PUBLIC REVIEW DRAFT
INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

for the

STONEY FARMS
CONDITIONAL USE PERMIT PROJECT

Prepared by: Denise Duffy & Associates

Lead Agency: County of San Benito, California
Resource Management Agency

Applicant: Stoney, LLC

November 2026

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Project Data

1. **Project Title:** Stoney Farms Conditional Use Permit Project ("project" or "proposed project").

2. **Lead Agency & Lead Agency Contact:** M. Abraham Prado, Director of Planning and Building Services, (831) 902-2273, aprado@sanbenitocountyca.gov, San Benito County Resource Management Agency, 2301 Technology Parkway, Hollister, CA 95023.

3. **Applicant Contact Information:** Ivan Villa II, Stoney, LLC, (408) 623-2217, ceo@stoneyllc.com, 415 E. Alondra Boulevard, Suite 1, Gardenia, CA 90248.

4. **Project Location**: The proposed project is located at 2639 Bolsa Road, Hollister, CA 95023, in unincorporated San Benito County, California. The project site is comprised of an approximately 13-acre portion of a vacant 20-acre parcel (Assessor's Parcel Number ["APN"] 019-010-015). The project site has historically been used for row crop farming. The proposed project would be located on the northeast portion of the parcel. Bolsa Road/State Route ("SR") 25 provides local access to the project site. Regional access is provided by SR 156 located approximately 2,300 feet northwest of the project site. The project site is located in a rural area and is surrounded by agricultural and rural residential land uses, as well as the Hollister Municipal Airport.

5. **Project Description**: The proposed project is a conditional use permit for an indoor commercial cannabis microbusiness (cultivation, manufacturing, and distribution) facility (County Planning File CAN230001). The proposed project would include two (2) 15,360 square foot greenhouse/warehouse structures totaling 30,720 square feet, a 43-stall parking lot, paved access driveway, trash enclosure, and septic system. Water service to the proposed project would be provided by an existing unpermitted well located on an adjacent parcel via a shared well agreement and access easement. The proposed project would require an encroachment permit from Caltrans due to the access road connecting with SR 25.

6. **Acreage of Project Site**: The parcel is approximately 20-acres (APN 019-010-015).

7. **Land Use Designations**: The San Benito County General Plan designates the project site as Agriculture ("A"). The site is located within the Agricultural Productive ("AP") Zoning District.

8. **Date Prepared**: November 2026.

9. **Prepared By**: Denise Duffy & Associates, Inc. ("DD&A").

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Chapter 1. Introduction and Project Description

1.1 Introduction

This Initial Study/Mitigated Negative Declaration ("IS/MND") has been prepared to evaluate the potential environmental effects associated with the Stoney Farms Conditional Use Permit Project ("project" or "proposed project"), in San Benito County, California ("County"). This IS/MND has been prepared in accordance with the California Environmental Quality Act ("CEQA"), Public Resources Code §21000 *et seq.*, and the State CEQA Guidelines, California Code of Regulations ("CCR") §15000 *et seq.*

An IS/MND is an informational document prepared by a lead agency to determine if a project may have a significant effect on the environment (CEQA Guidelines §15063, subd. (a)). If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report ("EIR") must be prepared, in accordance with CEQA Guidelines §15064(a). However, if the Lead Agency determines that revisions in the project plans or proposals made by or agreed to by the applicant mitigate the potentially significant effects to a less-than-significant level, an IS/MND may be prepared instead of an EIR (CEQA Guidelines §15070, subd. (b)). In this instance, the Lead Agency prepares a written statement describing the reasons the proposed project would not have a significant effect on the environment and, therefore, why an EIR need not be prepared. This IS/MND conforms to the content requirements under CEQA Guidelines §15071.

The San Benito County Resource Management Agency ("County RMA") is acting as the Lead Agency pursuant to CEQA Guidelines §15050(a). As the Lead Agency, the County RMA oversaw preparation of this IS/MND pursuant to CEQA Guidelines §15063, §15070, and §15152. This IS/MND will be circulated for agency and public review during a 30-day public review period pursuant to CEQA Guidelines §15073. Comments received by the County RMA on this IS/MND will be reviewed and considered as part of the deliberative process in accordance with CEQA Guidelines §15074.

The following section is consistent with the requirements of CEQA Guidelines §15124 to the extent that it is applicable to the project. This section contains a detailed description of the project location, existing setting, project components and relevant project characteristics, and applicable regulatory requirements.

1.2 Project Location

The proposed project is located at 2639 Bolsa Road, Hollister, CA 95023, in unincorporated San Benito County, California (see **Figure 1. Regional Map**). The project site is comprised of an approximately 13-acre portion of a vacant 20-acre parcel (Assessor's Parcel Number ["APN"] 019-010-015). The project site has historically been used for row crop farming. The proposed project would be located on the northeast portion of the parcel. Bolsa Road/State Route ("SR") 25 provides local access to the project site. Regional access is provided by SR 156 located approximately 2,300 feet northwest of the project site. The project site is located in a rural area and is surrounded by agricultural and rural residential land uses, as well as the Hollister Municipal Airport (see **Figure 2. Aerial Map**). The proposed project is located within the jurisdiction of the Airport Land Use Compatibility Plan ("ALUCP") for the Hollister Municipal Airport. Portions of the proposed project site are located within ALUCP Zones 2 and 3. However, the portion of the site proposed for development with habitable structures is in Zone 3, where aircraft may make turns but are not making direct approaches or departures to the airport.



Title:

Regional Map

Date	7/29/2025
Scale	N/A
Project	2025.50

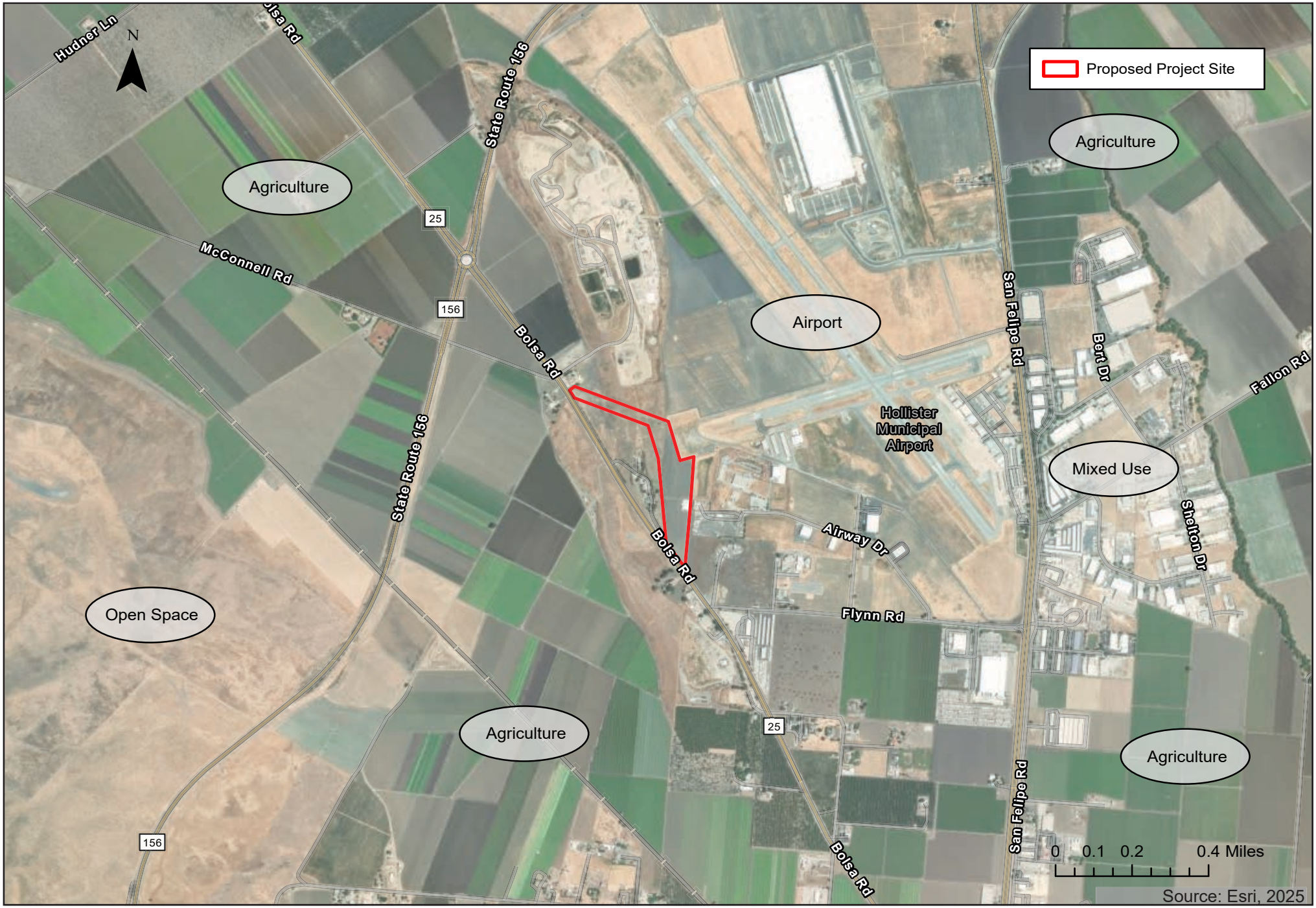
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Figure 1



Title:

Aerial Map

Date	7/29/2025
Scale	N/A
Project	2025.50

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Figure 2

The San Benito County General Plan designates the project site as Agriculture ("A") and the project site is zoned Agricultural Productive ("AP") (see **Figure 3. Land Use Map**). The AP designation applies to areas that are characterized by agriculturally productive lands of various types, including crop land, vineyards, and grazing lands. The purpose of this land use designation is to maintain the productivity of agricultural land, especially prime farmland, in the County. Manufacturing, laboratory testing, and microbusiness of cannabis for commercial use are considered conditionally acceptable uses under the AP zoning designation.

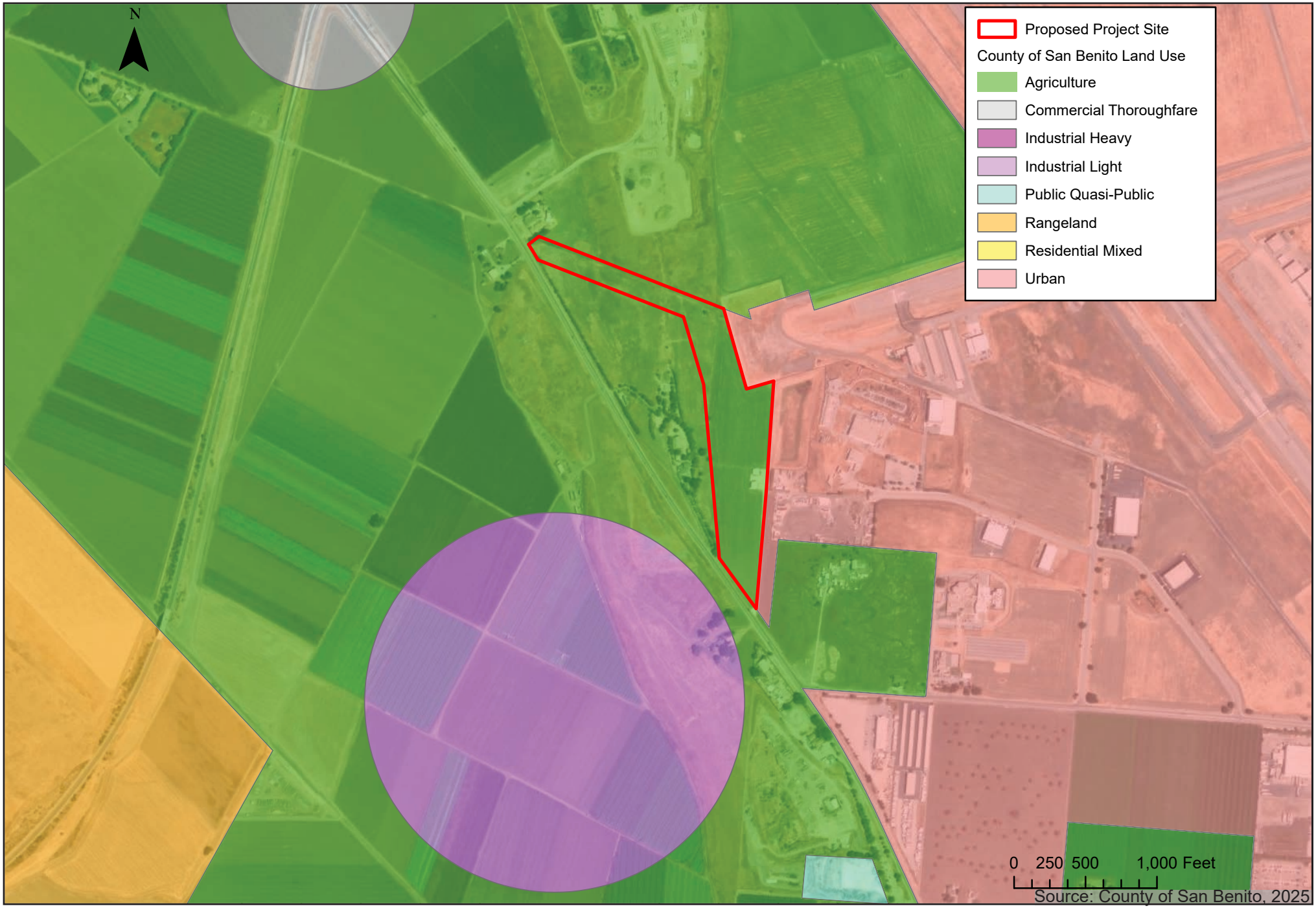
REGULATORY CONSIDERATIONS

The proposed project consists of the construction and operation of a cannabis microbusiness facility located at 2639 Bolsa Road. Pursuant to San Benito County Code Chapter 19.43, a cannabis microbusiness activities include at least three (3) of the following commercial cannabis activities conducted at a single location: (1) cultivation of up to 10,000 square feet ("sf") of canopy; (2) manufacturing using non-volatile solvents and mechanical extraction or infusion methods; (3) distribution or distribution transport-only; and/or (4) storefront or non-storefront retail. The proposed project includes cultivation, manufacturing, and distribution activities.

The project site must comply with County Code Chapter 7.04 Hemp Entities. The project site is located within two cannabis cultivation exclusion zones established by the San Benito County Code: (1) the one-half-mile buffer surrounding the City of Hollister Sphere of Influence and (2) the 100-foot buffer from a state highway. Pursuant to San Benito County Code § 7.04.003, outdoor cannabis cultivation is prohibited within one-half mile of the City of Hollister Sphere of Influence; however, indoor cultivation is permitted within an enclosed structure. In addition, cannabis cultivation is prohibited within 100 feet of a state highway. Accordingly, the project has been designed to locate all cultivation activities within enclosed structures and to maintain a minimum 100-foot setback from SR 25, thereby complying with the applicable exclusion zone requirements.

1.3 Project Description

The proposed project is a conditional use permit for an indoor commercial cannabis microbusiness (cultivation, manufacturing, and distribution) facility (County Planning File CAN230001). The proposed project would include two (2) new 15,360 sf combined greenhouse/warehouse structures totaling 30,720 sf, a 43-stall parking lot, a 24-foot wide paved access driveway, trash enclosure, and septic system (see **Figure 4a** and **Figure 4b**). An open air area would separate the two (2) buildings. The initial phase of the project will include the use of the south greenhouse facility, including up to 3,350 sf of warehouse space, 2,010 sf of processing space, and 10,000 sf of cultivation space. In subsequent phases, based on County Code § 19.43.140 and the Department of Cannabis Control Type 12 Microbusiness license requirements, the project will expand into the north greenhouse for additional processing and warehouse space; no additional cultivation use is planned for the north greenhouse at this time due to the 10,000 sf limit for cultivation space allowed under the Applicant's existing cannabis microbusiness license. However, the Applicant is exploring the possibility of operating the north greenhouse under a separate cultivation license, in which case the north greenhouse may be utilized as cultivation space.



Title:

Land Use Map

Date	12/17/2025
Scale	N/A
Project	2025.50

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Figure
3



Title:

Site Plan - Overall

Date	9/22/2026
Scale	N/A
Project	2025.50

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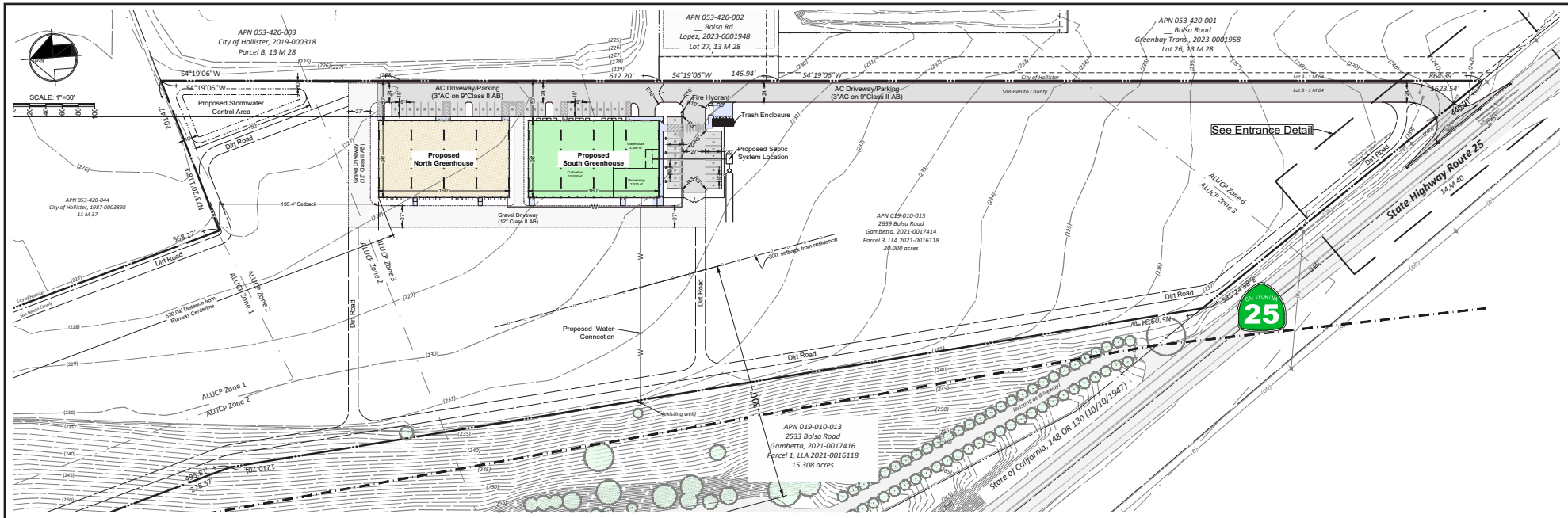
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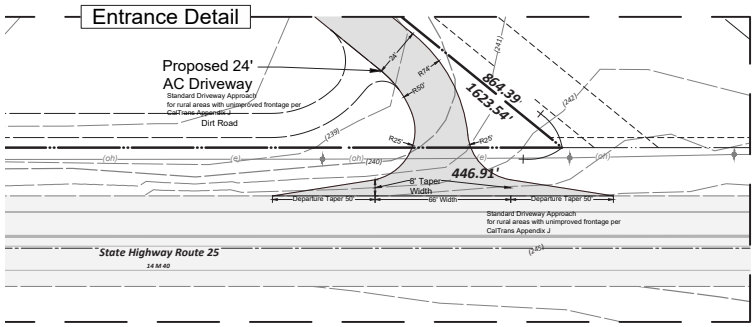
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Figure

4a





Source: MH Engineering Co., September 2026

Title:

Site Plan - Facility

Date	9/22/2026
Scale	N/A
Project	2025.50

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Figure
4b

Water service to the proposed project would be provided by an existing unpermitted well located on an adjacent parcel via a shared well agreement and access easement. Wastewater service to the proposed project would have wastewater service via installation of a new conventional septic system (consisting of a septic tank and drain-field designed in accordance with the requirements of the San Benito County Health Department) located south of the parking lot. A drainage management area is proposed north of the greenhouse/warehouse facility. Paved driveways would also be installed south and east of the new greenhouse/warehouse facility to facilitate internal site access, and gravel driveways would be installed on the north and west sides of the new structures. The maximum height of the proposed project would be approximately 21 feet, which is consistent with ALUCP requirements for Zone 3. The proposed project would require an encroachment permit from Caltrans due to the access road connecting with SR 25.

The proposed project also includes two (2) as-built structures that are used for storage space on the eastern side of the parcel, just south of the proposed cannabis facility (see **Figure 4c**). These structures are strictly used for materials storage and lack any utility connections (electrical, water, etc.). These structures were constructed without the required permits from the County but, as of 2025, have been a granted Temporary Use Permit ("TUP") valid for 12 months following issuance. Impacts associated with construction of these structures are evaluated within this document. These structures would become fully permitted structures with approval of the Conditional Use Permit for the proposed project.

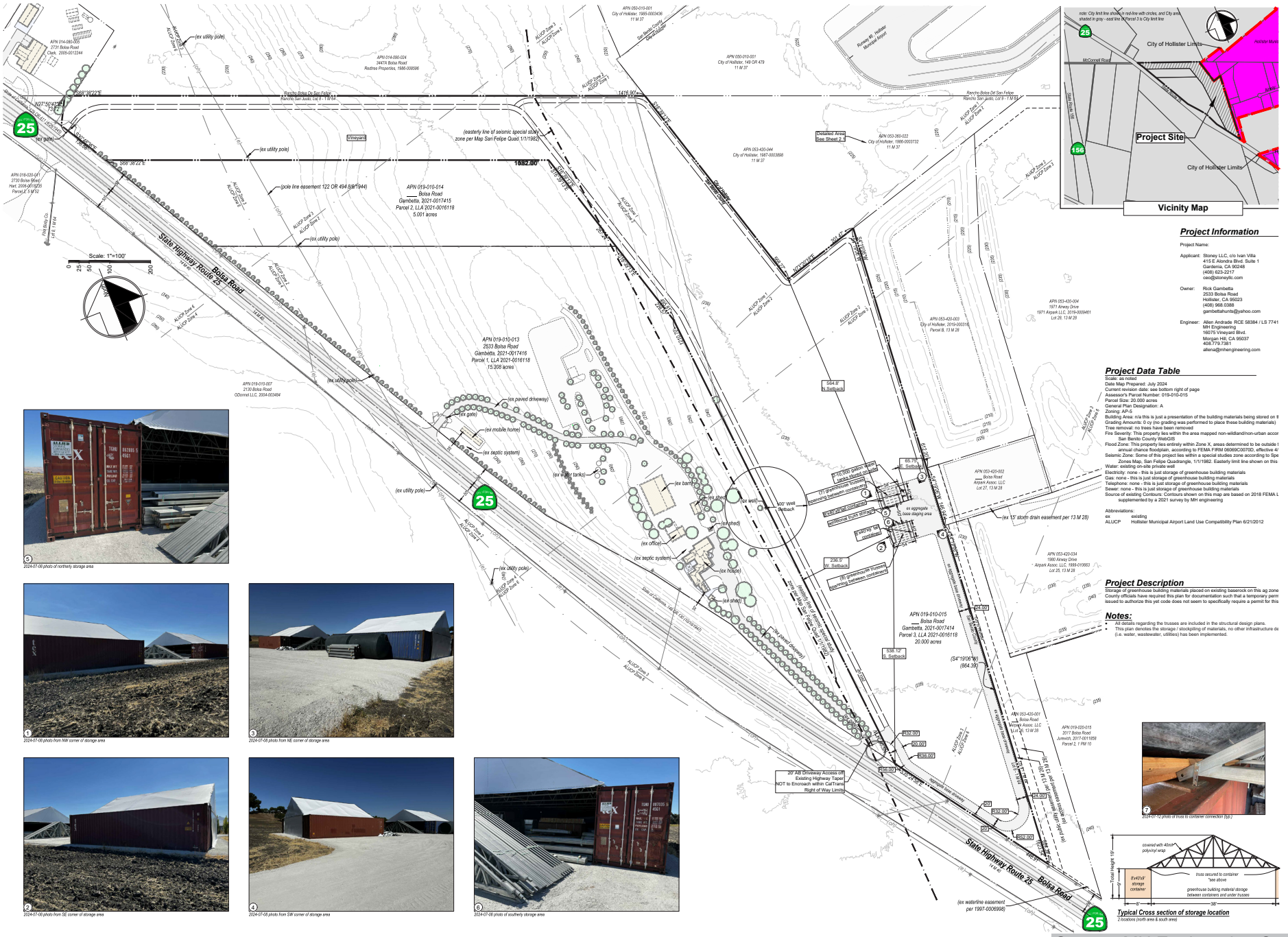
CONSTRUCTION

The proposed project involves construction of two (2) greenhouse structures intended for cannabis cultivation, manufacturing, and distribution, a new 43-stall parking lot and paved access driveway connecting with SR 25, as well as other improvements. Phase 1 of the project would utilize the south greenhouse only, including up to 3,350 sf of warehouse space, 2,010 sf of processing space, and 10,000 sf of cultivation space, while future phases of the project may expand to the north greenhouse as described above (see **Figure 5**). The south greenhouse structure would include two (2) Americans with Disabilities ("ADA") compliant restrooms for employees and a 20-foot wide loading gate. In addition, the proposed project would include a new trash enclosure of sufficient size to hold garbage, recycling, and organics containers, connections to an existing well on a neighboring parcel, and septic system. Other site improvements would include surveillance cameras and exterior security lighting. The remainder of the project site would remain in use for row crop farming. No tree removal or vegetation removal is included as part of the proposed project. A minimum 300-foot setback from residential uses is proposed for both the north and south greenhouses.

The as-built storage structures consist of two (2) storage containers connected with a roof covered by a polyvinyl wrap. The maximum height of these structures is 19 feet (see **Figure 5**). The as-built structures are used strictly for storage of materials, including the construction materials for the proposed greenhouse structures, and do not include any utility hookups. The as-built structures also include two (2) 10,000 gallon water tanks. No grading or tree removal would be required for the placement of the as-built storage.

