty trucks.

Exposure to construction-related TAC emissions from the project site is a potentially significant health risk impact. The air district recommends the use of best management practices during construction to reduce construction fugitive dust emissions by up to 50 percent (Monterey Bay Air Pollution Control District 2008). Additionally, emissions from engines used in construction that are diesel powered are subject to control under regulations adopted by both California Air Resources Board and U.S. Environmental Protection Agency. U.S. Environmental Protection Agency promulgated new emission standards for off-road engines in 1998, with CARB adopting parallel standards in 2000. In 2004, Tier 4 emission standards were adopted and were phased for new engines between 2011 and 2014. In 2007, the California Air Resources Board adopted an off-road equipment regulation to accelerate reductions of NO_x and diesel PM from existing off-road engines. Beginning in 2012 and through 2023, the off-road regulation requires operators of older equipment to either install abatement devices, upgrade to Tier 3 and eventually Tier 4 engines, or to retire older equipment.

Implementation of the following Mitigation Measures would reduce potential health risks associated with construction-related TAC emissions to a less-than-significant level.

Mitigation Measures

AQ-1 Prior to issuance of grading or construction permits, the applicant shall prepare a project-specific health risk assessment in accordance with California Air Resources Board guidance and applicable air district CEQA guidelines. The health risk assessment shall evaluate potential health risks to nearby sensitive receptors, including the residence located approximately 473 feet west of the project site, from construction-related TAC emissions, including diesel particulate matter.

The health risk assessment shall quantify cancer risk, non-cancer health impacts, and $PM_{2.5}$ concentrations using current modeling tools, emission factors, and project-specific construction assumptions. If the health risk assessment identifies that applicable health risk thresholds would be exceeded, the applicant shall implement additional feasible mitigation measures (e.g., use of Tier 4 Final equipment, electrification, construction phasing, or other emission reduction strategies) to reduce impacts below significance thresholds, subject to review and approval by the San Benito County Director of Planning, Building, and Code Enforcement and the air district.

AQ-2 The applicant shall prepare a Construction Management Plan for review and approval by the San Benito County Director of Planning, Building, and Code Enforcement. The Construction Management Plan shall include the following measures to reduce TAC emissions during construction:

a. Heavy-duty diesel vehicles shall have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation;

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

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

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

d. The most common sources of odors identified in complaints received by local air districts are sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, autobody shops, coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations. The proposed project would not produce these types or other significant objectionable odors.

4. BIOLOGICAL RESOURCES

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filing, hydrological interruption, or other means?	☐	☒	☐	☐
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Comments:

A reconnaissance-level biological field survey of the project site was conducted by EMC Planning Group biologist Rose Ashbach, M.S., on October 27, 2025, to document existing plant communities/wildlife habitats and assess the suitability of the site to support special-status species. Biological resources were documented in field notes, including plant and wildlife species observed, dominant plant communities, wildlife habitat quality, disturbance levels, and aquatic resources.

Prior to conducting the reconnaissance-level survey, EMC Planning Group biologists reviewed the conceptual plans, aerial photographs, natural resource database accounts, and other relevant scientific literature. This included searching the U.S. Fish and Wildlife Service (USFWS) *Information for Planning and Consultation* (USFWS 2025a), California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CDFW 2025a, CDFW 2025b), and California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants* (CNPS 2025a) to identify special-status plants, wildlife, and habitats known to occur in the vicinity of the project. A review of the USFWS *National Wetlands Inventory* database was conducted to identify jurisdictional aquatic features (wetlands, drainages, and/or riparian areas) on or adjacent to the project site (USFWS 2025b). The USFWS *Critical Habitat for Threatened & Endangered Species* online mapper was reviewed to determine the nearest locations of critical habitat (2025c).

As a result of the reconnaissance-level survey, additional surveys were recommended to address the potential for protected resources, including special-status plant species, sensitive natural communities, candidate bumble bee species, monarch butterfly, and jurisdictional aquatic resources. Additional surveys were conducted on March 17, 2026, May 14, 2026, and June 26, 2026. Results from these surveys are incorporated into this initial study section.

Existing Conditions

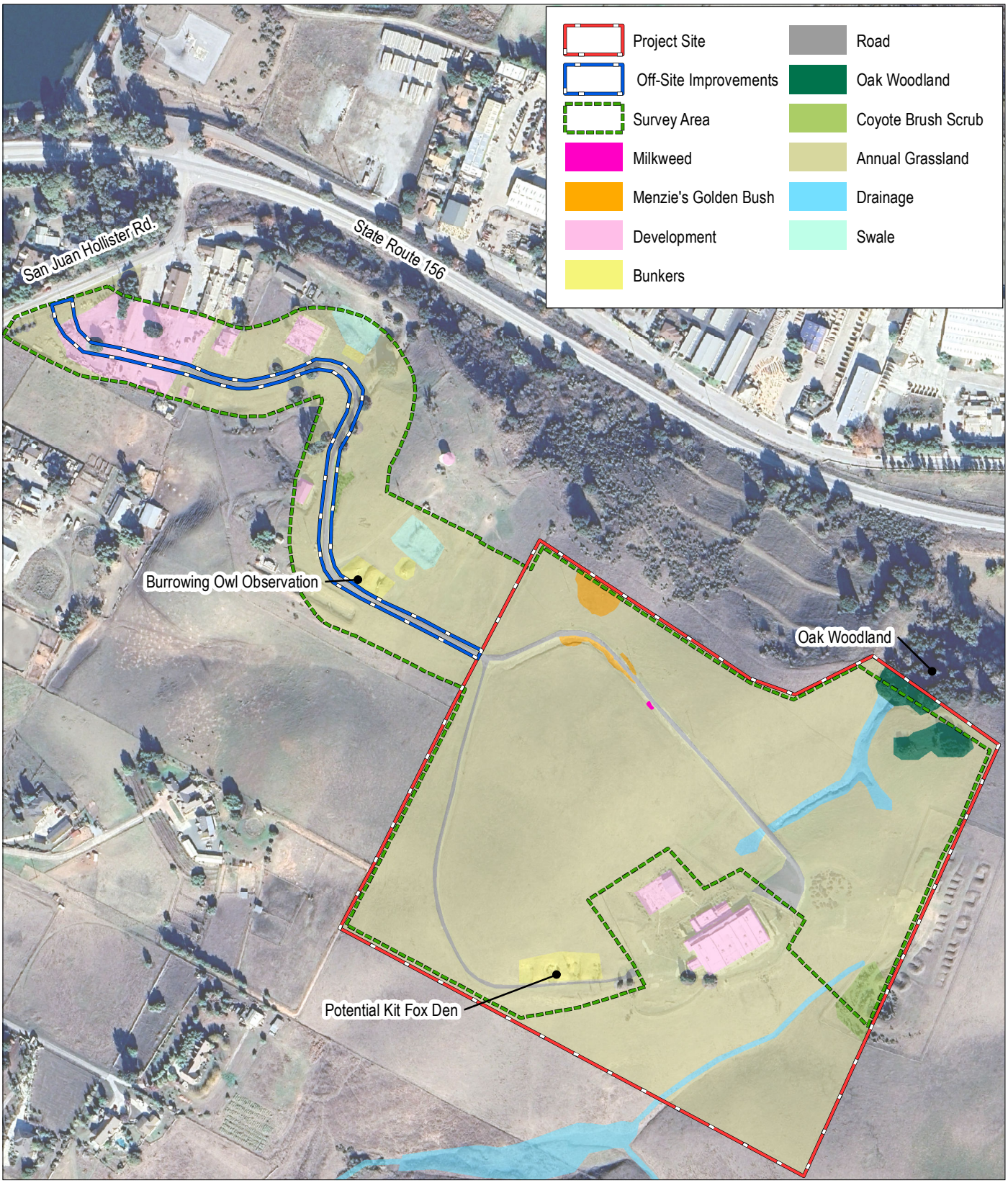
The project involves adding an entrance road southeast from San Juan Hollister Road through an equipment storage area and connecting to an existing, degraded roadway. The roadway climbs to the project site, which lies just east of the hill summit, at approximately 485 feet elevation. The development area is characterized by annual grassland currently grazed by cattle. Abandoned industrial manufacturing buildings are present on-site; however, these features are not expected to be removed or disturbed as a part of the project and will not be evaluated in this initial study.

Historically, the site supported industrial manufacturing from 1980 to 1993, along with metal parts fabrication. In the late 1990s it became evident that these operations resulted in soil and groundwater contamination. In 2011, contamination cleanup and abatement activities were initiated under orders from the Water Board. At present, the project site is used only for cattle grazing.

The project site is surrounded by open grassland habitats on all sides with low density residential, industrial, and agricultural uses in the vicinity.

Plant and Wildlife Habitats

Annual Grassland. The project site is located within annual grassland/valley grassland habitat that is currently grazed (Figure 6, Habitat Map). Species present include a mix of non-native grasses including: ripgut brome (*Bromus diandrus*), wild oats (*Avena barbata*), perennial ryegrass (*Lolium perenne*), blue wild rye (*Elymus glaucus*), soft brome (*Bromus hordaceuous*), and native purple needle grass (*Stipa pulchra*).



Source: ESRI 2025, Google Earth 2025

0 400 feet

Figure 6

Habitat Map

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant Initial Study

This side intentionally left blank.

Other species within the grassland habitat include, but are not limited to, lupine (*Lupinus* spp.), black mustard (*Brassica nigra*), crane's bill (*Erodium* spp.), coyote brush (*Baccharis pilularis*), fiddle dock (*Rumex pulcher*), wild radish (*Raphanus raphanistrum*), narrowleaf plantain (*Plantago lanceolata*), yarrow (*Achillea millefolium*), burclover (*Medicago polymorpha*), hayfield tarweed (*Hemizonia congesta*), Italian thistle (*Carduus pycnocephalus*), common vetch (*Vicia sativa*), and tocalote (*Centaurea melitensis*). Scattered native Menzies' golden bush (*Isocoma menziesii*) line the degraded road that leads through the main development area along with non-native invasive stinkwort (*Dittrichia graveolens*).

Oak Woodland. The northeast corner of the project site slopes to meet a large patch of oak woodland, dominated by coast live oak trees (*Quercus agrifolia*). A small portion of the oak woodlands is located within the project parcel. Several large coast live oak trees are also scattered within the parcel, adjacent to the oak woodland. The trees are old and include large canopies, fallen limbs, and cavities within the tree's branches and trunk. The understory here is dominated by annual grasses and black mustard (Figure 6, Habitat Map). A drainage within the parcel flows towards the coast live oak tree woodland.

Annual Grassland/Ruderal. In order to improve sight lines while entering and exiting San Juan Hollister Road, the project includes off-site improvements involving a new entrance. The new entrance will pass through an existing stockpile and storage area used for soil, cement, machinery, equipment, and building materials. In areas that are unpaved or not occupied by equipment or materials, vegetation consists of a mix of non-native grasses and herbs, including wild oats, ripgut brome, black mustard, crane's bill, Italian thistle, and rough cat's ear (*Hypochaeris radicata*). Scattered planted and naturally occurring trees are located along the roadway to the project site including Monterey pines (*Pinus radiata*) and coast live oaks.

Developed. The project proposes to repair and expand the existing degraded roadway, which currently extends from the off-site equipment storage area and adjacent to San Juan Hollister Road into the project site and to the existing on-site buildings. Although the roadway was historically wider, the lack of use and maintenance has resulted in cracking and overall narrowing. Currently, the roadway margins support a mix of non-native grasses and herbs, along with scattered native species. Species observed along the roadway include annual non-native grasses, stinkwort, and Menzies' golden bush. Adjacent to the roadway, additional species were documented, including pine (*Pinus* sp.), Peruvian pepper tree (*Schinus molle*), coast live oak, California sagebrush (*Artemisia californica*), and California poppy (*Eschscholzia californica*), among others. Abandoned infrastructure, including bunkers and industrial buildings, also occur along this roadway. Vegetation outside the roadway footprint is characterized as grassland.

Shrubs. A small patch of coyote brush scrub is located within the parcel but is currently fenced off along the easter boundary. Small patches of other shrub species are found growing along the roadway, including stands of Menzies' golden bush. Small herbaceous plants and annual grasses associated with roadside shrubs are also present.

Wildlife. Due to the lack of disturbance since manufacturing and remediation activities ceased, the project site supports expansive grassland habitat that is ideal for a variety of bird and mammal species. Bird species observed or heard during the site survey included the following: black phoebe (*Sayornis nigricans*), mourning dove (*Zenaida macroura*), red-shouldered hawk (*Buteo lineatus*), western meadowlark (*Sturnella neglecta*), California scrub-jay (*Aphelocoma californica*), European starling (*Sturnus vulgaris*), house finch (*Haemorhous mexicanus*), brown-headed cowbird (*Molothrus ater*), raven (*Corvus corax*), Say's phoebe (*Sayornis saya*), white-crowned sparrow (*Zonotrichia leucophrys*), golden-crowned sparrow (*Zonotrichia atricapilla*), grasshopper sparrow (*Ammodramus savannarum*), white-tailed kite (*Elanus leucurus*), turkey vulture (*Cathartes aura*), dark-eyed junco (*Junco hyemalis*), and burrowing owl (*Athene cunicularia hypugaea*).

Mammals and reptiles that utilize the site were inferred based on observations of scat, tracks, direct observation, or identification of potential habitat. As such, mammals that are likely found within the site include coyotes (*Canis latrans*), foxes (*Urocyon cinereoargenteus*, *Vulpes vulpes*, and/or *Vulpes macrotis mutica*), and burrowing mammals including ground squirrel (*Otospermophilus beecheyi*), and black-tailed jackrabbits (*Lepus californicus*). Other small mammals likely to utilize the habitats within the project site include raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), California vole (*Microtus californicus*), Botta's pocket gopher (*Thomomys bottae*), and small rodents (*Peromyscus maniculatus, Reithrodontomys megalotis, Chaetodipus californicus*). Reptiles that likely utilize habitats within the project site include pacific gopher snake (*Pituophis catenifer catenifer*), garter snake (*Thamnophis* spp.), California king snake (*Lampropeltis californirniae*), western fence lizard (*Sceloporus occidentalis*), and southern alligator lizards (*Elgaria multicarinata*).

The existing, abandoned bunkers located throughout the parcel provide suitable habitat for fossorial wildlife; animals that are specifically adapted for digging and living underground. At the bunkers immediately adjacent to the main parcel entrance, a burrowing owl was observed utilizing the numerous California ground squirrel burrows present during the October survey. On the west side of the parcel, den structures were observed within the bunkers, and are likely used by foxes.

Aquatic/Wetland

Based on the results of the reconnaissance-level survey and a review of the *National Wetlands Inventory* (NWI) (USFWS 2025b), an aquatic resources delineation was conducted at the project site on March 17, 2026. All observed wetland features were mapped and assessed for the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. The wetland delineation methodology followed the U.S. Army Corps of Engineers (USACE) *Wetland Delineation Manual* (USACE 2008). A map showing the extent of mapped features is included as Figure 7, Potentially Jurisdictional Aquatic Features.



Source: ESRI 2026, Google Earth 2025

0 400 feet

Project Site
Survey Area
Potentially Jurisdictional Aquatic Features
Off-Site Improvements
Drainage Centerline
Soil Pit

Figure 7

Potentially Jurisdictional Aquatic Features

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant Initial Study

This side intentionally left blank.

Drainage A. A drainage feature not identified in the National Wetlands Inventory (NWI) was observed within the development area during the reconnaissance-level survey. The feature has a defined top of bank but lacks hydrophytic vegetation. The drainage originates adjacent to the existing buildings within a small swale and passes beneath the on-site roadway through a small culvert. It likely conveys sheet flow from the surrounding hills before exiting the parcel through the oak woodland. No connection to other aquatic features was observed, and the flow appears to dissipate into the landscape at the base of the slope after leaving the parcel. The current conceptual plans show that Drainage A will be impacted by the proposed project.

The top of bank was mapped during the survey. No ordinary high-water mark (OHWM) indicators were observed; however, the centerline of the drainage would likely represent the location of concentrated flow during rain events. Dominant vegetation within the drainage included Italian ryegrass, wild oats, rattail fescue, and black mustard.

Drainage B. An aquatic feature identified in the NWI (USFWS 2025b) occurs within the southern portion of the project site. The NWI characterizes this feature as an intermittent, temporarily flooded, riverine streambed (R4SBA). This feature was identified as a topographic drainage, with no observed wetland vegetation. The NWI shows that the drainage connects to an off-site wetland area classified in NWI as a palustrine emergent wetland that is persistent and seasonally flooded (PEM1B) but is otherwise isolated from other aquatic features. The current conceptual plans show that Drainage B will not be impacted by the proposed project.

Within the project site, the feature consists of no more than the convergence of two slopes, with no apparent top of bank. Dominant vegetation is not considered hydrophytic and includes Italian ryegrass, rat-tailed fescue, ripgut brome, field mustard, and wild oats. Soils were not hydric, and no indicators of wetland hydrology were observed. Based on these observations, the feature does not exhibit characteristics indicative of a wetland or other aquatic resource.

Swales 1 and 2. Two additional depressions or swales were identified during the site visit on the north side of the entrance road. Although these features are located outside the proposed disturbance footprint, they may retain water for sufficient periods to provide potential breeding habitat for amphibians. No hydrophytic vegetation or other indicators of wetland hydrology were observed; therefore, a formal wetland delineation was not conducted for these features. Dominant vegetation included wild radish, wild oats, Italian thistle, black mustard, white top, bur clover, rattail fescue, and poison hemlock.