Construction of the proposed project would occur during weekdays between 8:00 A.M. and 5:00 P.M. over a period of approximately four (4) to five (5) months. No nighttime construction is proposed. Construction would be conducted by a single crew ranging from four (4) to six (6) workers. The following equipment is anticipated to be utilized during construction:

- One (1) All-Terrain Reach Forklift
- Two (2) All-Terrain Lifts
- Electric Scissor Lifts



Source: MH Engineering Co., 2024

Title:

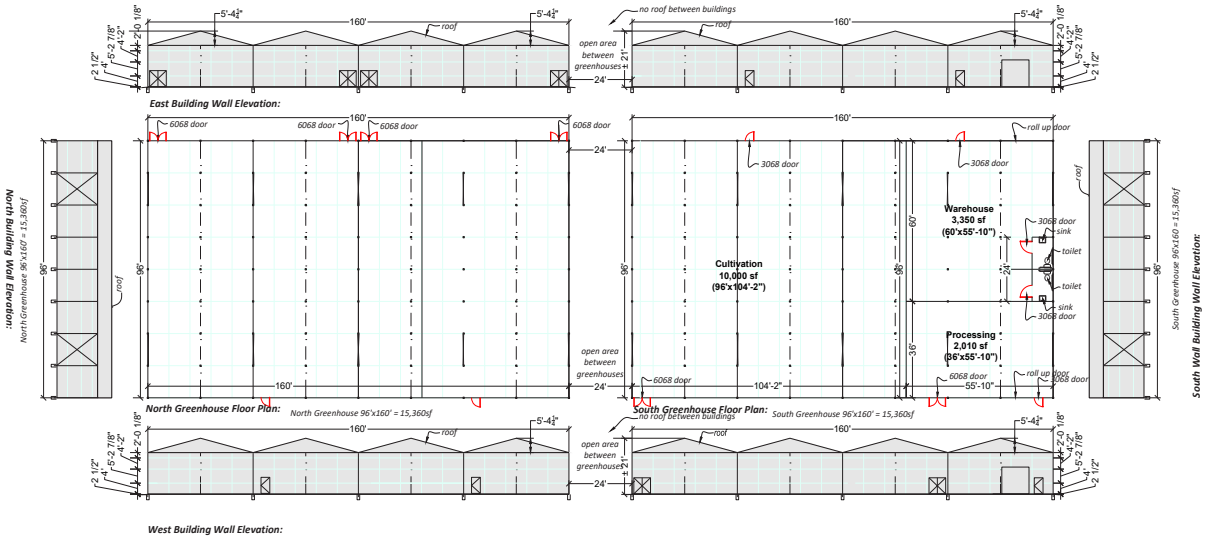
Site Plan - Existing Structures

Date	1/12/2026
Scale	N/A
Project	2025.50

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Figure
4c

Greenhouse Floor Plan & Elevations



Greenhouse Images:





Source: MH Engineering Co., September 2026

Title:

Floor Plan & Elevations

Date	9/22/2026
Scale	N/A
Project	2025.50

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Figure 5

DRAINAGE

The proposed project is designated by the Federal Emergency Management Agency ("FEMA") located in Flood Zone X (unshaded), which is an area of minimal flood hazard. The proposed project would add approximately two (2) acres (87,120 square feet) of new impervious surfaces to the site, inclusive of all structures, parking areas, and internal roadways. The proposed project includes a stormwater detention area at the lowest elevated portion of the site, located north of the proposed facility. Water generated from impervious surfaces would be directed towards the drainage management area for treatment.

UTILITIES

The proposed project would be served by an existing unpermitted well located on an adjacent parcel (APN 019-010-013). A connection to the existing well would be installed from the proposed greenhouse/warehouse structures west across the parcel boundary of APN 019-010-013 to connect the proposed project facilities to the well. Both parcels share common ownership and a well agreement is not required, though a well permit for the existing well would be required. All of the proposed structures are setback a minimum of 100 feet from the existing unpermitted well.

The proposed project site would have up to three (3) fire hydrants on the site to provide fire suppression, and the proposed greenhouse structures would have sprinkler systems.

The proposed project includes installation of a new conventional septic system consisting of a 2,500 gallon septic tank and drainfield designed in accordance with the requirements of the San Benito County Health Department. The new septic system would require the County's Environmental Health Department approval of a Sewage Disposal System permit prior to construction. The septic system would be located south of the proposed parking lot as shown in **Figure 4b**.

The project site includes a new trash enclosure to the south of the proposed greenhouse/warehouse buildings. Trash service to the site would be provided by Recology. The trash enclosure will be of sufficient size to hold garbage, recycling and organics containers in accordance with both CalGreen Code and Recology's design guidelines.

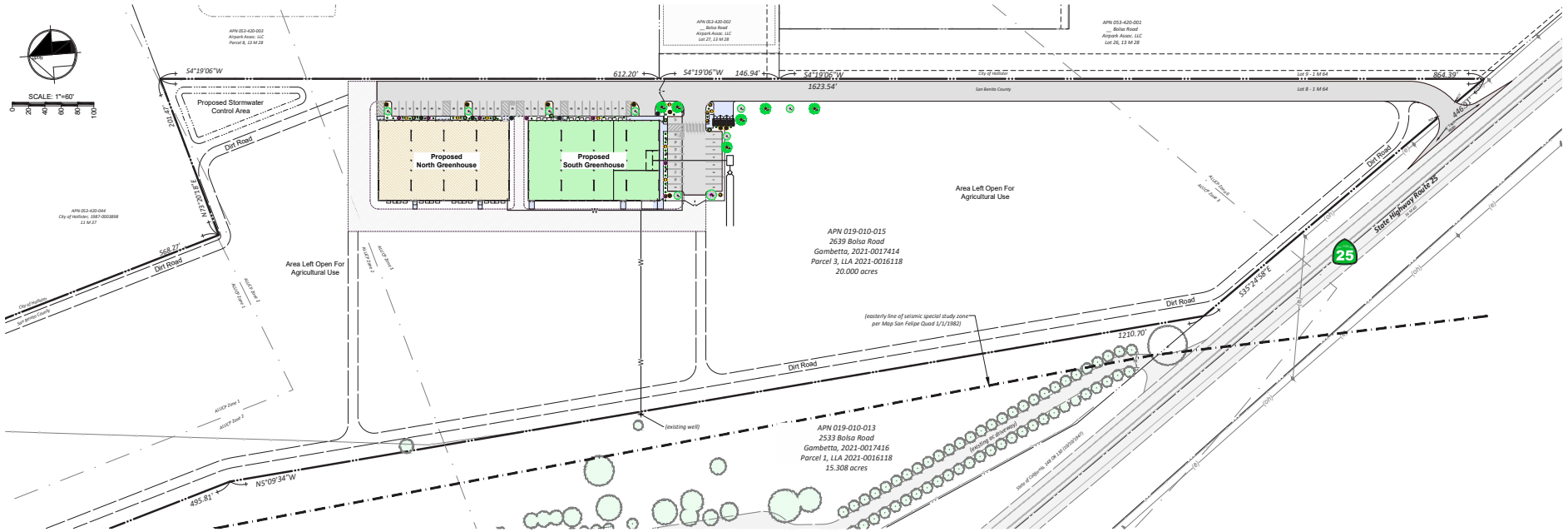
New electrical connections will serve the proposed greenhouse structures. The proposed project would connect to existing electrical infrastructure located along SR 25. The as-built storage structures do not include any utility hookups (electric, water, etc.).

LANDSCAPING

The proposed project includes landscaping improvements on the site. Specifically, a total of 66 trees are proposed to be planted on the site, with species consisting of western sycamore, crape myrtle, and ornamental pear. Various shrubs, vines, and ground cover species are also proposed, including, white rockrose, orchid rockrose, manzanita, yellow fortnight lily, grevilia, heavenly bamboo, cats claw vine, mat rush, myoporum, and dwarf rosemary. Refer to **Figure 6** for details on planting locations.

GRADING

The project site is relatively flat and would require only limited grading. The proposed project is anticipated to generate 300 cubic yards of cut and 300 cubic yards of fill, resulting in overall balanced earthwork (see **Figure 7**). No grading was required for the as-built unpermitted structures as noted above.



Landscape Irrigation watering schedule

Low Water Use | Clay Loam | Drip 1.0 gal/hour

Month	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.
Start Times/week	1	2	2	2	2	2	2	2	2	2	1	1
Hours per week	4	4	6	7	8	10	10	8	6	4	4	

Specific Notes

1. All irrigation hydrozones are low water use.
2. Irrigation source existing landscape water service as shown on plan below
3. provide 1 gallon per hour emitters to all plants. 1 per 1gc and 2 per 5gc
4. COH approved backflow preventer and weather station type irrigation controller to be used locations as shown on plan

Landscape Plant List

type	Botanical Name	Common Name	Size	Qty.	Water Use
Tree	Plantanus Racemosa	Western Sycamore	15 gc std.	7	Moderate
			24"/48"box	13 / 4	
Tree	Lagerstroemia	Crape Myrtle	15 gc std.	13	Low
	Natchez, Muskogee, Tuscarora		24" box	15	
Tree	Pyrus calleryana	Ornamental Pear	15 gc std.	10	Low
			24" box	14	
Shrub	Cistus hydridus	White Rockrose	5gc/1gc	20/20	Low
Shrub	Cistus purpureus	Orchid Rockrose	5gc/1gc	20/20	Low
Shrub	Arctostaphylos D.	Manzanita	5gc/1gc	20/20	Low
Shrub	Dietes bicolor	Yellow Fortnight Lily	5gc/1gc	20/20	Low
Shrub	Grevillia 'Noeli'	Grevilia	5gc/1gc	20/20	Low
Shrub	Nandina compacta	Heavenly Bamboo	5gc/1gc	1/2	Low
Vine	Macfadynena unguis	Cats Claw Vine	5gc		Low
GC	Lomandra longifolia	Mat Rush (swales)	1gc	14ksf	Low
GC	Myoporum parvifolium	Myoporum 'white'	1gc		Low
GC	Rosmarinus prostatus	Dwarf Rosemary	1gc	16ksf	Low

Ground Cover: (shall provide 100% coverage within 1 year)

Source: MH Engineering Co., September 2026

Title:

Landscape Plan

Date 9/22/2026

Scale N/A

Project 2025.50

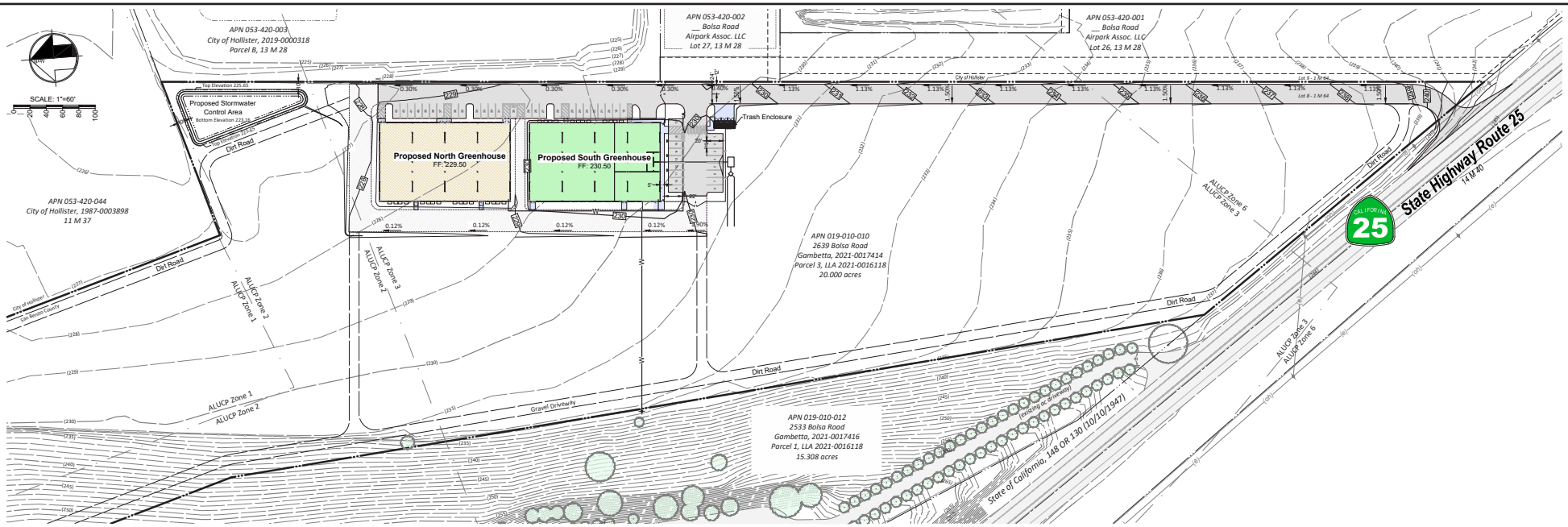
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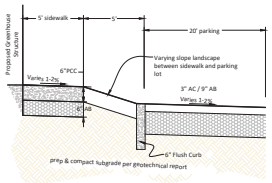
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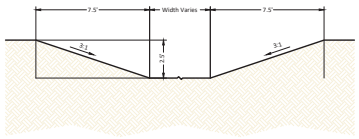
Figure 6





Typical Cross Section: Parking Lot Side

Dimensions As Given



Typical Cross Section: Stormwater Mitigation Swale

Dimensions As Given

Source: MH Engineering Co., September 2026

Title:

Grading and Drainage Plan

Date	9/22/2026
Scale	N/A
Project	2025.50

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Figure 7

LIGHTING

The proposed project includes new outdoor lighting for safety and security purposes, including building attached lights and lights for all walkways and parking areas. In addition, high pressure sodium lights will be placed on the perimeter of the proposed buildings at intervals of 30 feet and at every building entrance. All proposed outdoor lighting would conform to County requirements for nighttime lighting, including directing light sources downward in compliance with all County regulations. No sources of lighting were installed as part of the as-built unpermitted structures.

ACCESS AND PARKING

A new 24 foot-wide access driveway would connect the southern portion of the project site to SR 25. The access driveway would lead to a new paved 43-stall parking lot that wraps around the southern and eastern boundaries of the proposed greenhouse/warehouse. The parking lot would include two (2) ADA spaces. Paved driveways would also be installed around the south and east sides of the new greenhouse/warehouse facility and the area leading to the drainage management area to facilitate internal site access. Gravel driveways would also be installed along the north and western sides of the proposed structures. No new parking was installed as part of the as-built unpermitted structures.

OPERATION

Once operational, the proposed project would include separate spaces for indoor cultivation of cannabis, processing of cannabis into concentrated cannabis products, preparation and packaging of cannabis products, and office and warehouse space. Greenhouse space would be used to cultivate cannabis utilizing a mix of natural or artificial lighting. The 10,000 sf of cultivation space would not be allowed for non-cultivation uses such as cannabis processing and manufacturing activities. The proposed project would operate five (5) to seven (7) days per week, depending on business conditions, from the hours of 8:00 AM and 4:30 PM. No retail sales of cannabis or general public access to the facility would be permitted as part of operation. All finished cannabis products, as well as any on-site stores of cash, will be placed in a secure storage room. Access to the secure storage room would be limited to the manager, assistant manager, and security personnel. Cannabis products would be loaded into vehicles and transported offsite to licensed vendors to be made available for sale. The proposed project would have a total of four (4) to six (6) employees during regular operating hours. The proposed project will have a strict "no on-site consumption" policy in compliance with State regulations for cannabis facilities.

Security personnel will be located on the site on a 24-hour basis, seven (7) days a week. Security personnel will be responsible for granting entrance and exit to employees, and would also conduct an early morning walkthrough prior to employee arrival to confirm that no security threats are present and evening walkthrough following departure of all employees. High definition internal and external Closed Circuit Television ("CCTV") cameras will be used to deter criminal activities and monitor site activities. CCTV cameras will be angled to provide coverage of the proposed project site while respecting the privacy of adjacent property owners and residents. Other proposed security measures include motion sensitive burglar alarms, door and window monitoring devices and contact alarms, monitored building entries, and fire and burglar alarms. Security systems would be monitored on a 24-hour basis by a third-party alarm monitoring firm, as well as onsite security personnel. Battery backups would be utilized to power security systems for up to 72 hours in the event of a power failure. Building access will be controlled using a time-stamped key-card access control system, including limiting employee access to specific areas of the facility as-needed. Security systems will be tested and audited on a quarterly basis to ensure ongoing functionality.

The proposed project includes the processing of cannabis into concentrated cannabis products. These activities are anticipated to require the use of volatile solvents, including butane to convert plant matter to oil, as well as the use of ethanol and CO_2 for non-volatile solvent mechanical extractions.

WASTE DISPOSAL

The project site is located in the "Mandatory waste hauler zone" and would be required to sign up with Recology for solid waste services. The proposed project would generate various waste types including solid waste, recycling, and organic waste. Organic waste generated by the project would be hauled off-site for composting and no on-site composting of organic waste is proposed. Non-organic waste would be separated from compostable waste and disposed of separately. Furthermore, cannabis waste products would be rendered "unusable and unrecognizable" by mixing them with sawdust, hay, or other compostable, non-hazardous substrate. All non-compostable items would be separated from organic waste and removed as trash prior to disposal. Any hazardous materials (including solvents, vape pens, lightbulbs, etc.) generated during operation would be properly disposed of in accordance with applicable regulations. Project waste would be stored in a waste enclosure designed to be of sufficient size to hold containers for garbage, recycling, and organic waste.

1.4 Required Permits

This IS/MND is an informational document for both agency decision-makers and the public. The County RMA is the Lead Agency responsible for adoption of this IS/MND. It is anticipated that the proposed project would require permits and approvals from the following agencies.[1]

STATE AGENCY PERMITS

A list of the anticipated discretionary permits and approvals required by State Agencies is provided below:

- Cannabis Type 12 Microbusiness License – California Department of Cannabis Control
- Encroachment Permit – California Department of Transportation

LOCAL AGENCY PERMITS

A list of the anticipated discretionary permits and approvals required by the County of San Benito is provided below:

- Adoption of IS/MND.
- Conditional Use Permit.
- Cannabis Business Permit.
- Grading and building permits for the proposed project.
- San Benito County Environmental Health Department approval of a Sewage Disposal System permit application for the on-site septic system.
- Well Permit from San Benito County Water District.
- Approval or exemption from Recology San Benito County for solid waste service.

[1] This list is not considered exhaustive and additional agencies and/or jurisdictions may have permitting authority.

- Airport Land Use Commission (ALUC) approval for sites located within ALUC Review Area 1 including the Hollister Municipal Airport Noise Impact Zone, Hollister Municipal Airport Safety Zone, and the Airspace Protection Zone.
- Annual Cultivation Permit from the City of Hollister Fire Department.

Chapter 2. Environmental Factors Potentially Affected

The environmental factors identified below are discussed within **Chapter 4. Initial Study Environmental Checklist** Sources used for analysis of environmental effects are cited in parenthesis after each discussion and are listed in **Chapter 5. References.**

☒ Aesthetics	☒ Agricultural and Forest Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology/Soils	☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials
☒ Hydrology/Water Quality	☒ Noise	☒ Public Services
☒ Transportation/Traffic	☒ Tribal Cultural Resources	☒ Utilities/Service Systems
☒ Wildfire	☒ Mandatory Findings of Significance	

ENVIRONMENTAL FACTORS NOT AFFECTED

As part of the scoping and environmental analysis conducted for the project, the following environmental resources were considered but no potential adverse impacts to these resources were identified. Consequently, there is no further discussion regarding these resources in this document.

Mineral Resources: The site has not been mapped for mineral resources by the California Department of Conservation's Surface Mining and Reclamation Act ("SMARA"). According to SMARA Special Report 251, the nearest potential mining site is the SCL/Bolsa Mine located immediately north of the project site, (DOC et al., 2021). However, the project site has been designated by the County 2035 General Plan for agricultural use and is not designated for mineral extraction operations. Operation of the proposed indoor commercial cannabis microbusiness (cultivation, manufacturing, and distribution) facility would not interfere with mineral resource extraction. As a result, there would be no impact to mineral resources. (Sources: 2, 3, 14, 17)

Recreation: The proposed project consists of the construction of an indoor commercial cannabis microbusiness (cultivation, manufacturing, and distribution) facility on a site currently occupied by agricultural land uses. The proposed project would not directly generate new residents that would place increased demand on existing neighborhood and regional parks such that physical deterioration of these facilities would be accelerated. While the proposed project would create approximately six (6) new jobs, these jobs are anticipated to be filled largely by local residents, and non-County residents would generally return home following work and would not increase the burden on local and regional recreational facilities. As a result, the proposed project would have no impact on recreational facilities. (Sources: 14, 17)

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Chapter 3. Determination

On the basis of this initial evaluation:

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

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

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

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

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

_____ _____

Signature Date

_____ _____

Printed Name For

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Chapter 4. Initial Study Environmental Checklist

The following chapter assesses the environmental consequences associated with the proposed project. Mitigation measures, where appropriate, are identified to address potential impacts.

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).

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

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less-than-significant with mitigation, or less-than-significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less-Than-Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.
b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
c) Mitigation Measures. For effects that are "Less-than-Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate information sources for potential impacts (e.g., general plans, zoning ordinances) into the checklist references. 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-significant.

4.1 Aesthetics

4.1.1 Environmental Setting

The 2035 County General Plan Update Recirculated Draft EIR ("RDEIR") notes that the County's most striking features are the Diablo and Gabilan Mountain Ranges and the San Benito Valley, which lies between them. There are no State designated scenic highways located in the County. However, three (3) highways are County designated scenic highways, including Highway 101, located approximately 7.22 miles west of the project site; SR 156, located about 0.36 of a mile west of the project site; and SR 129, located approximately 7.63 miles west of the project site. In addition, SR 25 in the vicinity of the project site is designated as an eligible scenic highway by Caltrans (Caltrans, 2025).

According to the 2035 County General Plan RDEIR, important vistas within San Benito County that define its visual character include agricultural croplands, rangelands, rolling hills, open spaces, historic towns and mining sites, and views of the Diablo and Gabilan ranges. These agricultural and rangeland areas constitute more than 75 percent of the County's total land area. Additionally, the County's topography includes valleys and rolling hills, particularly in the northern portion of the County near Hollister and San Juan Bautista, where most of the County's population dwells.

The existing site is currently used for agricultural activities. Surrounding lands consist of a mix of agricultural, industrial, airport, and rural residential uses, which produce varying degrees of nighttime lighting and sources of glare. The proposed project would result in the construction of a new cannabis greenhouse/warehouse facility and associate infrastructure, such as a septic system, frontage improvements along Bolsa Road/SR 25, and an access driveway. The proposed project would not require any nighttime construction and construction activities would be limited to the hours of 8:00 AM to 5:00 PM, Monday through Friday. Therefore, construction activities would not result in any new nighttime lighting or glare.

The proposed project includes new sources of exterior lighting for ambient and security lighting. However, all security lighting would be directed downward to prevent off-site spillage and glare.

Section 19.31.005 of the San Benito County Code establishes three (3) lighting zones, with Zone I having the strictest regulations and Zone III imposing the least restrictive. The project site is located in Zone II. General requirements are applicable to all zones, under Section 19.31.006, and the special requirements applicable to project set forth in Section 19.31.008 are listed below:

(A) (1) Total outdoor light output (excluding streetlights used for illumination of county roadways or private roadways related to any development project in Zone II) shall not exceed 50,000 initial raw lamp lumens per net acre, averaged over the entire project.

(2) Furthermore, no more than 5,500 initial raw lamp lumens per net acre may be accounted for by lamps in unshielded fixtures permitted in Table 19.31.006(1) of this chapter.

(D) Class 3 lighting must be extinguished at 11:00 p.m. or when the business closes, whichever is later, except that low-wattage holiday decorations may remain on all night from November 15 to January 15.

4.1.2 Environmental Impacts

AESTHETICS. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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 point.) If the project is in an urbanized area would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.3 Explanation

a) **Less-than-Significant Impact.** According to the County's General Plan, most of the County consists of agricultural and rangeland uses and many of the County's scenic vistas consist of views of these areas. The proposed project consists of the construction of an indoor commercial cannabis microbusiness (cultivation, manufacturing, distribution) facility on a site currently occupied by agricultural land uses. The proposed project would have a maximum height of approximately 21 feet and would not involve the construction of buildings that would exceed the 35-foot building height threshold for the Agricultural Productive ("AP") zoning designation. Therefore, the proposed project would not block any neighboring views of distant mountain ranges. Lastly, while the proposed project would be constructed on agricultural land, the proposed project site is largely screened from public views by existing topography and vegetation and would not have a substantial adverse effect on County scenic vistas within the agricultural and rangeland uses. This represents a less-than-significant impact. (Sources: 14, 17)

b) **Less-than-Significant Impact.** The project site is not located within the vicinity of an officially designated State Scenic Highway (Caltrans, 2025). Therefore, the project is not visible from a state designated scenic highway. However, SR 25, which travels along the southern border of the project site, is designated as an eligible scenic highway. The proposed project would be visible to passing vehicles from SR 25 for a brief period. However, visibility of the proposed project would be limited due to the topography and vegetation of the site. In addition, the development of a greenhouse facility would be consistent with the present agricultural uses on and surrounding the project parcel. As a result, the proposed development of the site with a greenhouse/warehouse for cannabis cultivation, manufacturing, and distribution would have a less-than-significant impact on scenic resources such as rock outcroppings, trees, or historic buildings within view from a scenic highway. (Sources: 10, 14, 17)

c) **Less-than-Significant Impact.** The proposed project is located within a non-urbanized area. The proposed project would construct a greenhouse/warehouse for cannabis cultivation, manufacturing, and distribution, as well as other various site improvements within and adjacent to parcels zoned for agriculture. These residential uses are allowed conditional uses under the Agricultural Productive ("AP") zoning designation and Agricultural ("A") General Plan designation that apply to the site. Consistent with General Plan Policy NCR-8.11, future construction facilitated by the proposed project would be designed to appear similar to and visually blend with existing agricultural uses in the vicinity. The proposed project would be consistent with the County zoning and regulations governing land use and scenic quality. Given the above, the proposed project would result in a less-than-significant impact to the visual character and quality of public views of the project site. (Sources: 14, 17)

d) **Less-than-Significant Impact.** Construction activities would occur during daytime hours and nighttime lighting for construction activities is not proposed. Operational lighting would primarily consist of exterior lighting for security purposes. Specifically, all walkways and parking lots would be lit by exterior lighting, and high-pressure sodium lights would be placed on the perimeter of the buildings every 30 feet and/or above every entrance, whichever is less. Overall, nighttime lighting would only include that which is necessary for safety for vehicular movement and security. All lighting would be directed downward to prevent offsite light spillage and glare.

The increased lighting into a minimally lit site would increase the extent of lighting as compared to existing conditions. The proposed project would be required to conform with applicable provisions of the County "Dark Skies" Ordinance (Chapter 19.31), which requires the use of outdoor lighting systems and practices designed to reduce light pollution and glare, and protection of the nighttime visual environment by regulating outdoor lighting that interferes with astronomical observations and enjoyment of the night sky. Compliance with the County's "Dark Skies" Ordinance would ensure that potential adverse effects associated with site lighting would be less-than-significant.

Additionally, as part of the County permitting process, the proposed project would go through design review and approval in order to confirm consistency with applicable standards, requirements and design guidelines. As a result, potential impacts from lighting and glare would be less-than-significant. (Sources: 14, 17)

4.2 Agricultural and Forest Resources

4.2.1 Environmental Setting

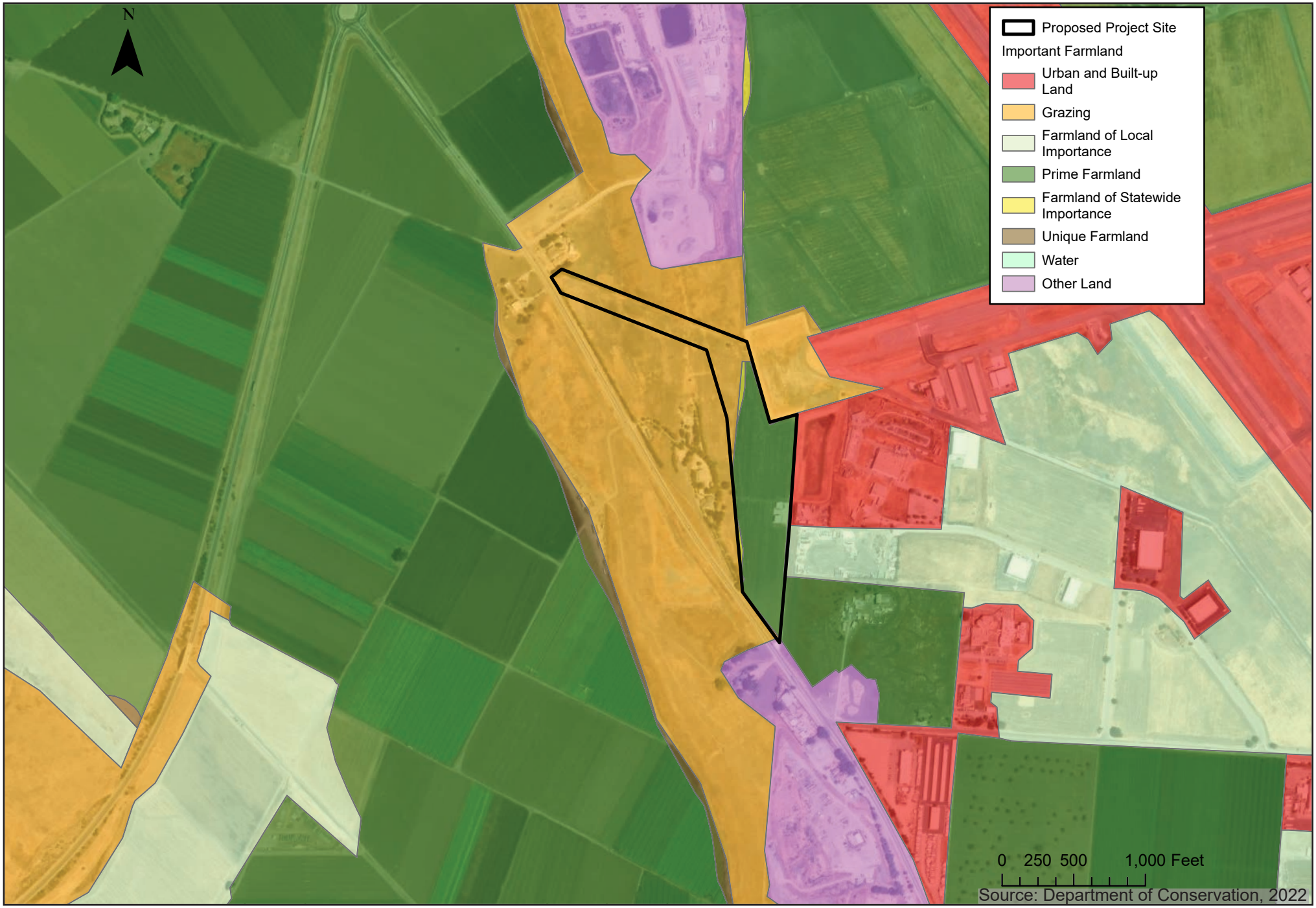
The California Department of Conservation ("DOC") Farmland Mapping and Monitoring Program ("FMMP"), established by the State Legislature in 1982, assesses the location, quality, and quantity of agricultural lands. In addition, the FMMP monitors the conversion of these lands over time. The FMMP is a non-regulatory program contained in Section 612 of the Public Resources Code. The Program contains five (5) farmland categories to provide consistent and impartial analysis of agricultural land use and land use changes throughout California. The five (5) farmland categories consist of the following (DOC, 2022):

- Prime Farmland (P) comprises the best combination of physical and chemical features able to sustain long-term agricultural production. To qualify as Prime Farmland, the land must be used for irrigated agricultural production for four (4) years prior to the mapping date. The land must be able to store moisture and produce high yields.
- Farmland of Statewide Importance (S) possesses similar characteristics to Prime Farmland with minor shortcomings, such as less ability to hold and store moisture and more pronounced slopes.
- Unique Farmland (U) has a production history of propagating crops with high-economic value.
- Farmland of Local Importance (L) is important to the local agricultural economy. Local advisory committees and a county specific Board of Supervisors determine this status.
- Grazing Land (G) is suitable for browsing or grazing by livestock.

The existing project site consists of "Prime Farmland" (approximately 12.21 acres), "Farmland of Statewide Importance" (approximately 0.46 acres), and "Grazing Land" (approximately 7.33 acres) in the FMMP (**Figure 8**). The adjacent parcels contain lands designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Other Land, and Urban and Built-up Land (DOC, 2022).

The Williamson Act, codified in 1965 as the California Land Conservation Act, allows local governments to enter into contracts with private landowners to offer tax incentives in exchange for an agreement that the land will remain as agricultural or related open space use for a 10-year period. The project site is not subject to a Williamson Act contract. Nearby Williamson Act contract lands are located southwest of the project site on the opposite side of SR 25 (DOC, 2025).

According to the California Public Resources Code §4526, the California Board of Forestry and Fire Protection defines "Timberland" as land not owned by the federal government, nor designated as experimental forest land, which is capable and available for growing any commercial tree species. The board defines commercial trees on a district basis following consultation with district committees and other necessary parties. There are no forest land, timberland, or timberland production areas on the project site, as zoned by applicable state and local regulations located within the County.



Title:

Important Farmland Map

Date	12/17/2025
Scale	N/A
Project	2025.50

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure
8

4.2.2 Environmental Impacts

AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) 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 With Mitigation 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 non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest uses?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

4.2.3 Explanation

a) **Less-than-Significant Impact.** The project site primarily consists of "Grazing Land" and "Prime Farmland", with a small portion of the site designated as "Farmland of Statewide Importance". Specifically, the portion of the site proposed for development consists of Prime Farmland, as shown on **Figure 8, Important Farmlands Map**. The portion of the site consisting of Farmland of Statewide Importance would remain available for active agricultural use following completion of the proposed project. The proposed project would result in the irreversible conversion of approximately 87,160 sf (approximately two (2) acres) of Prime Farmland to non-agricultural use. However, the proposed project would leave the remainder of the site available for ongoing agricultural use, including approximately 10.21 acres of Prime Farmland. The project's impacts from the conversion of farmland were evaluated as part of a Land Evaluation and Site Assessment ("LESA"), which is

provided as **Appendix A** of this document. Based on the evaluated factors, including soil type, "storie index" score, surrounding land uses and easements, surrounding lands in conservation, water availability, and area of conversion, the proposed project received a LESA score of 48.11. Projects receiving a score of 40 to 59 points are considered to have a significant impact unless either the Land Evaluation or Site Assessment score are each equal to or greater than 20 points. The Site Assessment subscore was 18.75 points, which is below the threshold of 20 points. As a result, the proposed project would have a less-than-significant impact from the conversion of Prime Farmland to non-agricultural use. (Sources: 4, 14, 17)

b) **Less-than-Significant Impact.** The project site is not subject to a Williamson Act Contract. The proposed project would result in the irreversible conversion of approximately 87,160 sf (approximately two (2) acres) of Prime Farmland to non-agricultural use, as noted above. However, the proposed use for the project is consistent as a conditional use with the project site's zoning designation, Agricultural Productive ("AP") overlay, and County General Plan designation, Agriculture ("A"). A cannabis microbusiness and its associated activities are considered a conditionally permitted use on agricultural lots in the County. As a result, the proposed project would be consistent with the existing zoning for agricultural use, resulting in a less-than-significant impact. (Sources: 6, 14, 17)

c-d) **No Impact.** There are no forest land, timberland, or timberland production areas, as zoned by applicable state and local laws and regulations within the County, or otherwise present on-site. As the project site is not designated as forest land, the proposed project would not convert these lands to non-forest use. Furthermore, the proposed project is consistent as a conditional use with the zoning designation and County General Plan designation of the existing site. The project would not conflict with or require rezoning of forest land or timberland; would not result in the loss or conservation of forest land; and would not involve other changes in the existing environment which could result in the conversion of forest land to non-forest land; therefore, no timber land or forest land exists on the site. Therefore, no impact would occur related to these resources. (Sources: 14, 17)

e) **Less-than-Significant Impact.** No forest land exists on or adjacent to the project site. However, the proposed project would directly result in the conversion of approximately 87,160 sf of farmland (designated as Prime Farmland in the FMMP) to non-agricultural use.[2] However, as discussed under impact a), the proposed project was determined to result in a less-than-significant impact due to conversion of Prime Farmland to non-agricultural use. In addition, the remainder of the project site would remain viable for agricultural use. As a result, the proposed project would have a less-than-significant impact related to the conversion of farmland to non-agricultural use. (Sources: 4, 14, 17)

4.3 Air Quality

4.3.1 Environmental Setting

The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of certain air pollutants. Under these Acts, the United States Environmental Protection Agency ("U.S. EPA") and the California Air Resources Board ("CARB") have established ambient air quality standards for specific "criteria" pollutants. These pollutants are carbon monoxide ("CO"), ozone ("O_3"), sulfur dioxide ("SO_2"), nitrogen oxides ("NO_X"), particulate matter less than 10 microns in diameter ("PM_{10}"), lead, and particulate matter less than 2.5 microns in diameter ("$PM_{2.5}$").

[2] Total area of conversion includes indoor cultivation space as a non-agricultural use to provide a conservative environmental analysis.

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

The U.S. EPA administers the National Ambient Air Quality Standards ("NAAQS") under the Federal Clean Air Act. The U.S. EPA sets the NAAQS and determines if areas meet those standards. Violations of ambient air quality standards are based on air pollutant monitoring data and evaluated for each air pollutant. Areas that do not violate ambient air quality standards are considered to have attained the standard. The NCCAB is in attainment for all NAAQS and for all California Ambient Air Quality Standards ("CAAQS") except O_3 and PM_{10}. The primary sources of O_3 and PM_{10} in the NCAAB are from automobile engine combustion. To address exceedance of these CAAQS, MBARD has developed and implemented several plans including the 2005 Particulate Matter Plan, the 2007 Federal Maintenance Plan, and the 2012-2015 Air Quality Management Plan ("AQMP"), a revision to the 2012 Triennial Plan. NCCAB Attainment Status to National and California Ambient Air Quality can be found in **Table 1** below.

Table 1
North Central Coast Air Basin Attainment Status

Pollutant	State Designation[1]	National Designation[2]
Ozone (O_3)	Attainment	Attainment
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment

Notes:
1) The State Designations apply to the entire NCCAB and are based on air quality data from 2017. Source: Monterey Bay Air Resources District Air Quality Management Plan 2012-2015; https://www.mbard.org/files/6632732f5/2012-2015-AQMP_FINAL.pdf
2) The National Designations apply to San Benito County only and are based on air quality data from as recent as January 31, 2021. Source: California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants; https://www3.epa.gov/airquality/greenbook/anayo_ca.html

Plans to attain these standards already accommodate the future growth projections available at the time these plans were prepared. Any development project capable of generating air pollutant emissions exceeding regionally established criteria is considered a significant impact for purposes of CEQA, whether or not such emissions have been accounted for in regional air planning. Any project that would directly cause or substantially contribute to a localized violation of an air quality standard would generate substantial air pollution impacts. The same is true for a project that generates a substantial increase in health risks from toxic air contaminants.

Sensitive receptors are more susceptible to the effects of air pollution than the general population. Land uses that are considered sensitive receptors include residences, schools, and health care facilities. Nearby sensitive receptors in the vicinity of the project site include residences located approximately 200 feet west of the project (specifically, the westernmost portion of the proposed connection to the existing well).

MBARD issues air quality permits for stationary equipment that may emit criteria air pollutants such as PM_{10} and $PM_{2.5}$, volatile organic compounds, oxides of sulfur, NO_X, and CO, as well as any toxic air contaminants identified by the U.S. EPA or the California State Office of Environmental Health Hazard Assessment ("OEHHA"), or odorous pollutants. Additionally, MBARD issues air quality permits for any abatement device which may reduce or eliminate air contaminants. MBARD has determined that the following activities conducted as part of the cannabis operations are subject to MBARD permitting requirements:

1) Cultivating Operations:
    - Cultivation located within a greenhouse, warehouse, or industrial building that is equipped with an odor control system;
    - Drying or processing of harvested cannabis within a building that is equipped with a dust collection system or odor control system;
    - Natural gas and/or liquefied petroleum gas ("LPG") fired boiler, or other closed heat transfer systems, with an individual heat input of equal to or greater than 2 million Btu/Hr;
    - Fuel oil fired boiler, or other closed heat transfer systems, with an individual heat input of equal to or greater than 0.25 million Btu/Hr; and,
    - Emergency or prime use internal combustion engines, rated equal to or greater than 50 horsepower.
2) Manufacturing Operations:
    - Cannabis leaf processing/preparation area equipped with either dust collection system, or odor control system;
    - Hash oil extraction via hydrocarbon solvents (i.e., butane, propane, ethanol, etc.);
    - Hash oil processing/separation via hydrocarbon solvents;
    - Emergency or prime use internal combustion engines, rated equal to or greater than 50 horsepower; and,
    - Tanks, containers, or reservoirs used to store ethanol, or an organic solvent with an initial boiling point of less than 300 degrees Fahrenheit, or with an organic vapor pressure greater than 0.5 mm Hg (0.1 psi absolute) at 70 degrees Fahrenheit, and having a capacity of greater than 250 gallons.

MBARD requires that emissions from cannabis operations are calculated in two (2) ways to determine whether Best Available Control Technology ("BACT") is required: 1) by each piece of equipment subject to MBARD permitting, and 2) overall emissions from the entire facility. Examples of cannabis operations that would be subject to BACT include individual extraction systems and hash oil processing/separation systems with the potential to emit of 25 lbs/day or greater of volatile organic compounds ("VOCs") or a cannabis stationary source with the potential to emit a total of 150 lbs/day or greater of VOCs (MBARD, 2017).

4.3.2 Environmental Impacts

AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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 non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in substantial emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.3 Explanation

DD&A prepared an Air Quality memorandum for the proposed project (**Appendix B**). The results of **Appendix A** are relied upon in the analysis below.

a) **Less-than-Significant Impact.** CEQA Guidelines §15125(b) requires an evaluation of project consistency with applicable regional plans, including the AQMP. As stated above, MBARD has developed and implemented several plans to address exceedance of State air quality standards, including the 2012-2015 AQMP. MBARD is required to update their AQMP once every three (3) years; the most recent update was the 2012-2015 AQMP (MBARD, 2017), which was approved in March of 2017. This plan addresses attainment of the State ozone standard and federal air quality standard. The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments ("AMBAG") and other indicators.

The proposed project would create up to six (6) new jobs and would represent a slight increase in the available jobs in San Benito County. Although the new jobs created by the proposed project are anticipated to be filled by existing County residents, the proposed project could potentially result in increased population growth of six (6) people. This population increase would not result in an exceedance of AMBAG population estimates for population San Benito County that would significantly increase emissions of any criteria pollutants. Therefore, the proposed project would be consistent with the MBARD 2012-2015 AQMP. For these reasons, implementation of the proposed project is not anticipated to result in a substantial increase in either direct or indirect emissions that would conflict with or obstruct implementation of the AQMP. This impact is considered less-than-significant. (Sources: 14, 17, 25, 27)

b) **Less-than-Significant Impact.** The proposed project could result in air quality impacts during construction due to the use of construction equipment for site grading, paving, removal of existing concrete surfaces, and other activities. Site disturbance activities could result in a short-term, localized decrease in air quality due to the generation of particulate emissions (PM_{10}). The MBARD 2016 Guidelines for Implementing CEQA contain standards of significance for evaluating potential air quality effects of projects subject to the requirements of CEQA. According to MBARD, a project would not violate an air quality standard and/or contribute to an existing or projected violation during construction if it would:

- Emit (from all sources, including exhaust and fugitive dust) less than:
    - 137 pounds per day ("lb/day") of oxides of nitrogen ("NOx");
    - 137 lb/day of reactive organic gases ("ROG");
    - 82 lb/day of respirable particulate matter ("PM_{10}");
    - 55 lb/day of fine particulate matter ("$PM_{2.5}$"); and
    - 550 lb/day carbon monoxide ("CO")

A project would not violate an air quality standard and/or contribute to an existing or proposed violation during operation if it would:

- Emit (from all sources, including exhaust and fugitive dust) less than:
    - 137 pounds per day ("lb/day") of oxides of nitrogen ("NOx");
    - 137 lb/day of reactive organic gases ("ROG");
    - 82 lb/day of respirable particulate matter ("PM_{10}");
    - 55 lb/day of fine particulate matter ("$PM_{2.5}$"); and

- 550 lb/day carbon monoxide ("CO")

- Not cause or contribute to a violation of any California or National Ambient Air Quality Standard;
- Not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment;
- Not exceed the health risk public notification thresholds adopted by the Air District;
- Not create objectionable odors affecting a substantial number of people; and
- Be consistent with the adopted federal and state Air Quality Plans.

Air quality emissions during construction and operation were evaluated in **Appendix A** and are summarized below.

Construction

Construction activities, including grading and excavation, could result in short-term impacts to air quality. Site disturbance activities could result in a short-term, localized decrease in air quality due to the generation of particulate emissions (PM_{10}). A detailed construction schedule is not available given the nature of the proposed project. Therefore, construction is assumed to occur over a ten-month period, which is considered a conservative estimate for modeling purposes. **Table 2** includes the emissions of criteria air pollutants during construction against the established MBARD thresholds.

Table 2
Construction Emissions of Criteria Air Pollutants (Emissions ("lbs./day"))

Condition	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions:	3.2	29	29	0.05	31	12
MBARD Significance Threshold:	137	137	550	150	82	55
Exceeds Threshold/Significant Impact?	No	No	No	No	No	No

Construction of the proposed project would result in minor emissions of criteria air pollutants and would not exceed applicable thresholds established by MBARD. Therefore, the proposed project's impacts related to air quality emissions would be less-than-significant during construction.

In addition, the project would also implement standard construction Best Management Practices ("BMPs") identified by MBARD related to dust suppression, which would include:

- Watering active construction areas;
- Prohibiting grading activities during periods of high wind (over 15 mph);
- Covering trucks hauling soil; and,
- Covering exposed stockpiles.

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

Operation

Operation of the proposed residential subdivision would not result in increased air quality emissions compared to existing conditions. The proposed project would introduce a new cannabis microbusiness facility on land currently used for agricultural uses, which would produce air quality emissions associated with vehicle trips, cannabis processing, and other related uses. Energy sources

include natural gas for uses such as lighting and other uses. **Table 3** includes the emissions of criteria air pollutants during operation against the established MBARD thresholds.

Table 3
Operational Emissions of Criteria Air Pollutants (Emissions ("lbs./day"))

Condition	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions:	4.4	4.7	31	0.07	5.7	1.5
MBARD Significance Threshold:	137	137	550	150	82	55
Exceeds Threshold/Significant Impact?	No	No	No	No	No	No

Operation of the proposed project would result in minor emissions of criteria air pollutants and would not exceed applicable thresholds established by MBARD. Therefore, the proposed project's impacts related to air quality emissions would be less-than-significant during operation. (Sources: 14, 17, 18, 25, 27)

c) **Less-than-Significant Impact.** A "sensitive receptor" is generally defined as any residence including private homes, condominiums, apartments, or living quarters; education resources such as preschools and kindergarten through grade twelve ("K-12") schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. There are existing residences located within 200 feet of the project (specifically, the westernmost portion of the proposed connection to the existing well). MBARD's 2008 CEQA Air Quality Guidelines state that a project would have a significant impact to sensitive receptors if it would cause a violation of any CO, PM_{10} or toxic air contaminant standards at an existing or reasonably foreseeable sensitive receptor.

The project would not generate construction air quality emissions exceeding MBARD thresholds (**Appendix B**). The project would implement standard air quality BMPs based on MBARD's 2008 CEQA Air Quality Guidelines. Additionally, the proposed project would not exceed any MBARD thresholds, including CO and PM_{10}. For these reasons, the proposed project would have a less-than-significant impact on sensitive receptors during construction.

The proposed project does not include installation of any new major stationary or mobile sources of emissions. A battery backup is proposed for emergency power rather than a traditional generator. The proposed land uses would consist of cannabis cultivation, manufacturing, and distribution, with the potential for continuing with some limited agricultural uses that would be consistent with existing use of the site. New trips generated by the proposed project would be minimal as the proposed project would not be open to the public. Operation of the proposed project would not exceed any MBARD emissions thresholds (**Appendix B**) and would result in a less-than-significant impact. (Sources: 14, 17, 18, 25, 27)

d) **Less-than-Significant Impact**. Pollutants associated with substantial emissions (such as those leading to odors) with the potential to adversely affect a substantial number of people include sulfur compounds and methane. Typical sources of odors include diesel emissions from construction equipment, odors from laying asphalt, landfills, rendering plants, chemical plants, agricultural uses, wastewater treatment plants, and refineries (MBARD, 2008). Cannabis cultivation, manufacturing, and distribution facilities are also known contributors of odor emissions and Air Quality Permits for such projects are subject to additional requirements from MBARD (MBARD, 2017).

The proposed project consists of a new cannabis microbusiness facility that would generate additional odors compared to existing conditions in the vicinity of the site. Existing residences are located within 200 feet of the project (specifically, the westernmost portion of the proposed connection to the existing well). However, the proposed project would be required to comply with

the conditions of an Air Quality Permit issued by MBARD, including the use of Best Available Control Technology ("BACT") for equipment, such as:

- an Odor Control System
- a Dust Collection System

The proposed project would result in odor emissions from diesel powered construction equipment and laying of asphalt for internal driveways within the parcel and along the project's frontage on Bolsa Road/SR 25. While the proposed project is located within a rural area, there are existing sensitive residential receptors within the vicinity of the proposed improvements. However, all construction related diesel and asphalt odors would be temporary and would cease upon the completion of construction. Therefore, the proposed project would not result in substantial emissions (such as those leading to odors) adversely affecting a substantial number of people with implementation of MBARD BACTs and due to the temporary nature of project construction and the impact would be considered less-than-significant. (Sources: 14, 17, 25, 26)

4.4 Biological Resources

4.4.1 Environmental Setting

Denise Duffy & Associates, Inc. ("DD&A") prepared a Biological Resources Report (**Appendix C**) and an Arborist Report (**Appendix D**) for the proposed project. The findings of these reports are discussed below.

DD&A biologists evaluated the project site on December 9, 2025. Survey methods included walking the project site to identify general and sensitive vegetation types and potential habitat for special-status plant and wildlife species, as well as an arborist assessment. Data collected during the surveys was used to assess the environmental conditions of the project site and its surroundings, evaluate environmental constraints at the site and within the local vicinity, and provide a basis for recommendations to minimize and avoid impacts.

The project site was evaluated for botanical resources following the applicable guidelines outlined in: *Guidelines for Conducting and Reporting Botanical Inventories for Federally listed, Proposed and Candidate Plants*, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*, and *California Native Plant Society Botanical Survey Guidelines* (**Appendix C**).

Trees within the project site were inventoried in accordance with the following protocol, which was designed to meet the requirements of County Code:

- Tree diameter ("DBH") was recorded at breast height (or 4.5 feet above native grade) or (for multi-stemmed trees) at the most representable location.

- Multi-stemmed trees, if present, were recorded as one (1) tree if the root crown (the point where the trunk meets natural grade) was contiguous. Multi-stemmed tree DBH was calculated by taking the square root of the squared sum of all stems measured (√[Stem 1 DBH2+ Stem 2 DBH2+ Stem 3 DBH2...]). This equation returns to the diameter at the base of the tree (**Appendix D**).

- The critical root zone ("CRZ") was calculated as one (1) foot for every one (1) inch DBH in accordance with American National Standards Institute ("ANSI") A300 Part 8 & Part 5 (**Appendix D**).

- The tree protection zone ("TPZ", also known as the dripline) was calculated as 1.5 feet for every one (1) inch DBH.

- Species, size, and health class were recorded for each tree. Tree health was determined as good, fair, or poor and are defined below:

    - *Good*. Tree is healthy and vigorous as indicated by color of foliage and density, has no apparent signs of insect, disease, structural defects or mechanical injury. Tree has good form and structure.

    - *Fair*. Tree is in average condition and vigor for the area, but may show minor insect, disease, or physiological problems. Trees rated as Fair may be improved with correctional pruning.

    - *Poor*. Tree is in a general state of decline and may show severe structural or mechanical defects which may lead to failure, and may have insect or disease damage, but is not dead.

    - *Dead/Snags*. Dead standing trees.

Habitat Types

DD&A mapped and quantified the acreage of each habitat type within the survey area (**Figure 9**). Approximately 22 acres of the survey area consist of actively cultivated agricultural fields. Areas where the habitat type is not cultivated agricultural land are either ruderal or developed roads and buildings. Due to the disturbed (mowed, sprayed, landscaped) nature of the survey area, no vegetation associations identified in *A Manual of California Vegetation* (**Appendix C**) are present, therefore these areas are not considered sensitive by any regulatory agency. A description of each habitat type is provided below.

Ruderal

Approximately 1.2 acres of the survey area can be classified as ruderal habitat. Ruderal areas are those areas which have been developed or have been subject to historic and ongoing disturbance by human activities and areas devoid of vegetation or dominated by non-native and/or invasive weed species. Within the survey area, ruderal land consisted primarily of areas along the fence line and locations of old, staged farm equipment. Ruderal habitat was dominated by non-native grasses and forbs.

Ruderal areas are considered to have low biological value as they are generally denuded of vegetation or are dominated by non-native plant species and consist of relatively low-quality habitat from a wildlife perspective. However, some common wildlife species that do well in urbanized areas, including European starling (*Sturnus vulgaris*), western fence lizard (*Sceloporus occidentalis*), ground squirrel (*Otospermophilus beecheyi*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), American crow (*Corvus brachyrhynchos*), California scrub jay (*Aphelocoma californica*), and rock pigeon (*Columba livia*), may be found foraging within these areas. Plants in the ruderal habitat lack continuous flowers necessary to support insect species of special concern; however, trees may provide nesting habitat for raptor and other avian species.

- *A Manual of California Vegetation* classification(s): None
- *California Natural Communities List*: Not sensitive



Title:

Habitat Map

Date 9/22/2026

Scale N/A

Project 2025.50

Monterey | San Jose

Denise Duffy and Associates, Inc.

Environmental Consultants Resource Planners

947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure 9

Active Agriculture

Approximately 22 acres of the survey area consists of active agricultural land (**Figure 9**). These areas are regularly disturbed, disked, maintained, and cultivated for crops. As such, it provides poor habitat for most plant and wildlife species of concern. However, several special-status species, such as California tiger salamander ("CTS") and California red-legged frog ("CRLF"), have the potential to disperse through active agricultural land.