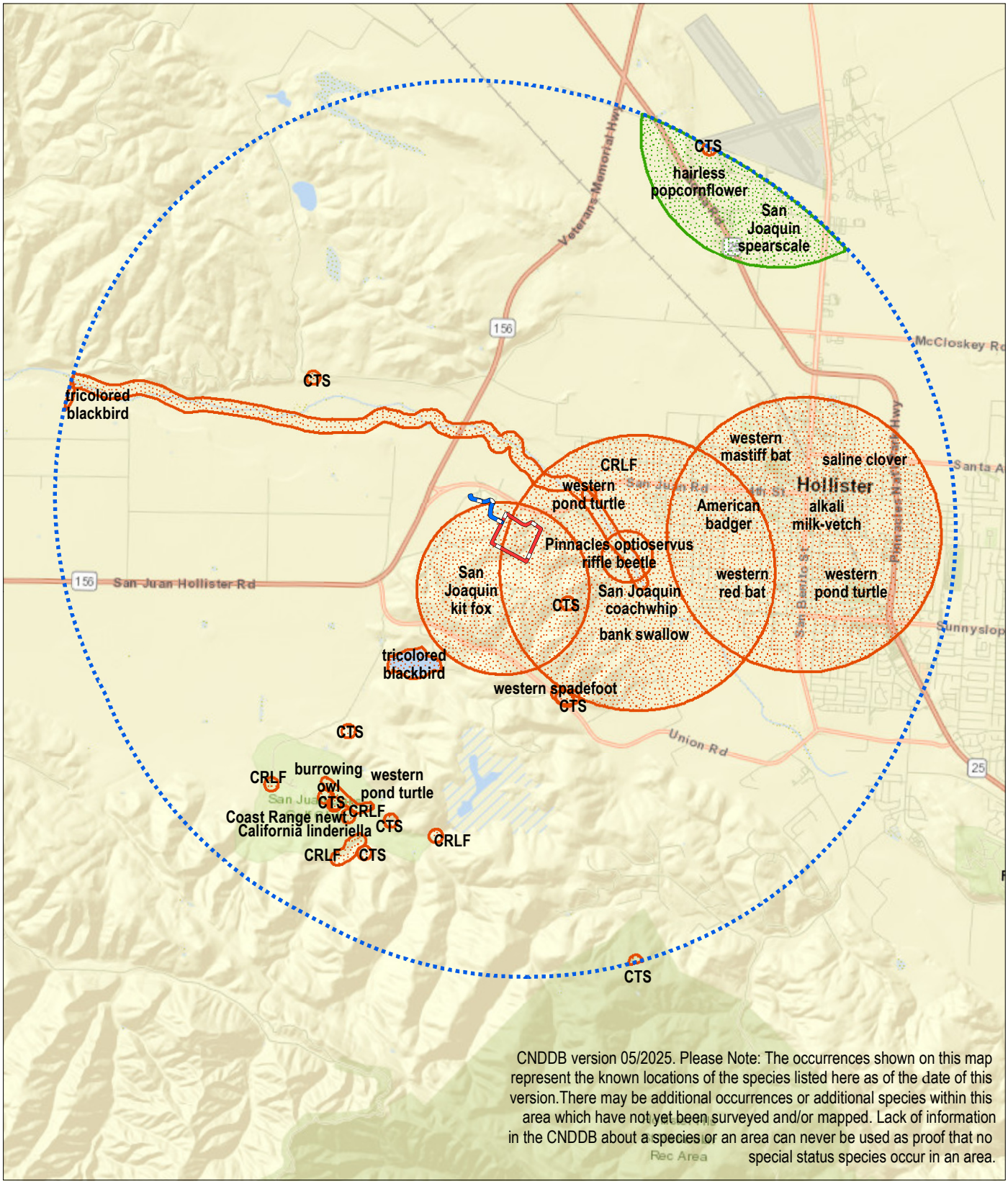
a. **Special-Status Species**. Special-status species in this report are those listed as Endangered, Threatened, or Rare or as candidates for listing by the USFWS and/or CDFW; as Species of Special Concern or Fully Protected species by the CDFW; or as Rare Plant Rank 1B or 2B species by CNPS. Appendix B, Special-Status Species with Potential to Occur in the Project Vicinity, presents tables with special-status species search results, which lists the special-status species documented within the project vicinity, their listing status, suitable habitat description, and their potential to occur on the project site. Figure 8, Special-Status Species in the Project Vicinity, presents a map of the CNDDB results.

Special-Status Plant Species. Special-status plant species were evaluated for probability to occur on the project site and within the off-site improvements area (refer to Appendix B, Special-Status Species with the Potential to Occur in the Project Vicinity and Figure 8, Special-Status Species in the Project Vicinity). Although no special-status plant species were observed during the reconnaissance-level survey on October 27, 2025, the survey was conducted outside the peak blooming period for most flowering plants. Two special-status plants have been reported as occurring within the project vicinity (nine-quad area) and have a low probability of occurring within the project boundary, including San Francisco popcorn flower (*Plagiobothrys diffusus*) (Occurrence No. 16, CNDDB 2025b), and fragrant fritillary (*Fritillaria lilacea*) (Occurrence Nos. 85, 89, 29, 942, CNDDB 2025b). Suitable habitat for San Francisco popcorn flower and fragrant fritillary is located on grassland slopes throughout the project site.

Consequently, focused plant surveys were conducted on March 17 and May 14, 2026, in accordance with the California Native Plant Society (CNPS) *Botanical Survey Guidelines* (CNPS 2001) and the California Department of Fish and Wildlife (CDFW) *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2008). Surveys were completed by walking 20-foot transects throughout the project site. All floral resources were documented in field notes. No special-status plant species were observed and no further plant studies are needed.

Special-Status Wildlife Species. Special-status wildlife species were evaluated for probability to occur on the project site and within the off-site improvements area (refer to Appendix B, Special-Status Species with the Potential to Occur in the Project Vicinity and Figure 8, Special-Status Species in the Project Vicinity). Special-status species that were identified on site, or have the potential to occur include: California red-legged frog (*Rana draytonii*), California tiger salamander (*Ambystoma californiense*), American badger (*Taxidea taxus*), western burrowing owl (*Athene cunicularia*), western spadefoot (*Spea hammondii*), Crotch's bumble bee (*Bombus crotchii*), monarch butterfly (*Danaus plexippus*), San Joaquin coachwhip (*Masticophis flagellum ruddocki*), San Joaquin kit fox (*Vulpes macrotis mutica*), nesting birds, and special-status bats. These species are addressed below.

California Red-Legged Frog. A federally-listed threatened species and California Species of Special Concern, California red-legged frog occurs in lowlands and foothills primarily in perennial or ephemeral ponds, pools, and streams where water remains long enough for breeding and metamorphosis of tadpoles (14-28 weeks). Specific breeding sites include streams, creeks, ponds, marshes, sag ponds, deep pools, backwater areas, dune ponds, lagoons, and estuaries. California red-legged frog may disperse from their aquatic breeding habitats to upland habitats during the dry season. They prefer upland habitats that provide moisture to prevent desiccation and protection from predators, including downed logs, woody vegetation, boulders, moist leaf litter, or other refugia during the dry season. In areas where upland habitats do not contain structure, California red-legged frog take refuge in burrows. However, if there is sufficient water at their breeding location, they may remain in aquatic habitats year-round instead of moving to adjacent uplands.



0 1 mile

Project Site
Off-Site Improvements
3-Mile Buffer
Special-Status Plants
Special-Status Wildlife

Source: ESRI 2025, CDFW CNDDB 2025

Note:
CRLF - California Red-Legged Frog
CTS - California Tiger Salamander

Figure 8

Special-Status Species within the Project Vicinity

2751 San Juan Hollister Road Concrete Ready-Mix Batch Plant Initial Study

This side intentionally left blank.

During wet seasons, frogs can move long distances between habitats, traversing upland areas or ephemeral drainages. Dispersal distances are typically less than 0.3 miles, with a few individuals moving 1.2-2.2 miles (USFWS 2005). Seeps and springs in open grasslands can function as foraging habitat or refugia for wandering frogs.

CNDDB records indicate that there are four known occurrences of California red-legged frog approximately 2.5 miles southwest of the project site (Occurrence Nos. 236, 349, 350, 351) and one occurrence within the San Bentio River approximately 0.5 miles northeast of the project site (Occurrence No. 465, CNDDB 2025b).

Overall, the probability of California red-legged frogs occurring within the project site and off-site improvements area is considered low due to the absence of breeding habitat within the immediate vicinity. However, the project site could function as a movement corridor for California red-legged frogs traveling between nearby aquatic features. Additionally, individuals may occasionally use on-site burrows within the grassland habitat for temporary refuge.

Grading and construction activities within the grassland habitat could result in the loss or harm of California red-legged frog if they are present in the area. Implementation of Mitigation Measures presented below will reduce the potential impacts to California red-legged frog to a less-than-significant level.

California Tiger Salamander. A federal and state-listed threatened species, California tiger salamander is dependent on small shallow bodies of water for breeding and can be found in grasslands, most frequently within 400 feet of breeding pools or ponds and where California ground squirrels are prevalent and active. Ephemeral ponds that completely dry out by late summer and early fall are ideal habitat for this species because the dry period prohibits bullfrog and non-native fish residency. California tiger salamanders will occupy burrows of ground squirrels during summer and fall months, emerging to move toward breeding sites when the rainy season commences. They typically disperse to burrows and other hiding places in oak woodlands and grasslands within a quarter mile or less from breeding ponds by early summer. The project site and off-site improvements area are not located within federally designated critical habitat for this species.

There are nine CNDDB records of California tiger salamander within three miles of the project site and three records from one and a half miles from the project site (Occurrence Nos. 885, 1121, and 1256, CNDDB 2025). The on-site grasslands may provide seasonal aquatic habitat suitable for California tiger salamander breeding and the grazed grassland habitat with abundant burrows provide suitable aestivation habitat. As such, the probability of California tiger salamander to occur within the project area is considered moderate.

Grading and construction activities within the grassland habitat could result in the loss or harm of California tiger salamander if they are present in the area. Implementation of Mitigation Measure BIO-2 presented above, which requires a training session on special-status species potentially present on the construction site, and the following mitigation measure will reduce the potential impacts to these species to a less-than-significant level.

Mitigation Measure

BIO-1 California Red-Legged Frog and California Tiger Salamander. The project proponent shall obtain Incidental Take Permits from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife for potential project impacts to California red-legged frog and California tiger salamander, and implement all avoidance, minimization, and compensatory mitigation measures required by these permits.

Take permit conditions would be determined by the applicable resource agency (CDFW or USFWS) and may include, but not be limited to, the avoidance and minimization measures identified below to minimize the potential for "take" of California red-legged frog and California tiger salamander.

- Qualified project biologists approved by the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife shall supervise and/or implement all species protection measures. Construction supervisors shall attend a training session regarding the protection measures, as described in Mitigation Measure BIO-2. Construction contracts shall expressly include language requiring compliance with the protection measures.

- At least 15 days prior to ground disturbance, the project proponent shall submit the name and credentials of the project biologists who would conduct activities specified in this measure. No project activities shall begin until the project proponent has received written approval from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife that the project biologists are qualified to conduct the work.

- The project biologists shall have the authority to halt construction work at any time to prevent harm to California red-legged frog and California tiger salamander or when any of the permit-specified protection measures have been violated. Work shall re-commence only when authorized by the project biologists. If work is stopped due to potential harm to protected species, the project biologists shall contact the U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife by telephone or email on the same day to communicate the event and coordinate appropriate action.

- A project biologist shall be present during all initial ground disturbance activities; the biologist shall conduct biological construction monitoring in all work areas with potential to impact California red-legged frog or California tiger salamander. Before the start of work each day, a project biologist shall

check for wildlife under any equipment such as vehicles and stored pipes within active construction zones that are fenced. A project biologist shall also check all excavated steep-walled holes or trenches greater than one foot deep for trapped animals. If California red-legged frog or California tiger salamander is observed within an active construction zone, a project biologist shall be notified immediately and all work within 100 feet of the individual animal shall be halted and all equipment turned off until the biologist has captured and removed the individual from the work area. California red-legged frog and California tiger salamander shall be relocated to a U.S. Fish and Wildlife Service/California Department of Fish and Wildlife -approved off-site location according to permit specifications.

- Special-status species shall be excluded from the project site and off-site improvements area by installing exclusionary fencing (i.e., silt fencing or other appropriate fencing). This will prevent construction from expanding into natural areas and prevent any special status species that are may migrate through the site from becoming harmed during ground disturbing work. A U.S. Fish and Wildlife Service and California Department of Fish and Wildlife- approved biologist will conduct weekly exclusionary fence inspections to ensure that any breaks in the fencing are repaired.

BIO-2 Worker Environmental Awareness Program (WEAP). Before construction activities begin, a qualified biologist(s) shall conduct a worker environmental awareness training session for all construction personnel. At a minimum, the training shall include a description of protected biological resources, species descriptions and habitat requirements, and general measures being implemented to protect sensitive resources during construction. Informational handouts with photographs clearly illustrating species appearances shall be used in the training session.

- Training topics shall include special-status species with potential to occur on the project work sites as determined by final site plan impact boundaries and results of focused surveys. Species discussed shall include California red-legged frog, California tiger salamander, American badger, western burrowing owl, western spadefoot, Crotch's bumble bee, monarch butterfly, San Joaquin coachwhip, San Joaquin kit fox, special-status bats, and nesting birds and raptors.

- The training session shall include information about steps to take if a special-status species is encountered, including contact information for the biological monitoring staff and measures to protect species during construction. All new construction personnel shall undergo this mandatory worker environmental awareness training when they start work on the project. Training shall occur prior to the start of construction and periodically, as needed, if new construction personnel begin work at the project site. Each worker shall sign

a statement that they received training and the statement shall be posted or easily available for viewing at the project site. The biologist will document evidence of completion of this training by a letter report and submit it to the San Benito County Director of Planning, Building & Code Enforcement, where it will be kept on file.

American Badger. American badger is a California Species of Special Concern. It is an uncommon, permanent resident found throughout most of the state, except in the North Coast area. Typical habitats include drier open stages of most shrub, forest, and herbaceous habitats with friable soils suitable for burrows. Prey species include fossorial rodents such as rats, mice, chipmunks, ground squirrels, and pocket gophers. Badger diet shifts seasonally depending on the availability of prey and may also include reptiles, insects, earthworms, eggs, birds, and carrion. Mixed oak woodland, coastal scrub, and grassland habitats provide cover, drier soils for burrowing, and prey resources for this species.

CNDDB record number 121 for American badger is located one mile east of the project site within the City of Hollister (CNDDB 2025b). This record does not have a date or a precise location. Additional observations of American badger from within a five- to seven-mile project vicinity include three road kill observations and one nighttime observation (Occurrence Nos. 184, 186, 494, 591, CNDDB 2025b).

American badger has a moderate probability of occurring in grassland habitats on the project site due to suitable open grassland habitat with friable soils and many burrows. Loss or harm to individual badgers could result if they are present on the site during construction activities. Loss or harm to American badger is considered a significant adverse impact. Implementation of the following mitigation measures would reduce the potential impact to American badger to a less-than-significant level.

Mitigation Measures

BIO-3 American Badger. Not more than 14 days prior to the commencement of ground-disturbing construction activities, a qualified wildlife biologist shall conduct surveys of the grassland habitat on site to identify any potential American badger burrows/dens. If the survey results are negative (i.e., no badger dens observed), a letter report confirming absence shall be prepared and submitted to the San Benito County Director of Planning, Building & Code Enforcement and no further mitigation is required.

If the results are positive (badger dens are observed), the qualified biologist shall determine if the dens are active by installing a game camera for three days and three nights to determine if the den is in use.

- If the biologist determines that a den may be active, coordination with the California Department of Fish and Wildlife shall be undertaken to develop a suitable strategy to avoid impacts to American badger. The strategy may

include the following: the biologist shall install a one-way door in the den opening and continue use of the game camera. Once the camera captures the individual exiting the one-way door, the den can be excavated with hand tools to prevent badgers from reusing them. If the biologist determines that the den is a maternity den, construction activities shall be delayed during the maternity season (February to August), or until the badgers leave the den on their own accord or the biologist determines that the den is no longer in use.

- If the game camera does not capture an individual entering/exiting the den, the den can be excavated with hand tools to prevent badgers from reusing them.

- After dens have been excavated and the absence of American badger confirmed, a letter report shall be prepared and submitted to the to the San Benito County Director of Planning, Building & Code Enforcement, prior to project initiation.

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

One burrowing owl was observed during the reconnaissance survey on October 27, 2025. Burrowing owls were not observed during the March 17, May 14, or June 26, 2026 surveys. The sighting occurred around bunkers with numerous ground squirrel burrows located approximately 20 feet from the existing roadway leading to the project site (Figure 6, Habitat Map). The CNDDB lists known occurrences of burrowing owls approximately two miles southwest of the project site within San Juan Oaks Golf Club (Occurrence No. 934 (CNDDB 2025b). A CNDDB form was created and will be submitted to the California Natural Diversity Database.

Over wintering burrowing owls were present within portions of the grassland habitat at the off-site improvements area. Suitable overwintering and breeding habitat for burrowing owls is present within the project site. Loss or harm to individual burrowing owls could result if they are present during grading and construction activities. Loss or harm to burrowing owls are considered a significant adverse impact. Implementation of Mitigation Measure BIO-2 presented above, which requires a training session on special-status species potentially present on the construction site, and the following mitigation measures will reduce the potential impact to burrowing owl to a less-than-significant. Mitigation measure language was submitted to the CDFW for review and comment (personal comm. With Ruby Kwan, CDFW, 2026).

Mitigation Measures

BIO-4 Burrowing Owl Preconstruction Surveys. To avoid/minimize impacts to burrowing owls occurring within the project site, a biologist qualified in ornithology shall conduct surveys for burrowing owl prior to ground disturbance or vegetation removal. The qualified biologist shall conduct a two-visit (i.e., morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to the project site boundary, with one survey no less than 14 days prior to the start of construction or ground disturbance activities and the second survey occurring no more than 48 hours prior to initiating construction activities. Surveys shall be conducted according to the methods described in protocols accepted by California Department of Fish and Wildlife (the qualified biologist shall contact California Department of Fish and Wildlife for up-to-date guidance). If no burrowing owls are found, a letter report confirming absence shall be prepared and submitted to San Benito County and the California Department of Fish and Wildlife. If burrowing owls are observed, implementation of seasonal no-disturbance buffers is required (see BIO-5).

BIO-5 Burrowing Owl Avoidance. To avoid loss of or harm to burrowing owl and known overwintering habitat, seasonal no-disturbance buffers, as outlined in the *Burrowing Owl Survey Protocol and Mitigation Guidelines* (CBOC 1993) and the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012), shall be in place around known and/or occupied habitat prior to and during any ground disturbance activities.

The following buffer recommendations are based on the time of year and level of disturbance (CDFG 2012), unless a qualified biologist approved by the California Department of Fish and Wildlife verifies through non-invasive measures that either: 1) birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

- From April 1 through August 15: 200-meter buffer for low level of disturbance, 500-meter buffer for medium and high levels of disturbance;
- From August 16 through October 15: 200-meter buffer for low and medium levels of disturbance, 500-meter buffer for high level of disturbance; and
- From October 16 through March 31: 50-meter buffer for low level of disturbance, 100-meter buffer for medium level of disturbance, and 500-meter buffer for medium and high level of disturbance.

If avoidance through implementation of the required buffers is not possible, consultation with the California Department of Fish and Wildlife shall occur to interpret survey results and develop a project-specific avoidance and minimization approach.