- *A Manual of California Vegetation* classification(s): None
- *California Natural Communities List*: Not sensitive

Developed

Approximately 0.8 acres of developed area occurs within the survey area, consisting of buildings for farm equipment storage and an access road (**Figure 9**). Developed areas are considered to have low biological value as they are generally denuded of vegetation and consist of relatively low-quality habitat from a wildlife perspective. However, the common wildlife species identified above for ruderal communities may be found foraging within these areas. No vegetation is present in developed areas aside from non-native grasses and forbs and thus do not have the necessary continuous flowers to support insect species of concern.

- *A Manual of California Vegetation classification(s):* None
- *California Natural Communities List*: Not sensitive

Sensitive Habitats

Sensitive habitats include riparian corridors, wetlands, habitats for legally protected species, areas of high biological diversity, areas supporting rare or special-status wildlife habitat, and unusual or regionally restricted vegetation types. Vegetation types considered sensitive include those listed on the California Department of Fish and Wildlife ("CDFW") *California Natural Communities List* (i.e., those habitats that are rare or endangered within the borders of California), those that are occupied by species listed under the Endangered Species Act ("ESA") or are critical habitat in accordance with the ESA, and those that are defined as Environmentally Sensitive Habitat Areas under the California Coastal Act. Specific habitats may also be identified as sensitive in city or county general plans or ordinances. Sensitive habitats are regulated under federal regulations (such as the Clean Water Act ["CWA"] and Executive Order ["EO"] 11990 – Protection of Wetlands), state regulations (such as CEQA and the CDFW Streambed Alteration Program), or local ordinances or policies (such as city or county tree ordinances and general plan policies).

A seasonal wetland feature is present approximately 220 feet southwest of the survey area, across SR 25/Bolsa Road. This feature is identified as a freshwater pond with the classification code PUSA (Palustrine, Unconsolidated Shore, Temporarily Flooded) on the United States Fish and Wildlife Service ("USFWS") National Wetlands Mapper (**Appendix C**); however, it is outside the survey area and will not be directly impacted by construction. While this seasonal wetland feature is located outside of the construction limits, there is the potential for federally-listed wildlife to utilize this habitat as a breeding resource. No hydrophytic vegetation or hydrological indicators were identified within areas surveyed. Therefore, the project is not anticipated to impact wetlands or waters of the U.S or State. No other habitats identified as sensitive on CDFW's *Natural Communities List* or riparian habitat are present within the survey area.

Special-Status Species

Special-status species are those plants and animals that have been formally listed or proposed for listing as endangered or threatened or are candidates for such listing under the ESA or the California Endangered Species Act ("CESA"). Listed species are afforded legal protection under the ESA and CESA. Species that

meet the definition of rare or endangered under CEQA Guidelines Section 15380 are also considered special-status species. Animals identified as "species of special concern" (most of which are species whose breeding populations in California may face extirpation if current population trends continue) on CDFW's "Special Animals List" (CDFW, 2025c) meet this definition and are typically provided management consideration through the CEQA process, although they are not legally protected under the ESA or CESA. CDFW also includes some animal species that are not assigned any of the other status designations on their "Special Animals" list; however, these species have no legal or protection status and are not analyzed in this document.

Plants listed as rare under the California Native Plant Protection Act ("CNPPA") or included in California Native Plant Society ("CNPS") California Rare Plant Ranks ("CRPR") 1A, 1B, 2A, and 2B are also treated as special-status species as they meet the definitions of Sections 2062 and 2067 of the CESA and in accordance with CEQA Guidelines Section 15380. In general, CDFW requires that plant species on CRPR 1A (Plants presumed extirpated in California and Either Rare or Extinct Elsewhere), CRPR 1B (Plants rare, threatened, or endangered in California and elsewhere), CRPR 2A (Plants presumed extirpated in California, but more common elsewhere); and CRPR 2B (Plants rare, threatened, or endangered in California, but more common elsewhere) of the CNPS *Inventory of Rare and Endangered Vascular Plants of California* be fully considered during the preparation of environmental documents relating to CEQA. CRPR 3 (plants about which more information is needed) and CRPR 4 species (plants of limited distribution) may, but generally do not, meet the definitions of Sections 2062 and 2067 of the CESA and are not typically considered in environmental documents relating to CEQA, and therefore are not analyzed in this document.

Raptors (e.g., eagles, hawks, and owls) and their nests are protected under the Migratory Bird Treaty Act ("MBTA"), the California Migratory Bird Treaty Act ("CMBTA") and in California under Fish and Game Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except otherwise provided by this code or any regulation adopted pursuant thereto." In addition, fully protected species under the Fish and Game Code Section 3511 (birds), Section 4700 (mammals), Section 5515 (fish), and Section 5050 (reptiles and amphibians) are also considered special-status animal species. Species with no formal special-status designation but thought by experts to be rare or in serious decline may also be considered special-status animal species in some cases, depending on project-specific analysis and relevant, localized conservation needs or precedence.

Published occurrence data within the project area and surrounding USGS quadrangles were evaluated to compile a table of special-status species known to occur in the vicinity of the project site. Each of these species was evaluated for their likelihood to occur within and immediately adjacent to the site. The initial field survey was conducted outside the blooming period for most special-status plants presented in **Appendix C**; however, due to current disturbance regime associated with agricultural land cultivation, including disking, it was determined that no special-status plant species have the potential to occur on the project site. A review of suitable habitat and occurrence data determined several special-status wildlife species have the potential to occur within the project site including Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus),* western red bat (*Lasiurus blossevillii*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus),* Swainson's hawk (*Buteo swainsoni*), California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), and San Joaquin Coachwhip *(Masticophis flagellum ruddockz*). Raptors and other protected avian species have the potential to nest within trees present within and adjacent to the survey area. These species are discussed further below. All other species are assumed unlikely to occur or have a low potential to occur within the project site based on the species-specific reasons presented in Appendix C of **Appendix C**, are therefore unlikely to be impacted by the project, and are not discussed further.

Special-Status Plant Species

No special status plant species are likely to occur within the project site based on lack of suitable habitat, ongoing agricultural operations, and other species-specific reasons provided in **Appendix C**.

Special-Status Wildlife Species

Townsend's Big Eared Bat

The Townsend's big-eared bat (*Corynorhinus townsendii*) is a CDFW species of special concern. The Townsend's big-eared bat is a year-round resident in California occurring from low desert to mid-elevation montane habitats. It is found primarily in rural settings from inland deserts to coastal redwoods, oak woodland of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. Townsend's big-eared bats typically roost during the day in caves and mines but can roost in buildings that offer suitable conditions. Night roosts are in more open settings and include bridges, rock crevices, and trees. This species hibernates in mixed sex aggregations of a few to several hundred individuals. Hibernation is more prolonged in colder areas. This species arouses periodically and moves to alternative roosts and actively forages and drinks throughout the winter. A single young bat is born per year between May and July. Females form maternity colonies of 35 to 200 individuals, while males roost individually. Townsend's big-eared bats feed primarily on small moths that are gleaned from vegetation.

The California Natural Diversity Database ("CNDDB") reports four (4) occurrences of the Townsend's big-eared bat within the quadrangles reviewed, the nearest of which is located approximately eight (8) miles north of the project site, from 2017. This species may forage over the entire project site and trees within the project site may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the survey area. Therefore, this species has a moderate potential to occur within the project site.

Pallid Bat

The pallid bat (*Antrozous pallidus*) is a CDFW species of special concern, and is a year round resident in California. This species of bat occurs in a wide variety of habitats including grasslands, shrublands, arid desert areas, oak savanna, coastal forested areas, and coniferous forests of the mountain regions of California and forests ranging from sea level up through mixed conifer forests. Pallid bats are most common in open, dry habitats with rocky areas for roosting. Day roosts of this species include caves, crevices, mines, and occasionally hollow trees and buildings. This species seems to prefer rocky outcrops, cliffs, and crevices with access to open habitats for foraging. Pallid bats make use of similar structures for night roosting and will use more open sites such as eaves, awnings, and open areas under bridges for feeding roosts. Pallid bats feed on large insects (20 to 70 mm in length). Foraging takes place over open ground, at heights generally not greater than 7.5 feet, although prey is most often caught on the ground. Jerusalem crickets, scorpions and beetles make up most of the diet of pallid bats in central California. Copulation occurs in the fall, October through December. Females store the sperm and ovulation occurs in the following spring. Parturition timing is determined by local climate and embryonic development usually takes about nine (9) weeks with birth occurring in May or June. Twins are the norm in northern California but in other areas they are known to have triplets. Maternity colonies range from 20 to 200 individual adult bats. Males roost in much smaller groupings (**Appendix C**).

The CNDDB reports three (3) occurrences of the pallid bat within the quadrangles reviewed, the nearest of which is from 1949 and located approximately 10.6 miles west of the project site. This species may forage over the entire project site and trees within the project site may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the project site. Therefore, this species has a moderate potential to occur within the project site.

Western Mastiff Bat

The western mastiff bat (*Eumops perotis californicus*) is a CDFW species of special concern. Mastiff bats occur across the southwestern United States to central Mexico (**Appendix C**). In California, this species is an uncommon resident in southeastern San Joaquin Valley and Coastal Ranges from Monterey County southward through southern California. This species occurs in many open, semiarid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, agricultural, and urban environments. Western mastiff bats are reliant on crevices in cliff faces, high buildings, trees, and tunnels for roosting. When roosting in rock crevices, this species requires a vertical face to drop off and take flight. Western mastiff bats roost alone or in small colonies, usually consisting of less than 100 individuals. Although nursery roosts for many bat species contain only adult females and their young, some western mastiff bat colonies contain adult males and females at all times of year. Mating occurs most often in early spring and young may be born from early April through August or September as parturition dates for this species varies more than any other bat in the United States. The primary diet of western mastiff bat is moths, although beetles, crickets, and katydids are also taken (**Appendix C**). Prey are caught in flight, generally from ground to tree-level.

The CNDDB reports one (1) occurrence of the western mastiff bat within the quadrangles reviewed from 1998 located approximately three (3) miles south of the project site. This species may forage over the entire project site and trees within the project site may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the project site. Therefore, this species has a moderate potential to occur within the project site.

Western Red Bat

The western red bat is a CDFW species of special concern. This species occurs in California, Arizona, and New Mexico, with a range that extends southward to South America. In California, western red bats occur from Shasta County to the Mexican border, west of the Sierra Nevada/Cascade crest and deserts. Although this species is migratory, western red bats are known to reside in California year-round and there is evidence that California populations do not migrate out of the state. Western red bats are associated with forests and woodlands from sea level up through mixed conifer forests; however riparian areas appear to be favored, particularly willows, cottonwoods, and sycamores. Roost sites are often in edge habitat adjacent to streams, fields, or urban areas. Preferred sites are hidden from above, with few branches below, and have ground covers of low reflectivity. This nocturnal species emerges from roosting sites one (1) to two (2) hours after dark and feeds over a variety of habitats, including grasslands, shrublands, open woodlands, forests, and croplands. Moths, beetles, crickets, and cicadas are the typical prey species. Western red bats are typically a solitary species, but they often feed with other bat species, may migrate in groups, and may form nursery colonies. Mating occurs in the fall and sperm is stored over winter. Fertilization occurs in the spring and gestation is 80 to 90 days. One (1) to five (5) young are born in mid-May to early July; however, most litters have two (2) or three (3) young. During the rearing period, females may move the young between roost sites. Young are capable of sustained flight after approximately three (3) to six (6) weeks (**Appendix C**).

The CNDDB reports one (1) occurrence of the western red bat within the quadrangles reviewed from 1998 located approximately three (3) miles south of the project site. This species may forage over the entire project site and trees within the project site may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the project site. Therefore, this species has a moderate potential to occur within the project site.

White-Tailed Kite

The white-tailed kite (*Elanus leucurus*) is a CDFW fully protected species. This raptor species is a fairly common to uncommon, year-long resident in coastal and valley lowlands. This species generally utilizes

herbaceous lowlands with variable tree growth and an associated high population density of voles. Nests are made of loosely piled sticks and twigs and lined with grass, straw, or rootlets. Nests are generally placed near the top of a dense oak, willow, or other tree stands (usually six (6) to 20 meters [20 to 100 feet] above ground), and are often located near an open foraging area. Breeding occurs from February to October with peak activity occurring from May to August. Foraging occurs in undisturbed open grasslands, meadows, farmlands, and emergent wetlands.

The CNDDB reports two (2) occurrences of the white-tailed kite within the quadrangles reviewed, the nearest of which is from 2001 and located approximately 12.5 miles west of the project site. Additionally, several "eBird" occurrences from 2024-2025 are reported along SR 25 and San Felipe Road adjacent to the project site. Trees within and adjacent to the project site may provide suitable nesting habitat and suitable foraging habitat is present within annual grassland located adjacent to the project site. Therefore, this species has a moderate potential to occur within the project site.

Loggerhead Shrike

The loggerhead shrike (*Lanius ludovicianus*) is a CDFW species of special concern. This species frequents open habitats with sparse shrubs and trees, suitable perches, and low or sparse herbaceous cover. This species occurs only rarely in heavily urbanized areas and is often found in open agricultural areas with associated fencing. Nests are built upon a stable branch in densely foliaged shrubs or trees, usually well-concealed. Nest height averages from 0.4 to 15 meters (1.3 to 50 feet) above ground. Breeding occurs from March to May, with peak activity occurring in July or August. Loggerhead shrikes mainly eat large insects, but may also take small birds, mammals, amphibians, reptiles, fish, carrion, and various invertebrates. This species frequently skewers prey on a thorn, sharp twig, wire barb, or forces it into a tree crotch as a food cache for later consumption.

The CNDDB does not report any occurrences of the loggerhead shrike within the quadrangles reviewed; however, several "eBird" occurrences from 2024-2025 are present along SR 25, near the Hollister Airport, and along San Felipe Road. Shrubs and trees within the project site may provide suitable nesting habitat and this species may forage over the entire project site. Therefore, this species has a moderate potential to occur within the project site.

Swainson's Hawk

Swainson's Hawk is listed as a state Threatened species and is protected by the MBTA. In California, this species is found in a variety of open habitats including grasslands, desert scrub, and agricultural fields. Most breeding sites in California are limited to two (2) disjunct populations in the Great Basin and Central Valley. This species breeds in California from late February to March, lays eggs between April and May, and departs for southern migration between September and October. This species forages on foot or scans for prey from a perch with a diet consisting mostly of voles, other small rodents, birds, and insects. Swainson's Hawk often nests near riparian areas but will also use isolated trees in agricultural fields and along roadsides if adjacent to suitable foraging habitat. In the Central Valley, nests are typically built in the upper canopy and lateral branches of riparian trees which offer a panoramic view for hunting.

The CNDDB reports six (6) occurrences of the Swainson's hawk within the quadrangles reviewed, the nearest is from 2020 and located 1.5 miles northeast along SR 156 and San Felipe Road. Trees within and adjacent to the project site may provide suitable nesting habitat and suitable foraging habitat is present within annual grassland located adjacent to the project site. Therefore, this species has a moderate potential to occur within the project site.

California Red-legged Frog

The CRLF was listed as a federally Threatened species on June 24, 1996 (61 FR 25813-25833) and is also a CDFW species of special concern. Critical Habitat was designated for CRLF on April 13, 2006 (71 FR 19244-19292) and went into effect on May 15, 2006.

The CRLF is the largest native frog in California and was historically widely distributed in the central and southern portions of the state. Adults generally inhabit aquatic habitats with riparian vegetation, overhanging banks, or plunge pools for cover, especially during the breeding season (Jennings and Hayes, 1988). They may take refuge in small mammal burrows, leaf litter, or other moist areas during periods of inactivity or to avoid desiccation. Radiotelemetry data indicates that adults engage in straight-line breeding season movements irrespective of riparian corridors or topography and they may move up to two (2) miles between non-breeding and breeding sites. During the non-breeding season, a wider variety of aquatic habitats are used, including small pools in coastal streams, springs, water traps, and other ephemeral water bodies. CRLF may also move up to one (1) mile (1.6 km) from aquatic and riparian habitats into surrounding upland habitats for shelter or to forage. These upland habitats include various vegetation types, such as grassland, woodland, forest, and wetlands that contain structural features such as boulders, rocks, organic debris (e.g., downed trees and logs), small mammal burrows, and moist leaf litter (**Appendix C**).

This species requires still or slow-moving water during the breeding season where it can deposit large egg masses, which are most often attached to submergent or emergent vegetation. Breeding typically occurs between December and April depending on annual environmental conditions and locality. Eggs require six (6) to 12 days to hatch and metamorphosis generally occurs after 3.5 to seven (7) months, although larvae are also capable of over-wintering. Following metamorphosis, generally between July and September, juveniles are 25-35 millimeters ("mm") in size. Juvenile CRLF appear to have different habitat needs than adults. Juvenile frogs have been recorded mostly from sites with shallow water and limited shoreline or emergent vegetation. Additionally, it was important that there be small one-meter breaks in the vegetation or clearings in the dense riparian cover to allow juveniles to sun themselves and forage, but to also have close escape cover from predators. Jennings and Hayes also noted that tadpoles have different habitat needs and that in addition to vegetation cover, tadpoles use mud. It is speculated that CRLF larvae are algae grazers, however, foraging larval ecology remains unknown (**Appendix C**).

It has been shown that occurrences of CRLF are negatively correlated with presence of non-native bullfrogs, although both species are able to persist at certain locations, particularly in the coastal zone. It is estimated that CRLF have disappeared from approximately 75 percent of its former range and have been nearly extirpated from the Sierra Nevada, Central Valley, and much of southern California (**Appendix C**).

The CNDDB reports 151 occurrences of CRLF within the quadrangles reviewed, the nearest occurrences are 2.6 miles southwest of the survey area from 2001 and 4.2 miles north along SR 156, from 1991. Adult CRLF may disperse up to two (2) miles between breeding and non-breeding sites, and up to 1.6 km (1 mile) from aquatic to upland habitat to shelter or forage. There are no recorded breeding sites within dispersal distance; however, no data is available for the nearby aquatic resources. A seasonal pond is located 220 feet west of the project site and a reservoir is located 130 feet east of the project site. The hydroperiod for both of these resources is unknown, which could affect their suitability as breeding resources. Therefore, this species has a moderate potential to occur within the survey area.

California Tiger Salamander

The CTS is a federal and state threatened species. The CTS is a large, stocky salamander most commonly found in annual grassland habitat, but also occurs in the grassy understory of valley-foothill hardwood and chaparral habitats, and uncommonly along stream courses in valley-foothill riparian habitats. Adults spend

most of their lives underground, typically in burrows of ground squirrels and other animals. The California tiger salamander has been eliminated from an estimated 55 percent of its documented historic breeding sites. Currently, about 150 known populations of California tiger salamanders remain. The CTS persists in disjunct remnant vernal pool complexes in Sonoma County and Santa Barbara County, in vernal pool complexes and isolated stock ponds scattered along a narrow strip of rangeland on the fringes of the Central Valley from southern Colusa County south to northern Kern County, and in sag ponds and human maintained stock ponds in the coast ranges from the San Francisco Bay Area south to the Temblor Range.

Above-ground migratory and breeding activity may occur under suitable environmental conditions from mid-October through May. Adults may travel long distances between upland and breeding sites; adults have been found two (2) kilometers (1.24 miles) from breeding sites. Breeding occurs from November to February, following relatively warm rains. The CTS breeds and lays eggs primarily in vernal pools and other temporary rainwater ponds. Permanent human-made ponds are sometimes utilized if predatory fishes are absent; streams are rarely used for reproduction. Eggs are laid singly or in clumps on both submerged and emergent vegetation and on submerged debris in shallow water. Males typically spend six (6) to eight (8) weeks at breeding ponds, while females typically spend only one (1) to two (2) weeks. Eggs hatch within 10-14 days and a minimum of 10 weeks is required to complete development through metamorphosis, although the larval stage may last up to six (6) months and some larvae in Contra Costa and Alameda Counties may remain in their breeding sites over the summer (**Appendix C**).

There are no recorded breeding resources within the dispersal distance of two (2) kilometers (1.24 miles) of the project site. A seasonal wetland located 220 feet from the project site is within the dispersal distance for CTS and may provide suitable aquatic habitat; however, no data has been collected for this pond. The agricultural and ruderal habitats provide marginally suitable upland habitat for CTS, as most animal burrows have been disturbed. However, these habitats could also provide suitable dispersal habitat for CTS.

The CNDDB reports 102 occurrences of CTS within the quadrangles reviewed, including one (1) occurrence from 2007 that overlaps with the project site. One (1) seasonal pond, for which no data is available, is located within dispersal distance to the project site and may provide suitable aquatic habitat. Some small mammal burrows were observed within the ruderal habitat within the project site, but most burrows have been disturbed by active agricultural use. Based on this information, there is a moderate potential for CTS to occur within the project site.

San Joaquin Whipsnake

The San Joaquin whipsnake (*Masticophis flagellum ruddocki*) is a CDFW species of special concern. Whipsnakes seek cover in rodent burrows, bushes, trees, and rock pies. This species hibernates in soil or sand approximately one (1) foot (0.3 meter) below the surface, sometimes at the bases of plants. Little is known about nest sites. In desert regions, whipsnakes may be attracted to water to drink or ambush prey. Open terrestrial habitats are preferred, but whipsnakes will occasionally climb trees and bushes to bask, seek prey, or take cover. This species' diet consists of rodents, lizards and their eggs, snakes (including rattlesnakes), birds and their eggs, young turtles, insects, and carrion. Whipsnakes search actively for prey, with their heads elevated. They pole their heads in burrows or climb trees, using both vision and olfaction to detect prey. Whipsnakes are diurnal. Mating occurs in April and May, eggs are laid in June and July, and the first young appear in late August to early September.

The CNDDB includes one (1) occurrence of the San Joaquin whipsnake within the quadrangles evaluated, the nearest of which is located approximately three (3) miles south of survey area from 1996. Habitat quality for San Joaquin whipsnake within the survey area is relatively low. However, ruderal areas may provide dispersal habitat for the species. Therefore, this species has a moderate potential to occur within the survey area.

Raptors and Other Nesting Birds

Raptors, their nests, and other nesting birds are protected under Fish and Game Code, the CMBTA, and the MBTA. While the life histories of these species vary, overlapping nesting and foraging similarities allow for their concurrent discussion. Most raptors are breeding residents throughout most of the wooded portions of the state. Stands of live oak, riparian deciduous, or other forest habitats, as well as open grasslands, are used most frequently for nesting. Breeding occurs February through September, with peak activity occurring from May to July. Prey for these species include small birds, small mammals, and some reptiles and amphibians. Many raptor species hunt in open woodland and habitat edges.

Various species of raptors and other protected species, such as red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus),* American kestrel (*Falco sparverius*), great horned owl (*Bubo virginianus*), and turkey vulture (*Cathartes aura*), have a potential to nest within the trees present within and adjacent to the survey area. Other avian species with the potential to nest in the area include but are not limited to American crow, white-crowned sparrow (*Zonotrichia leucophrys*), black phoebe (*Sayornis nigricans*), yellow-rumped warbler (*Dendroica coronata*), California gnatcatcher (*Polioptila californica*), and bushtit (*Psaltriparus minimus*).

Trees

Eight (8) trees—five (5) Peruvian peppertrees (Schinus molle) and three (3) red-flowering gums (Corymbia ficifolia)—were inventoried during the tree assessment (**Appendix D**). Both species are non-native in California. Detailed field data for each tree is included in **Table 4**.

Table 4
Tree Survey Results

Tree ID	Species	Common Name	DBH (in)	CRZ (ft)	TPZ (ft)	Health	Notes
1336	*Schinus molle*	Peruvian Peppertree	13	13	20	Fair	Trunk in neighboring property.
1337	*Schinus molle*	Peruvian Peppertree	21	21	32	Fair	Tree along margin of property.
1338	*Schinus molle*	Peruvian Peppertree	10	10	15	Fair	Inside project grading limits. Recommend removal.
1339	*Schinus molle*	Peruvian Peppertree	10	10	15	Poor	Ant infestation (typical for health response of another health-related issue related to the tree). Recommend removal.
1340	*Schinus molle*	Peruvian Peppertree	11	11	17	Fair	Tree along margin of property.
1341	*Corymbia ficifolia*	Red-Flowering Gum	22	22	33	Fair	Trunk in neighboring property.
1342	*Corymbia ficifolia*	Red-Flowering Gum	22	22	33	Fair	Trunk in neighboring property.
1343	*Corymbia ficifolia*	Red-Flowering Gum	24	24	36	Fair	Trunk in neighboring property.

Source: **Appendix D**

Regulatory Setting

Federal

Federal Endangered Species Act

Provisions of the ESA of 1973 (16 USC 1532 *et seq.*, as amended) protect federally listed threatened or endangered species and their habitats from unlawful take. Listed species include those for which proposed and final rules have been published in the Federal Register. The ESA is administered by the USFWS and the National Oceanic and Atmospheric Administration National Marine Fisheries Service ("NMFS"). In general, NMFS is responsible for the protection of ESA listed marine and anadromous fish species, whereas other listed species are under USFWS jurisdiction.

Section 9 of ESA prohibits the take of any fish or wildlife species listed under ESA as endangered. Take, as defined by the ESA, is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." Harm is defined as "any act that kills or injures the fish or wildlife…including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife." In addition, Section 9 prohibits removing, digging up, and maliciously damaging or destroying federally listed plants on sites under federal jurisdiction. Section 9 does not prohibit the take of federally listed plants on sites unless those sites are on federal land. If there is the potential for incidental take of a federally listed fish or wildlife species, take of listed species can be authorized through either the Section 7 consultation process for federal actions or the Section 10 incidental take permit process for non-federal actions. Federal agency actions include activities that are on federal land, conducted by a federal agency, funded by a federal agency, or authorized by a federal agency (including issuance of federal permits).

Clean Water Act

The U.S. Army Corps of Engineers ("ACOE") and U.S. Environmental Protection Agency ("EPA") regulate discharge of dredged and fill material into waters of the U.S. under Section 404 of the CWA. Waters of the U.S. are defined broadly as waters susceptible to use in commerce (including waters subject to tides, interstate waters, and interstate wetlands) and other waters (such as interstate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds) (33 CFR 328.3). Potential wetland areas are identified as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions."

Under Section 401 of the CWA, any applicant receiving a Section 404 permit from the ACOE must also obtain a Section 401 Water Quality Certification from the Regional Water Quality Control Board ("RWQCB"). A Section 401 Water Quality Certification is issued when a project is demonstrated to comply with state water quality standards and other aquatic resource protection requirements.

Migratory Bird Treaty Act

The MBTA of 1918 prohibits killing, possessing, or trading migratory birds except in accordance with regulation prescribed by the Secretary of the Interior. Most actions that result in taking or in permanent or temporary possession of a protected species constitute violations of the MBTA. The USFWS is responsible for overseeing compliance with the MBTA and implements Conventions (treaties) between the United States and four (4) countries for the protection of migratory birds – Canada, Mexico, Japan, and Russia. The USFWS maintains a list of migratory bird species that are protected under the MBTA.

State

California Endangered Species Act

CESA was enacted in 1984. The California Code of Regulations (Title 14, Section 670.5) lists animal species considered endangered or threatened by the state. Section 2090 of CESA requires state agencies to comply with endangered species protection and recovery and to promote conservation of these species. Section 2080 of the Fish and Game Code prohibits "take" of any species that the commission determines to be an endangered species or a threatened species. "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill or attempt to hunt, pursue, catch, capture, or kill." Section 2081 Incidental Take Permit from CDFW is required to "take" any state listed species.

California Native Plant Protection Act

CNPPA of 1977 directed CDFW to carry out the legislature's intent to "preserve, protect and enhance rare and Endangered plants in the State." CNPPA prohibits importing rare and endangered plants into California, taking rare and endangered plants, and selling rare and endangered plants. CESA and CNPPA authorized the Fish and Game Commission to designate endangered, threatened, and rare species and to regulate the taking of these species (§2050-2098, Fish and Game Code). Plants listed as rare under CNPPA are not protected under CESA; however, these plants may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research.

California Fish and Game Code

Birds. Section 3503 of the Fish and Game Code states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Section 3503.5 prohibits the killing, possession, or destruction of any birds in the orders Falconiformes or Strigiformes (birds-of-prey). Section 3511 prohibits the take or possession of fully protected birds. Section 3513 (i.e., CMBTA) prohibits the take or possession of any migratory nongame birds designated under the MBTA. Section 3800 prohibits take of nongame birds.

Fully Protected Species. The classification of fully protected was the state's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish (§5515), mammals (§4700), amphibians and reptiles (§5050), and birds (§3511). Most fully protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

Species of Special Concern. CDFW also maintains a list of wildlife "species of special concern." Although these species have no legal status, the CDFW recommends considering these species during analysis of project impacts to protect declining populations and avoid the need to list them as endangered in the future.

Sensitive Habitats. CDFW has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations (§1802). As a trustee agency under CEQA Guidelines Section 15386, CDFW provides expertise in reviewing and commenting on environmental documents and provides protocols regarding potential negative impacts to those resources held in trust for the people of California.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1969 ("Porter-Cologne") is California's statutory authority for the protection of water quality and applies to surface waters, wetlands, and groundwater, and to both

point and nonpoint sources. Under Porter-Cologne, the State Water Resources Control Board ("State Board") has the ultimate authority over State water rights and water quality policy. However, Porter-Cologne also establishes nine RWQCBs to oversee water quality on a day-to-day basis at the local/regional level. The survey area is located within Region 3 – Central Coast RWQCB. Porter-Cologne incorporates many provisions of the federal CWA, such as delegation to the State Board and RWQCBs of the National Pollutant Discharge Elimination System ("NPDES") permitting program.

Under Porter-Cologne, the state must adopt water quality policies, plans, and objectives that protect the state's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegated to the nine (9) RWQCBs. The regional boards are required to formulate and adopt water quality control plans for all areas in the region and establish water quality objectives in the plans. Porter-Cologne sets forth the obligations of the State Board and RWQCBs to adopt and periodically update water quality control plans (basin plans). The act also requires waste dischargers to notify the RWQCBs of such activities through filing of Reports of Waste Discharge ("RWD") and authorizes the State Board and RWQCBs to issue and enforce waste discharge requirements ("WDRs"), NPDES permits, Section 401 water quality certifications, or other approvals. The RWQCBs also have authority to issue waivers to RWD requirements and WDRs for broad categories of "low threat" discharge activities that have minimal potential for adverse water quality effects, when implemented according to prescribed terms and conditions.

The term "Waters of the State" is defined by Porter-Cologne as "any surface water or groundwater, including saline waters, within the boundaries of the state." Each RWQCB protects all waters in its regulatory scope but has special responsibility for wetlands, riparian areas, and headwaters, including isolated wetlands, and waters that many not be regulated by the ACOE under Section 404 of the CWA. Waters of the State are regulated by RWQCB under the State Water Quality Certification Program, which regulates discharges of fill and dredged material under Section 401 of the CWA and the Porter-Cologne.

Local

County of San Benito Code of Ordinance

The County of San Benito regulates the removal or significant trimming of all trees greater than eight (8) inches in diameter measured at breast height ("DBH") or a multi-trunked tree having an aggregate diameter of ten (10) inches or more in DBH, per the provisions in the County Code of Ordinances Chapter 25.07 (Tree Protection) and 19.33 (Management and Conservation of Woodlands). The removal of a protected tree requires a tree removal permit from the County as defined in the County Code.

San Benito County Code Chapter 19.33

County Code Chapter 19.33 (Management and Conservation of Woodlands) establishes regulations to conserve and protect woodlands in the unincorporated areas of San Benito County while allowing for reasonable use and enjoyment of private property. Chapter 19.33 regulates the removal, modification, and disturbance of trees and woodland areas through a discretionary permit process, with standards intended to retain a minimum level of woodland canopy and prevent excessive or unnecessary tree loss. A discretionary permit is generally required when proposed tree removal would reduce woodland canopy below the retention thresholds established in Table 19.33.007(1), when removal occurs on slopes of 30 percent or greater, or when activities would otherwise significantly impact protected woodland resources.

4.4.2 Environmental Impacts

BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

4.4.3 Explanation

a) **Less-than-Significant Impact with Mitigation Incorporated**. No special-status plant species are known or have the potential to occur within the project site based on the results of surveys and/or lack of suitable habitat (**Appendix C**). However, the proposed project is located in an area where several special-status wildlife species have moderate potential to occur. These species include the Townsend's big-eared bat, pallid bat, western mastiff bat, western red bat, white-tailed kite, loggerhead shrike, Swainson's hawk, CTS, and CRLF. Take of these species as a result of the proposed project could result in significant environmental impacts. However, impacts to special-status wildlife species as a result of construction of the proposed project would be reduced to less-than-significant with incorporation of the following mitigation measures. (Sources: 14, 17, 20)

Mitigation Measures

BIO-1 Prior to construction activities, the project proponent shall retain a qualified biologist to conduct an Employee Education Program for the construction crew. The qualified biologist will meet with the construction crew at the onset of construction at the project site to educate the construction crew on the following: a) the appropriate access route(s) in and out of the construction area and a review of the project boundaries; b) how a biological monitor will examine the area and agree upon a method which will ensure the safety of the monitor during such activities, c) and all special-status species that may be present, their habitat, and proper identification; d) the specific mitigation measures that will be incorporated into the construction effort; e) the general provisions and protections afforded by the regulatory agencies; and f) the proper procedures if a special status species is encountered within the project site. The qualified biologist shall provide copies of attendance logs and presentation materials to the County for their records.

BIO-2 During vegetation removal and ground disturbing activities, the project proponent shall retain a qualified biologist to survey appropriate areas of the construction site daily before the onset of work activities for the presence of special-status wildlife species. The qualified biologist shall remain available to come to the site if special-status wildlife are identified until all ground disturbing activities are completed. If non-listed special-status wildlife species are found and these individuals are likely to be killed or injured by work activities, the qualified biologist shall be contacted, and work shall stop in that area until the animal has moved on its own out of the work area or the qualified biologist has moved the animal outside of the work area. Measures for encounters with state and/or federally-listed species are provided below in **Mitigation Measures BIO-7a** through **7d**.

After vegetation removal and ground disturbing are complete, or earlier if determined appropriate by the qualified biologist, the qualified biologist shall designate a construction monitor to oversee on-site compliance with all avoidance and minimization measures. The qualified biologist shall ensure that this construction monitor receives sufficient training in the identification of special-status species known or with the potential to occur within the project site. The construction monitor or the qualified biologist shall be authorized to stop work if the avoidance and/or minimization measures are not being followed.

BIO-3 The following best management practices will be implemented during construction (i.e., during and post-construction) to reduce impacts to special-status wildlife species:

- All construction debris and associated materials stored in staging area shall be removed from the work site upon completion of the project.
- To prevent inadvertent entrapment of wildlife during project construction, all excavated, steep-walled holes or trenches more than two (2) feet deep will be covered at the close of each working day with plywood or similar materials. Before such holes or trenches are filled, they will be thoroughly inspected for trapped animals.
- Only tightly woven fiber netting or similar material may be used for erosion control at the project site. Coconut coir matting is an acceptable erosion control material. No plastic mono-filament matting will be used for erosion control, as this material may ensnare wildlife, including special-status amphibians.

- Because dusk and dawn are often the times when special-status wildlife are most actively foraging and dispersing, all construction activities shall cease one half hour before sunset and should not begin prior to one half hour after sunrise.
- All trash that may attract predators shall be properly contained, removed from the construction site, and disposed of regularly. Following construction, all trash and construction debris shall be removed from work areas.

Special-status bats may utilize any of the large trees within the survey area for night roosts and may forage within the project site. No suitable day roosting habitat is present within the project site. However, tree removal or limbing may result in direct impacts to special-status bats, if present at the time of removal. This would be considered a significant impact under CEQA. **Mitigation Measures BIO-1** through **BIO-3**, and **BIO-4** would reduce potential impacts to a less-than-significant level.

Mitigation Measure

BIO-4 To the extent practical, limbing/tree removal operations required for the project should occur between September 15 and November 1 to avoid bat maternity roosts and winter hibernacula. If tree limbing/tree must occur outside the period of September 15 through November 1 a survey for bats shall be conducted by a qualified biologist.

Prior to commencement of construction related activities including tree trimming and removal and demolition of dilapidated buildings, a qualified biologist shall conduct a pre-construction survey for bats as follows:

- The biologist shall determine if bats are utilizing the site for roosting. For any trees/snags/buildings that could provide roosting space for cavity or foliage-roosting bats, potential bat roost features shall be thoroughly evaluated to determine if bats are present. Visual inspection and/or acoustic surveys shall be utilized as initial techniques.
- If roosting bats are found, the biologist shall develop and implement acceptable passive exclusion methods based on CDFW recommendations. If feasible, exclusion shall take place during the appropriate windows (September 15 through November 1) to avoid harming bat maternity roosts and/or winter hibernacula. (Authorization from CDFW is required to evict winter hibernacula for bats).
- If established maternity colonies are found, a buffer shall be established around the colony to protect pre-volant young from construction disturbances until the young can fly; or implement other measures acceptable to CDFW.
- If a tree or structure is determined not to be an active roost site for roosting bats, it may be immediately removed or limbed.

Tree removal may result in direct mortality or nest destruction for raptors, special-status avian species (including Swainson's hawk, loggerhead shrike, and white-tailed kite), or other nesting birds, if present within the work area. In addition, indirect impacts from construction activities (e.g., noise, vibrations) could result in injury, nest abandonment, and/or mortality of raptors, special-status avian species, and other nesting birds, if nesting within or directly adjacent to the work area during construction activities. These are potentially significant impacts that can be minimized to less-than-significant with implementation of **Mitigation Measures BIO-1** through **BIO-3**, and **BIO-5**.

Mitigation Measure

BIO-5 Construction activities that may directly (e.g., vegetation and tree removal) or indirectly (e.g., noise/ground disturbance) affect nesting raptors and other protected avian species shall be timed to avoid the breeding and nesting seasons (February 1 through September 15).

- If construction activities must occur during the breeding and nesting season (February 1 through September 15), a qualified biologist shall conduct pre-construction surveys for nesting raptors and other protected avian species within 300 feet of the proposed construction activities. Preconstruction surveys should be conducted no more than seven (7) days prior to the start of the construction activities during the early part of the breeding season (February through April) and no more than 14 days prior to the initiation of these activities during the late part of the breeding season (May through August).

- If raptors or other protected avian nests are identified during the pre-construction surveys, the qualified biologist shall notify the project proponent and an appropriate no-disturbance buffer would be imposed within which no construction activities or disturbance would take place (generally 300 feet in all directions for raptors; other avian species may have species-specific requirements) until the young of the year have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.

A seasonal pond and reservoir bordering the project provide potential breeding habitat for CTS and CRLF; however, no available data has been recorded on the presence of special-status amphibians in these aquatic bodies. Overlapping occurrence data for CTS within the survey area suggests the presence of this species in close proximity to the project. The project is located within the dispersal range of these potential CTS and CRLF breeding resources. Upland habitat is only marginally suitable due to the reduction of burrows present as a result of the active agriculture. However, dispersal habitat is present within all areas of the project. CTS and CRLF may disperse through and in ruderal and agricultural areas and CTS may utilize mammal burrows as upland refugia.

Construction activities, including vegetation removal and excavation may result in direct mortality of individuals, if present at the time of construction. In addition, the project would result in loss of potential upland habitat for CTS and dispersal habitat for CTS/CRLF. These are potentially significant impacts that can be minimized to less-than-significant with implementation of **Mitigation Measures BIO-1** through **BIO-3, BIO-6a** through **BIO-6d**. In addition, this would be considered take of federal and/or state-listed species. The project will need to comply with the ESA and/or CESA and conduct consultation with the USFWS and/or CDFW to determine whether incidental take authorization for CRLF and/or CTS is required, as described in **Mitigation Measure 6a** below.

Mitigation Measures

BIO-6a Prior to construction, the project applicant shall comply with the ESA/CESA and conduct consultation with the USFWS/CDFW to determine whether incidental take authorization for CRLF and/or CTS is required prior to issuance of a grading permit. If it is determined that authorization for the incidental take of this species is required from the USFW/CDFW, the project shall comply with the ESA/CESA to obtain authorization from USFWS/CDFW at the project-level prior to the issuance of a grading permit. Permit requirements typically involve the preparation and

implementation of a mitigation plan and mitigating impacted habitat through preservation and/or restoration. The project applicant would be required to retain a qualified biologist to prepare a mitigation plan, which shall include, but is not limited to, identifying avoidance and minimization measures, and identifying a mitigation strategy that includes a take assessment, avoidance and minimization measures, compensatory mitigation lands, success criteria, and funding assurances. The project applicant would be required to implement the approved plan and any additional permit requirements.

BIO-6b A qualified biologist shall survey the proposed project area and immediately adjacent areas within 72 hours before and the morning of the onset of work activities for the presence of CTS/CRLF. If any life stage of CTS or CRLF is observed and take authorization has been acquired, relocation measures, as defined in applicable permits, shall be followed. If any life stage of CRLF/CTS is observed and take authorization has not been acquired, construction activities shall not commence until the USFWS/CDFW are consulted and appropriate actions are taken to allow project activities to continue.

BIO-6c During ground disturbing and vegetation removal activities, a qualified biologist shall survey appropriate areas of the construction site daily before the onset of work activities for the presence of CTS/CRLF. The qualified biologist shall remain available to come to the site if a CTS/CRLF is identified until all ground disturbing activities are completed. If any life stage of the CTS/CRLF is found and these individuals are likely to be killed or injured by work activities, the qualified biologist shall be contacted, and work shall stop in that area until the CTS/CRLF has moved on its own out of the work area and the USFWS/CDFW has been contacted. Construction activities will not resume until the USFWS/CDFW is consulted and appropriate actions are taken to allow project activities to continue.

BIO-6d After ground disturbing and vegetation removal activities are complete, or earlier if determined appropriate by the qualified biologist, the qualified biologist shall designate a construction monitor to oversee on-site compliance with all avoidance and minimization measures. The qualified biologist shall ensure that this construction monitor receives sufficient training in the identification of CTS/CRLF. The construction monitor or qualified biologist shall be authorized to stop work if the avoidance and/or minimization measures are not being followed. If work is stopped, the USFWS/CDFW shall be notified.

b) **No Impact**. No riparian, wetlands, or other sensitive habitat is located within the project site. Therefore, the proposed project would have no impact on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service as none are present within the site. (Sources: 14, 17, 20)

c) **No Impact**. The project site does not contain wetland features. As a result, the proposed project would have no impact on federally protected wetlands as defined by Section 404 of the Clean Water Act as none occur on the site. (Sources: 14, 17, 20)

d) **Less-than-Significant Impact**. The project site has historically been used as agricultural land and is not located within a migratory wildlife corridor. The project consists of construction of a new cannabis facility and related infrastructure/alterations to active agriculture land and developed areas. Therefore, activities associated with the project would not interfere with the movement of any native

resident or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites and this represents a less-than-significant impact. (Sources: 14, 17, 20)

e) **Less-than-Significant Impact with Mitigation Incorporated**. The project site includes mature trees. Of these, one (1) (Tree 1338) is located within the grading limits of the proposed project. In addition, another tree (Tree 1339) was found to be in poor condition and infested with ants, which typically indicates that a tree has underlying decay and/or disease. These trees are recommended for removal (**Appendix D**). In addition, the proposed project site is located outside of the County's Single Family Residential (R-1) and Residential Mixed (RM) zones and no oak woodlands are present within the site. Therefore, the proposed project does not require a tree removal permit for tree removal within the site. However, tree removal could potentially impact nesting birds protected by California Fish and Game Code and the federal Migratory Bird Treaty Act. This would be reduced to a less-than-significant impact with implementation of **Mitigation Measure BIO-5**, above. In addition, the project construction could potentially impact trees located on adjacent properties. The following mitigation measure would be applied to the project to ensure that impacts to trees on adjacent properties are less-than-significant. (Sources: 14, 17, 19)

Mitigation Measure

BIO-7 All trees which will be retained during construction but whose Tree Protection Zone ("TPZ") lies within or partially within the project site shall be protected prior to and during construction per the following specifications:

- Fencing or barricades shall be installed along the entire perimeter of a tree's TPZ to the extent feasible; generally, no less than 75 percent of a tree's TPZ shall be within the fenced area. However, fencing location may be adjusted or omitted in coordination with a certified arborist.

- Fencing shall consist of either chain link, supported snowdrift or plastic mesh, hay bales, or field fence. Fencing shall have cross bracing (typically 2x4 material) on both the top and lower edges of the fencing material to prevent sagging and provide lateral support. Fencing shall stand a minimum height of five (5) feet above grade.

- Fenced areas and the trunk protection materials shall remain in place during the entire construction period. Torn or damaged roots shall be cleanly cut to sound wood wherever possible to minimize decay entry points. Any root found that must be cut should be cut by manually digging a trench and cutting exposed roots with a saw, vibrating knife, rock saw, narrow trencher with sharp blades, or other approved root pruning equipment. No tree seals shall be used as seal material promotes decay.

- Equipment staging, vehicle parking and access, and stockpiling or dumping of construction materials shall be prohibited within the TPZs of trees.

- Soil disturbance (e.g., over excavation, sub excavation, grading, compaction or trenching) within TPZs shall be avoided to the extent feasible. If avoidance of a tree's entire TPZ is not possible, or if the TPZ is reduced from the dripline by a qualified arborist, work within the TPZ shall be conducted only under the supervision of a qualified arborist. In no instance shall permanent improvements exceed the following distances towards a tree's trunk: 12 inches for curbs, gutters, and walkways, and 24 inches for retaining walls, foundations, and concrete pads.

- For trees where the TPZ was reduced from the dripline, a mulch layer up to approximately four (4) inches deep shall be applied to the ground following construction under the supervision of a qualified arborist. Only one (1) to two (2) inches of mulch should be applied within one (1) to two (2) feet of the trunk, and under no circumstances should any soil or mulch be placed against the root crown (base) of trees. The best source of mulch would be from chipped material generated on-site.

f) **No Impact**. There are no Habitat Conservations Plans or Natural Community Conservation Plans that apply to the project site. Therefore, future development facilitated by the proposed 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. No impact would occur. (Sources: 14, 17, 20)

4.5 Cultural Resources

4.5.1 Environmental Setting

The County of San Benito General Plan notes that only three (3) percent of the land area of San Benito County has been surveyed for cultural resources, yet over 1,300 cultural sites have been documented, including over 500 prehistoric and historic archaeological sites and over 850 historic buildings. The 2035 County General Plan RDEIR identified that the majority of historic properties in the County are in the incorporated cities of Hollister and San Juan Bautista, with the exception of two (2) small historic communities, Paicines and Tres Pinos.

Albion Environmental, Inc. ("Albion") prepared a Phase I Cultural Resource Inventory for the proposed project summarizing the results of the records search and site survey conducted for the proposed project site (Albion, 2026). Albion conducted a survey of the proposed project site on December 9, 2025. The Phase I Cultural Resource Inventory is not included as an appendix to this document due to the potentially confidential nature of the results discussed in the report. Qualified personnel may request to view a copy of this report at the County's office at 2301 Technology Parkway, Hollister CA 95023. Both the records search and pedestrian site survey discussed in the Phase I Cultural Resource Inventory identified that the proposed project site has low potential for historic or pre-colonial materials.

4.5.2 Environmental Impacts

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

4.5.3 Explanation

a) **No Impact.** CEQA Guidelines §15064.5 describes a historical resources as: 1) any resource that is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource included in a local register of historical resources; and, 3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant based on substantial evidence in light of the whole record. A substantial adverse change includes physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance would be materially impaired (CEQA Guidelines §15064.5(b)).

The proposed project would not cause substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. No structures, historic or otherwise, exist on the project site. Furthermore, the Phase I Cultural Resource Inventory states that no previously recorded or identified historic buildings or structures are known to occur within the boundaries of the project site, though six (6) are located within the vicinity of the proposed project site. However, the proposed project would not impact these nearby resources as development activities would be confined to the project parcel where no historic resources are located. Archival research shows that the project area has remained undeveloped and used for agricultural purposes since at least 1939 (Albion, 2026). For these reasons, the proposed project would have no impact on historical resources. (Sources: 1, 14, 17)

b) **Less-than-Significant Impact with Mitigation Incorporated.** Public Resources Code §21083.2 requires that lead agencies evaluate potential impacts to archaeological resources. Specifically, lead agencies must determine whether a project may have a significant effect or cause a substantial adverse change in the significance of an archaeological resource.

Albion prepared a Phase I Cultural Resource Inventory for the proposed project, which included results from a search of records at the Northwest Information Center ("NWIC") and a pedestrian survey of the proposed project site conducted on December 9, 2025. The search at the NWIC revealed that no previously recorded precolonial cultural resources are located within the Project area; however, one known precolonial resource has been recorded within a ¼-mile radius of the Project area. The pedestrian survey covered approximately 20-acres of the site and found no evidence of precolonial cultural materials. The Phase I Cultural Resource Inventory concluded, based on background research and the pedestrian survey of the site, that the sensitivity for precolonial archaeological resources is low and sensitivity for buried precolonial deposits is low (Albion, 2026).[3]

While no archaeological resources have been documented on-site, previously unknown or buried archaeological resources could still be present at the proposed project site. Therefore, the project could result in a significant impact to unknown or buried resources during construction**.** Implementation of **Mitigation Measures CR-1** would ensure that potential impacts would be less-than-significant. (Sources: 1, 14, 17)

Mitigation Measure

CR-1 The project applicant shall retain a qualified archaeologist (project archaeologist) on an on-call basis to evaluate potential inadvertent finds of archaeological resources. If

[3] The Amah Mutsun Tribal Band identified that the proposed project site as possessing a moderate potential for the disturbance of previously unrecorded Indigenous archaeological resources. Please refer to **Section 4.16** of this document for discussion of the AB 52 process and results of consultation with the Amah Mutsun Tribal Band.

potentially significant archaeological resources are discovered, the construction contractor shall halt excavation until any finds are properly evaluated by the project archaeologist and culturally affiliated Tribes. If the project archaeologist and Tribal representative determine that the find is determined to be significant, work shall remain halted near the find to permit development and implementation of an appropriate mitigation plan to avoid and minimize impacts to the discovered resources with the concurrence of the CEQA Lead Agency (San Benito County). At the discretion of the qualified archaeologist and Tribal representative, monitoring could be discontinued if there is enough information collected from direct observation of the subsurface conditions to conclude that cultural resources do not exist. The qualified archaeologist and Native American monitor shall provide either a monitoring report following the completion of construction or a written recommendation that monitoring is no longer necessary during construction for the County's review and approval.

c) **Less-than-Significant Impact with Mitigation Incorporated.** No human remains, including those interred outside of formal cemeteries, are known to occur at the proposed project site. While the likelihood of human remains being discovered at the proposed project site is low, it is possible that previously unknown human remains may be present. Previously unknown human remains could be impacted during ground-disturbing construction and grading activities. Implementation of **Mitigation Measure CR-2** would ensure that any potential adverse impacts would be reduced to a less-than-significant level. (Sources: 1, 14, 17)

Mitigation Measure

CR-2 If human remains are found at any time on the proposed project site, work shall be stopped by the construction manager, and the County Coroner shall be notified immediately. If the Coroner determines that the remains are Native American, the Native American Heritage Commission shall be notified as required by law. The Commission will designate a Most Likely Descendant who will be authorized to provide recommendations for management of the Native American human remains. (Ref: California Public Resources Code Section 5097.98; and Health and Safety Code Section 7050.5). Notification of the discovery will also be immediately provided to any Tribes that engaged in AB52 consultation with San Benito County with regard to the Project.

Specific County of San Benito provisions and further measures shall be required as follows if human remains are found:

If, at any time in the preparation for, or process of, excavation or otherwise disturbing the ground, discovery occurs of any human remains of any age, or any significant artifact or other evidence of an archeological site, the applicant or builder shall:

a. Cease and desist from further excavation and disturbances within two hundred feet of the discovery or in any nearby area reasonably suspected to overlie adjacent remains.

b. Arrange for staking completely around the area of discovery by visible stakes no more than ten (10) feet apart, forming a circle having a radius of not less than one hundred feet from the point of discovery; provided, however, that such staking need not take place on adjoining property unless the owner of the adjoining property authorizes such staking. Said staking shall not include flags or other devices which may attract vandals.

c. Notify Planning and Building Director, who shall also be notified within 24 hours if human and/or questionable remains have been discovered. The Sheriff–Coroner shall also be notified immediately of the discovery as noted above.

d. Subject to the legal process, grant all duly authorized representatives of the Coroner and the Planning and Building Director permission to enter onto the property and to take all actions consistent with Chapter 19.05 of the San Benito County Code and consistent with §7050.5 of the Health and Human Safety Code and Chapter 10 (commencing with §27460) of Part 3 of Division 2 of Title 3 of the Government Code.

4.6 Energy

4.6.1 Environmental Setting

Starting in 2018, all Pacific Gas & Electric ("PG&E") customers within Monterey, San Benito, and Santa Cruz Counties were automatically enrolled in Central Coast Community Energy ("3CE"), formerly known as Monterey Bay Community Power. 3CE is a locally-controlled public agency providing carbon-free electricity to residents and businesses. Formed in February 2017, 3CE is a joint powers authority, and is based on a local energy model called community choice energy. 3CE partners with PG&E, which continues to provide billing, power transmission and distribution, customer service, grid maintenance services and natural gas services to San Benito County. 3CE's standard electricity offering is carbon free and is classified as 30 percent renewable (3CE, 2025).

4.6.2 Environmental Impacts

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

4.6.3 Explanation

a) **Less-than-Significant Impact.** The proposed project would result in the construction of a new cannabis microbusiness facility and associated site and frontage improvements, which is assumed to intensify energy use compared to the existing agricultural uses. Energy use consumed during construction and operation is expected to be low because both construction energy use and operational energy use would conform to state and local standards for energy efficiency.