BIO-6 Burrowing Owl Take Permitting. If avoidance of burrowing owl habitat or nesting sites is not possible, permanent direct impacts to active burrowing owl overwintering and/or nesting sites shall be offset through an incidental take permit with the California Department of Fish and Wildlife, pursuant to the same permitting process required under BIO-1, which may include, but is not limited to, onsite and/or offsite preservation of burrowing owl habitat demonstrated to support, at a minimum, the number of active burrowing owl nest sites impacted by construction. Lands to be conserved as mitigation for direct impacts shall include:

- Sufficient acreage to support the number of burrowing owl individuals impacted, including adequate territory size and foraging habitat, with fossorial mammals (e.g., California ground squirrel) present;
- Permanent protection through a conservation easement or similar protective instrument for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use;
- Preparation and implementation of a Mitigation Land Management Plan to address long-term ecological sustainability, enhancement of conserved lands, and maintenance of the site for burrowing owls; and
- Funding for the long-term maintenance and management of the mitigation land through the establishment of a long-term funding mechanism, such as an endowment. The applicant shall comply with any additional measures (e.g., avoidance, conservation) incorporated into any permits or authorizations issued by the regulatory agencies with jurisdiction over these resources.

Western Spadefoot. Western spadefoot is a California species of special concern. This species of toad lives within grassland habitats of Central California and the Southern California coast. It requires temporary pools of water free of predators (such as fish, bullfrogs, or crayfish) for egg-laying. Breeding usually occurs in late winter. With the exception of the breeding season and foraging excursions during rain events, this species spends most of its life aestivating in self-excavated burrows, although burrows of small mammals are sometimes utilized.

CNDDB records indicate one occurrence of western spadefoot approximately one mile south of the project site (Occurrence No. 341, CNDDB 2025b).

Western spadefoot has a moderate probability of occurring at the project site due to potential on-site breeding and upland habitat adjacent to and within the project boundary. If western spadefoot frogs are present in the development areas, construction activities could result in the loss or harm of individual animals. Loss or harm to western spadefoot is considered a significant adverse impact. Implementation of Mitigation Measure BIO-2 presented above, which requires a training session on special-status species potentially present on the construction site, and the following mitigation measure would reduce the potential impact to a less-than-significant level.

Mitigation Measure

BIO-7 Western Spadefoot. The project applicant shall implement the following measures for the protection of western spadefoot:

- Within 24 hours prior to vegetation removal or ground-disturbing activities within 200 feet of aquatic habitat, the project applicant shall retain a qualified biologist to conduct a pre-construction survey of the area in and adjacent to the development area for western spadefoot. If any western spadefoot are found in or adjacent to the development area, ground disturbing activities shall not commence until the individuals have left the area or the qualified biologist relocates the western spadefoot to nearby suitable habitat a minimum of 300 feet from the development areas. Western spadefoot relocation shall only be conducted with California Department of Fish and Wildlife authorization.

- During all initial ground-disturbing activities within 200 feet of aquatic habitat, the qualified biologist shall monitor construction activity to assess the potential impacts to spadefoot, if present. Relocation of western spadefoot shall only be conducted with California Department of Fish and Wildlife authorization.

- Disturbance to aquatic vegetation shall be avoided to the extent possible. Placement of all staging areas, access roads, and other construction related facilities shall be located a minimum of 100 feet away from aquatic habitat.

- Within 200 feet of aquatic habitat, all construction-related holes shall be covered at the end of each workday to prevent entrapment of amphibians.

- The qualified biologist shall prepare a report documenting the results of the preconstruction survey for submittal to San Benito County Director of Planning, Building & Code Enforcement prior to initial ground disturbance.

Crotch's Bumble Bee. On June 12, 2019, the California Fish and Game Commission voted to accept a petition to consider listing four subspecies of bumble bee, including the Crotch's bumble bee (B*ombus crotchii*), under the California Environmental Species Act. The candidacy for listing was challenged in court, and its candidate status/protections were reinstated on September 30, 2022. CDFW now recognizes these bumble bee species as candidate species, which are afforded the same legal protection afforded to an endangered or threatened species (California Fish and Game Code [FGC] sections 2074.2 and 2085) (CDFW 2022). Crotch's bumble bee range historically extended throughout the southern two-thirds of California, from coastal California east to the Sierra-Cascade crest and south into Mexico; however, recent data indicates that this species is absent from the center of its historical range due to extensive agricultural intensification and urbanization (Xerces Society 2018).

Crotch's bumble bees inhabit open grassland and scrub habitats. Suitable bee habitat is based on the availability of flowers on which to forage throughout the duration of the colony (spring through fall), colony nest sites, and overwintering sites for the queens (Xerces Society 2018). Bumble bees are generalist foragers (i.e., they do not depend on any one flower type). Documented food plants for Crotch's bumble bees include *Asclepias* sp., *Chaenactis* sp., *Lupinus* sp., *Medicago* sp., *Phacelia* sp., and *Salvia* sp. (Xerces Society 2018). Crotch's bumble bees, like most bumble bee species, nest underground, particularly within abandoned rodent holes (Xerces Society 2009). The flight period for Crotch's bumble bee queens is from late February to late October, peaking in early April and again in July. The flight period for workers and males extends between late March and September (Xerces Society 2018).

There are no CNDDB records for Crotch's bumble bee from within the project vicinity (CNDDB, 2025b). However, Bumble Bee Watch's *Sightings Mapper* has multiple recent observations of Crotch's bumble bee between seven and twelve miles from the project site in Tres Pinos and Paicines, as well as from Henry Coe State Park and its vicinity (CABBW 2025).

The grassland habitat at and around the project site likely provides marginal to moderate foraging and nesting habitat for Crotch's bumble bee. Crotch's bumble bee habitat surveys were conducted by EMC Planning Group biologists on March 17, May 14, and June 26, 2026, following the *California Bumble Bee Atlas Survey Protocol* (CABBA 2025) and the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). Historical and current records of special-status bumble bee occurrences within the project vicinity were reviewed using Bumble Bee Watch, iNaturalist, and the California Natural Diversity Database. To evaluate habitat suitability and potential species presence, the parcel was surveyed on foot along 20-foot transects to assess floral resources, potential nesting sites, and other habitat features.

Suitable foraging and burrowing habitat were observed during the surveys, and at least two bumble bee species were observed foraging on floral resources including yellow-faced bumble bee (*Bombus vosnesenskii*) and another unidentified species. It should be noted that the 2026 spring rainy season received less precipitation than normal. Floral resources appeared to be reduced relative to typical conditions, as evidenced by the abundance of bumble bees observed during the June 2026 survey and the largely senescing floral resources present at that time. Due to the presence of other bumble bee species and suitable habitat for Crotch's bumble bee, additional surveys are necessary to determine presence or absence.

If present, grading and construction activities could result in in loss or harm to Crotch's bumble bee, which is considered a significant adverse impact. Implementation of Mitigation Measure BIO-2 presented above, which requires a training session on special-status species potentially present on the construction site, and the following mitigation measure would reduce the potential impact to Crotch's bumble bee to a less-than-significant level.

Mitigation Measure

BIO-8 Crotch's Bumble Bee. If Crotch's bumble bee remains a candidate species or its status becomes elevated to a listed species under the California Endangered Species Act prior to project implementation, one of the following options shall be implemented prior to vegetation removal:

Option 1: Seasonal Avoidance

Between September and March prior to construction, clear vegetation and conduct ground-disturbing activities outside of the colony active period (April through August) to avoid peak flight season. A qualified bee biologist with a Memorandum of Understanding to perform surveys for Crotch's bumble bee shall conduct a habitat assessment to identify the project site as a potential Crotch's bumble bee overwintering habitat. If the project site is identified as potential Crotch's bumble bee overwintering habitat, the following measures shall be implemented during the overwintering season:

- A qualified biological monitor that has received the Crotch's bumble bee training and is in possession of the training materials shall monitor the staking of limits, clearing and grubbing, and removal of stockpiled vegetation from the site until the site no longer provides potential Crotch's bumble bee habitat.

- The biological monitor shall be responsible for monitoring Crotch's bumble bee when they are detected and shall ensure active foraging patches are not removed until the Crotch's bumble bee(s) leave the area on their own volition.

- The biological monitor shall monitor the slow and methodical removal of vegetation in patches and by hand where necessary should Crotch's bumble bee nesting or overwintering behavior be observed (scanning the ground instead of targeting flowering resources, seen entering a burrow or disappearing into thick vegetation and no re-emerging, sitting on the open ground), until it is confirmed that a Crotch's bumble bee nest or overwintering site is not present.

- Should the project result in unpermitted take of a Crotch's bumble bee individual or nest, work shall immediately halt and the California Department of Fish and Wildlife shall be immediately notified by the qualified Crotch's bumble bee biologist. If determined necessary during consultation, an Incidental Take Permit may be required.

Option 2: Assume Presence of Crotch's Bumble Bee

Assume presence and obtain Incidental Take Authorization from the California Department of Fish and Wildlife (Section 2081 of the Fish and Game Code). Avoidance measures identified in the permit will be implemented. Compensatory mitigation, such as land acquisition and habitat restoration or enhancement would be required.

Option 3: Conduct Focused Surveys for Crotch's Bumble Bee

If seasonal avoidance is not possible, consultation with the California Department of Fish and Wildlife should occur at least one flight season (March to September) prior to ground disturbance to evaluate potential impacts and other feasible avoidance measures, including habitat assessments and/or surveys.

Surveys should occur during the colony active period for the Crotch's bumble bee (April through August) prior to vegetation clearing, grading, or the initiation of any construction activity in the staging areas/entry nodes or where fencing is proposed.

A qualified bee biologist with a Memorandum of Understanding should be retained to perform surveys for Crotch's bumble bee. Protocol-level surveys for Crotch's bumble bee should be conducted in accordance with the *Considerations for Conserving Crotch's Bumble Bee (*Bombus crotchii*), Franklin's Bumble Bee (*Bombus franklini*), Western Bumble Bee (*Bombus occidentalis*), and Suckley's Cuckoo Bumble Bee (*Bombus suckleyi*)* (CDFW 2026). Surveys should be conducted during the appropriate flying season where suitable habitat occurs in direct impact area(s). Any modification to the Crotch's bumble bee survey protocol should be submitted to California Department of Fish and Wildlife for review and approval prior to survey implementation. If the survey results are negative (i.e., no bumble bee activity observed), a letter report confirming absence should be prepared and submitted to San Benito County Director of Planning, Building & Code Enforcement and the California Department of Fish and Wildlife, and no further mitigation is required.

If Crotch's bumble bees or bumble bee nests are detected and if direct or indirect impacts to Crotch's bumble bee suitable habitat will occur, the applicant shall consult with the California Department of Fish and Wildlife. If take of Crotch's bumble bee is expected, no construction activities with the potential to result in direct or indirect adverse impacts on Crotch's bumble bee shall occur until the California Department of Fish and Wildlife has authorized such take through an Incidental Take Permit under Section 2081(b) of the California Fish and Game Code for unavoidable impacts.

Direct impacts to Crotch's bumble bee occupied habitat shall be mitigated through an incidental take permit with the California Department of Fish and Wildlife, with a revegetation plan and plant palette of locally native nectar sources that are weed and pest free (e.g., Argentine ants), pathogen-free, and have not been treated with

pesticides. Mitigation that satisfies the fully mitigated standard may occur through one or more of the following: onsite and/or offsite habitat creation, restoration, and/or enhancement; acquisition and preservation of onsite and/or offsite lands demonstrated to be occupied by the species; and/or purchase of mitigation credits at an approved mitigation bank. The applicant would comply with any additional measures (e.g., avoidance, conservation) incorporated into any permits or authorizations issued by regulatory agencies with jurisdiction over this resource.

Monarch Butterfly. The monarch butterfly is a candidate for listing under the Endangered Species Act and will be reviewed by U.S. Fish and Wildlife Service annually until a listing decision is made. The California Department of Fish and Wildlife monitors overwintering colonies of this species because monarch populations in California have severely declined since the 1980s (Jepsen et al. 2017). The monarch overwintering season is typically October to March and takes place as close as 15 miles west of the project site (CNDDB 2025b).

Although the project does not provide suitable overwintering habitat for monarch butterflies, it is located within the butterfly's migration corridor. Milkweed individuals have been documented one mile from the project site on Union Road (iNaturalist 2025). An isolated population of narrowleaf milkweed (*Asclepias fascicularis*) was found and mapped during focused plant surveys (Figure 6, Habitat Map). Because only one small population of milkweed, the host plant for monarch butterflies, was observed onsite, the monarch butterfly is considered to have a low probability of occurring on the project site.

If present, grading and construction activities could result in loss or harm to monarch butterflies, which is considered a significant adverse impact. Implementation of Mitigation Measure BIO-2 presented above, which requires a training session on special-status species potentially present on the construction site, and the following mitigation measure would reduce the potential impact to monarch butterflies to less than significant.

Mitigation Measure

BIO-9 Monarch Host Plants. If work is planned to occur during the breeding season (March 16–October 30), a qualified biologist shall survey the disturbance area? for monarch host plants (*Asclepias* sp.). If host plants are found within the project site, the qualified biologist will survey each plant for monarch eggs, caterpillars, and chrysalises within the work area two weeks prior to the start of initial ground disturbance. If monarch eggs, caterpillars, or chrysalises are observed, no work shall occur within 25 feet of the host plant until the monarch egg, caterpillar, or chrysalis is no longer present. If an exclusion buffer is not feasible, the applicant shall contact the U.S. Fish and Wildlife Service for further guidance. The results of the survey shall be provided to the County of San Benito Director of Planning, Building & Code Enforcement prior to initial project activities.

San Joaquin Coachwhip. San Joaquin coachwhip, a CDFW Species of special concern, is a slender, fast-moving nonvenomous snake, native to California. It occupies open grassland and shrubland habitats and burrows under rocks, in dense vegetation or in

mammal burrows. San Joaquin coachwhip breeds in open habitat and lays eggs in abandoned rodent burrows, under logs, rocks, and other debris where the soil is warm and well drained.

San Joaquin Coachwhip has been observed within 0.5 miles west of the project site along the San Benito River and adjacent riparian scrub habitat (Occurrence No. 1, 53, CNDDB 2025b). No reptiles were observed during the reconnaissance-level biological field survey. However, grasslands throughout the project site and off-site improvements area could provide habitat for reptiles known to occur in the vicinity of the project site, including the San Joaquin coachwhip.

If present, project development and construction activities at the project site could result in the loss or harm to San Joaquin coachwhip, which is considered a significant adverse impact. Implementation of Mitigation Measure BIO-2 presented above, which requires a training session on special-status species potentially present on the construction site, and the following mitigation measure would reduce the potential impact to San Joaquin coachwhip to a less-than-significant level.

Mitigation Measure

BIO-10 Preconstruction Surveys for San Joaquin Coachwhip. A qualified biologist shall complete a preconstruction survey for San Joaquin coachwhip within 48 hours prior to the start of initial grading. If San Joaquin coachwhip is observed, it shall be allowed to leave on its own volition and the observation submitted to the California Natural Diversity Database. The results of the survey shall be provided to the County of San Benito Director of Planning, Building & Code Enforcement within one (1) week of survey completion.

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

Observations of this species from 1992 were documented immediately adjacent to the project area when pups were found on a ranch property along San Juan Hollister Road (Occurrence No. 605, CNDDB 2025b). Additional records are located approximately five miles west of the project site (Occurrence Nos. 1023, 1024, 1025, 1026, CNDDB 2025b). Suitable habitat for San Joaquin kit fox is present within the grassland habitats, abandoned buildings, and bunkers on the site and in the off-site improvements area. Possible den structures were observed during the site survey in the project site (Figure 6, Habitat Map).

The San Joaquin kit fox has a moderate probability of occurring on the project. Loss of or harm to individual kit foxes could result if they are present on the site or seek shelter during construction within artificial structures, such as stored pipes or exposed trenches. Loss or harm to San Joaquin kit fox is considered a significant adverse impact. Implementation of Mitigation Measure BIO-2 presented above, which requires a training session on special-status species potentially present on the construction site, and the following mitigation measure would reduce the potential impact to San Joaquin kit fox to a less-than-significant level.

Mitigation Measure

BIO-11 Preconstruction Surveys and Avoidance Measures for San Joaquin Kit Fox. The U.S. Fish and Wildlife Service *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) will be implemented prior to initiation of and during any grading activity on the project site to avoid unintended take of individual San Joaquin kit foxes.

A qualified biologist will conduct preconstruction/pre-activity surveys for San Joaquin kit fox no less than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity that may impact San Joaquin kit fox. The surveys will include all work areas and a minimum 200-foot buffer of the project site. The preconstruction surveys will identify kit fox habitat features on the project site, evaluate use by kit fox and, if possible, assess the potential impacts of the proposed activity. The status of all dens will be determined and mapped. If no dens are found, a letter report confirming absence will be prepared and submitted to the County of San Benito Director of Planning, Building & Code Enforcement and no further mitigation is required.

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

In addition, the following measures will be observed:

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

- To prevent inadvertent entrapment of kit foxes or other animals during the earth-moving and construction phase of the project, all excavated, steep-walled holes or trenches more than two feet deep will be covered at the close of each working day by plywood or similar materials, or provided with one or

more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they will be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the procedures under Number 11 of the Construction and Operational Requirements in the Standardized Recommendations must be followed.

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

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

- No firearms will be allowed on the project site during earth-moving and construction activities.

- To prevent harassment, mortality of kit foxes or destruction of dens by dogs or cats, no pets will be permitted on site during earth-moving and construction activities.

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

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

- Any contractor, employee, or agency personnel who inadvertently kills or injures a San Joaquin kit fox shall immediately report the incident to the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service.

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

Mitigation Measure

BIO-12 Nesting Birds. To avoid impacts to white tailed kite and other nesting birds during the nesting season (January 15 through September 15), all construction activities will be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for raptors), then a qualified biologist shall conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project grading and construction activities.

Two surveys for active bird nests will occur within 14 days prior to start of ground disturbance, with the final survey conducted within 48 hours prior to ground disturbance. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the County of San Benito Director of Planning, Building & Code Enforcement and no further mitigation is required.

If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction will be established. The buffer will be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist will conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist will monitor

the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman will have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, the biologist will submit to the County of San Benito Director of Planning, Building & Code Enforcement.

Protected Bat Species. Bat species inhabit a wide variety of habitats including grasslands, woodlands, and forests. Abandoned buildings and bunkers within and adjacent to the project site, as well as cavities within the oak trees could provide roosting habitat for special-status bat species known to occur in the vicinity, including State species of concern pallid bat (*Lasiurus cinereus*) and western mastiff bat (*Eumops perotis californicus*). Both pallid and western mastiff bats require semi-arid to arid open habitats with rocky outcrops or structures for roosting.

Construction activities at the project site could result in the loss or harm to roost and/or natal sites if occupied by special-status bats, which is considered a significant adverse impact. Implementation of the following mitigation measure will reduce the potential impact to special-status bats to less than significant.

Mitigation Measure

BIO-13 Preconstruction Surveys and Avoidance Measures for Special-Status Bat Species. Approximately 14 days prior to construction activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees or buildings within 50 feet of the construction boundary. These surveys will include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the project site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an "Anabat" unit. Potential roosting features found during the survey shall be flagged or marked.