The length of the construction schedule is not known at this time. The construction phase would require energy for the manufacture and transportation of building materials, preparation of the site, and the actual construction of the structures. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks. The construction energy use has not been

determined at this time. However, the project would not cause inefficient, wasteful, or unnecessary consumption of energy as the construction schedule and process is designed to be efficient to avoid excess monetary costs. Energy use required to complete construction would be limited and short-term.

Operation of the proposed project would consume energy primarily for the operation of lights, cultivation equipment, and processing equipment. The operational energy use has not been determined at this time. Given the scale of the proposed project, operational activities are unlikely to result in a significant increase in energy use. Furthermore, the proposed project would be required to comply with California Building Code Title 24 and the California Green Building Standards Code ("CalGreen"), which would ensure energy use related to project operation is not wasteful or inefficient. Additionally, the Applicant proposes to perform the following actions to minimize operational energy use:

- Conduct annual energy audits.
- Measure and record net energy usage.
- Maintain efficient heating/cooling/dehumidification systems.
- Implement energy efficient lighting.
- Implement automated lighting systems.
- Utilize natural light when possible.
- Utilize an efficient circulation system.
- Ensure that energy use is above or in-line with industry benchmarks.
- Implement phase-out plans for the replacement of inefficient equipment.

As a result, implementation of the proposed project would not result in a substantial environmental impact on energy resources.

Based on the discussion above, the proposed project would not result in a potentially significant environmental impact, during operation or construction, due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources during project operation or construction. This results in a less-than-significant impact. (Sources: 13, 14)

b) **Less-than-Significant Impact.** As mentioned in the discussion (a) above, construction and operation of the proposed project would have a less-than-significant impact due to energy usage and efficiency and, thus, would not conflict with local or state plans for energy efficiency. The proposed project would also be required to build in accordance with California Building Code standards, Title 24 energy efficiency standards (or subsequent revised standards adopted prior to issuance of building permits), and CALGreen code, which includes design provisions to minimize wasteful energy consumption, thereby improving the efficiency of the overall project. As a result, the project would comply with existing state energy standards and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (Sources: 13, 14)

4.7 Geology and Soils

4.7.1 Environmental Setting

The following discussion describes the geological characteristics of the project site based on available information, including a site-specific Geological Engineering Investigation prepared by Krazan & Associates, Inc. (October, 2025).

Faulting and Ground Shaking

Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California (see **Figure 10 – Fault Map**). The project site is located in a seismically active region. The California Earthquake Hazards Zone Application ("EQ Zapp") shows that the project site is located within the San Felipe fault zone quadrangle and in close proximity to the Calaveras Fault zone and the Sargent Fault zone. More specifically, the Calaveras Fault zone is located within the project site, approximately 900 feet west of the proposed building site (Krazan & Associates, 2025). In addition, the Sargent Fault zone is located approximately 1.1 miles southeast of the project site (Krazan & Associates, 2025).

Liquefaction, Lateral Spreading, and Seismic Induced Settlement

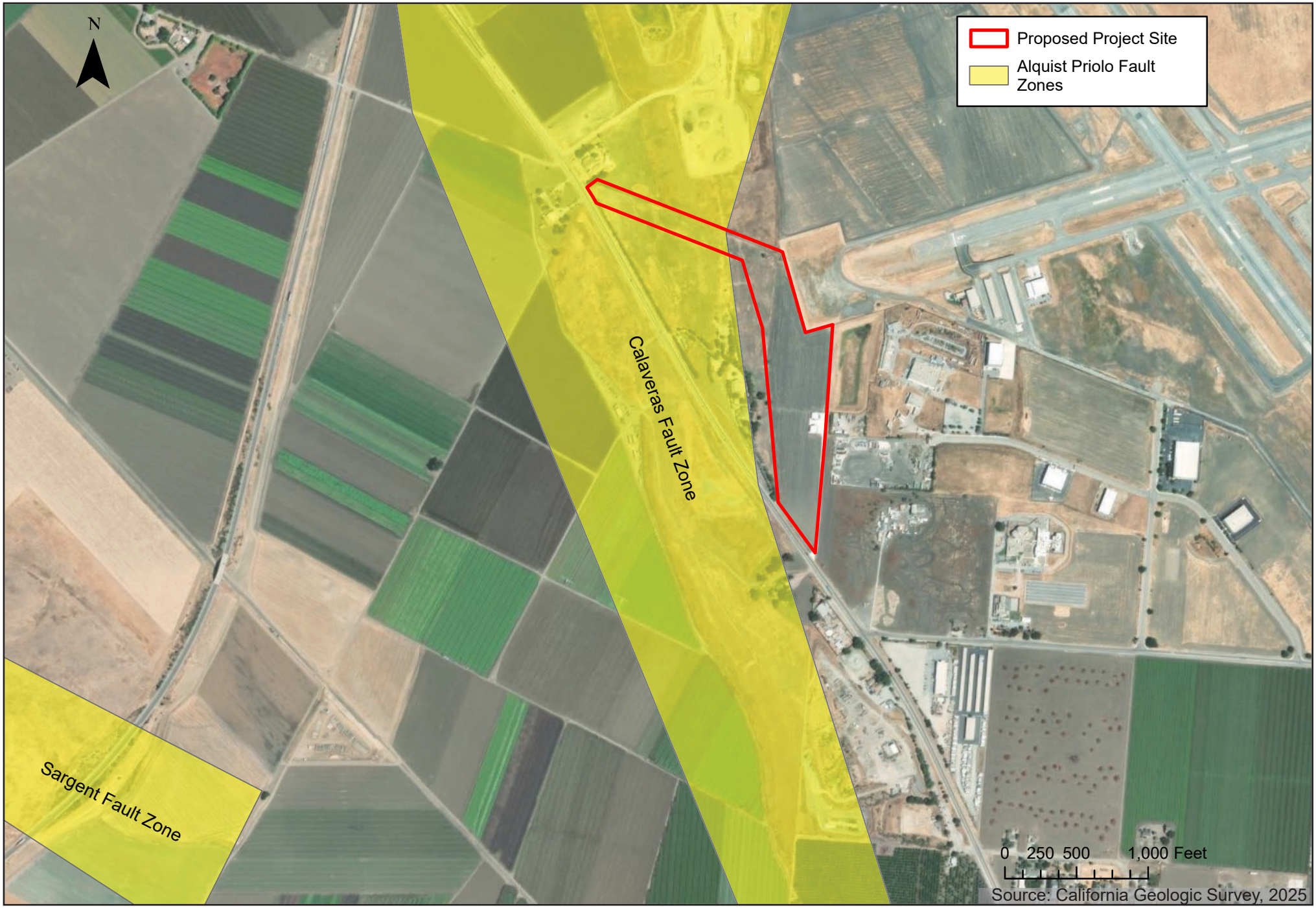
The term liquefaction refers to the liquefied condition and subsequent softening that can occur in soils when they are subject to cyclic strains, such as those generated during a seismic event. Liquefaction typically occurs due to a combination of low soil density, grain sizes within a certain range, and a sufficiently strong earthquake. The effects of liquefaction can include ground settlement, lateral soil spreading, and localized loss, of foundation support. EQ Zapp indicates that the project site is not within an area susceptible to liquefaction (DOC, 2025).

Soil Profile

The soil profile of the project site includes very loose silty clay for the first six (6) to 12 inches, underlain by approximately three (3) to four (4) feet of stiff to very stiff silty clay (Krazan & Associates, 2025). Krazan & Associates conducted laboratory testing of these soils and found that they possess moderate strength characteristics, are slightly compressible, and have a high shrink/swell potential. These soils are underlain by a further four (4) to five (5) feet of very stiff silty clay, with varying amounts of fine sand and medium dense silty sand and silty sand with trace clay encountered near the maximum boring depth of 20 feet (Krazan & Associates, 2025). Krazan & Associates conducted laboratory testing of these soils and found that they possess moderate strength, are slightly compressible, and have a high shrink/swell potential.

Groundwater

Groundwater was not encountered during site soil boring tests, which extended to a maximum of 20 feet below ground surface. Krazan & Associates noted that the California Department of Water Resources website estimates that groundwater elevation in the project region sits around 50 feet below ground surface.



Title:

Fault Map

Date	12/17/2025
Scale	N/A
Project	2025.50

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure
10

4.7.2 Environmental Impacts

GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative 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?	☐	☐	☐	☒

4.7.3 Explanation

a.i) **Less-than-Significant Impact with Mitigation Incorporated.** The Calaveras Fault zone is located within the project site, approximately 900 feet west of the proposed building site (Krazan & Associates, 2025). In addition, the Sargent Fault zone is located approximately 1.1 miles southeast of the project site (Krazan & Associates, 2025). Earthquake fault zone boundaries are defined in **Figure 10**. Therefore, the project site is considered to be located in a seismically active area and there is the risk of loss, injury, or death from rupture of a known earthquake fault delineated based on a review of the most recent Alquist-Priolo zoning map. Future development of the site would be contingent on adhering to the recommendations of the design-level geotechnical report as outlined in

Mitigation Measure GEO-1. Incorporation of **Mitigation Measure GEO-1** would reduce this impact to a less-than-significant level. (Sources: 14, 17, 22)

Mitigation Measure

GEO-1 Prior to the issuance of any grading or building permit, the applicant shall submit evidence demonstrating that the design-plans for the proposed project (including, but not limited to, grading plans, foundation plans, and design loads) have been reviewed by a qualified professional certifying that the design complies with all recommendations outlined in Krazan & Associates' design-level geotechnical report prepared for the project site. The applicant shall provide the design-level geotechnical report to the County for review and approval.

a.ii) **Less-than-Significant Impact with Mitigation Incorporated.** Due to the project site's location in a seismically active region, the proposed project could be subject to strong seismic ground shaking during its design life. Future buildout of the project site would be required to comply with the recommendations of a design-level geotechnical analysis consistent with Section 19.17.010 of the San Benito County Code, thereby ensuring impacts would be minimized. Implementation of the **Mitigation Measure GEO-1**, as well as compliance with all applicable building requirements related to seismic safety, including applicable provisions of the California Building Code and Title 24 of the California Administrative Code, would ensure that potential seismic-related hazards would be less-than-significant. (Sources: 14, 17, 22)

a.iii) **Less-than-Significant Impact.** Krazan & Associates' site investigation indicates that the project site is at low risk of liquefaction hazards. Therefore, the potential for liquefaction-related hazards at the project site is considered to be low or very low (Krazan & Associates, 2025). Therefore, construction of the proposed project would not expose structures to damage or loss of life from liquefaction related hazards. The proposed project would have a less-than-significant impact from liquefaction related geologic hazards. (Sources: 14, 17, 22)

a.iv) **Less-than-Significant Impact**. The proposed project site is relatively flat and there are no significant changes in site grade within the portion of the parcel proposed for development (Krazan & Associates, 2025). Therefore, the proposed project would result in a less-than-significant impact related to loss of life or damage to structures as a result of landslide-related geological hazards. (Sources: 14, 17, 22)

b) **Less-than-Significant Impact with Mitigation Incorporated**. Chapter 19.17 of the San Benito County Code regulates grading, drainage and erosion, and contains requirements regarding discharge and construction site stormwater runoff control. Grading associated with site preparation and construction activities on the project site would be minimal and is not expected to significantly disturb soil or increase its susceptibility to erosion. The construction contractor would be required to implement standard BMPs for avoiding erosion and sedimentation to protect water quality during construction. Any temporary erosion related to construction would be reduced to a less-than-significant level through the implementation **Mitigation Measure GEO-2**. (Sources: 14, 17, 22)

Mitigation Measure

GEO-2 During construction activities, the construction contractor shall implement the following erosion control measures and associated BMPs to reduce soil disturbance and the potential for erosion and sedimentation as a result of the project:

- Stockpiling and disposing of demolition debris, concrete, and soil.
- Protecting existing storm drain inlets and stabilizing disturbed areas.
- Hydroseeding/re-vegetating disturbed areas.
- Minimizing areas of impervious surfaces.
- Implementing runoff controls (e.g., percolation basins and drainage facilities).
- Properly managing construction materials.
- Managing waste, aggressively controlling litter, and implementing sediment controls.
- Limiting grading to the minimum area necessary for construction and operation of the project.

County staff shall verify that the above conditions are shown on project plans prior to issuance of any grading or building permit.

c) **Less-than-Significant Impact with Mitigation Incorporated**. As described in aiii) and aiv) above, the potential for the project to result in liquefaction or on- or off-site landslides is considered low. However, impacts from fault rupture and strong seismic ground shaking may be potentially significant due to the proximity of nearby faults and the project's location in a seismically active region. The proposed project would be required to adhere to the recommendations of the design-level geotechnical analysis required as part of **Mitigation Measure GEO-1.** Adherence to this mitigation measure would ensure that the project would have a less-than-significant impact resulting from the project being located on a potentially unstable geologic unit. (Sources: 14, 17, 22)

d) **Less-than-Significant Impact with Mitigation Incorporated**. Soils within the project site generally consist of very loose silty clay for the first six (6) to 12 inches, underlain by approximately three (3) to four (4) feet of stiff to very stiff silty clay, with a further four (4) to five (5) feet of very stiff silty clay and varying amounts of fine sand and medium dense silty sand and silty sand with trace clay to the maximum tested boring depth of 20 feet (Krazan & Associates, 2025). These soils are considered to have expansive characteristics and are unsuitable for non-expansive engineered fill (Krazan & Associates, 2025). Development of structures on expansive soils could represent a potentially significant geological impact. However, the proposed project would be subject to the recommendations of the design-level geotechnical analysis prepared by Krazan & Associates, as outlined in **Mitigation Measure GEO-1.** This would include, but is not limited to, the use of clayey soils at least two (2) percent above optimum moisture-conditions during mixing operations and further site-specific testing on site soils in the locations of building foundations. As such, the proposed project would have a less-than-significant impact from expansive soils with incorporation of mitigation and incorporation of geotechnical recommendations. (Sources: 14, 17, 22)

e) **Less-than-Significant Impact with Mitigation Incorporated.** The proposed project would include the installation of a new septic system. Construction of the proposed project would be subject to the recommendations of the design-level geotechnical analysis prepared by Krazan & Associates, as outlined in **Mitigation Measure GEO-1,** to confirm that septic systems introduced by future development facilitated by the proposed project would not be located on soils incapable of supporting septic systems. As such, this impact would be less-than-significant with incorporation of mitigation. (Sources: 14, 17, 22, 24)

f) **No Impact**. Significant paleontological specimens have been found throughout the County.[4] Specifically, fossils have been found in the Cantua Canyon, Los Gatos Creek Canyon, Coalinga and Pleasant Valley areas, Tumey Gulch, Griswold Hills, Larious Creek, San Carlos Creek, the Bolsa Valley, Tres Pinos Creek, and the San Benito River valley. There are no known paleontological resources or unique geologic features on the project site. The project site is disturbed and there are no records of paleontological resources found on the site. For these reasons, the project would not impact any paleontological resources as none are known in the project area. (Sources: 14, 17, 22)

4.8 Greenhouse Gas Emissions

4.8.1 Environmental Setting

Various gases in the earth's atmosphere, classified as atmospheric greenhouse gases ("GHGs"), play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, the radiation that otherwise would have escaped back into space is retained, resulting in a warming of the atmosphere known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect, or climate change, are carbon dioxide ("CO_2"), methane ("CH_4"), O_3, water vapor, nitrous oxide ("N_2O"), and chlorofluorocarbons ("CFCs"). Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for enhancing the greenhouse effect. In California, the transportation sector is the largest emitter of GHGs.

4.8.2 Environmental Impacts

GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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?	☐	☐	☒	☐

4.8.3 Explanation

DD&A also evaluated construction and operational GHG emissions using CalEEMod as summarized in **Appendix B**.

[4] Paleontological resources (fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits (rock formations) in which they were originally buried. Paleontological resources represent limited, non-renewable, sensitive scientific, and educational resources. The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations make it possible to predict where fossils will or will not be encountered.

a) **Less-than-Significant Impact**. The project is located in the NCCAB, where air quality is regulated by MBARD. Neither the State, MBARD, nor San Benito County have adopted GHG emissions thresholds or a GHG emissions reduction plan that would apply to the project. MBARD has determined that if a project emits less than 1,100 metric tons per year ("MT/yr") of Carbon Dioxide equivalent ("CO_2e"), then its impact would be considered less-than-significant. This calculation is determined by combining the estimated GHG emissions generated by construction, amortized over a 30-year period, with the estimated annual GHG emissions resulting from the operation of the project.

Construction of the proposed project would contribute GHG emissions that are associated with global climate change, including increases of CO_2 and, to a lesser extent, other GHG pollutants such as CH_4 and N_2O. GHG emissions would be generated by the proposed project from sources that include vehicle trips, on-site electricity consumption, on-site fuel combustion, and solid waste disposal (decomposition of solid waste disposed in a landfill). **Table 5** summarizes the construction period GHG emissions associated with full buildout of the proposed project.

Table 5
Construction Emissions of GHGs

Construction Phase	Annual Emissions ($MTCO_2e$/Year)
Site Preparation (2026)	24.41
Grading (2026)	19.57
Building Construction (2026)	47.60
Paving (2026)	19.20
Architectural Coating (2026)	1.02
Total Annual Construction Emissions[1]:	111.80
Amortized Construction Emissions:	3.73
Significance Threshold:	1,100
Exceeds Significance Threshold:	No

[1] GHG emissions quantified for buildout conditions.

As shown in **Table 5**, construction of the proposed project would generate 111.80 $MTCO_2e$/year. Amortized over a 30-year period, construction of the proposed project would generate annual emissions of 3.73 $MTCO_2e$/year. This would be well below MBARD's threshold of 1,100 $MTCO_2e$/year.

Table 6 summarizes operational GHG emissions associated with full buildout of the proposed project.

Table 6
Operational Emissions of GHGs

Source (Year 2027)	Annual Emissions ($MTCO_2e$/Year)
Area	1.90
Energy Use	41
Natural Gas	74
Mobile	825
Waste	14
Water	17
Refrigerants	1.40
Total:[1]	974.30
Total with Amortized Construction Emissions:[2]	978.03
Significance Threshold:	1,100

Source (Year 2027)	Annual Emissions ($MTCO_2e$/Year)
Exceeds Significance Threshold:	No

[1] Yearly GHG emissions quantified for buildout conditions.
[2] Yearly GHG operational emissions factoring in the 30 amortized construction emissions.

As shown in **Table 6**, operation of the proposed project would generate 974.30 $MTCO_2e$/year of GHG. When accounting for the amortized construction GHG emissions, the proposed project would generate 978.03 $MTCO_2e$/year of GHG. (Sources: 14, 17, 18, 25, 27)

b) **Less-than-Significant Impact**. Neither the State, MBARD, nor San Benito County have adopted GHG emissions thresholds or a GHG emissions reduction plan that would apply to the project. As described above, the project would not exceed acceptable thresholds. Also, in accordance with the General Plan Goals and Policies, the project would be required to include energy and water-efficient appliances, fixtures, lighting, and windows that meet applicable state energy performance standards. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases as described above. This represents a less-than-significant impact. (Sources: 14, 17, 18, 25, 27)

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

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

The State of California uses databases such as EnviroStor, GeoTracker, and the Cortese List to map the location of hazardous waste sites including sites that have been remediated, sites currently undergoing remediation, and sites that require cleanup. Based on a search of the above databases, no cases of hazardous material contamination have been documented within or adjacent to the project site (DTSC, 2025).

To address airport safety hazards, San Benito County created an Airport Land Use Commission ("ALUC") to provide orderly growth of San Benito's two (2) public airports. The Commission ensures compatible land uses around the Hollister Municipal Airport and the Frazier Lake Airpark through the implementation of their respective Comprehensive Land Use Plans. The Hollister Municipal Airport is located immediately adjacent to the project site on the northeast border of the parcel. The project site is located within the airport influence area as defined by the Hollister Municipal Airport's Land Use Compatibility Plan (San Benito County Airport Land Use Commission, 2012).

The California Department of Forestry and Fire Protection ("CalFire") prepares maps of Fire Hazard Severity Zones ("FHSZ"), which are used to develop recommendations for local land use agencies and for general planning purposes. The project site is located in a Local Responsibility Area ("LRA"), where fire response service is provided by a local agency. The project site is in an unzoned area that does not have a FHSZ designation.

4.9.2 Environmental Impacts

HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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, would it create a significant hazard to the public or the environment	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

4.9.3 Explanation

a) **Less-than-Significant Impact with Mitigation Incorporated**. The proposed project consists of the development of a portion of an agricultural parcel with a new cannabis microbusiness facility and related improvements. Construction activities would, however, require the temporary use of hazardous substances, such as fuel for construction equipment, oil, solvents, or paints. Use of hazardous materials for construction on the project site would be conducted by an appropriately licensed contractor. Any handling, transporting, use, or disposal would comply with manufacturer labels and applicable laws, regulations, policies, and programs set forth by various federal, state, and local agencies. Required compliance with applicable hazardous material laws and regulations would ensure that construction-related hazardous material use would not result in significant impacts. These construction impacts would be temporary in nature and would be considered less-than-significant.

The proposed project includes the transport, use, and disposal of hazardous materials during operation, including butane, ethanol, and CO_2, as well as fertilizers and pesticides for cannabis cultivation, manufacturing, and distribution activities. These operational uses of hazardous materials could potentially result in an increased risk of public hazards compared to existing conditions. These potential impacts would be reduced to a less-than-significant impact through the incorporation of the following mitigation measure:

Mitigation Measure

HAZ-1 Prior to the issuance of building permits for the proposed project, the Applicant shall provide the County with a commitment to implement, at a minimum, the following design features to prevent potential impacts from hazardous materials during operation:

- Installation of NFPA 13 automatic fire sprinkler system (or equivalent sprinkler system) for both greenhouse/warehouse structures.
- Installation of fire alarm and gas detection systems for both greenhouse/warehouse structures.
- Installation of explosion control and deflagration venting where required for emergency shutoff systems for both greenhouse/warehouse structures.
- Installation of secondary containment systems for both greenhouse/warehouse structures.
- Preparation of a hazardous materials management plan.
- Dedication and construction of fire department access roads compliant with California Fire Code.
- Installation of on-site water storage, fire pumps, and dedicated hydrant systems.
- Installation of Knox access systems (or equivalent) to allow site access to emergency responders in the event of a power outage.
- Preparation of 24-hour emergency contact procedures.
- Administration of annual emergency response coordination exercises.
- Preparation of pre-incident fire plan.
- Compliance with permit and inspection program requirements set by the fire response agency.

Proof of compliance with the above requirements shall be provided on plans, supplemental documents, and other project materials to the satisfaction of the County, prior to the issuance of occupancy permits.

In addition, all cannabis processing operations would be conducted according to regulatory requirements including adherence to the conditions of a Type 12 Microbusiness License from the California Department of Cannabis Control, as well as the County's Cannabis Business Regulatory Program. In addition, any handling, transporting, use, or disposal of hazardous materials during operation would comply with manufacturer labels and applicable laws, regulations, policies, and programs set forth by various federal, state, and local agencies. Therefore, long-term operational impacts associated with hazardous materials would be less-than-significant with incorporation of mitigation and standard County and State regulations for cannabis processing and conditions of approval for the proposed project. (Sources: 11, 14, 17)

b) **Less-than-Significant Impact with Mitigation Incorporated**. Construction of the proposed project is not anticipated to create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The proposed project could result in the accidental release of hazardous

material resulting in a potential hazard to the public during construction as construction activities would require the use of hazardous materials (e.g., fuel for construction equipment, oil, solvents, or paints). However, hazardous materials used during construction would be stored, applied, transported, and disposed of in accordance with all applicable BMPs, manufacturer labels, and applicable federal, state, and local regulations, which would help to prevent accidental release of hazardous materials. Furthermore, the construction contractor would be required by law to immediately clean up any accidental releases of hazardous materials that occur during construction.

The potential for hazardous material impacts during operation would be moderate given the use of volatile solvents, including butane to convert plant matter to oil, as well as the use of ethanol and CO_2 for non-volatile solvent mechanical extractions, as well as fertilizers and pesticides for cannabis cultivation. However, all cannabis processing operations would be conducted according to regulatory requirements including adherence to the conditions of a Type 12 Microbusiness License from the California Department of Cannabis Control, as well as the County's Cannabis Business Regulatory Program. In addition, all hazardous materials used during operation would be stored within the staging area in accordance with BMPs, manufacturer labels, and applicable regulations. Any waste products resulting from construction and operation would be stored, handled, and recycled or disposed of in accordance with federal, state, and local laws. Furthermore, implementation of **Mitigation Measure HAZ-1**, as described above, would ensure that the proposed project has adequate safety facilities to prevent impacts from the accidental release of hazardous materials during operation. For these reasons, the project would have a less-than-significant impact with incorporation of mitigation as a result of creating 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. (Sources: 11, 14, 17)

c) **No Impact**. Calaveras Elementary School located about 2.1 miles south of the project site, is the closest school to the site. In addition, San Benito County Juvenile Hall is located approximately 0.5 miles east of the site. There are no schools within a one-quarter mile radius of the project boundaries. As a result, the project would not result in the generation of a hazardous emission within a one-quarter mile radius of a school. There would be no impact in connection with the proposed project. (Sources: 14, 17)

d) **No Impact**. The project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. There would be no impact in connection with the proposed project. (Source: 32)

e) **Less-than-Significant Impact**. The project site is within the jurisdiction of the adopted airport land use plan for the Hollister Municipal Airport, which is located about 900 feet east of the project site. The Hollister Municipal Airport is governed by the adopted Master Plan, which is intended to "provide systematic guidelines for the airport's overall maintenance, development, and operation." Land uses adjacent to the airport are regulated by the Airport Land Use Compatibility Plan (San Benito County Airport Land Use Commission, 2012). The ALUCP regulates airport safety with adjacent uses by providing protection compatibility policies to prevent physical, visual, or electronic hazards to airport operation.