If no roosting sites or bats are found, a letter report will be prepared by the biologist and submitted to the County of San Benito Director of Planning, Building & Code Enforcement, and no further measures are required.

If bats or roosting sites are found, bats will not be disturbed without specific notice to and consultation with California Department of Fish and Wildlife.

The bat nursery season is generally considered May 1 to October 1. If bats are found roosting outside of the nursery season, California Department of Fish and Wildlife will be consulted prior to any eviction or other action. If avoidance or

postponement is not feasible, a Bat Eviction Plan will be submitted to California Department of Fish and Wildlife for written approval prior to project implementation. A request to evict bats from a roost includes details for excluding bats from the roost site and monitoring to ensure that all bats have exited the roost prior to the start of activity and are unable to re-enter the roost until activity is completed. Any bat eviction will be timed to avoid lactation and young-rearing. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) will be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

b. **Riparian Habitat or Sensitive Natural Communities**. There were no riparian habitats observed at the project site. A small patch of Menzies' golden bush scrub was observed along the entrance road within the project parcel. The patch of Menzies' golden bush qualifies as Menzies' golden bush scrub under the membership rules *Isocoma menziesii* > 50 percent relative cover. Menzies' golden bush scrub is listed as a California Department of Fish and Wildlife S3 sensitive natural community (CDFW 2025e).

Widening of the entrance road may adversely affect this sensitive natural community. Impacts to sensitive natural communities are considered significant under CEQA. Implementation of the following mitigation measures would reduce potential impacts to a less-than-significant level.

Mitigation Measure

BIO-14 Sensitive Habitat Fencing. Prior to project implementation, the boundaries of Menzies' golden bush scrub located near project work areas or access roads shall be delineated with clearly visible flagging or fencing, or otherwise marked for avoidance. The flagging, fencing, and/or other marking shall be maintained in place for the duration of construction at each location until work is completed at the site. Fencing shall be checked weekly by the qualified biologist or designated site representative and repaired as needed.

BIO-15 Avoidance and Mitigation for Menzies' Golden Bush. Impacts to Menzies' golden bush scrub shall be avoided to the maximum extent feasible. If complete avoidance is not feasible, the extent of impacts shall be quantified, and the applicant shall coordinate with the California Department of Fish and Wildlife to develop and implement a mitigation plan that provides no net loss of this sensitive natural community. Mitigation may include restoration, enhancement,

and/or preservation at ratios acceptable to the California Department of Fish and Wildlife and shall be incorporated into project plans prior to ground-disturbing activities that could affect Menzies' golden bush scrub.

c. **Waters of the United States**. An aquatic resources delineation was conducted at the project site. Results included Drainage A, an isolated wetland located within the project footprint, and Drainage B, a drainage channel outside of the project footprint but within the parcel. The drainages did not exhibit indicators of wetland hydrology or support wetland vegetation. However, Drainage A is defined by a distinct top of bank. No indicators of an ordinary high-water mark were observed, likely due to the ephemeral nature of the drainage and the limited duration and frequency of flows.

Both drainages originate on-site and flow off-site, but neither appears to connect to a larger aquatic feature. Therefore, the on-site drainages would not be considered jurisdictional under USACE; however, they may still fall under the jurisdiction of the Regional Water Quality Control Board.

Two swales, Swale 1 and Swale 2, are located outside the project site and did not exhibit evidence of hydrology or wetland vegetation during the 2026 assessment. Therefore, neither swale would qualify as a wetland. Additionally, the swales are located outside the project site and would not be impacted by the proposed project.

The current project design would result in the loss of Drainage A, a potentially State-jurisdictional aquatic features. Additionally, if the project design is modified, ground-disturbing activities could result in impacts to additional potentially jurisdictional aquatic features. Loss of jurisdictional aquatic features is considered a significant adverse impact. Implementation of the following mitigation measures would reduce construction impacts to jurisdictional aquatic features to a less-than-significant level.

Mitigation Measures

BIO-16 Prior to initiation of construction, the applicant will retain a qualified biologist to determine the extent of potential wetlands and waterways regulated by the Regional Water Quality Control Board (RWQCB) within or adjacent to the grading/development footprint. If the RWQCB claims jurisdiction, the applicant shall obtain a Clean Water Act Section 401 Water Quality Certification.

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

- A Wetland Mitigation and Monitoring Plan (Plan) shall be prepared to outline the mitigation and monitoring requirements for temporary impacts to wetlands and other waters resulting from construction activities. The Plan will describe measures to minimize surface disturbance; reseed and mulch

disturbed areas with certified weed-free native seed mixes; and utilize native, noninvasive species for erosion control plantings. The Plan will also define thresholds of success, monitoring and reporting requirements, and site-specific mitigation to compensate for any wetland losses associated with the project. The Plan shall be submitted to the appropriate regulatory agencies for review and approval during the permit application process.

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

  For improvements on the project site, the applicant shall comply with terms and conditions of the permits, including measures to protect and maintain water quality, restore work sites, and mitigation to offset temporary and/or permanent wetland impacts. The applicant shall be responsible for implementation of this mitigation measure prior to issuance of a grading permit.

BIO-17 Water Quality Protection Measures. Prior to ground disturbance or construction activities, the applicant shall protect all protected aquatic features within 50 feet of project related activities through the use of best management practices for erosion control and vehicle/equipment fueling. This will include the installation of silt fencing between the project site and adjacent waterways. The silt fencing will prevent soil from washing off the project site into waterways and exclude construction activities from the drainage channels.

Potential fuel spills and leaks from construction vehicle/equipment fueling operations shall be prevented from entering waterways. Designated fueling areas shall be on a level grade and must be at least 50 feet from any waterway. The fueling area shall be protected by a berm to prevent any runoff from leaving the fueling area.

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

The project site and off-site improvements area is located within open grassland habitat currently used for grazing. The project site is not located within any previously defined essential connectivity areas as mapped by the *California Essential Habitat Connectivity Project* (CDFW 2025c). The project site likely facilitates small scale wildlife movement due to the

site being surrounded by open grassland surrounding the proposed development. Implementation of the following mitigation measure would reduce potential impacts on wildlife movement to less-than-significant levels.

Mitigation Measure

BIO-18 Wildlife Movement. Prior to issuance of a grading permit, the applicant shall submit lighting and fencing plans to the County of San Benito Director of Planning, Building & Code Enforcement for review and approval to ensure consistency with wildlife movement protection standards. To maintain and enhance wildlife movement opportunities within the developed parcel, the applicant shall implement the following measures:

- Replace or modify any new or existing fencing within the parcel to ensure permeability for small- to medium-sized wildlife.
- Install wildlife friendly, downward-directed lighting. Motion sensors or timing controls shall be used in areas adjacent to designated movement pathways to minimize nighttime illumination.
- Along entrance road, install wildlife crossing signage and reduced speed limits.

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

San Benito County 2035 General Plan. The General Plan was adopted by the Board of Supervisors in 2015 and applies to unincorporated lands and communities in San Benito County (San Benito County 2025). The General Plan *Natural and Cultural Resources Element* (NCR) contains the following goals and policies associated with biological resources that may be applicable to the proposed project:

Goal NCR-1. To preserve and enhance valuable open space lands that provide wildlife habitat and conserve natural, historical, archeological, paleontological, tribal, and visual resources of San Benito County.

Policy NCR-1.2 Conservation Easements. The County shall support and encourage the use of conservation easements to protect open space that contains valuable natural resources.

Goal NCR-2. To protect and enhance wildlife communities through a comprehensive approach that conserves, maintains, and restores important habitat areas.

Policy NCR-2.1. The County shall work with property owners and Federal and State agencies to identify feasible and economically-viable methods of protecting and enhancing natural habitats and biological resources in the county.

NCR-2.5 Mitigation for Wetland Disturbance or Removal. The County shall encourage the protection of the habitat value and biological functions of oak woodlands, native grasslands, riparian and aquatic resources, and vernal pools and wetlands. The County shall require that development avoid encroachment and require buffers around

these habitats to the extent practicable. The County shall further require mitigation for any development proposals that have the potential to reduce these habitats. Exceptions to this action include irrigation pumps, roads and bridges, levees, docks, public boat ramps, and similar uses. In all cases where intrusions into these buffers are made, only the minimum amount of vegetation necessary to construct the feature shall be removed.

NCR-2.6 Regeneration of Oak Woodland Communities. The County shall promote the restoration, restocking, and protection of oak woodland habitat on public and private lands in the county through a combination of habitat conservation planning, inter-agency coordination, and updated development review or tree preservation procedures.

Policy NCR-2.8 Pre-Development Biological Resource Assessment. The County shall require the preparation of biological resource assessments for new development proposals as appropriate. The assessment shall include the following: a biological resource inventory based on a reconnaissance-level site survey, and an analysis of anticipated project impacts to: potentially occurring special-status species (which may require focused special-status plant and/or animal surveys); an analysis of sensitive natural communities; wildlife movement corridors and nursery sites on or adjacent to the project site; potentially jurisdictional wetlands/waterways; and locally protected biological resources such as trees. The assessment shall contain suggested avoidance, minimization, and/or mitigation measures for significant impacts to biological resources.

NCR-2.9 Mitigation Funding and Site Protection. The County shall require that project applicants demonstrate that adequate funding can be provided to implement all required biological mitigation and monitoring activities. Habitat preserved as part of any mitigation and monitoring plan shall be preserved through a conservation easement, deed restriction, or other method to ensure that the habitat remains protected.

NCR- 2.10 Invasive Species. The County shall require that new developments avoid the introduction or spread of invasive plant species during construction by minimizing surface disturbance, seeding and mulching disturbed areas with certified weed-free native mixes, and using native or noninvasive species in erosion control plantings.

San Benito County Code of Ordinances. The San Benito County Code of Ordinances contains local legislation that may be applicable to the proposed project:

Section 19.17.005 Riparian Protection. Grading activity shall not take place within 50ft (measured horizontally) from the top bank of a stream, creek, or river or within 50 ft of a wetland or body of water. (1966 Code, § 7A-5) (Ord. 708, § 1)

Section 19.17.008 Permits Required. Except as otherwise exempted by this chapter, no person shall do any grading without first obtaining a grading permit from the Building Inspection and Planning Department. A separate permit shall be required for each site and may cover both excavation and fills. Grading permits are not transferable. (1966 Code, § 7A-8) (Ord. 708, § 1)

Section 19.17.009 Applications. Plans will be required with all applications for grading permits. Plans and specifications shall be prepared and signed by a civil engineer when the grading or filling is over 1,500 cubic yards; or a dam, retaining wall or fill over four feet in height is required; or when grading will occur on slopes greater than 20%. (1966 Code, § 7A-9) (Ord. 708, § 1; Ord. 801, § 1(V, VI)

Section 19.17.010 Soils and Geologic Report. Application for a grading permit shall be accompanied by supporting data consisting of a soils engineering report and geologic reports, unless waived by the county because information is available showing the data is not needed. The soil engineering report shall include data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures when necessary, and opinions and recommendations covering adequacy of sites to be developed by the proposed grading. (1966 Code, § 7A-10) (Ord. 708, § 1)

The mitigation measures contained in this section, such as preconstruction surveys for special-status plant and wildlife species, environmental awareness training sessions for all construction personnel, and the delineation of aquatic resources, will mitigate impacts to biological resources to a less-than-significant level. With these considerations, the proposed project would not conflict with local regulations related to biological resources.

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

The applicant proposes to remove three mature coast live oak trees in the northeast corner of the project (Figure 6, Habitat Map). Therefore, a tree removal permit shall be obtained in accordance with San Benito County Code Chapter 19.33 to ensure potential impacts are less than significant.

Management and Conservation of Woodlands. San Benito County Code Chapter 19.33.003 establishes regulations for the conservation and protection of woodlands in the unincorporated areas of San Benito County by limiting tree removal in a manner which allows for reasonable use and enjoyment of the property. A discretionary permit shall be required for the removal of woodlands when: the removal of individual and or masses of trees within woodlands of between 90 percent and 100 percent as per the canopy retention standard within a period of ten years; or any tree removal is located on slopes greater than or equal to 30 percent.

A small portion of oak woodland is located within the project parcel. These woodlands are on slopes steeper than 30 percent. If the applicant proposes any modification of the oak woodland, a discretionary permit shall first be obtained from the Director of Planning, Building, & Code Enforcement.

The mitigation measures within this document and the Mitigation Measures BIO-17 and BIO-18 comply with local policies and ordinances protecting biological resources. Implementation of these measures would avoid conflicts with local policies and ordinances.

Mitigation Measures

BIO-19 Tree and Woodland Protection. Prior to project implementation, the boundaries of oak woodlands and/or protected trees located adjacent to or within the vicinity of project work areas or access roads shall be clearly delineated for avoidance using highly visible flagging, fencing, and/or other approved markers. All flagging, fencing, and/or other markers shall be installed before construction begins and shall remain in place and be maintained for the duration of construction activities at each location until work is completed. The fencing and/or markers shall be inspected at least weekly by a qualified biologist or designated site representative and repaired or replaced as necessary.

If removal of protected trees or oak woodland is required, the applicant shall obtain the appropriate tree removal permit for individual protected trees and/or a discretionary permit for the removal of oak woodland, in accordance with applicable local regulations, prior to tree removal activities.

BIO-20 Invasive Species Management. The following measures shall be implemented to reduce the spread of non-native invasive species:

- All construction equipment, vehicles, and tools arriving at the project site, and when moving from areas with known invasive plant populations to uninfested areas, shall will be cleaned of mud or other debris that may contain invasive plants and/or seeds.
- Revegetation, erosion control, and landscaping shall use locally appropriate native species and certified weed-free mulch, seed, and soil.
- Bare and disturbed soils shall be revegetated using a California Department of Fish and Wildlife recommended seed mix or plantings composed of locally native species, to minimize the establishment and spread of invasive and noxious weeds within the project site.

f. **Conservation Plans**. There are no critical habitat boundaries, habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans applicable to the project site or off-site improvements area. San Benito County is developing a multi-species Habitat Conservation Plan/Natural Community Conservation Plan, referred to as the "San Benito County Conservation Plan," compliant with the Endangered Species Act and the California Natural Community Conservation Planning Act to address and mitigate potential impacts to threatened and endangered species associated with growth and development in San

Benito. The project site and off-site improvements area is within the habitat plan permit area; however, the San Benito County Conservation Plan is currently in development and not yet approved.

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

5. CULTURAL RESOURCES

Would the project:

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

Comments:

An archival database search was conducted through the Northwest California Information Center (NWIC), of the California Historical Resources Information System affiliated with the State of California Office of Historic Preservation in Sacramento. The NWIC was provided with a location map and coordinates of the project area, with a request for the archaeological and non-archaeological resources within a one-quarter mile radius of the project site boundary.

The NWIC results show no recorded sites at the project site (NWIC File No.: 25-0570). One historic-era cultural resource was recorded within a quarter mile of the project site. The resource consists of a scatter of fragmented domestic artifacts associated with a residence constructed in 1919 (Davis and Nayyar 2018); however, the structure no longer exists.

EMC Planning Group archaeologist, Vanessa Potter, MA, RPA, conducted an archaeological reconnaissance survey of the project site on December 16, 2025, which did not reveal any indigenous historic or unique archaeological resources on the project site. However, several unused on-site buildings, which are not proposed for removal or modification and will be avoided during permitted activities, were observed.

a-b. **Historic Structures**. The NWIC results show that no historic structures exist within one-quarter mile of the site.

Indigenous Historic Resources or Unique Archaeological Resources. The results provided by the NWIC, as well as the results of the archaeological reconnaissance survey, revealed that no indigenous historic or unique archaeological resources were found within the project site. However, unknown or unidentified buried, significant indigenous historic or unique archaeological resources could be present at the project site.

Therefore, the applicant shall comply with San Benito County Code Chapter 19.05, Archaeological Site Review. This chapter intends to protect, preserve, and show respect

for Native American, Spanish, Mexican, Euroamerican and other archaeological sites and resources within the County of San Benito. The chapter establishes regulations for the protection, enhancement, and perpetuation of archaeological sites by, among other things, ceasing from all excavations and ground disturbances within 200 feet of a find, if any significant artifact or other evidence of archaeological site is found.

Additionally, the applicant shall comply with Mitigation Measures TCR-1 and TCR-2 discussed in Section 18.0, Tribal Cultural Resources. Compliance with the San Benito County Code and Mitigation Measures TCR-1 and TCR-2 would ensure that that potential impacts associated with indigenous historic resources or unique archaeological resources are less than significant.

c. While there are no indications of any past human burial activities on or near the project site based on its historical and existing uses, the potential exists for unanticipated discovery of human remains during project-related ground-disturbing activities. Therefore, the applicant will be required to comply with San Benito County Code Chapter 19.05, specifically Section 19.05.007, which states the following:

A. Presence of artifacts and/or human remains. Any property owner who, at any time in the preparation for or process of excavating or otherwise disturbing the ground, discovers any human remains of any age, or any significant artifact or other evidence of an archaeological site, shall:

1. Cease and desist from all further excavations and disturbances within 200 feet of the discovery or in any nearby area reasonably suspected to overlie adjacent remains;

2. Arrange for staking completely around the area of discovery by visible stakes no more than ten feet apart, forming a circle having a radius of no less than 100 feet from the point of discovery; provided, however, that the staking need not take place on adjoining property unless the owner of the adjoining property authorizes the staking. The staking shall not include flags or other devices which may attract vandals;

3. Notify the Sheriff-Coroner of the discovery if human and/or questionable remains have been discovered. The Planning Director shall also be notified; and

4. Subject to the legal process, grant all duly authorized representatives of the coroner and the Planning Director permission to enter onto the property and to take all actions consistent with this chapter and consistent with Cal. Health and Safety Code § 7050.5 and Cal. Gov't Code Chapter 10 (commencing with § 27460) of Part 3 of Division 2 of Title 3.

B. Human remains. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains or artifacts.

C. Property inspection. Upon notification of the discovery, the Planning Director shall arrange for an inspection of the property and shall notify the coroner and the Native American Heritage Commission.

1. The Planning Director may use the services of a qualified archaeologist in making inspections and determinations on archaeological sites. The archaeological services shall be at the expense of the applicant for the project. The inspection shall take place within two working days of the notice to the Director of the discovery. The property owner and a representative of local Native Californian Indian groups designated by the Native American Heritage Commission as the most likely descendant shall be notified of the time of the inspection and both may accompany the Director and his or her representative at all times on the property. The purpose of the inspection shall be to determine whether the discovery is a site of archaeological/cultural significance and to make recommendations to the property owner and the person responsible for the excavation work regarding the treatment of the human remains and any associated grave goods. The inspection shall be made pursuant to Cal. Public Resources Code § 5097.98.

2. The Coroner shall determine whether the remains are subject to the provisions of Cal. Gov't Code § 27491 or any other related provisions of the law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment of disposition of the human remains in a manner consistent with Cal. Public Resources Code § 5097.98. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.

D. Resumption of the development.

1. If the aforementioned inspection has not taken place within three working days of notice of discovery to the Planning Director, ground disturbance of the property may proceed; except, however, that if human remains have been discovered, no excavation or development may take place until specifically authorized by the Coroner.

2. If the Planning Director determines, based on recommendations of those individuals with whom the Director consults pursuant to this section, that the discovery is not a site of cultural significance, the Director shall notify the property owner of the determination, and excavation or the development may resume. The notice, in either event, may be given orally but shall be confirmed to the property owner in writing.

E. Culturally significant sites. If the Planning Director determines that the discovery is a site of cultural significance, the Director shall notify the property owner that the site is of cultural significance and that an archaeological report must be prepared and

completed within 90 days and no further excavation or development may take place except as authorized by an archaeological site development approval. The property owner may appeal the decision of the Planning Director as specified in § 19.05.011.

F. Recordation of sites. The Director shall ensure that all archaeological sites shall be recorded with and assigned a reference number by the California Archaeological Inventory. Copies of archaeological site records and reports shall be submitted to the California Archaeological Inventory for inclusion in the inventory.

In addition to the abovementioned San Benito County Code section, the mitigation measures listed in Section 18.0, Tribal Cultural Resources are also required (TCR-1 and TCR-2). Compliance with the above San Benito County Code and mitigation measures listed in Section 18.0, Tribal Cultural Resources, would ensure that potential impacts associated with Native American human remains is less than significant.

6. ENERGY

Would the project:

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

Comments:

a. The threshold of significance for energy consumption under CEQA is qualitative, as the terms wasteful, inefficient, and unnecessary are not explicitly defined or quantified in the CEQA Guidelines. Consequently, determining whether a project would result in energy consumption that is considered wasteful, inefficient, or unnecessary is inherently subjective. For this reason, the energy impacts of the proposed project are evaluated qualitatively, based on a review of projected energy demand, applicable state and local building and transportation regulations that govern energy efficiency in new development, and the mitigation measures identified throughout this initial study that would further reduce overall energy demand.

Regulatory Requirements

A wide range of state regulations and legislative actions are aimed at improving vehicle fuel efficiency, increasing building energy efficiency, and promoting overall energy conservation. Many of these regulations also have co-benefits for air quality and greenhouse gas (GHG) reduction. In the transportation sector, regulations such as the Pavley I standards, continued implementation of Advanced Clean Cars II, and other vehicle efficiency requirements focus on reducing transportation fuel consumption and accelerating the adoption of electric vehicles. In addition, statewide implementation of Senate Bill 743 is expected to reduce vehicle miles traveled over time, resulting in decreased transportation-related energy use. Implementation of these transportation regulations is generally outside the control of individual project applicants.

In the renewable energy sector, legislation such as Senate Bill 350 and Executive Order B-16-12 promotes increased use of renewable energy sources and supports statewide goals for zero-emission vehicle transitions.

In the building energy sector, several statutes and codes directly reduce electricity and natural gas consumption. These include Assembly Bill 2021, the California Building Standards Code, and the California Green Building Standards Code (CALGreen). The

California Energy Code (Title 24, Part 6)—incorporated into the California Building Standards Code—has been updated on a triennial basis since 1978 to reflect evolving energy-efficient technologies and construction practices. The Energy Code applies to all new buildings in California, including industrial facilities, and establishes efficiency requirements for conditioned spaces and regulated building systems, such as lighting, HVAC, and service water heating. While certain industrial process areas may be exempt, compliance with the Energy Code ensures that building-related energy consumption associated with the proposed project would not be wasteful or inefficient. CALGreen further requires all new buildings to meet enhanced energy efficiency and environmental performance standards; the current 2022 version will be replaced by the 2025 update, effective in 2026, which includes additional conservation measures.

Projected Energy Demand

The primary sources of energy consumption associated with construction and operation of a concrete ready-mix batch plant include fuel usage from vehicle trips to and from the site and building energy demand in the form of electricity and, to a lesser extent, natural gas. As discussed in the project description, the proposed project involves the relocation of an existing concrete batch plant operation from its current facility, which would cease operations, located approximately 3.75 miles north of the project site. The proposed facility would continue operations of similar type, scale, and intensity to those occurring at the existing location. Accordingly, energy consumption and vehicle miles traveled generated by the proposed project are expected to be similar to existing conditions, and the project would not introduce new or substantially increased sources of energy demand.

Compliance with applicable building energy efficiency requirements, including the Building Energy Efficiency Standards and CALGreen, with construction/redevelopment of existing buildings (which may occur in the future) for the proposed project would ensure that building-related energy demand from the proposed project is not wasteful, inefficient, or unnecessary. As described previously, the proposed project is expected to have the same energy-related impacts as currently occurring at the existing facility. Therefore, the proposed project would not result in wasteful, inefficient or unnecessary energy usage during construction or operation. Operational impacts would remain the same and construction/grading impacts would be less than significant.

b. At this time, there are no regulations at the state or local level that would mandate that the proposed project must include on-site renewable energy sources. The California Building Standards Code require the proposed project be built to the Building Energy Efficiency Standards in effect at the time building permits are issued. By incorporating energy efficiency and renewable energy measures per the Building Energy Efficiency Standards, and incorporating green building features per the CALGreen standards, the project would comply with existing state and local energy standards and would not conflict with or obstruct a state or local plan for energy efficiency.

7. GEOLOGY AND SOILS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	(1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☐	☒
	(2) Strong seismic ground shaking?	☐	☐	☒	☐
	(3) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
	(4) Landslides?	☐	☐	☒	☐
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Comments:

a. **(1) Surface Fault Rupture**. The project site is located 2.8 miles northeast of the San Andreas Fault Zone and 1.94 miles west of the Calaveras Fault Zone, but is not located on a fault line, where surface rupture usually occurs, nor is it within the Alquist-Priolo Fault Zone (California Department of Conservation 2025). Therefore, the project would

not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a fault within an Alquist-Priolo Fault Zone.

(2) Ground Shaking. San Benito County is a seismically active region, and the project site is located approximately 2.8 miles northeast of the San Andreas Fault and 1.94 miles west of the Calaveras Fault. As a result, the site could experience strong ground shaking during a seismic event.

The proposed project does not include the construction of any new buildings or changes to existing buildings on site. Future construction of any new buildings or changes to existing buildings on site would be required to comply with General Plan Policy HS-3.6, which requires adherence to the California Building Code to ensure that structures are designed to address seismic and other geologic hazards. San Benito County adopted the 2022 California Building Standards Code, including the California Building Code, by reference in San Benito County Code Section 21.01.020 (County of San Benito 2025a). The California Building Code includes specific requirements for seismic design to ensure that structures are constructed to withstand ground shaking and related seismic hazards. All new development in the County is required to obtain a building permit, which includes a review of project plans to ensure compliance with these standards. This process ensures that new construction meets current seismic safety requirements as set forth in the California Building Code. Compliance with the General Plan and California Building Code would ensure seismic-related impacts are less than significant.

(3) Liquefaction. Soil liquefaction is a state of soil particle suspension caused by a complete loss of strength when the effective stress drops to zero. Liquefaction usually occurs under vibratory conditions such as those induced by seismic event. The project site is not located in or near any identified liquefaction zones (California Department of Conservation 2025). Therefore, the project would not directly or indirectly cause the potential for substantial adverse effects, including risk of loss, injury, or death involving liquefaction.

(4) Landslide. According to the project application, the project site contains slopes of 30 percent or greater. The project site generally slopes from the northwestern corner toward the southeastern portion, with elevations ranging from approximately 390 to 434 feet above sea level (Google Earth 2025). The California Geological Survey has not mapped any landslides on or near the project site (California Department of Conservation 2025). The General Plan notes that landslide risk in the County is greatest along steep topographic slopes and active fault zones. As discussed previously, the project site is not located within an Alquist-Priolo Fault Zone. However, the site includes steep slopes and, therefore, the applicant would be required to comply with San Benito County Code Section 19.17.006, Areas of Landslides and Steep Slopes, which states that no grading shall occur in areas of active landslide as determined by a geotechnical evaluation or in areas exceeding 30 percent in slope measured both horizontally and vertically, except as provided in this section. There are several exceptions with conditions, one of which states that project plans and specifications shall be prepared and signed by a registered civil engineer and be accompanied by a geotechnical report.

Compliance with the San Bentio County Code would ensure that the project's potential to directly or indirectly cause the potential for substantial adverse effects, including risk of loss, injury, or death involving landslides would be less than significant.

b. Grading required for operation of the proposed project would involve approximately 42,155 cubic yards of soil cut and 97,805 cubic yards of soil fill, resulting in an estimated import of 55,650 cubic yards of material. These activities would disturb soil across most of the project site and could result in soil erosion or loss of topsoil, particularly during active grading phases when soils are most susceptible to wind and water erosion.

Because the project would disturb more than one acre of soil, it would be subject to the National Pollutant Discharge Elimination System (NPDES) permitting requirements administered by the Central Coast Regional Water Quality Control Board. Compliance with the County's NPDES program would require implementation of construction-related best management practices to minimize erosion and sedimentation, such as dust control watering, slope stabilization, and covering or treating exposed soil and stockpiles.

In addition, San Benito County Code Section 19.17.010 requires grading permit applications to include a soils engineering report and a geologic report to evaluate soil conditions and geologic hazards (County of San Benito 2025). Grading permits may also include conditions of approval, such as preparation and implementation of an erosion control plan identifying measures to manage runoff, erosion, and sedimentation. These documents must be reviewed and approved by the County prior to permit issuance. Compliance with Section 19.17.010 ensures that site-specific geotechnical and erosion control measures are incorporated into project design and construction.

Overall, compliance with NPDES regulations and San Benito County Code requirements would ensure that erosion-related impacts are less than significant.

c. As previously mentioned, the project site is susceptible to landslide hazards due to its steep slope but is not susceptible to liquefaction hazards. Because of the project site's potential for ground shaking and high clay content, it is possible that lateral spreading, subsidence, or collapse could occur.

The proposed project has not yet undergone a geotechnical analysis; however, as discussed under checklist questions "a" and "b" above, the project would be required to prepare a soils engineering report and a geologic report to evaluate soil conditions and geologic hazards. Compliance with this requirement would ensure that appropriate design measures are incorporated into the project and, therefore, impacts associated with soil instability would be less than significant.

d. The soil type located at the project site is Diablo-Ayar clays on 9 to 30 percent slopes, eroded (San Bentio County 2025b), which has the potential for expansive properties due to its high clay contents. However, as previously discussed, the applicant will be required to prepare a soils engineering report and geologic report that will ensure that the potential impacts associated with expansive soils are less than significant.

e. There are no septic tanks or alternative wastewater disposal systems proposed as part of the project. Therefore, no impacts associated with the site soils and its capability of adequately supporting the use of septic tanks or alternative wastewater disposal systems would occur.

f. There are no known paleontological resources at the project site; however, the General Plan EIR indicates that paleontological resources have been encountered at many locations within the County and it is likely that additional resources may be located in areas within the County designated for developed uses (p. 9-25).

Therefore, it is possible that paleontological resources could be accidentally discovered during construction activities associated with development of the project site. Directly or indirectly destroying a unique paleontological site is considered a significant, adverse environmental impact. Implementation of the following mitigation measure would ensure this potential impact would be less than significant.

Mitigation Measure

GEO-1 The following language shall be included on all grading permits: "If paleontological resources are discovered during earthmoving activities, work shall stop within 100 feet of the find until a paleontologist can assess if the find is unique and, if necessary, develop appropriate treatment measures in consultation with the San Benito County Resource Management Agency."

8. GREENHOUSE GAS EMISSIONS

Would the project:

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

Comments:

a. A project's greenhouse gas (GHG) impacts may be determined to be less than significant if the project is consistent with a qualified GHG reduction plan. However, neither San Benito County nor the air district has adopted a qualified plan or strategy that can be referenced for this purpose. In the absence of a local GHG reduction plan, lead agencies may rely on the GHG reduction plans, strategies, or guidance developed by other agencies as the basis for determining the significance of a project's GHG emissions.

GHG emissions associated with industrial projects are typically generated from both mobile and non-mobile sources. Mobile sources include vehicle miles traveled by employees, haul trucks, and delivery vehicles, while non-mobile (stationary) sources include combustion equipment, such as generators, mixers, and other machinery used in daily operations. Additional GHG emissions may result from energy consumption, water use, and solid waste generation associated with facility activities.

As discussed in the project description, the proposed project involves the relocation of an existing concrete batch plant operation from its current facility, which would cease operations, located approximately 3.75 miles north of the project site. The proposed facility would continue operations similar in type, scale, and intensity to those currently occurring at the existing site. As such, the same air quality, energy, vehicle miles traveled, and greenhouse gas emission impacts currently occurring at the existing facility are expected to occur at the project site. Therefore, the proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

b. As describe in checklist question "a" above, neither the County nor the air district have adopted plans for reducing GHG emissions. However, the proposed project involves the relocation of an existing concrete batch plant operation, which would function in the same type, scale, and intensity, and therefore, would not result in new impacts that would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Comments:

a. The proposed ready-mix concrete batch plant would involve the routine transport, use, and storage of hazardous materials commonly associated with industrial operations. According to the project application, hazardous materials anticipated on-site include diesel fuel, concrete, and chemical admixtures.

The project would be required to comply with General Plan Policy HS-6.1, which mandates the proper storage, handling, and disposal of hazardous materials to prevent leaks, spills, explosions, fires, or the release of harmful gases, and to ensure that otherwise

non-hazardous materials do not combine to form hazardous substances, particularly during disposal activities. The project would also be required to comply with General Plan Policy HS-6.5, which restricts the transport of hazardous materials within San Bentio County to designated routes; in this case, the applicable regional and primary route is State Route 156 (San Benito County 2022).

The project site is also regulated under a Waste Discharge Requirement by the State Water Resources Control Board, which would ensure that hazardous materials are properly handled, stored, and disposed of in accordance with federal, state, and local regulations (see more detail in checklist questions "b" and "d," below). According to the General Plan EIR, "the County is responsible for providing regulatory oversight for prevention, investigation, and clean-up at sites that manufacture, store, use, and have hazardous contamination or leaking underground storage tanks" (p. 12-38). In addition to local regulations and applicable General Plan policies, the project would be subject to all applicable federal and state regulations, such as a current hazardous materials business plan. Compliance with these regulations would ensure that the project's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

b. The project site was previously used as part of the Whittaker Ordnance Facility, which includes a former burn area that has since undergone remediation. As discussed under checklist question "d" below, the site is listed in the State Water Resources Control Board's GeoTracker database as an active case subject to a Cease-and-Desist Order and Cleanup and Abatement Order, and is currently regulated under Waste Discharge Requirement Resolution No. R3-2009-0115. As a result, the proposed project must comply with all applicable requirements of the Waste Discharge Requirement, as well as the General Plan policies identified under checklist question "a," which collectively ensure that any remaining contamination is properly managed and that the project does not exacerbate existing environmental conditions.

   Compliance with the applicable General Plan policies and federal and state regulations identified in checklist question "a," along with the Waste Discharge Requirements, would ensure that the project's potential to create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials would be less than significant.

c. The project site is not located within one-quarter mile of an existing or proposed school. Therefore, the proposed project would not result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. The project site is not located on or adjacent to sites identified on any of the following lists compiled pursuant to Government Code section 65962.5:

a. Hazardous Materials Waste and Substances Sites from the Department of Toxic Substances Control EnviroStor Database (Department of Toxic Substances Control 2025);

b. Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker Database (State Water Resources Board 2025);

c. Solid Waste Disposal Sites Identified by Water Board with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit (California Environmental Protection Agency 2025a); and

d. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the Department of Toxic Substances Control (California Environmental Protection Agency 2025b).

The project site is listed on the State Water Resources Control Board's GeoTracker list of "Active" Cease and Desist Order and Cleanup and Abatement Orders (California Environmental Protection Agency 2025c). According to the GeoTracker database, the project site is actively regulated under Waste Discharge Requirement (WDR) Resolution Number R3-2009-0115 (issued December 12, 2011) due to historic operations associated with the former Whittaker Ordnance Facility (California State Water Resources Control Board 2025). The site is identified as requiring cleanup for groundwater contamination, including perchlorate, volatile organic compounds, and hexavalent chromium.

The proposed project would be subject to the requirements of the applicable Waste Discharge Requirements, which provide regulatory oversight for site contaminants and remediation activities. Required compliance with these requirements would ensure that potential impacts associated with hazardous materials are reduced to a less than significant level.

e. The project site is not located within an airport land use plan, nor is it within two miles of a public airport or public-use airport. Therefore, implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area.

f. Emergency evacuation and response for unincorporated areas of San Benito County, including the project site, are coordinated under the *San Benito County Operational Area Emergency Operations Plan – Basic Plan*, adopted in January 2024. This plan does not identify the roadways surrounding the project site, including State Route 156, as designated evacuation routes. However, employees and visitors would likely use State Route 156 as the primary evacuation route, with potential direction to alternate local roadways as determined by the San Benito County Sheriff's Office during an emergency.

The County also adopted its Multi-Jurisdictional Hazard Mitigation Plan in September 2022 to reduce vulnerability to natural and human-caused hazards and enhance community resilience by incorporating lessons learned from recent wildfires, floods, and other disasters. The plan identifies State Route 156 as a primary evacuation route in the County providing east-west access through Hollister and connection to U.S.

Highway 101. Neither construction nor operation of the proposed project would obstruct State Route 156. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.

g. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones in State Responsibility Area mapping tool (effective April 1, 2024), the project site is located within a State Responsibility Area designated as a High Fire Hazard Severity Zone (CAL FIRE 2024).

In accordance with General Plan Policy HS-4.4, the project must be designed and constructed to minimize fire hazard risks and comply with all applicable State and County fire safety standards. Additionally, General Plan Policy HS-4.5 requires incorporation of fire-resistant vegetation, establishment of cleared fire breaks separating structures or development clusters from native vegetation, and/or implementation of a long-term vegetation and fuel management program consistent with Public Resources Code Sections 4290 and 4291, which establish standards for wildland-urban interface fire protection and vegetation management.

Compliance with the General Plan policies would ensure that potential wildfire-related impacts would be less than significant. Refer also to Section 20.0, Wildfire, for a more detailed discussion of wildfire-related impacts.

10. HYDROLOGY AND WATER QUALITY

Would the project:

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

Comments:

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

Use of the project site with the proposed ready-mix concrete batch plant has the potential to increase discharge of storm water pollutants during grading activities. Projects disturbing more than one acre of land during construction, such as the proposed project, are required to file a notice of intent to be covered under the State NPDES Construction General Permit (2022-0057-DWQ) for discharges of storm water associated with construction activities (California State Water Resources Control Board 2022). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan that details how water quality would be protected during construction activities. The Storm Water Pollution Prevention Plan must contain a site map(s) that shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography (both before and after grading and construction), and drainage patterns across the project. Best management practices, which are detailed within each permit, are to be implemented to protect water quality.