The proposed project site is within the flight path for aircraft utilizing Runway 6-24. As a result, employees working at the proposed project could potentially be subject to safety hazards or excessive noise from aircraft. However, the area of the site proposed for development is outside of the 65 DNEL noise contour delineated in the Master Plan. As a result, impacts from excessive airport noise would be less-than-significant. In addition, the area of the site proposed for development is within Airport Land Use Compatibility Zone 3, where aircraft may make turns but are not making direct

approaches or departures (San Benito County Airport Land Use Commission, 2012). The ALUCP describes criteria for determining the acceptable heights of projects based on the standards set forth in Federal Aviation Regulations (FAR) Part 77, Subpart C, *Safe, Efficient Use and Preservation of the Navigable Airspace*. The Proposed Project is located within the FAA Height Notification Zone based on a review of Map 4 of the ALUCP. The Applicant would therefore be required to submit notification to the FAA. The FAA would then conduct an aeronautical study of the proposed project to determine whether the proposed structures (including any temporary uses such as cranes and other construction equipment) would constitute a hazard to aircraft navigation. The maximum height of the proposed project would be approximately 21 feet, which appears to be compatible with the Airspace Obstruction Zone that applies to the site. This would be confirmed as part of FAA review of the proposed project. Furthermore, the proposed project is located within ALUCP Review Area 1 and would be reviewed and approved by the ALUCP prior to construction to ensure that the proposed uses are compatible with respect to airport noise, safety, overflight compatibility, and airspace protection. As a result, the project is not anticipated to be subject to hazards from airport operation, and this represents a less-than-significant impact. (Sources: 14, 17, 21, 29)

f) **Less-than-Significant Impact**. San Benito County has prepared a Multi-Jurisdiction Local Hazard Mitigation Plan ("LHMP") with the cities of Hollister and San Juan Bautista, and with two (2) water agencies. The LHMP designates certain roadways in the County for primary evacuation routes. Panoche Road is the primary evacuation roadway for the County. The project site, located on Bolsa Road/SR 25, is located and accessed from a major roadway that would likely be used as a regional evacuation route in the event of a regional emergency. However, the proposed project would not impair implementation of or physically interfere with designated evacuation routes or otherwise conflict with an adopted emergency response plan or emergency evacuation plan because the proposed project would add only four (4) to six (6) full-time employees. This represents a marginal increase in the number of vehicles that would utilize Bolsa Road/SR 25 in the event of an evacuation. In addition, the proposed project would include new access roads and driveways in compliance with the County Code and Hollister Fire Department standards for emergency vehicle access and would not conflict with the approved LHMP. This represents a less-than-significant impact. (Sources: 14, 16, 17)

g) **Less-than-Significant Impact**. CalFire prepares maps of FHSZs, which are used to develop recommendations for local land use agencies and for general planning purposes. The project site is located within an LRA, in an area that has not been formally evaluated as a FHSZ (CalFire, 2025). While the project site is located in a rural area and wildfire could expose people or structures directly or indirectly, the proposed project would comply with the applicable fire safety provisions of the California Building Code as well as standard conditions of approval, thereby reducing the risk of damage from fire to the maximum extent practicable. In addition, the proposed project would install new on-site firefighting infrastructure, including three (3) fire hydrants, to prevent hazards from wildfire. As a result, the proposed project would not expose people or structures to significant risk of loss, injury, or death and this represents a less-than-significant impact. (Sources: 8, 9, 14 ,17)

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

San Benito County has a moderate California coastal climate with a hot and dry summer season lasting from May through October. Average annual rainfall ranges from seven (7) inches in the drier eastern portion of the County, to 27 inches per year in high elevations to the south. Most of the annual rainfall occurs in the fall, winter, and to a lesser extent, spring, generally between November and April (San Benito County, 2015).

Groundwater is the major source of water supply in the County. Groundwater is generally available throughout the County. The project is located on the North San Benito sub-basin of the Gilroy Hollister Valley Basin (SGMA, 2025). The North San Benito Basin is not critically over-drafted, as defined by the Sustainable Groundwater Management Act ("SGMA") and has been marked as medium priority.

Through the Federal Emergency Management Agency's ("FEMA's") flood hazard mapping program, FEMA identifies flood hazards, assesses flood risks, and partners with states and communities to provide accurate flood hazard and risk data to guide them to mitigation actions. Flood hazard mapping is an important part of the National Flood Insurance Program ("NFIP"). The NFIP consists of three (3) components: flood insurance, floodplain management, and flood hazard mapping. FEMA maintains and updates data through Flood Insurance Rate Maps ("FIRMs"), which are used in the NFIP. These maps identify the locations of special flood hazard areas, including the 100-year flood zone.

Flood hazard areas identified on the FIRMs are identified as a Special Flood Hazard Area ("SFHA"). SFHA are defined as the area that will be inundated by the flood event having a one (1) percent chance of being equaled or exceeded in any given year. The one (1) percent chance flood is also referred to as the base flood or 100-year flood. SFHAs are labeled as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. Moderate flood zone hazard areas, labeled Zone B or Zone X (Shaded) are also shown on the FIRM, and are the areas between the limits of base flood and the 0.2 percent annual chance (or 500-year) flood. The areas of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2 percent annual chance flood, are labeled Zone C or Zone X (Unshaded).

The existing site is currently and has historically been used for agricultural uses. Per the FEMA FIRM for the project site the project site is located in Zone X (Unshaded), which is outside the 0.2 percent annual chance floodplain (see **Figure 11 – Floodplain Map**).

Tsunamis or "tidal waves" are seismic waves created when displacement of a large volume of seawater occurs as a result of movement on seafloor faults. A seiche is a standing wave in an enclosed or partially enclosed body of water. Seiches are triggered by earthquake waves and have been observed on lakes, reservoirs, swimming pools, bays, harbors, and seas. A mudflow is a form of mass wasting involving very rapid to extremely rapid surging flow of debris that has become partially or fully liquified by the addition of significant amounts of water.

The Applicant retained MH Engineering Co. to prepare a Water Management Plan for the proposed project. The Water Management Plan reviewed the estimated water use by the proposed project in coordination with the existing water use on the site to determine the net change in groundwater use. The findings of the Water Management Plan are discussed below in **Section 4.10.3** and a copy of the Water Management Plan has been provided as **Appendix E**.



Title:

Floodplain Map

Date	12/12/2025
Scale	N/A
Project	2025.50

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure 11

4.10.2 Environmental Impacts

HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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:	☐	☒	☐	☐
i) Result in substantial erosion or siltation on- or off-site;	☐	☒	☐	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☒	☐	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☒	☐	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

4.10.3 Explanation

a) **Less-than-Significant with Mitigation Incorporated**. The following discussion identifies potential impacts related to violation of water quality standards or waste discharge requirements as a result of the proposed project.

Construction

Temporary soil disturbance would occur during construction of the proposed project as a result of earth-moving activities, such as excavation and trenching for utilities, soil compaction and moving, cut and fill activities, and grading. If not managed properly, disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project site. In addition, construction of the proposed project would disturb more than one (1) acre of soil, which can result in potentially significant impacts. As a result, construction of future development facilitated by the proposed project could result in a significant impact related to water quality standards. The implementation of **Mitigation Measure HYD-1** identified below would ensure that construction impacts would be less-than-significant.

Mitigation Measure

HYD-1 Prior to the issuance of a grading or building permit, the developer shall retain a certified Qualified SWPPP Practitioner ("QSP") and/or Qualified SWPPP Developer ("QSD") to prepare a Stormwater Pollution Prevention Plan ("SWPPP"). The SWPPP shall be submitted to County Resource Management Agency for review and approval prior to the issuance of grading or building permits. A QSD/QSP should be retained for the duration of the construction and should be responsible to coordinate and comply with requirements by the RWQCB and to monitor the project as to compliance with requirements until its completion. BMPs that are typically specified within the SWPPP may include, but would not be limited to, the following:

- The use of sandbags, straw bales, and temporary de-silting basins during project grading and construction during the rainy season to prevent discharge of sediment-laden runoff into storm water facilities.
- Revegetation as soon as practicable after completion of grading to reduce sediment transport during storms.
- Installation of straw bales, wattles, or silt fencing at the base of bare slopes before the onset of the rainy season (October 15th through April 15th).
- Installation of straw bales, wattles, or silt fencing at the project perimeter and in front of storm drains before the onset of the rainy season (October 15th through April 15th).

The QSD/QSP shall provide written documentation of compliance with the requirements of these measures to the County for review and approval following the completion of construction.

Operation

The proposed project would result in a net increase in impervious surfaces on the site by a maximum of approximately 87,120 sf compared to existing conditions, thereby potentially generating additional sources of polluted runoff under post-construction conditions. The types of pollutants contained in runoff may include, but are not limited to, sediments and contaminants such as oils, fuels, paints, fertilizers, and solvents. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to downstream drainages and ultimately into collecting waterways, contributing to degradation of water quality. These operational phase impacts would be reduced to a less-than-significant level with implementation of **Mitigation Measure HYD-1**.

In addition, construction of the proposed project would be contingent on obtaining coverage under the RWQCB NPDES General Storm Water Permit. Chapter 19.17 of the San Benito County Code regulates grading, drainage and erosion, and contains requirements regarding discharge and construction site stormwater runoff control. BMPs for construction and post construction runoff.

Compliance with **Mitigation Measure HYD-1,** implementation of standard BMPs, and compliance with County erosion control requirements would reduce temporary impacts to surface water quality. As such, future construction of the proposed project would not violate water quality standards or contribute additional sources of polluted runoff. Therefore, project-related impacts to water quality would be less-than-significant with mitigation incorporated. (Sources: 14, 17)

b) **Less-than-Significant Impact.** The proposed project involves the construction of a new cannabis greenhouse and processing facility, as well as related site infrastructure improvements. The new development would be served by an existing well located near the edge of a neighboring parcel (APN 019-010-013). The proposed project would generate a net shift in groundwater use compared to existing conditions, as described below and in **Appendix E**.

The project site is utilized for agricultural purposes under existing conditions. MH Engineering Co. reviewed annual existing water use using acre-feet per year ("AFY") under existing conditions, as summarized in **Table 7**.

Table 7
Existing Water Use

#	Area Description	Area (sf)	Existing Water Use Rate (AFY/Acre)	Existing Water Use (AFY)
A1	Row Crop Farming	798,640	1.0	18.3
A2	Farm Access Roads	72,560	0.0	0.0
N/A	Total	871,200	N/A	18.3

Source: **Appendix E**

MH Engineering Co. also prepared water use estimates for the site under project conditions. This included ongoing row crop production for the portions of the parcel located outside of the building area. The estimate assumed one (1.0) AFY of water per acre of indoor cannabis cultivation, based on available estimates utilized for similar projects, as well as a Monterey County Agricultural Commissioner's report, and anecdotal evidence from the UC Berkeley Cannabis Research Center. In addition, estimates factored in the use of specific water conservation measures included as part of the project, including pulse watering systems. These estimates are summarized in **Table 8**.

Table 8
Estimated Project Water Use

#	Area Description	Area (sf)	Existing Water Use Rate (AFY/Acre)	Existing Water Use (AFY)
B1	Warehouse Portion of Greenhouse	2,400	0.0	0.0
B2	Processing Portion of Greenhouse	2,400	0.0	0.0
B3	Cultivation Portion of Greenhouse	4,800	1.0	0.1
B4	Unused Portion of Greenhouse	24,960	1.0	0.6
B5	Landscaped Area Around Greenhouse	12,800	1.0	0.3
B6	Sidewalks Around Greenhouse	2,370	0.0	0.0
B7	Driveway and Parking Areas	42,183	0.0	0.0
B8	Access Roads and Buffer Around Building	77,784	0.0	0.0
B9	Row Crop Farming South of Greenhouse	199,490	1.0	4.6
B10	Row Crop Farming West of Greenhouse	23,900	1.0	0.5
B11	Row Crop Farming North of Greenhouse	421,086	1.0	9.7
B12	Storm Water Mitigation Swale	7,200	0.0	0.0
B13	Farm Access Roads	49,197	0.0	0.0
N/A	Total	871,200	N/A	15.8

Source: **Appendix E**

The proposed project would result in a net reduction of 2.5 AFY of groundwater use compared to existing conditions. While the proposed project would introduce approximately 87,120 sf of new impervious surfaces that would interfere with groundwater recharge, this would be offset by the overall reduction of water use under project conditions. In addition, runoff from impervious surfaces

would be directed to new treatment systems (a stormwater detention area at the lowest elevated portion of the site, located north of the proposed facility) and would ultimately be returned to the ground to facilitate groundwater recharge. As a result, the proposed project would not substantially reduce groundwater supplies or significantly decrease the rate of groundwater recharge and this represents a less-than-significant impact. (Sources: 14, 17, 23)

ci-ciii) **Less-than-Significant with Mitigation Incorporated.** The proposed project includes new impervious surfaces on the site. The installation of new impervious surfaces could alter the existing drainage pattern of the site or result in substantial erosion or siltation or flooding on- or off-site. Site topography, specifically the area proposed for development, is relatively flat (Krazan & Associates, 2025). The site generally drains to the north under existing conditions. The proposed project includes a new stormwater detention area at the lowest elevated portion of the site, located north of the proposed facility. As described above, the proposed project would include a SWPPP (see **Mitigation Measure HYD-1**) to ensure that the required stormwater improvements are designed in accordance with applicable standards and requirements of the County ordinances and permit requirements for stormwater runoff. The proposed project would not alter the course of a stream or river since none are present on the site. The proposed project would be required to comply with standard BMPs, including standard County requirements related to erosion control. Compliance with applicable regulations and implementation of the proposed project drainage features and BMPs would reduce impacts due to runoff and water quality to a less-than-significant level. (Sources: 14, 17, 22)

civ) **Less-than-Significant Impact.** The project site is located within FEMA Zone X (Unshaded), which indicates that it is outside of the FEMA designated 100-year flood hazard area. As a result, construction of the proposed project would not redirect or impede flood flows, as the site is located outside of the flood hazard area. Therefore, impacts would be less-than-significant. (Sources: 14, 17)

d) **No Impact.** The proposed project site is not located in an area subject to significant seiche, tsunami, or flood hazard zones. The project site is located within FEMA Zone X (Unshaded) and outside of the flood hazard zone. The project site is located in an inland area that is not subject to tsunami hazards. There are no surface bodies of water on or adjacent to the project site that could result in hazards from seiches. The proposed project would have no impact from the risk of release of pollutants as a result of seiche, tsunami, or flooding. (Sources: 14, 17)

e) **No Impact.** The project site is not subject to any water quality control plans or sustainable groundwater management plans. The project is located on the Gilroy Hollister Valley Basin, which is not critically over-drafted as defined by the SGMA and has been marked as medium priority. The project would have no impact with respect to conflicting with an adopted water quality control plan or sustainable groundwater management plan. (Sources: 14, 17, 31)

4.11 Land Use and Planning

4.11.1 Environmental Setting

The project site is located in an agricultural, rural area of unincorporated San Benito County, California. The project site is comprised of an approximately 13-acre portion of a vacant (aside from the two (2) as-built structures) 20-acre parcel (APN 019-010-015). Surrounding land uses are primarily agricultural, with some rural residential uses in the vicinity, as well as the Hollister Municipal Airport to the northeast and SR 25 to the southwest.

The San Benito County 2035 General Plan is the planning document that guides development within the County. The project site is within the General Plan Agricultural (A) designation and Agricultural Productive (AP) Zoning District.

4.11.2 Environmental Impacts

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

4.11.3 Explanation

a) **No Impact**. The proposed project consists of the development of agricultural land with a new cannabis microbusiness facility and related site improvements. The existing site is used for agricultural purposes and development of the site with the proposed cannabis microbusiness facility would not physically divide an established community, therefore resulting in no impact. (Sources: 14, 17)

b) **Less-than-Significant Impact**. The proposed project would construct a new cannabis cultivation and processing facility and related site improvement on a site designated for agricultural use. The proposed land use is allowed as a conditional land use for parcels within the Agricultural Productive (AP) Zoning District. The proposed project would be subject to conditions of approval issued by the County at the time of permit issuance to ensure consistency with applicable land use plans, policies, and regulations. In addition, mitigation measures are identified throughout this document to ensure that potential adverse impacts associated with the proposed project would be minimized to a less-than-significant level. Thus, impacts would be less-than-significant. (Sources: 14, 17)

4.12 Noise

4.12.1 Environmental Setting

Noise is generally defined as unwanted sound that is disturbing or annoying. The policies in the County 2035 General Plan identify noise standards to avoid conflicts between noise-sensitive uses and noise source contributors. The project site is located in an agricultural area with a few residences located nearby. Existing residences are located within approximately 200 feet of the project (specifically, the westernmost portion of the proposed connection to the existing well). The largest sources of existing noise at the project site are SR 25 to the south and the Hollister Municipal Airport.

Health and Safety Policies under Goal HS-8 of the San Benito County 2035 General Plan identify noise and land use compatibility guidelines. San Benito County Code, Title 19, Chapter 19.39, Article IV, Sound Level Restrictions, limits received noise generated by any sources at any property line. The noise guidelines

generally utilize an exterior noise limit of 70-75 decibels Ldn/CNEL, dB (day/night level)[5] at Industrial, Manufacturing Utilities, Agriculture properties. Existing noise levels on the site were not measured in the field, but given the site's proximity to the Hollister Municipal Airport, they are expected to be in the range of 60-65 Ldn/CNEL, dB (San Benito County Airport Land Use Commission, 2012).

4.12.2 Environmental Impacts

NOISE. Would the project result in:	Potentially Significant Impact	Less-Than-Significant With Mitigation 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 applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

4.12.3 Explanation

a) **Less-than-Significant Impact**. The noise environment in the vicinity of the proposed project is generally characterized by noise from agricultural operations, noise from the adjacent airport, and traffic along SR 25/Bolsa Road. The Proposed Project would result in temporary construction-related noise and new ongoing operational noise, as discussed below.

Construction

Construction of the proposed project would result in short-term noise increases in the project vicinity. Noise impacts from construction activities depend on the type of equipment used, the timing and length of activities, the distance between the noise generating construction activities and receptors and shielding. Construction is anticipated to occur over a period of up to five (5) months and construction equipment is anticipated to include: one (1) all-terrain reach forklift, two (2) all-terrain lifts, and electric scissor lifts. **Table 9** shows the typical construction equipment noise levels.

Table 9
Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dBA) 50 ft from Source	Typical Noise Level (dBA) 100 ft from Source[1]	Typical Noise Level (dBA) 200 ft from Source[1]	Typical Noise Level (dBA) 400 ft from Source[1]
Air Compressor	81	75	69	63
Backhoe	80	74	68	62

[5] The Ldn represents the average sound level over a 24-hour period, accounting for greater noise sensitivity during night hours by adding five (5) decibels to noise between 7-10 p.m. and 10 decibels to noise between 10 p.m.-7 a.m.

Equipment	Typical Noise Level (dBA) 50 ft from Source	Typical Noise Level (dBA) 100 ft from Source[1]	Typical Noise Level (dBA) 200 ft from Source[1]	Typical Noise Level (dBA) 400 ft from Source[1]
Ballast Equalizer	82	76	70	64
Ballast Tamper	83	77	71	65
Compactor	82	76	70	64
Concrete Mixer	85	79	73	67
Concrete Pump	82	76	70	64
Concrete Vibrator	76	70	64	58
Dozer	85	79	73	67
Generator	81	75	69	63
Grader	85	79	73	67
Impact Wrench	85	79	73	67
Jack Hammer	88	82	76	70
Loader	85	79	73	67
Paver	89	83	77	71
Pneumatic Tool	85	79	73	67
Pump	76	70	64	58
Roller	74	68	62	56

Source: U.S. Department of Transportation, Transit Noise and Vibration Impact Assessment, 2006.
Construction generated noise levels drop off at a rate of about 6 dBA per doubling of distance between the source and receptor.

According to the San Benito County 2035 General Plan, typical hourly average construction noise levels could be as loud as 75 - 80 decibels at a distance of approximately 100 feet from the construction area during active construction periods. The nearest sensitive receptors are residences located approximately 200 feet to the west of the project site (specifically, the westernmost portion of the proposed connection to the existing well). However, the majority of construction work would be further from sensitive receptors, at a distance of approximately 350 feet. Based on the average construction noise levels in **Table 9** and the distance to the nearest sensitive receptors, the proposed project is not anticipated to exceed County exterior noise standards of 70 decibels at adjacent residential uses. In addition, construction noise would be temporary and would cease upon completion of construction activities. As a result, the proposed project would have a less-than-significant impact related to generating substantial noise increases in the vicinity of the site during construction.

Operation

The proposed project would generate limited noise during project operation. Operational noise would largely be associated with vehicle trips to and from the facility and operation of mechanical equipment during regular business hours (i.e. 8:00 AM and 4:30 PM). The proposed project would not represent a new source of significant operational noise compared to the existing noise environment given the proximity to a major roadway and a local airport. The addition of these operational land uses to the site would not result in a significant permanent increase in ambient noise levels compared to existing conditions, resulting in a less-than-significant impact. (Sources: 14, 17)

b) **Less-than-Significant Impact**. The proposed project would result in temporary construction-related vibration and ongoing operational vibration, as discussed below.

Construction

The proposed project would generate temporary groundborne vibration during the construction phase. A vibration impact could occur where noise-sensitive land uses are exposed to excessive vibration levels. Construction of the proposed project may generate temporary groundborne vibration within 200 feet from the adjacent residential receptors. The Federal Transit Authority has

published standard vibration levels and peak particle velocities for construction equipment. **Table 10** below summarizes these standards for construction equipment.

Table 10
Vibration Velocities for Construction Equipment

Equipment	Approximate Velocity Level at 25 Feet ("VdB")	Approximate Peak Particle Velocity at 25 Feet ("inches/second")	Approximate Peak Particle Velocity at 50 feet ("inches/second")	Approximate Peak Particle Velocity at 400 feet ("inches/second")
Pile Driving (sonic)	104	0.644	N/A	0.006
Pile Driver (impact)	112	1.518	N/A	0.015
Large Bulldozers	87	0.089	0.031	0.001
Small Bulldozer	58	0.003	0.001	0.000
Loaded Trucks	86	0.076	0.027	0.001
Jackhammer	79	0.035	N/A	0.000

Note: Data reflects typical vibration level. Source: (U.S. Department of Transportation, May 2006)

A vibration impact could occur where noise-sensitive land uses are exposed to excessive vibration levels. Residences, which are considered sensitive receptors, 200 feet west of the project (specifically, the westernmost portion of the proposed connection to the existing well). For purposes of this analysis, excessive groundborne vibration would be 0.2 inches per second or greater peak particle volume ("PPV") (as derived from the U.S. Department of Transportation, Earthborne Vibrations Technical Advisory equation for attenuation of vibration) which is the level at which vibration could cause damage to masonry and wood buildings. Vibration levels from construction equipment attenuate as they radiate from the source (U.S. Department of Transportation, May 2006). Sensitive receptors in the area could be exposed to groundborne vibrations of varying magnitudes depending on the type of equipment and proximity to construction activities, as shown in **Table 10**. Heavy equipment, including pile drivers and jackhammers, are not anticipated to be required for future construction facilitated by the proposed project.

While construction activities may occur within 200 feet of residential receptors as a result of the proposed project, construction vibrations from these activities would be below the threshold 0.2 inches per second (see **Table 10**). Vibration associated with the construction of the proposed project would be below levels that could cause damage to structures, would not result in prolonged interference for sensitive receptors, and would barely be perceptible. This represents a less-than-significant impact.

Operation

Once operational, future residential development facilitated by the proposed project would not generate excessive or substantial vibration. Operation of the proposed cannabis microbusiness facility would not include activities that would produce substantial vibrations. Operation of the Proposed Project would not introduce new sources of substantial vibration, resulting in a less-than-significant impact. (Sources: 14, 17)

c) **Less-than-Significant Impact**. The project site is within the jurisdiction of the adopted airport land use plan for the Hollister Municipal Airport, which is located about 900 feet east of the project site. The proposed project site is within the flight path for aircraft utilizing Runway 6-24. As a result, employees working at the proposed project could potentially be subject to safety hazards or excessive noise from aircraft. However, the area of the site proposed for development is outside of the 65 DNEL noise contour delineated in the Master Plan (San Benito County Airport Land Use

Commission, 2012). In addition, the County's General Plan indicates that noise ranges at 70-75 decibels Ldn/CNEL, dB are normally acceptable for Industrial, Manufacturing Utilities, Agriculture properties. Airport noise at the project site is anticipated to be within the range of 60-65 Ldn/CNEL, dB. While project occupants would be exposed to airport noise, this would be a less-than-significant impact as the estimated noise is within the County's acceptable range for the proposed use. (Sources: 14, 17, 29)

4.13 Population and Housing

4.13.1 Environmental Setting

The most recent U.S. census population estimates for the County (2022) estimated a total population of 67,579 residents living in the County (US Census Bureau, 2022). The California Department of Finance's E-5 Population and Housing Estimates for Cities, Counties, and the State for 2025 estimated that the total amount of housing units was 22,261 homes in the County (including the incorporated Cities of Hollister and San Juan Bautista) (California Department of Finance, 2025).

The County 2035 General Plan REIR notes that employment for 2010 in unincorporated areas of the County was approximately 4,530 jobs. The County 2035 General Plan REIR notes that there will be an increase at an estimated 6.44 percent per year, and an estimated 94,731 total residents living in the County between 2010 and 2035. Concerning employment, a large number of San Benito County residents commute to other counties for work. Employment in the unincorporated areas of the County are projected to increase approximately 10 percent per year to an estimated 12,030 and 13,130 total jobs between 2010 and 2035. It is anticipated that there will be approximately 14,844 dwelling units located in unincorporated areas of the County, and 5,425 located within the City of Hollister's sphere of influence, for a total of 20,269 homes. There is an estimated ratio of 2.85 persons per household in the unincorporated County, reflecting the past 50 years of declining persons per dwelling with a two (2)-percent decline from the 2010 ratio of persons per dwelling.

The County anticipates providing 182 new residential units for very low-income households, 282 residential units for low-income households, 331 new residential units for moderate income households, and 678 new residential units for above moderate households for a total of 1,655 new residential units located in the unincorporated County by the year 2035 (County of San Benito, 2015). Various General Plan goals and policies, including those listed in the Housing Element, and the County Code reflect the County's planning vision to accommodate the future growth projections. The proposed project is a cannabis microbusiness facility and does not include any new residential uses.

4.13.2 Environmental Impacts

POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.13.3 Explanation

a) **Less-than-Significant Impact.** The proposed project consists of a cannabis microbusiness facility and would not include any new residential units that would directly result in a population increase. The proposed project would generate up to six (6) new jobs that could indirectly result in population growth. However, the overall scale of the proposed project would not create jobs that would substantially increase population growth. In addition, the new jobs are likely to be filled, at least in-part, by existing County residents. As such, the population increase resulting from the project would not constitute substantial unplanned growth and impacts would be less-than-significant. (Sources: 7, 14, 17)

b) **No Impact.** The proposed project consists of a cannabis microbusiness facility on a site used for agricultural purposes. No existing people or housing units are located on the site. As a result, no existing people or housing units would be displaced as a result of the proposed project and no impact would occur. (Sources: 14, 17)

4.14 Public Services

4.14.1 Environmental Setting

Fire Protection: Fire protection services at the project site are provided by the City of Hollister Fire Department. Hollister Fire Station No. 3 is the nearest fire station, located at the Hollister Municipal Airport, about 1,000 feet to the northeast of the site, or about 1.1 miles away via local roadways. Industrial development in San Benito County is required to pay a fire protection impact fee to offset costs associated with increased demand for fire protection services. All fees for fire protection must be paid to the County prior to the issuance of permits. The County's fire protection impact fee for industrial use[6] is $0.32 per sf of development (County of San Benito, 2018).

Police Protection: Police protection services are provided to the project site by the San Benito County Sheriff's Office. The County operates one (1) Sheriff's Office located at 2301 Technology Parkway in the City of Hollister, which is located approximately one (1) mile (approximately two (2) miles via local roadways) east of the project site. Industrial development in San Benito County is required to pay a law enforcement impact fee to offset costs associated with increased demand for policing services. All fees for law enforcement must be paid to the County prior to the issuance of permits. The County's law enforcement impact fee for industrial use is $0.132 per sf of development (County of San Benito, 2018).