By complying with the NPDES Construction General Stormwater Permit requirements, potential impacts associated with water quality standards or waste discharge requirements during construction of the project would be less than significant.

Operational Water Quality. The proposed project would alter existing stormwater drainage conditions by replacing undeveloped land with impervious surfaces, including paved areas and remodeled structures. These changes would increase stormwater runoff relative to existing conditions, where a substantial portion of stormwater currently infiltrates into exposed soils. Increased runoff can result in higher flow volumes and velocities, potentially causing erosion of downstream drainage features if not properly managed.

To address these conditions, the project proposes to retain and manage stormwater on-site through engineered drainage facilities, including three stormwater ponds—two detention ponds located in the northeastern and southwestern portions of the site and one retention pond in the eastern portion. These features would be designed to collect, detain, and treat stormwater for reuse in plant operations. An existing natural drainage swale in the southeastern area of the site would also be preserved to maintain natural drainage conveyance. All stormwater facilities would be designed consistent with applicable regional and local standards to control runoff, prevent off-site discharge, and minimize erosion.

This stormwater approach is consistent with General Plan Policy PFS-6.1, which requires that stormwater drainage facilities are properly designed, sited, constructed, and maintained to efficiently capture and dispose of runoff and minimize impacts to water quality; and Policy PFS-6.4, which requires projects to minimize drainage concentrations, reduce impervious surface impacts, and support groundwater recharge. The detention and retention ponds would be required to comply with Policy PFS-6.5, which requires on-site detention/retention or flow-reduction measures to maintain pre-development runoff rates, and Policy PFS-6.6, which requires stormwater basins be designed to ensure

public safety, be visually unobtrusive, and provide temporary or permanent wildlife habitat. In addition, the project must comply with Policy PFS-6.7, which requires all drainage systems to meet applicable state and federal non-point source pollution control requirements.

Additionally, the San Bentio County Water District provided a letter after review of the project application (San Benito County Water District 2025) and notes project requirements associated with San Bentio County Code Sections 19.17.009.B.5 and B.8, and Section 19.17.011.C.13; these sections of the San Benito County Code discuss the requirements of grading applications such as a map showing the drainage area and estimated runoff of the area served by any drains, proposed methods to control erosion and drainage, and drainage plans (full detail can be found under the response for Runoff in checklist question "c"). Further, pursuant to San Benito County Code Section 23.31.002.B, detailed plans and specifications for all grading and drainage improvements, including stormwater ponds, must be submitted to the County Engineer for review and approval prior to construction (County of San Benito 2025).

In addition, the proposed ready-mix concrete batch plant is classified as an industrial facility subject to the Statewide NPDES Industrial General Permit for Storm Water Discharges Associated with Industrial Activities (Order 2014-0057-DWQ, as amended) (California State Water Resources Control Board 2018). As such, the design and operation of on-site stormwater drainage facilities would be required to comply with industrial NPDES requirements, including implementation of best management practices, preparation and implementation of an Industrial Storm Water Pollution Prevention Plan, and ongoing stormwater monitoring and reporting.

Compliance with applicable State Water Resources Control Board requirements, General Plan policies, and San Benito County Code requirements would ensure that stormwater generated during facility operations is appropriately managed and treated, thereby preventing water quality degradation and ensuring post-construction stormwater impacts would be less than significant.

b. **Groundwater Supplies**. The project site is located within the Gilroy-Hollister Groundwater Basin, specifically the North San Benito Subbasin. This subbasin has four management areas; the project site is located within the San Juan Management Area. The *North San Benito Groundwater Sustainability Plan* was adopted by the San Benito County Water District in November 2021 and approved by the Department of Water Resources in July 2023.

Water demand at the project site would primarily be associated with operation of the ready-mix concrete batch plant. According to the project applicant, total water demand for all project operations is estimated at approximately five to six acre-feet per year. The ready-mix process would require approximately 35 to 40 gallons of water per cubic yard of concrete produced.

The sustainable yield for the San Juan Management Area is 19,017 acre-feet per year (San Benito County Water District GSA 2021, Table 5.11). The project's annual water demand would therefore represent approximately 0.0316 percent of the sustainable yield of the management area. Additionally, the applicant has indicated that the existing operations at the current site on Bolsa Road would cease, which would eliminate the water demand from that site on groundwater resources.

Given the small proportion of groundwater demand relative to available supply, the project would not substantially decrease groundwater supplies or interfere with sustainable groundwater management of the basin.

Groundwater Recharge. The proposed stormwater detention ponds at the northeastern and southwestern portions of the project site would temporarily capture stormwater runoff and allow for infiltration into on-site soils, thereby contributing to groundwater recharge. Additionally, an existing natural drainage swale in the southeastern area of the site would be preserved to maintain natural drainage conveyance. Accordingly, the project would not substantially interfere with groundwater recharge.

c. **(1) Erosion**. Refer to the response under checklist question "b" in Section 7.0, Geology and Soils.

(2) Flooding. Increases in impervious surfaces can increase stormwater runoff, which may elevate the potential for on- or off-site flooding if not properly managed. The project application indicates the project will create and/or replace 77,759 square feet of impervious surfaces. As discussed under checklist question "a," the proposed project is required to comply with General Plan Policies PFS-6.1 and PFS-6.5, which require projects to minimize stormwater runoff and maintain pre-development drainage conditions. In addition, the proposed stormwater detention ponds would capture and retain stormwater on-site reducing the rate and volume of runoff that could otherwise contribute to flooding.

Pursuant to San Benito County Code Section 23.31.002.B, detailed plans and specifications for all proposed drainage facilities must be submitted to the County Engineer for review and approval, ensuring that stormwater infrastructure is properly designed and constructed. Compliance with applicable General Plan policies and San Benito County code regulations would ensure that the project's potential to result in flooding on- or off-site would be less than significant.

(3) Runoff. As discussed under checklist question "b," the proposed stormwater detention ponds in the northeastern and southwestern portions of the site would temporarily capture stormwater runoff and allow infiltration into on-site soils. In addition, the stormwater retention pond is proposed to collect and treat stormwater for reuse in plant operations.

The proposed project must comply with applicable provisions of San Benito County Code Chapter 19.17 (Grading, Drainage, and Erosion Control), including:

e. Section 19.17.009.B.5, which requires detailed plans for all surface and subsurface drainage devices and protective structures, along with drainage area maps and estimated runoff calculations;

f. Section 19.17.009.B.8, which requires proposed methods to control erosion and drainage such that runoff does not leave the site unless directed to an approved drainage channel and does not cause damage to adjacent properties, as well as methods to establish vegetation on disturbed slopes; and

g. Section 19.17.011.C.13, which requires drainage plans to meet the specifications of the County Subdivision Ordinance and include on-site stormwater retention to pre-development levels.

Because the project would retain and manage stormwater on-site, in addition to complying with San Benito County Code and NPDES regulatory requirements, it would not create or contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems, nor would it provide a substantial additional source of polluted runoff.

(4) Flood Flows. The project site is not located within a flood hazard zone (refer to the discussion under checklist question "d" below). Therefore, the project would not impede or redirect flood flows.

d. The project site is not located within a Federal Emergency Management Agency (FEMA) flood hazard zone (FEMA 2025). In addition, the site is not located within a tsunami or seiche hazard zone due to its inland location and distance from large bodies of water (Google Earth 2025). Therefore, the project would not risk the release of pollutants due to inundation.

e. **Sustainable Groundwater Management Plan.** As discussed in checklist question "b," the *North San Benito Groundwater Sustainability Plan* was adopted by the San Benito County Water District in November 2021 and approved by the Department of Water Resources in July 2023.

The project would comply with applicable regulations associated with stormwater flows and runoff and provides both storm water retention and detention ponds to treat and retain stormwater on-site and allow for stormwater infiltration into the groundwater table. These stormwater drainage features contribute to the sustainability goals of the *North San Benito Groundwater Sustainability Plan*. Further, the project would demand 0.0316 percent of the sustainable yield for the San Juan Management Area. Therefore, the project would not conflict with or obstruct implementation of a sustainable groundwater management plan.

Water Quality Control Plan. The *Water Quality Control Plan for the Central Coastal Basin* (hereinafter "Basin Plan") shows how the quality of the surface and ground waters in the Central Coast Region should be managed to provide the highest water quality reasonably possible. The Regional Water Quality Control Board implements the Basin Plan by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose waste discharges can affect water quality. These requirements can be

either State Waste Discharge Requirements for discharges to land, or federally delegated NPDES permits for discharges to surface water. As discussed under checklist item "a" above, the project applicant would be required to obtain a State NPDES Construction General Permit for development on the project site. By complying with the Construction General Stormwater Permit requirements, the proposed project would not conflict with the Basin Plan.

11. LAND USE AND PLANNING

Would the project:

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

Comments:

a. The proposed project site is located in a less developed area of unincorporated San Benito County, surrounded primarily by agricultural, and industrial uses, with some scattered rural residential development. Given the surrounding land use context, the proposed project would not physically divide an established community.

b. The project site is currently designated Industrial Light under the General Plan and zoned Light Industrial (M-1). The proposed project includes a General Plan amendment to redesignate the site to Industrial Heavy and a corresponding rezoning to Heavy Industrial (M-2) to accommodate the proposed ready-mix concrete batch plant. The proposed use is consistent with General Plan Policy LU-6.5, which requires a general plan amendment, use permit, and applicable CEQA review for the establishment of new heavy industrial uses outside existing Industrial Heavy (IH) designations to ensure that potential near- and long-term environmental effects are minimized (San Benito County 2015).

The proposed project would not conflict with the proposed Industrial Heavy land use or M-2 zoning designations. Additionally, the various environmental topics in this initial study address applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. This initial study shows that for those environmental topics (e.g., air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, etc.), there are either no impacts, less than significant impacts, or significant impacts that can be mitigated to a less-than-significant level. Therefore, the project would not create any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

12. MINERAL RESOURCES

Would the project:

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

Comments:

a. The proposed project involves the production of concrete, which utilizes mineral resources. The project would make use of mineral resources that are already available and valuable to the region and the residents of the state. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state

b. The General Plan EIR states that there are mineral resources within the County, which are primarily sand and aggregate based. However, according to the Mineral Resources Online Spatial Data prepared by the U.S. Geological Survey mapping agency, there are no known mineral resources within or adjacent to the project site that could be impacted as a result of the project (U.S. Geological Survey 2025). Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan.

13. NOISE

Would the project result in:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies?	☐	☒	☐	☐
b.	Generation of excessive ground-borne vibration or ground borne noise levels?	☐	☐	☐	☒
c.	For a project located within the vicinity of a private airstrip or an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Comments:

This section is informed by the *Environmental Noise Assessment for the Don Chapin Concrete Plant & Recycling Facility, San Benito County, California* ("noise assessment") (February 2026) prepared for the proposed project by WJV Acoustics, Inc. (WJVA). The full noise assessment is provided in Appendix D.

a. **Temporary Noise Levels**. Construction activities associated with the proposed project would generate temporary noise in the project site vicinity. The nearest sensitive receptors are a cluster of several residences (identified as noise sensitive receptor R-1 in the noise assessment, Figure 9) located approximately 480 feet south of the proposed off-site roadway improvements and a single-family residence (identified as noise sensitive receptor R-2 in the noise assessment, Figure 9) located approximately 1,425 feet east of the proposed concrete-ready mix batch plant and approximately 1,000 feet east of the proposed recycling facility.

The proposed project would be required to comply with General Plan Policy HS-8.3, which restricts construction between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and 8:00 a.m. to 5:00 p.m. on Saturdays, with no construction on Sundays or holidays. San Benito County Municipal Code Chapter 19.39 Noise Control Regulations implements this policy, the provisions of which the project would be subject to.

Compliance with San Benito County Code requirements and applicable General Plan policies would ensure that the project does not generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance.

Permanent Noise Levels. San Benito County General Plan noise standards require that new non-transportation noise sources do not exceed 55 dBA L_{eq} during daytime hours (7:00 a.m.–10:00 p.m.) and 45 dBA L_{eq} during nighttime hours (10:00 p.m.–7:00 a.m.) at nearby noise-sensitive land uses.

Operational noise associated with the concrete batch plant, recycling activities, and on-site truck movements was modeled at the nearest sensitive receptors. With implementation of the proposed operational characteristics and site configuration, including substantial acoustic shielding provided by intervening topography and separation distances of 700 feet or greater between major noise sources and residences, project-generated noise levels would not exceed applicable County daytime noise standards at any analyzed sensitive receptor (WJVA 2026, p.19). Modeled combined operational noise levels would remain below applicable standards provided that recycling operations occur during daytime hours, as proposed (generally between 7:00 a.m. and 4:00 p.m.), and are not operated concurrently with batch plant activities during nighttime hours. If the recycling plant were to operate simultaneously with the concrete ready-mix batch plant during the nighttime hours of 10:00 p.m. to 7:00 a.m., combined noise levels (concrete ready-mix batch plant and recycling plant) could exceed San Benito County nighttime noise level standards at analyzed sensitive receptors (WJVA 2026).

The proposed project would be subject to the following general plan policies, each of which include provisions for noise standards associated with existing and new development.

> **HS-8.1 Project Design.** The County shall require new development to comply with the noise standards shown in Tables 9-1 and 9-2 through proper site and building design, such as building orientation, setbacks, barriers (e.g., earthen berms), and building construction practices. The County shall only consider the use of soundwalls after all design-related noise mitigation measures have been evaluated or integrated into the project or found infeasible.
>
> **HS-8.9 Interior Noise Standards.** Adopt the State of California Code of Regulations' (Title 24) minimum noise insulation interior performance standard of 45 dBA Ldn for all new residential construction including hotels, motels, dormitories, apartment houses, and single-family dwellings.
>
> **HS-8.11 New Project Noise Mitigation Requirements.** Require new projects to include appropriate noise mitigation measures to reduce noise levels in compliance with the Table 9-1 and 9-2 standards within sensitive areas. If a project includes the creation of new non-transportation noise sources, require the noise generation of

those sources to be mitigated so they do not exceed the interior and exterior noise level standards of Table 9-2 at existing noise-sensitive areas in the project vicinity, unless an exception is made by the County on a case-by-case basis. However, if a noise-generating use is proposed adjacent to lands zoned for residential uses, then the noise generating use shall be responsible for mitigating its noise generation to a state of compliance with the standards shown in Table 9-2 at the property line of the generating use in anticipation of the future residential development, unless an exception is made by the County on a case-by-case basis.

Additionally, the proposed project would be required to implement the following mitigation measure to ensure that the proposed project's impacts related to noise levels produced during nighttime hours remain below County standards.

Mitigation Measure

N-1 Operation of the concrete ready-mix batch plant and the recycling facility shall not occur simultaneously between the hours of 10:00 p.m. and 7:00 a.m. If nighttime operations are necessary for either facility, only one facility (either the concrete ready-mix batch plant or the recycling facility) may operate at a time during nighttime hours. Concurrent nighttime operation of both facilities is expressly prohibited.

The San Benito County Resource Management Agency shall ensure that this requirement is reflected on all applicable operational plans, lease agreements, and permits. The project applicant shall be responsible for ensuring on-going compliance with this requirement for the life of the project.

Additionally, traffic noise modeling determined that project-generated trips would not cause roadway noise levels to exceed County standards or result in a perceptible increase of greater than three decibels at any sensitive receptor (WJVA 2026, p.).

Compliance with Mitigation Measure N-1 and applicable General Plan policies would ensure that the proposed project does not generate a substantial 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.

b. The primary sources of groundborne vibration typically include pile driving, blasting, demolition, rail operations, and other heavy construction activities capable of generating perceptible or damaging vibration levels. None of these activities are proposed as part of project construction or operation. Table 1, Typical Vibration Levels During Construction, presents typical vibration levels associated with common construction equipment at varying distances from the source.

Table 1 Typical Vibration Levels During Construction

Equipment	PPV (in/sec)	
	@ 100 Feet	@ 300 Feet
Bulldozer (large)	0.011	0.0006
Bulldozer (small)	0.0004	0.00019
Loaded truck	0.01	0.005
Jackhammer	0.005	0.002
Vibratory roller	0.3	0.013
Caisson drilling	0.1	0.006

SOURCE: WJVA 2026

Construction activities associated with the project would consist of typical grading and equipment use, such as loaders, trucks, and compactors, which are not expected to generate substantial vibration. Due to the distance between construction areas and the nearest sensitive receptors, vibration generated by construction equipment would not be expected to result in perceptible vibration levels or structural damage at nearby residences. Typical vibration levels from construction equipment attenuate rapidly with distance and would remain well below thresholds associated with human annoyance or structural damage (WJVA 2026, p.22).

Operational activities associated with the concrete batch plant, recycling operations, and truck movements are not vibration-intensive uses and would not generate substantial groundborne vibration. Given the separation distances between operational areas and nearby sensitive receptors, project-related operational vibration would not be perceptible or result in damage to nearby structures.

Therefore, the proposed project would not generate excessive groundborne vibration or groundborne noise levels.

c. The project site is not located within the vicinity of a private airstrip, an airport land use plan, or within two miles of a public airport or public-use airport. Therefore, implementation of the proposed project would not expose people residing or working in the project area to excessive noise levels associated with aircraft operations.

14. POPULATION AND HOUSING

Would the project:

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

Comments:

a. The proposed project would not result in an increase in population or involve the development of new housing. Therefore, the project would not directly or indirectly induce population growth in the area.

b. The project site does not contain any existing residences. Therefore, implementation of the proposed project would not displace existing housing or people, nor would it necessitate the construction of replacement housing elsewhere.

15. PUBLIC SERVICES

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

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

Comments:

a. The proposed project involves moving the operation of a ready-mix concrete batch plant from its existing location within the County, which could result in the increase in demand on fire protection services at the project site.

Fire protection services within the County are provided by several agencies including the San Benito County Fire Department, Aromas Tri-County Fire Department, Hollister Fire Department, and San Juan Bautista Volunteer Fire Department. The California Department of Forestry and Fire Protection ("CAL FIRE") also assists the departments. The nearest fire station to the project site is the Hollister Fire Department Station 1 Headquarters located at 110 5th Street in Hollister approximately 3.3 miles east of the project site.

Pursuant to General Plan PFS-13.7 and San Benito County Code Section 5.01.340, the project would be required to pay its fair share of cumulative costs associated with new fire station facilities, equipment, and staffing necessary to maintain the County's service standards in that area, thereby mitigating its contribution to cumulative impacts on fire protection facilities. Compliance with the abovementioned General Plan policy and San Benito County Code section would ensure that the project's impacts associated with the construction or expansion of fire protection services and facilities, the construction of which could result in significant adverse environmental impacts, would be less than significant.

b. The proposed project involves moving the operation of a ready-mix concrete batch plant from its existing location within the County, which could result in the increase in demand on police protection services at the project site.

The San Benito County Sheriff's Department provides police protection services to the County, including the project site. Additional automatic aid agreements exist with the cities of Hollister and San Juan Bautista Police Departments. The San Benito County Sheriff's Department is located at 2301 Technology Parkway in the City of Hollister, which is approximately 5.8 miles northeast of the project site.

Pursuant to General Plan Policy PFS-12.4 and San Benito County Code Section 5.01.312, the project would be required to pay its fair share of cumulative costs associated with providing law enforcement facilities and services necessary to serve the project, thereby mitigating its contribution to cumulative impacts on police protection facilities. Compliance with this General Plan policy and San Benito County Code section would ensure that the project's impacts associated with the construction or expansion of police protection services and facilities, the construction of which could result in significant adverse environmental impacts, would be less than significant.

c. The proposed project does not include residential uses and would not generate student-age children. Therefore, the proposed industrial use would not create new demand for school facilities or necessitate the construction or alteration of existing schools, the construction of which could otherwise result in significant environmental impacts.

d-e. The proposed project involves industrial uses and, therefore, would not result in adverse environmental impacts associated with the need for construction of new or alteration of the existing parks or other public facilities, the construction of which could cause significant environmental effects.

16. RECREATION

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Comments:

a-b. The proposed project involves industrial uses on the site and, therefore, would not result in increased use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. As an industrial project, no recreational facilities are proposed, and project operations would not require the construction or expansion of recreational facilities that could result in an adverse physical effect on the environment.

17. TRANSPORTATION

Would the project:

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

Comments:

This section is informed by the *Trip Generation and Operations Analysis for the Chapin Concrete Plant and Recycling Facility in San Benito County* ("traffic analysis") (December 2025) prepared for the proposed project by Hexagon Transportation Consultants, Inc. (Hexagon). The full traffic analysis is provided in Appendix E.

According to the project application, the facility would operate up to six days per week, generally between 5:00 a.m. and 5:00 p.m., with most activities concluding by early afternoon. The project would employ up to 50 employees, including 15 truck drivers. Truck activity is estimated to average approximately 32 round trips per day, with most trips occurring during off-peak traffic hours. The precast facility would generate an additional two to four truck round trips per day, while recycling operations would result in approximately six truck round trips per day during active periods. Employee trips would primarily occur during typical morning and afternoon commute hours.

a. The County of San Benito and the California Department of Transportation (Caltrans) both establish Level of Service (LOS) D as the acceptable standard for intersections and overall congestion conditions (San Benito County 2015).

   The traffic analysis evaluated AM and PM peak-hour traffic conditions at the following study intersections: (1) Union Road and State Route 156; (2) Union Road and San Juan Hollister Road; and (3) San Juan Hollister Road and State Route 156. The analysis concluded that all study intersections currently operate at an acceptable LOS D or better during both the AM and PM peak hours, consistent with the County of San Benito's intersection operating standards. With the addition of project-generated traffic, the study

intersections would continue to operate at acceptable levels. Based on the results of the intersection level of service analysis, the proposed project would not adversely affect traffic operations at the analyzed intersections and no off-site improvements are deemed necessary.

Roadway, Transit, Bicycle, and Pedestrian Facilities. The project site is situated in a rural area characterized by a limited roadway network, consisting primarily of state highways and local two-lane roadways that serve agricultural, industrial, and some rural residential uses. As a result, the project area lacks the dense roadway infrastructure typically found in urban settings.

The project site is located just south of State Route 156 along San Juan Hollister Road and is accessed via a paved, degraded roadway that provides access to the project site. The nearest public transit stop is located at Fourth and Miller Streets in Hollister, approximately two miles east of the project site. San Juan Hollister Road does not include existing pedestrian or bicycle infrastructure adjacent to the project site.

The project complies with General Plan Policy C-1.13, which requires that existing private roads (such as the one associated with the off-site improvements area that leads to the project sites and runs along the northern portion of the project site) be upgraded to County standards as a condition of approval for any project that will be served by such roads. Additionally, the project is required to comply with General Plan Policy C-3.9, which requires that all new development proposals be consistent with and implement the San Benito County Regional Transportation Plan transit policies. Finally, General Plan Policy C-1.5, Mitigating Transportation Impacts, requires that the proposed project pay its fair share of costs for new and expanded transportation facilities, as applicable, to County, City, regional and/or State facilities (San Benito County 2015). No other policies associated with the County's circulation system including transit, roadway, bicycle, or pedestrian facilities are applicable to the proposed project.

Compliance with these policies would ensure that the project does not conflict with any program, plan, ordinance, or policy addressing the county's circulation system, including transit, roadway, bicycle, or pedestrian facilities.

b. As discussed in the project description, the proposed project involves relocation of an existing concrete and materials operation from its current facility located approximately 3.75 miles north of the proposed project site. The proposed facility would continue operations similar in type and scale to those currently occurring at the existing site, which would cease operations after initiation of the proposed facility. Therefore, the project would not result in an increase in vehicle miles traveled compared to existing conditions and would not conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b).

c. The proposed project would introduce a new 18-foot-wide gated driveway on San Juan Hollister Road, connecting to an existing 16-foot drive aisle that provides internal circulation. Although the County of San Benito does not maintain industrial driveway

standards, a review of the City of Hollister's design guidelines—which serve as a comparable reference—indicates that commercial and industrial driveways should be a minimum of 21 feet in width. As proposed, the project driveway is narrower than this recommended standard. To ensure adequate and safe ingress and egress, particularly for heavy-vehicle movements associated with the facility, the traffic analysis recommends evaluating the driveway using truck-turning templates for the largest anticipated truck type to confirm that turning movements can be completed without encroaching into opposing traffic lanes.

Implementation of the following mitigation measure would reduce impacts associated with driveway design to a less-than-significant level.

Mitigation Measure

TR-1 Prior to the issuance of a grading or building permit, the applicant shall prepare and submit a driveway design analysis to the County of San Benito Public Works Division for review and approval. The analysis shall include truck-turning templates for the largest truck type anticipated to access the facility and shall demonstrate that all turning movements into and out of the project driveway can be completed without encroaching into opposing traffic lanes on San Juan Hollister Road. If the analysis identifies insufficient turning capacity or safety concerns, the applicant shall revise the driveway design—such as by widening the driveway approach or modifying internal circulation—to ensure adequate and safe ingress and egress for all vehicle types. The final, approved driveway design shall include a driveway approach with a minimum width of 21 feet and be incorporated into the project's improvement plans and implemented prior to occupancy.

Sight distance at the proposed driveway was also evaluated by the traffic analysis. Although the driveway is located along a straight segment of San Juan Hollister Road, horizontal curves to the north and south limit available sight distance to approximately 300 feet and 200 feet, respectively. Based on a conservative design speed assumption of 40 miles per hour, the California Department of Transportation stopping sight distance guidelines recommend 300 feet of visibility in both directions. The limited southbound sight distance does not meet this recommendation. However, due to roadway curvature and the rural roadway context, actual operating speeds are expected to be lower. The traffic analysis recommends installation of regulatory speed limit signs and cross-traffic warning signage to enhance driver awareness and reduce potential hazards associated with limited sight distance.

Implementation of the following mitigation measure would ensure impacts associated with sight distance are less than significant.

Mitigation Measure

TR-2 Prior to commencement of operations, the applicant shall coordinate with the San Benito County Public Works Division to install roadway signage along San Juan Hollister Road consistent with the recommendations of the traffic analysis

prepared by Hexagon Transportation Consultants (December 2025) for the proposed project. Required signage shall include (1) regulatory speed limit signs establishing the County-approved speed limit in both directions, and (2) cross-traffic warning signage to alert approaching drivers to the project driveway and limited sight-distance conditions. All signage shall be installed in accordance with the California Manual on Uniform Traffic Control Devices and any additional County standards as directed by the Public Works Division. Verification of installation shall be provided to the County Public Works Division prior to occupancy.

d. The project proposes one entrance and exit along San Juan Hollister Road, located just northwest of the project site. The San Benito County Fire Department has reviewed the project plans ensuring adequate emergency vehicle access is provided prior to issuance of any permits. With San Benito County Fire Department application approval, the project would not result in inadequate emergency access.

18. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources code section 5020.1(k), or	☐	☒	☐	☐
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Comments:

a. County staff sent out letters offering tribal consultation to Native American Tribes traditionally and culturally affiliated with the project area on July 3, 2025 pursuant to AB52 and SB18. One response was received from the Indian Canyon Band of Costanoan Ohlone People. The County agreed to the terms recommended by the tribe, but consultation is not yet complete (Michael Kelly, email message, July 16, 2026).

Based on the County's tribal consultation with the Indian Canyon Band of Costanoan Ohlone People, the following recommendations have been agreed upon to be implemented as part of the proposed project:

- Tribal monitor to be present before groundbreaking and before demolition(s);
- Cultural awareness training much like biologist training would occur before and during disturbance—to keep an eye open for cultural resources or indications of human remains so as not to encounter indigenous ancestors;
- Training ahead of time to get the scope of the day, reminding construction workers that the tribal monitor is present for ground-disturbing activities—can save on builder budget if disturbance is not happening that day—whenever native soils are moving then monitor;

- Request that no disturbance occur if a native monitor is not on site—the monitor would make arrangement with builder;
- Recommending that an archaeologist be present for expertise like osteological training;
- Archaeologist and native monitor can observe one part of site while construction happens elsewhere; and
- After fresh excavation has finished, the monitor will no longer need as much focus on the activity.

Therefore, the following mitigation measures are required to ensure that impacts associated with tribal cultural resources are less than significant.

Mitigation Measures

TCR-1 Cultural Awareness Training Program. Prior to and during ground-disturbing activities, a Cultural Awareness Training Program shall be provided to all construction personnel at the project site. The training shall be prepared and conducted by a qualified archaeologist to the satisfaction of the San Benito County Director of Planning, Building, and Code Enforcement. The training shall be a length of time adequate to explain applicable statues, regulations, enforcement provisions; the pre-contact and historic environmental setting and context; local tribal groups; show sample artifacts; and to discuss what pre-contact and historic archaeological deposits look like at the surface and when exposed during construction. The training may be discontinued to new workers at the site when ground disturbance is completed. Construction personnel shall not be permitted to operate equipment within the construction area unless they have attended the training. A list of the names of all personnel who attended the training and copies of the signed acknowledgement forms shall be submitted to the San Benito County Director of Planning, Building, and Code Enforcement for their review and approval.

TCR-2 Cultural Resources Construction Monitoring. During ground disturbance activities, a qualified archaeologist and/or tribal monitor shall be present before groundbreaking activities to observe disturbance areas. Monitoring services will no longer be required after fresh excavation has finished. The monitor shall submit a written report to the San Benito County Director of Planning, Building, and Code Enforcement at the end of monitoring activities to document the process and whether any resources were discovered.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Comments:

a. **Water**. According to the project application, water service for the proposed project would be provided by the City of Hollister public water system through a new connection to the existing main line along San Juan Hollister Road. The new water line would be no larger than three inches and is planned for installation within the existing access roadway to the project site, which is proposed to be reconstructed as part of the project to improve site access. The new water connection would be designed and constructed in accordance with applicable City standards and requirements. Potential environmental impacts associated with construction of the new water infrastructure improvements are evaluated throughout this initial study. Where necessary, mitigation measures have been identified to reduce potential impacts to a less-than-significant level.

Wastewater. According to the project application, wastewater service for the proposed project would be provided by the City of Hollister public sanitary sewer system through

an existing connection to the sewer main along San Juan Hollister Road. Therefore, the proposed project would not require the relocation or construction of new or expanded wastewater treatment, the construction or relocation of which could cause significant environmental effects.

Stormwater. Stormwater management features would be incorporated into the project design in accordance with applicable regional and local standards to control runoff, prevent off-site discharge, and minimize erosion. These features include the construction of three stormwater ponds designed to collect, detain, and treat stormwater for reuse in plant operations, to the extent possible. Potential environmental impacts associated with construction of these stormwater improvements are evaluated throughout this initial study. Where necessary, mitigation measures have been identified to reduce potential impacts to a less-than-significant level.

Additional Utilities. The project would connect to existing overhead electric power and telecommunication facilities on San Juan Hollister Road and would not require or result in the relocation or construction of new or expanded utilities, the construction of which could cause significant environmental effects.

b. As discussed in Section 10.0, Hydrology and Water Quality, the proposed project anticipates a water demand of approximately five to six acre-feet per year and the sustainable yield for the San Juan Management Area is 19,017 acre-feet per year (San Benito County Water District GSA 2021). The sustainable yield is based upon the future baseline (2050) conditions that incorporate current land uses, among other factors. The project's annual water demand would represent approximately 0.0316 percent of the sustainable yield of the management area.

While the proposed project proposes a General Plan amendment to change the land use designation from Industrial Light to Industrial Heavy, the *North San Benito Groundwater Sustainability Plan* does not differentiate light and heavy industrial water use in determining the sustainable yield (San Benito County Water District GSA 2021). Therefore, for the purpose of this discussion, the project is consistent with the land uses that were considered during development of the sustainable yield of the San Juan Management Area, and there would be sufficient water supplies available to serve the proposed project.

Additionally, the *2020 Hollister Urban Area Urban Water Management Plan* states that there are sufficient water supplies available to serve the Hollister Urban Area, which includes the project site, and reasonably foreseeable future development during normal, single-dry and multiple- dry years (Tables 7-2a, 7-3, and 7-4).

c. According to the project application, the proposed project would be served by an existing sewer main connected to the City of Hollister's wastewater collection system along San Juan Hollister Road. Sewage generation would be minimal, limited to employee restrooms and handwashing facilities. No other wastewater disposal needs are anticipated, and little to no peak flow increases would occur as a result of the project.

The City of Hollister Regional Domestic Wastewater Treatment Plant has a permitted dry-weather treatment capacity of 4.0 million gallons per day and a permitted wet-weather capacity of 5.0 million gallons per day (City of Hollister 2018). According to the City of Hollister Design Standards, Standard Specifications, and Standard Plans (2019), heavy industrial land uses are assigned a wastewater generation factor of 0.12 gallons per day per square foot. Applying this factor to the project's estimated 1,100 square feet of building area results in an estimated wastewater generation rate of 132 gallons per day, equating to approximately 48,180gallons per year.

Given the minimal amount of wastewater that would be generated by the proposed project—limited to employee restrooms and handwashing facilities— in addition to the fact that the current operations at the existing facility on Bolsa Road will cease once the proposed operations begin, it can be reasonably assumed that the City of Hollister's wastewater treatment plant has sufficient capacity to serve the project.

d-e. The San Benito County Integrated Waste Management Agency coordinates recycling and solid waste services for the County, with Recology providing collection services. The John Smith Road Landfill (landfill) serves as the primary disposal facility for the County and would accommodate solid waste generated by the proposed project. As of April 2021, the landfill has a remaining capacity of approximately 1,921,000 cubic yards and a maximum permitted throughput of 1,000 tons per day (CalRecycle 2025).

The proposed project includes employment of up to 50 employees. Based on CalRecycle's Estimated Solid Waste Generation Rates for industrial sector uses (2006), the employee generation rate is 8.93 pounds per employee per day, which would result in approximately 447 pounds of solid waste per day (8.93 pounds x 50 employees = 446.5 pounds/day), or about 0.22 tons per day. On an annual basis, this equates to approximately 80 tons of solid waste per year (0.22 ton/day × 365 days/year).

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

Given that the proposed project would generate a negligible amount of solid waste relative to the landfill's daily intake capacity and remaining disposal capacity, the project would not generate solid waste in excess of state or local standards, or exceed the capacity of local infrastructure, nor would it impair attainment of applicable solid waste reduction goals. The project would also comply with all federal, state, and local statutes and regulations related to solid waste management and reduction.

20. WILDFIRE

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

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☒	☐
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Comments:

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones in State Responsibility Area mapping tool (effective April 1, 2024), the project site is located within a State Responsibility Area designated as a High Fire Hazard Severity Zone (CAL FIRE 2024).

The project site is developed with existing, abandoned on-site structures; one bunker; an existing paved, degraded roadway along the northern portion of the site; and a disturbed, unpaved roadway along the southern portion of the site. The project site contains slopes of 30 percent or greater, generally sloping from the northwestern corner toward the southeastern portion, with elevations ranging from approximately 390 to 434 feet above sea level (Google Earth 2025).

The existing vegetation on the site is characterized by annual grassland currently grazed by cattle. The northeast corner of the project site slopes to meet a large patch of oak woodland off-site. Several large coast live oak trees are also scattered throughout the parcel. The trees are old and include large canopies, fallen limbs, and cavities within the tree's branches and trunk.

The site is currently primarily pervious and the proposed project will result in the increase in impervious surfaces through construction of the concrete plant and parking area.

The project site does not include any existing overhead wires and is surrounded by State Route 156 to the north, rural residential uses to the west and south, and open grassland to the east.

a. Refer to Section 9.0, Hazards and Hazardous Materials, checklist question "f." The project would not impair an adopted emergency response plan or emergency evacuation plan.

b. The site's slope has the potential to increase the speed and intensity of wildfire spread, thereby exacerbating wildfire risks.

The project would be required to comply with San Benito County Code Section 25.08.018 (Fire Safety Standards), which establishes requirements for roadway and safety standards, fire protection water supply systems, and vegetation management (County of San Benito 2025). In addition, the project must comply with all applicable provisions of the California Fire Code governing property development and building design to protect occupants from fire hazards, as adopted by San Benito County Code Section 21.01.021.N (County of San Benito 2025b). These standards include the maintenance of defensible space around buildings and other fire safety design features. Compliance with these regulations would reduce the potential for structures on the project site to ignite during a wildfire, thereby minimizing wildfire risk.

In addition, as discussed in Section 9.0, Hazards and Hazardous Materials, the transport, storage, and use of hazardous materials, including flammable materials, on the project site would be required to comply with existing State and local regulations as enforced by the County Division of Environmental Health. This would minimize the potential for the occurrence of a fire due to improper handling of flammable materials.

The proposed project has also been reviewed by both the Building Department and the Fire Department to ensure compliance with applicable local ordinances and the California Building Code. The project would introduce occupants to the site, which has been abandoned for years, that could increase the likelihood of ignitions from, for example: careless disposal of lit cigarettes, hot catalytic convertor on a parked car setting grass on fire, truck tire exploding and sparking nearby vegetation, etc.

However, compliance with the abovementioned local and state requirements would ensure less than significant impacts associated with the project's potential to exacerbate wildfire risks and thereby expose project occupants and visitors to wildfire pollutants or the uncontrolled spread of a wildfire.

c. The proposed project would connect to existing electric power infrastructure located along San Juan Hollister Road and would not require installation of new electrical facilities. The project also includes paving of internal roadways and construction of a new off-site driveway entry from San Juan Hollister Road, the impacts of which are analyzed throughout this initial study. As discussed under checklist question "b" above, the proposed project would be required to comply with San Benito County Code Sections 25.08.018 (Fire Safety Standards) and 21.01.021.N (California Fire Code Adoption), as well as all applicable provisions of the California Fire Code.

The project plans have also been reviewed by several County departments; therefore, coordination will be involved to ensure that the project components are constructed in a manner that complies with state and local regulations. Compliance with these local and state regulations would ensure that the project results in less than significant impacts associated with infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d. As discussed in Section 7.0, Geology and Soils, the project site contains slopes of 30 percent or greater, but is not located within an Alquist-Priolo Fault Zone, and no landslides have been mapped on or near the site. While slopes of this magnitude could increase the potential for soil movement or erosion following a wildfire event, the project would be designed and constructed in compliance with General Plan Policy HS-3.6 and the California Building Code, which require geotechnical evaluation and slope stabilization measures to ensure structural safety.

Additionally, as discussed under checklist questions "b" and "c" above, the project would comply with San Benito County Code Sections 25.08.018 and 21.01.021.N and the California Fire Code, which include requirements for vegetation management, defensible space, and fuel modification to minimize post-fire risks. These measures would reduce the likelihood of post-fire slope instability or runoff-related hazards.

Compliance with the applicable General Plan policies, San Benito County Code regulations, and state regulations would reduce impacts related to downslope or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes to a less-than-significant level.

21. MANDATORY FINDINGS OF SIGNIFICANCE

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

Comments:

a. As discussed in Section 4.0, Biological Resources, the proposed project has the potential to have an effect on the following special-status wildlife species: American Badger, western burrowing owl, California red-legged frog, California tiger salamander, western spadefoot, Crotch's bumble bee, Monarch butterfly, San Joaquin coachwhip, San Joaquin kit fox, nesting birds, and special-status bats.

Implementation of Mitigation Measures BIO-1 through BIO-20 would reduce these potential impacts to a less-than-significant level. Therefore, the proposed project would not 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.

As discussed in Section 5.0, Cultural Resources, and Section 18.0, Tribal Cultural Resources, the proposed project has the potential to impact historic and/or unique archaeological resources. Implementation of San Benito County Code Chapter 19.05 and Mitigation Measures TCR-1 and TCR-2 would reduce potential impacts to a less-than-significant level. Therefore, the proposed project would not eliminate important examples of the major periods of California history.

b. Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable. As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

The proposed development would result in temporary air quality (construction toxic air contaminants), biological resources (potential disturbance to special-status wildlife species, potential to have a substantial adverse effect on sensitive natural communities, potential to have a substantial adverse effect on wetlands or other waters of the U.S., potential to interfere substantially with the movement of small scale wildlife, and conflict with local ordinance protecting the management and conservation of woodlands), cultural resources (potential adverse change to historic and unique archaeological resources), geology and soils (paleontological resources), noise (overnight operational noise), transportation (potential increased hazard associated with the driveway design and sight distance at the driveway), and tribal cultural resources (potential to cause a substantial adverse change in the significance of a tribal cultural resource). With the implementation of Mitigation Measures AQ-1 through AQ-2, BIO-1 through BIO-20; GEO-1; N-1; TR-1 through TR-2, and TCR-1 through TCR-2, impacts would be mitigated to a less than significant level. Because the nature of the identified impacts is temporary and/or would be mitigated, the proposed project would not have a cumulatively considerable impact.

c. Based on the analysis provided in this initial study, the proposed project could indirectly cause substantial adverse effects to human beings through air quality and greenhouse gas emissions, seismic ground shaking, soil instability and expansivity, release of hazardous materials, and wildfire. However, as discussed throughout this initial study, the impacts would not be significant. Therefore, the proposed project would not result in significant environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

E. SOURCES

Environmental Setting

Google Earth. 2025.

California State Water Resources Control Board. "List of Leaking Underground Storage Tank Sites." Accessed on October 30, 2025. https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search

Kelly, Michael, Senior Planner, County of San Benito Resource Management Agency. Email message to consultant, 17 December 2025.

San Benito County. July 2015. *San Benito County 2035 General Plan.* https://www.sanbenitocountyca.gov/home/showpublisheddocument/5859/637347294134470000

Project Description

Landset Engineers, Inc. January 2024.

Project Application. December 2024.

Aesthetics

California Department of Transportation. 2025. "Statewide Scenic Highway Map." Accessed on October 21, 2025. https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774#data_s=id%3Awidget_22_output_config_default_geocode_0_0%3A0

San Benito County. March 2015a. *Revised Draft Environmental Impact Report 2035 San Benito County General Plan Update State Clearinghouse #201111101.* https://www.sanbenitocountyca.gov/departments/resource-management-agency/building-planning/general-plan/2035-general-plan-background-materials-and-historical-documents

———. July 2015b. *San Benito County 2035 General Plan.* https://www.sanbenitocountyca.gov/home/showpublisheddocument/5859/637347294134470000

———. 2025. San Benito County Code of Ordinances. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/overview

Agriculture

California Department of Conservation. 2025a. "California Important Farmland Finder." Accessed on October 15, 2025. https://maps.conservation.ca.gov/DLRP/CIFF/

———. 2025b. "Williamson Act Enrollment Finder." Accessed on October 15, 2025. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/

Air Quality

Monterey Bay Air Resource District 2026. *Our Air Into Review 2023 to 2024*. Accessed January 10, 2026. https://www.mbard.org/files/86d9fe7a0/Our+Air+in+Review++2023+into+2024l+Oil+and+Gas+Methane+Regulations.pdf

Monterey Bay Air Resources District. 2017. *2012-2015 Air Quality Management Plan.* Accessed on November 8, 2025. https://www.mbard.org/files/6632732f5/2012-2015-AQMP_FINAL.pdf

Monterey Bay Unified Air Pollution Control District. 2008. *CEQA Air Quality Guidelines.* Accessed on November 8, 2025. https://www.co.monterey.ca.us/home/showdocument?id=22559.

WJV Acoustics, Inc. February 2026. *Environmental Noise Assessment for the Don Chapin Concrete Plant & Recycling Facility, San Benito County, California.* Visalia, CA.

Biological Resources

Baldwin, B. et al. 2012. *The Jepson Manual: Vascular Plants of California. Second Edition*. University of California Press, Berkeley, CA.

Bumble bee watch (CABBW). 2025. Bumble Bee Sightings Map. https://www.bumblebeewatch.org/maps/?type=1-2&project=&user=&status=2&month=&year=&sex=&species=12&county=&state=18&page=1&needs=false

Calflora Database. 2025. *Calflora: Information on California plants for education, research and conservation online database*. Berkeley, California. Accessed November 2025. https://www.calflora.org/

California Burrowing Owl Consortium (CBOC). 1993. *Burrowing Owl Survey Protocol and Mitigation Guidelines.*

California Department of Fish and Wildlife (CDFW). 2026. *Considerations for Conserving Crotch's Bumble Bee (*Bombus crotchii*), Franklin's Bumble Bee (*Bombus franklini*), Western Bumble Bee (*Bombus occidentalis*), and Suckley's Cuckoo Bumble Bee (*Bombus suckleyi*).* https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=246938&inline

CDFW. 2025a. *California Natural Diversity Database (CNDDB)* online database. Sacramento, California. Accessed November 2025. https://wildlife.ca.gov/data/cnddb

CDFW. 2025b. *Biogeographic Information and Observation System (BIOS)* online database. Sacramento, California. Accessed November 2025. http://bios.dfg.ca.gov

CDFW. 2025c. *California Natural Community List*. Sacramento, California. Accessed November 2025. https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities

CDFW. 2025d. *California Essential Habitat Connectivity Project*. Sacramento, California. Accessed November 2025. https://wildlife.ca.gov/Conservation/Planning/Connectivity/CEHC

CDFW. 2022. CDFW *Seeks Public Comment Related to Crotch's Bumble Bee, Franklin's Bumble Bee, Suckleys Cuckoo Bumble Bee and Western Bumble Bee*. December 14, 2022. Available from: https://wildlife.ca.gov/News/Archive/cdfw-seeks-public-comment-related-to-crotchs-bumble-bee-franklins-bumble-bee-suckleys-cuckoo-bumble-bee-and-western-bumble-bee

CDFW. 2008b. *Life History Account for California Red-legged Frog*. Wildlife Habitat Relationships System. California Interagency Wildlife Task Group.

CDFW. 2012. *Staff Report on Burrowing Owl Mitigation*. State of California Natural Resources Agency.

CDFW. 2018. *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, California. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

California Invasive Plant Council (Cal-IPC). 2025. *Cal-IPC Invasive Plant Inventory* online database. Accessed November 2025. https://www.cal-ipc.org/plants/inventory/

California Native Plant Society (CNPS). 2001. CNPS Botanical Survey Guidelines. Sacramento, California. https://www.cnps.org/plant-science/field-protocols-guidelines

California Native Plant Society (CNPS). 2025a. *Manual of California Vegetation*. Sacramento, California. Accessed November 2025. https://www.cnps.org/vegetation/manual-of-california-vegetation

California Native Plant Society (CNPS). 2025b. *Inventory of Rare and Endangered Plants of California online database*. Sacramento, California. Accessed November 2025. http://www.rareplants.cnps.org

iNaturalist. 2025. Community Observations. Accessed November 2025. https://www.inaturalist.org/observations

Jepson Flora Project. 2025. *Jepson eFlora* online database. Accessed November 2025. https://ucjeps.berkeley.edu/eflora/

Jameson, E. W., and Hans J. Peeters. 2004. *Mammals of California.* University of California Press.

Jepsen, S., E. Pelton, S. H. Black, C. Fallon, C. Voight, and S. Weiss. 2017. Protecting California's butterfly groves: management guidelines for monarch butterfly over- wintering habitat. Xerces Society for Invertebrate Conservation and Creekside Center for Earth Observation, Portland, OR and Meno Park, CA, USA.

Nafis, G. 2025. *California Herps: A Guide to the Amphibians and Reptiles of California* online database. http://www.californiaherps.com/

San Benito County. July 2015. *San Benito County 2035 General Plan.* https://www.sanbenitocountyca.gov/home/showpublisheddocument/5859/637347294134470000

San Benito County. 2025. San Benito County Code of Ordinances. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/overview

Sawyer, J. O., T. Keeler-Wolf, and J.M. Evens. 2009. *A Manual of California Vegetation.* California Native Plant Society, Sacramento, CA.

Sibley, David A. 2016. *The Sibley Field Guide to Birds of Western North America: Second Edition.* New York, Alfred A. Knopf.

U.S. Fish and Wildlife Service (USFWS). 2025a. *Critical Habitat for Threatened and Endangered Species* online mapper. Accessed November 2025. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77

USFWS. 2025b. *Information for Planning and Consultation* online database. Species list for Hollister, California. Washington, D.C. Accessed November 2025. http://www.fws.gov/endangered/

USFWS. 2025c. *National Wetlands Inventory* online database. Washington, D.C. Accessed November 2025. http://www.fws.gov/wetlands/

USFWS. 2003. *Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander.*

USFWS. 2005. *Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog*

U.S. Fish and Wildlife Service (USFWS). 2011. *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance.*

U.S. Geological Survey (USGS). 2024. National Map Spot Elevation Data. Online mapper. https://apps.nationalmap.gov/viewer/

Xerces Society. 2024. Crotch's Bumble Bee. Website. https://xerces.org/endangered-species/species-profiles/at-risk-bumble-bees/crotchs-bumble-bee

Xerces Society. 2018. The Xerces Society Seeks Endangered Species Protections for California Bumble Bees. https://www.xerces.org/blog/california-endangered-bumble-bees-2018

Cultural Resources

Kelly, Michael, Senior Planner, County of San Benito Resource Management Agency. Email message to consultant, 17 December 2025 and 16 July 2026.

Neal, Annette, Researcher, California Historical Resources Information System. Letter to Vanessa Potter, subject: Concrete Facility Use Permit and General Plan Amendment, dated 4 November 2025.

Energy

N/A

Geology and Soils

California Department of Conservation. 2025. "Earthquake Zones of Required Investigation." Accessed on October 29, 2025. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/

Google Earth. 2025.

San Benito County. 2025a. San Benito County Code of Ordinances. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/overview

———. "County of San Benito GIS Web." Accessed on December 21, 2025b. https://experience.arcgis.com/experience/eccc7174b6904afe857b91253314c5f0

———. 2015. *Revised Draft Environmental Impact Report 2035 San Benito County General Plan Update State Clearinghouse #201111101*. https://www.sanbenitocountyca.gov/departments/resource-management-agency/building-planning/general-plan/2035-general-plan-background-materials-and-historical-documents

Greenhouse Gas Emissions

N/A

Hazards and Hazardous Materials

California Department of Forestry and Fire Protection (CAL FIRE). 2024. "Fire Hazard Severity Zones in State Responsibility Area." Accessed on October 25, 2025. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008

California Department of Toxic Substances Control. "Envirostor – Hazardous Waste and Substances Site List (Cortese)." Accessed on October 30, 2025. https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29

California Environmental Protection Agency. 2025a. "List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit (PDF)." Accessed on October 30, 2025. https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf

———. 2025b. "List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC." Accessed on October 30, 2025. https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/

———. 2025c. "List of "active" CDO and CAO from Water Board (MS Excel, 1,453 KB)." Accessed on October 30, 2025. https://calepa.ca.gov/sitecleanup/corteselist/

California State Water Resources Control Board. "List of Leaking Underground Storage Tank Sites." Accessed on October 30, 2025. https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search

Google Earth. 2025.

San Benito County. January 2024. *San Benito County Operational Area Emergency Operations Plan – Basic Plan*. https://www.sanbenitocountyca.gov/home/showpublisheddocument/11957/638415122753530000

———. September 2022. *San Benito County Multi-Jurisdictional Hazard Mitigation Plan*. Accessed on October 25, 2025. https://drive.google.com/file/d/148xCdrKq-Jv_0UQ07JGV8AG9UF-P9J5u/view

———. July 2015. *San Benito County 2035 General Plan.* https://www.sanbenitocountyca.gov/home/showpublisheddocument/5859/637347294134470000

Hydrology and Water Quality

California State Water Resources Control Board. 2022. "NPDES 2022 Construction Stormwater General Permit." Accessed on October 29, 2025. https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/general_permit_reissuance.html

———. 2018. "Industrial General Permit." Accessed on October 29, 2025. https://waterboards.ca.gov/water_issues/programs/stormwater/igp_20140057dwq.html?utm

Flood Emergency Management Agency (FEMA). 2025. "FEMA Flood Map Service Center: Search By Address." Accessed on October 29, 2025. https://msc.fema.gov/portal/search#searchresultsanchor

San Benito County. July 2015. *San Benito County 2035 General Plan*. https://www.sanbenitocountyca.gov/home/showpublisheddocument/5859/637347294134470000

———. 2025. San Benito County Code of Ordinances. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/overview

San Benito County Water District GSA. 2021. *North San Benito Groundwater Sustainability Plan*. Accessed on October 29, 2025. https://sbcwd.ca.gov/wp-content/uploads/2021/11/PUBLICDRAFTNorthSanBenitoGSP_Final.pdf

Macdonald, David, P.E., Senior Engineer, San Benito County Water District. Letter to San Benito County Planning Department, subject: Comments on Planning Application PLN 24-0034-Chapin-2751 San Juan Road, dated 29 January 2025.

Land Use and Planning

N/A

Mineral Resources

San Benito County. March 2015. *Revised Draft Environmental Impact Report 2035 San Benito County General Plan Update State Clearinghouse #201111101*. Hollister, CA.

U.S. Geological Survey. "Mineral Resources Online Spatial Data." Accessed on October 21, 2025. https://mrdata.usgs.gov/general/map-us.html#home

Noise

Google Earth. 2026.

San Benito County. July 2015. *San Benito County 2035 General Plan.* https://www.sanbenitocountyca.gov/home/showpublisheddocument/5859/637347294134470000

———. 2026. San Benito County Code of Ordinances. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/overview

WJV Acoustics, Inc. February 2026. *Environmental Noise Assessment for the Don Chapin Concrete Plant & Recycling Facility, San Benito County, California.* Visalia, CA.

Population and Housing

N/A

Public Services

San Benito County. 2025. San Benito County Code of Ordinances. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/overview

Transportation

Hexagon Transportation Consultants Inc. 2025. *Trip Generation and Operations Analysis for the Chapin Concrete Plant and Recycling Facility in San Benito County, California Memorandum.* Gilroy, CA.

Tribal Cultural Resources

Kelly, Michael, Senior Planner, County of San Benito Resource Management Agency. Email message to consultant, 17 December 2025 and 16 July 2026.

Utilities and Service Systems

CalRecycle. 2025. "SWIS Facility/Site Activity Details – John Smith Road Landfill (35-AA-0001)." Accessed on October 24, 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2151?siteID=2583

———. 2006. "Estimated Solid Waste Generation Rates: Industrial Sector Generation Rates." Accessed on October 24, 2025. https://www2.calrecycle.ca.gov/wastecharacterization/general/rates

City of Hollister. May 2023. *Hollister 2040 General Plan Climate Action Plan and Agricultural Lands Preservation Program Environmental Impact Report Public Draft.* Hollister, CA. https://hollister2040.org/wp-content/uploads/2023/05/HollisterGP2040_CAP_ALPP_DraftEIR_051723.pdf

———. November 2019. *Design Standards, Standard Specifications, Standard Plans.* https://files.hollister.ca.gov/Document%20Center/Government/Departments/Engineering/Engineering%20Standards/Standards_Specifications_Plans_Nov2019Update.pdf?t=202409101527050

———. March 2018. *Sanitary Sewer Collection System Master Plan Update.* https://files.hollister.ca.gov/Document%20Center/Government/Departments/Community%20Services/Sewer/Sanitary%20Sewer%20Management%20Plan/1011-0003-03_FINAL-SSCSMP-Update-with-Sig-Page.pdf?t=202408210951220&t=202408210951220

Project Application. December 2024.

San Benito County. July 2015. *San Benito County 2035 General Plan.* https://www.sanbenitocountyca.gov/home/showpublisheddocument/5859/637347294134470000

San Benito County Water District. July 2021. *2020 Hollister Urban Area Urban Water Management Plan*. Hollister, CA. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.sunnyslopewater.org/files/abbc80336/Final+Approved+UWMP+2020.pdf

San Benito County Water District GSA. November 2021. *North San Benito Groundwater Sustainability Plan*. https://sbcwd.ca.gov/wp-content/uploads/2021/11/PUBLICDRAFTNorthSanBenitoGSP_Final.pdf

Wildfire

California Department of Forestry and Fire Protection (CAL FIRE). 2024. "Fire Hazard Severity Zones in State Responsibility Area." Accessed on October 25, 2025. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008

San Benito County. 2025. San Benito County Code of Ordinances. https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/overview

This side intentionally left blank.