Schools: The project is located within the North County Joint Union Elementary District ("NCJUED") and the San Benito High School District ("SBHSD"). Calaveras Elementary School located about 2.1 miles south of the project site, is the closest school to the site. Both NCJUED and SBHSD charge developer impact fees to offset impacts from development on existing schools. NCJUED's does not have a development fee

[6] Given the project's use for cannabis processing, industrial land use is assumed to provide a conservative analysis for fee payment.

category for industrial use. SBHSD's base development impact fee for commercial/industrial development is currently $0.29 per sf.

Parks: The closest park to the proposed project is Bark Park, which is located approximately 0.86 miles east of the project site. The County does not presently charge industrial-type land uses an impact fee for new development (County of San Benito, 2018).

Other Public Facilities: The County assesses various other impact fees for industrial development to offset impacts on public facilities. All fees must be paid to the County prior to the issuance of permits (County of San Benito, 2018).

4.14.2 Environmental Impacts

PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities 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 public services:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Fire protection?	☐	☒	☐	☐
b) Police protection?	☐	☒	☐	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

4.14.3 Explanation

a) **Less-than-Significant Impact with Mitigation Incorporated**. The proposed project would require fire protection services and would incrementally increase demand on the City of Hollister Fire Department. However, the construction of a new cannabis microbusiness facility would not increase the demand for fire protection services such that new or expanded fire facilities would need to be constructed. The City of Hollister Fire Department already serves the site and adjacent properties. In addition, developers of the proposed project would be required to pay the current fire protection impact fees to the County prior to the issuance of permits. Therefore, construction of the proposed project would have a less-than-significant impact on fire service during construction.

The proposed project includes cannabis manufacturing as part of operations, which would increase safety hazards associated with volatile extraction processes, compressed gases, carbon dioxide enrichment systems, and hazardous materials storage. These new uses introduced could result in additional demand for emergency fire response compared to existing conditions. However, implementation of **Mitigation Measure HAZ-1**, as described in **Section 4.9** of this document, would reduce impacts related to increasing demand on fire protection services by implementing various safety and on-site emergency response procedures during project operation to a less-than-significant level. (Sources: 14, 17)

b) **Less-than-Significant Impact with Mitigation Incorporated**. The proposed project would require police protection services and would result in a minor incremental increase demand on the

San Benito County Sheriff's Office. However, the construction of a new cannabis microbusiness facility would not increase the demand for police protection services such that new or expanded police facilities would need to be constructed. The San Benito County Sheriff's Office already serves the site and adjacent properties. In addition, developers of the proposed project would be required to pay the current law enforcement impact fees to the County prior to the issuance of permits. Therefore, construction of the proposed project would have a less-than-significant impact on fire service during construction.

The proposed project includes cannabis manufacturing as part of operations, which would increase safety hazards associated with volatile extraction processes, compressed gases, carbon dioxide enrichment systems, and hazardous materials storage. These new uses introduced could result in additional demand for emergency fire response compared to existing conditions. However, implementation of **Mitigation Measure HAZ-1**, as described in **Section 4.9** of this document, would reduce impacts related to increasing demand on police protection services by implementing various safety and on-site emergency response procedures during project operation to a less-than-significant level. (Sources: 14, 17)

c) **No Impact**. The proposed project consists of a new cannabis microbusiness facility. There are no schools or educational facilities on the site that would be directly impacted by the proposed project. The proposed project does not include any new residential development that would generate new students. In addition, the proposed project would be subject to the current developer fees imposed by the HSD (HSD, 2023) and the NCJUED (NCJUED, 2025) at the time of development. The proposed project would have no impact related to increasing demand on schools. (Sources: 14, 17, 28)

d-e) **No Impact**. The proposed project consists of a new cannabis microbusiness facility. There are no parks or other public facilities on the site that would be directly impacted by the proposed project. The proposed project does not include any new residential development that would generate new park users or otherwise substantially increase demand on other public facilities. In addition, the proposed project would be subject, as applicable, to the current parks, library, drainage, and other impact fees imposed by the County (County of San Benito, 2018) at the time of development. The proposed project would have no impact related to increasing demand on parks or other public facilities. (Sources: 14, 17)

4.15 Transportation/Traffic

4.15.1 Environmental Setting

The existing project site is accessible via Bolsa Road/SR 25 which runs along the southern border of the project site. Other roadways in the study area include SR 156 to the west and Flynn Road to the east. There are no sidewalks or marked crosswalks within the project area. There are no bicycle facilities in the project area. There are no bus stops within the vicinity of the project site.

4.15.2 Environmental Impacts

TRANSPORTATION/TRAFFIC. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with a 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 (for example, sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

4.15.3 Explanation

a) **Less-than-Significant Impact.** The Circulation Element of the 2035 General Plan includes policies directing the development of the County transportation network. The 2035 General Plan (Policy C-1.12) states the County shall endeavor to maintain a General Plan target goal of a Level of Service of "D" (defined as a roadway segment approaching unstable traffic flow and where drivers have little freedom to select their own speeds) at all locations. The proposed project consists of a new cannabis microbusiness facility with up to six (6) employees. The proposed project would also generate up to 12 new daily vehicle trips during operation related to the import of materials for cannabis cultivation and processing and the export of cannabis products from the site. The addition of six (6) employees and 12 operational vehicle trips would not substantially increase the number of trips during AM or PM peak hours at intersections near the project site compared to existing conditions. In addition, the proposed project includes a ROW dedication and frontage improvements. These improvements would be required prior to recording the final map and would be consistent with Policies C-1.5 and C-1.9 of the Circulation Element of the 2035 General Plan. As a result, the proposed project would not conflict with existing policies addressing circulation and this represents a less-than-significant impact. (Sources: 14, 17)

b) **Less-than-Significant Impact**. Section 15064.3 (b)(1) of the CEQA Guidelines identifies that VMT exceeding an applicable threshold of significance may indicate that a project has a significant transportation related effect. Currently, the County of San Benito has not adopted VMT thresholds. As a result, the analysis completed for the proposed project used state published guidance to determine the threshold for significance. The Governor's Office of Land Use and Climate Innovation (previously the Office of Planning and Research) issued a Technical Advisory on Evaluating Transportation Impacts in CEQA which provides "screening thresholds" that indicate whether a project may have a significant impact. These screening thresholds, such as project size, maps, transit availability, and provision of affordable housing, quickly identify when a project is expected to cause a less-than-significant impact without conducting a detailed study. In the absence of substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy ("SCS") or general plan, projects that

generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.

The proposed project consists of a new cannabis microbusiness facility with up to six (6) employees, each making one (1) round-trip to and from the site, for a total of 12 vehicle trips per day. This represents a conservative analysis, as each trip would represent a single driver, with no carpooling between employees. The anticipated 12 trips per day would be below the 110 trip project threshold identified by the Office of Land Use and Climate Innovation. Therefore, project-level VMT impacts would be less-than-significant. (Sources: 14, 17)

c) **Less-than-Significant Impact.** The proposed project would facilitate the future development of new frontage improvements along SR 25, as well as internal circulation infrastructure to facilitate the movement of vehicles within the project parcel. Compared to existing conditions, the addition of these new roadway features could result in new roadway hazards caused by geometric design features. However, the frontage improvements, access road, and driveways would be designed to comply with all current design and safety criteria, as well as all applicable policies of the Circulation Element of the 2035 General Plan, including Policies C-1.10, C-1.14, and C-1.16. In addition, the frontage improvements would be subject to the conditions of a project-specific encroachment permit from Caltrans. The proposed project would not increase hazards or introduce incompatible uses onto a public roadway and this represents a less-than-significant impact. (Sources: 14, 17)

d) **Less-than-Significant Impact.** San Benito County has prepared a Multi-Jurisdiction LHMP in coordination with the cities of Hollister and San Juan Bautista and two (2) water agencies. The LHMP designates certain roadways in the County for primary evacuation routes, as described in **Section 4.9, Hazards and Hazardous Materials**. SR 25, being a major roadway in the County, would be used as an evacuation route in the event of a local or regional emergency. The proposed project would introduce up to six (6) new employees on the site compared to existing conditions, which would incrementally increase the total number of vehicles using SR 25 to evacuate in the event of a local or regional emergency. This incremental increase would not substantially impair implementation of or physically interfere with designated evacuation routes or otherwise conflict with an adopted emergency response plan or emergency evacuation plan. In addition, the proposed project complies with County Code and jurisdiction having Fire Department standards for emergency vehicle access and would not conflict with the approved Multi-Jurisdictional LHMP. Therefore, the proposed project would not interfere with any emergency response or evacuation plans and this represents a less-than-significant impact. (Sources: 14, 16, 17)

4.16 Tribal Cultural Resources

4.16.1 Environmental Settings

California Assembly Bill ("AB") 52, in effect since July 2015, provides CEQA protections for Tribal cultural resources. All lead agencies approving projects under CEQA are required, if formally requested by a culturally affiliated California Native American Tribe, to consult with such Tribe regarding the potential impact of a project on Tribal cultural resources before releasing an environmental document. Under California Public Resources Code §21074, Tribal cultural resources include site features, places, cultural landscapes, sacred places, or objects that are of cultural value to a tribe and that are eligible for or listed on the California Register of Historical Resources ("CRHR") or a local historic register, or that the lead agency has determined to be of significant Tribal cultural value.

In compliance with AB 52, the County RMA sent notices to California Native American Tribes notifying the Tribes of the proposed project and soliciting requests for consultation (see attached sample AB 52 Consultation letter sent by the County, **Appendix F**) on May 4, 2026. A search of the Native American Heritage Commission's Sacred Lands File ("SLF") was positive for tribal resources.

The County received a request for consultation from the Amah Mutsun Tribal Band. The Amah Mutsun Tribal Band met with the County on May 27, 2026 to discuss the proposed project, and provided a letter with their perspective and recommendations for the proposed project on August 19, 2026. The Amah Mutsun Tribal Band expressed their disagreement with the conclusion of the Phase I Cultural Resource Inventory regarding the sensitivity of the site as it pertains to precolonial resources based on their understanding of the tribal cultural sensitivity and previous discoveries within the vicinity of the project area. The Amah Mutsun Tribal Band indicated that, based on their knowledge of the tribal landscape of the project area, that ground disturbance associated with the proposed structures, access road, parking lot, stormwater detention basin, and other project components could potentially result in impacts to previously undetected tribal resources or ancestral remains.

4.16.2 Environmental Impacts

TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section5024.1, the lead agency shall consider the significance of the resource to a California Native America Tribe.	☐	☒	☐	☐

4.16.3 Explanation

a) **No Impact.** As described above in **Section 4.5 Cultural Resources,** the proposed project site does not contain any resources that are 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). There are no historical resources within the project area, and therefore, the proposed project would have no impact to these resources. (Source: 1)

b) **Less-than-Significant with Mitigation Incorporated**. The County consulted with the Amah Mutsun Tribal Band pursuant to AB 52 as described above. The Amah Mutsun Tribal Band indicated that construction of the proposed project would have the potential to result in impacts to previously undetected tribal resources and/or ancestral remains. Impacts to these tribal resources as a result of project construction could constitute a potentially significant environmental impact. The proposed

project would implement the following mitigation measures to ensure that potential impacts to tribal resources during construction are less-than-significant. (Source: 1)

Mitigation Measure

TCR-1 Prior to the commencement of grading, excavation, or any soil disturbing construction-related activities on the project site, an in person cultural and archaeological sensitivity training will be held and attended by construction personnel. This training will be conducted by at least one designated representative of the Amah Mutsun Tribal Band and one qualified archaeologist designated by the retained project archaeologist.

TCR-2 Upon request of the Tribe or the on-call project archaeologist, access to all active construction areas where soil disturbing activities are occurring will be granted for the purposes of spot checking during normal jobsite hours. This will include same day requests for access. The Tribal monitor or qualified archaeologist will notify the County and the jobsite foreman of the request for spot checking and will utilize appropriate personal protective equipment ("PPE") and comply with the safety requirements of the jobsite. The purpose of spot checking is to inspect spoil piles, cut banks, and exposed soil subsurface areas for the presence of any potential cultural resources.

i. Should the Tribal monitor or archaeologist detect potentially significant archaeological materials, the discovery procedure outlined in Mitigation Measure CR-1 shall be followed. At either the Tribal monitor or project archaeologist's discretion, a requirement for archaeological and Native American monitoring may be established. Upon this request being submitted to the County, all ground disturbing activities on the jobsite will be halted until archaeological and Tribal monitors are retained and scheduled.

Once operational, no further excavation of the site is proposed, and operation of the proposed project would not pose any potential impacts to tribal resources.

4.17 Utilities and Service Systems

4.17.1 Environmental Setting

Water and Wastewater: Future development facilitated by the proposed project would be served by an existing unpermitted well located on the adjacent parcel to the west (APN 019-010-013). The new well would require a well permit pursuant to Section 15.05.004 and Section 15.05.007 of the County's Municipal Code. A new septic system would be installed on the project site to serve the greenhouse buildings. No water or wastewater utility connections are proposed for the storage structure.

Storm Drainage. The San Benito River, Pajaro River, and the Santa Ana Creek tributary are the three (3) natural channels that receive stormwater from the County. Stormwater drainage systems serve very few areas of the County. Water and/or wastewater services are provided by five (5) service providers and several CSAs. Most residents and businesses in the unincorporated County rely on individual drainage solutions or small-scale drainage systems. The proposed project would result in approximately 87,120 sf of new impervious surfaces. The site would be served by a new stormwater control pond located to the north of the proposed greenhouse to manage stormwater flows.

Solid Waste. The current solid waste disposal and recycling service provider for the City of Hollister, the City of San Juan Bautista, and most parts of unincorporated San Benito County is Recology. Recology transports

solid waste to the John Smith Road Landfill ("JSRL"), which is owned by the San Benito County Integrated Waste Management Department ("IWM") and operated by Waste Connections, Inc. The JSRL is the only operating active solid waste landfill in the County and has a maximum permitted throughput of 1,000 tons per day. As of October 17, 2024, the JSRL has a remaining capacity of approximately 1,921,000 cubic yards (CalRecycle, 2026).[7]

Electric and Gas. Beginning in 2018, all PG&E customers within Monterey, San Benito, and Santa Cruz Counties were automatically enrolled in Central Coast Community Energy (3CE, originally called Monterey Bay Community Power). 3CE is a locally controlled public agency providing carbon-free electricity to residents and businesses. Formed in February 2017, 3CE is a joint powers authority, and is based on a local energy model called community choice energy. 3CE partners with PG&E who continues to provide billing, power transmission and distribution, customer service, grid maintenance services and natural gas services to San Benito County. 3CE's standard electricity offering is carbon free and is classified as 31 percent renewable (3CE, 2026).

4.17.2 Environmental Impacts

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

[7] https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2151?siteID=2583

4.17.3 Explanation

a) **Less-than-Significant Impact**. The proposed project would develop a new cannabis microbusiness facility on currently vacant agricultural land. The proposed project would require extension of utilities to serve the new development. The proposed project would be served via a new connection to an existing well on the parcel located to the west of the site (APN 019-010-013). This existing well is unpermitted, so the proposed project would require a well permit pursuant to Section 15.05.004 and Section 15.05.007 of the County Code. Conformance with the terms and conditions of the well permit would confirm that the use of the existing well would not result in any additional environmental impacts. Therefore, the proposed well use would result in a less-than-significant impact from the expansion of existing water supply systems.

A new conventional septic system would be installed to serve the proposed project. The conventional septic system will consist of a septic tank and drain-field designed in accordance with the requirements of the San Benito County Health Department. Hookups to the septic system would be limited to the greenhouse/cultivation space, with no connections proposed to the as-built structures on the site. The location of the septic system is shown in **Figure 4b**. MH Engineering Co. prepared a preliminary soil report to determine the suitability of site soils for the proposed septic system and found that the on-site soils are conducive to the proposed septic system. The proposed septic system would be subject to approval by the County as part of the Conditional Use Permit for the proposed project. As a result, the proposed septic system would have a less-than-significant impact related to the expansion of wastewater treatment facilities.

The proposed project would result in future development that would include an approximately two (2) acre net increase in impervious surfaces. The proposed project includes a new stormwater management pond to the north of the development area. Detailed drainage plans would need to be submitted to the County for review and approval prior to issuance of construction permits for the proposed project. The County would review drainage plans to ensure the stormwater facilities for the development are designed to detain the difference between a 10-year pre and 100-year post development, in accordance with County standards, and to detain flows in excess of this to release post-development flows at pre-development levels, satisfying post construction requirements, LID requirements, and County stormwater management requirements. Therefore, the proposed drainage changes from the proposed project would result in a less-than-significant impact from the expansion of stormwater drainage systems.

Electricity (and potentially natural gas service) for the proposed project would be provided by PG&E by way of existing electrical infrastructure in the project vicinity. Utility connections would be limited to the greenhouse/cultivation space, with no connections proposed to the as-built structures on the site. The proposed project would likewise connect to existing telecommunications service infrastructure in the project vicinity. The proposed project would require additional electricity (and potentially natural gas consumption) compared to what is currently used on-site. While additional electricity and natural gas would be consumed, the use would be accommodated by existing infrastructure and would not require relocation or expansion of existing infrastructure. Thus, the proposed project would have a less-than-significant impact related to the expansion of existing or creation of new utility systems. (Sources: 14, 17)

b) **Less-than-Significant Impact**. The proposed project would result in additional water use for the cultivation and processing of cannabis, as well as general operation of the facility. The estimated annual water use is not known at this time. The proposed project would be served via a new connection to an existing well on the parcel located to the west of the site (APN 019-010-013). As

stated above, the project's connection to the well would be subject to County permitting requirements due to the unpermitted nature of the existing well and due to its location on an adjacent parcel. The County's permitting process would require the project to demonstrate that sufficient water supplies are available to serve the project. Specifically, completion of a Title 22 water quality analysis would be required to prove that potable water is available for each proposed lot during normal, dry, and multiple dry years. As a result, the proposed project would have a less-than-significant impact related to water supply and availability. (Sources: 14, 17)

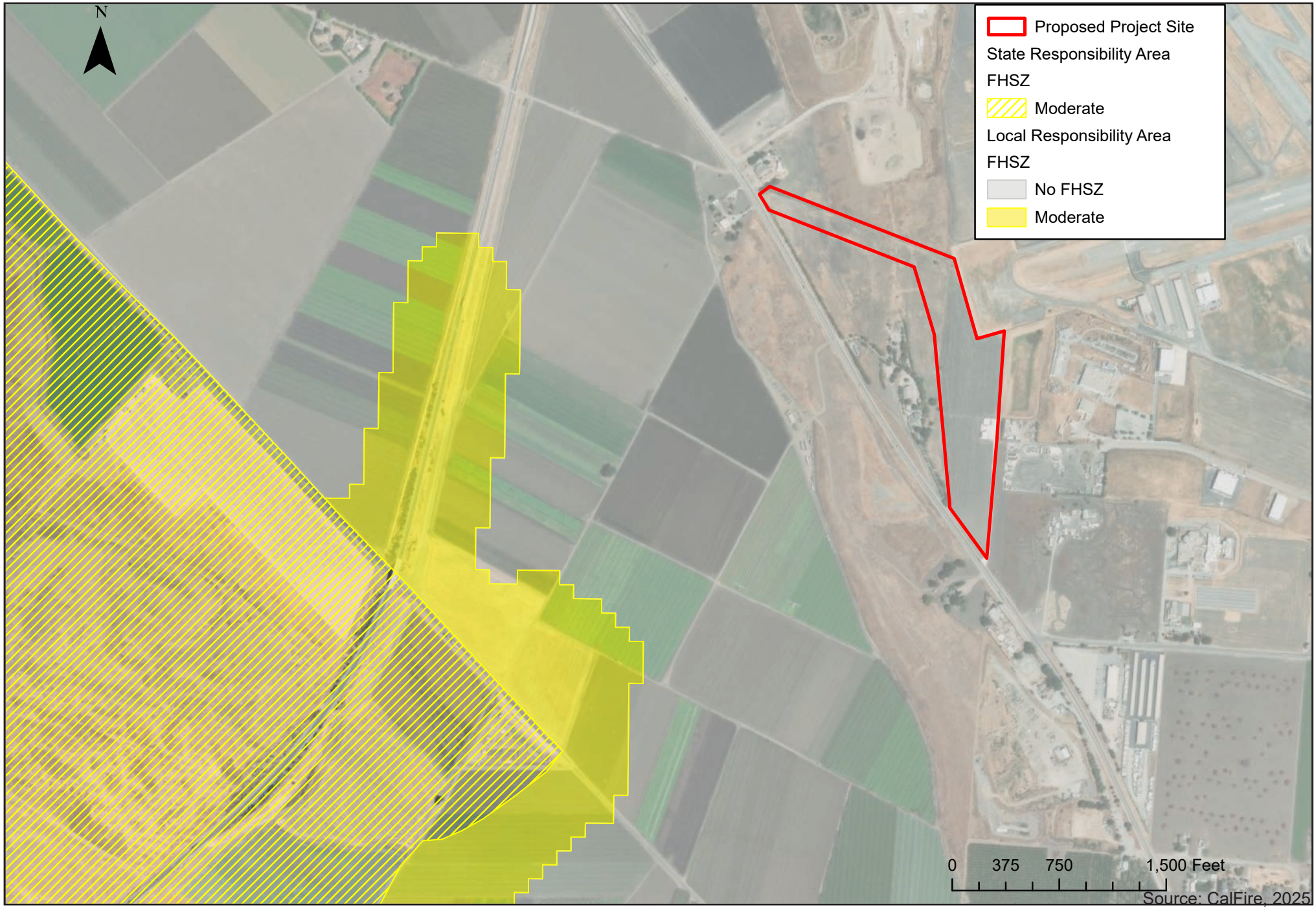
c) **No Impact**. The proposed project would be served by a new on-site conventional septic system. The proposed project would not connect to an existing off-site wastewater treatment system and would not affect existing treatment capacity at an off-site treatment plant. No impact on the capacity of existing wastewater treatment systems would occur as a result of the proposed project. (Sources: 14, 17)

d-e) **Less-Than-Significant Impact**. The proposed project would generate waste during construction and operation, consisting of solid waste, recycling, and organic waste. General trash and recycling would be transported to the JSRL near Hollister. The JSRL has an estimated remaining capacity of approximately 1,921,000 cubic yards (CalRecycle, 2026) and the additional waste generated by future development facilitated by the Proposed Project would not result in an exceedance of the JSRL's waste processing and storage capacities. All organic waste generated by the project would be hauled off-site for composting and all cannabis waste products would be mixed with other organic materials (such as sawdust, hay, or other compostable, non-hazardous substrate) to render them "unusable and unrecognizable" in accordance with County regulations. Therefore, the proposed project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure, negatively impact solid waste services, impair the attainment of solid waste reduction goals. Additionally, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste during future demolition of existing buildings, construction, and operation. This represents a less-than-significant impact. (Sources: 12, 14, 17)

4.18 Wildfire

4.18.1 Environmental Setting

Urban and wildland fire hazards create potential for injury, loss of life, and property damage. The County General Plan identifies vegetation fires as the majority of fires in the County, with most being caused by human activities involving motor vehicles, equipment, operation, arson, and burning of debris (County, 2015). Approximately 76 percent of the County lies within areas with high and very high fire threats (County, 2015). The project site is located within an LRA (**Figure 12**), in an area that has not been formally evaluated as a FHSZ (CalFire, 2025).



Title:

Fire Haza rd Severity Map

Date	12/17/2025
Scale	N/A
Project	2025.50

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Figure
12

Regulatory Setting

Local

County of San Benito General Plan:

The County of San Benito General Plan identifies the following relevant policies for the Proposed Project, especially as these polices relate to areas of high and very high fire hazard areas:

HS-4.1 Community Wildfire Protection Plan: The County shall maintain and implement the Community Wildfire Protection Plan as a mechanism for community input and identification of areas presenting high fire hazard risk.

HS-4.4 Development in Fire Hazard Zones: The County shall require development in high-fire-hazard areas to be designed and constructed in a manner that minimizes the risk from fire hazards and meets all applicable State and County fire standards.

HS-4.5 Fire-Resistant Vegetation: The County shall require development in high-fire-hazard areas to have fire-resistant vegetation, cleared fire breaks separating communities or clusters of structures from native vegetation, or a long-term comprehensive vegetation and fuel management program consistent with State codes 4290 and 4291 for wildland fire interface and vegetation management.

4.18.2 Environmental Impacts

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 With Mitigation 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 a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impact 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?	☐	☐	☐	☒

4.18.3 Explanation

a) **Less-than-Significant Impact**. The proposed project would develop a new cannabis microbusiness facility on agricultural land. The proposed project would also construct new internal access driveways, frontage improvements to SR 25, a septic system, drainage improvements, and other

miscellaneous improvements. The proposed project would be accessed via a new access road connecting to SR 25. The proposed access improvements would ensure that the site is accessible in the event of a site-specific or regional emergency for both emergency response teams and evacuating employees. The proposed project would introduce a maximum of six (6) new employees to the site. The addition of six (6) new employees would not substantially impair any County emergency response plans or evacuation plans applicable to the project area and this represents a less-than-significant impact. (Sources: 8, 9, 14, 17)

b) **Less-than-Significant Impact**. The project site is located in unincorporated San Benito County in an agricultural region of the County. The project site is relatively flat and would not exacerbate the spread of wildfire due to slope. The project site is located within an LRA, in an area that has not been formally evaluated as a FHSZ (CalFire, 2025). Given the limited on-site vegetation, the overall wildfire risk of the site is assumed to be low. Furthermore, the proposed project would be subject to all County requirements for wildfire abatement and prevention, including, but not limited to, installation of on-site firefighting infrastructure, maintenance of appropriate firebreaks of at least 30 feet around all buildings, and regular removal of dry vegetation. As a result, the proposed project would have a less-than-significant impact from the spread of wildland fire on the site due to slope, prevailing winds, and other factors. This represents a less-than-significant impact with mitigation. (Sources: 8, 9, 14, 17)

c) **Less-than-Significant Impact**. The proposed project is located on a currently undeveloped site and would require new utility connections to serve the proposed cannabis microbusiness facility. New utility connections, including electricity, and potentially natural gas, would be required to serve the proposed project. Detailed utility plans were not available at the time of this analysis; however, electrical lines to serve the proposed project are assumed to be aboveground due to the aboveground nature of the electrical infrastructure along SR 25, where the proposed project would connect to existing infrastructure. Aboveground electrical infrastructure could potentially result in fire in the event of a malfunction. However, the proposed project is located on an agricultural site that is largely devoid of vegetation. In addition, the proposed project includes the installation of on-site firefighting infrastructure, and would be required to comply with County building setback requirements for buildings and regular removal of dry vegetation as discussed above. These actions would serve to substantially reduce the risk of fire as a result of the extension of electrical infrastructure on the site. Natural gas lines, if included for the project, are traditionally installed belowground.

The proposed project would require construction utilizing mechanized equipment. The use of mechanized equipment to construct the access road and other site improvements would temporarily exacerbate fire risk. However, all mechanized equipment would be fitted with spark arrestors pursuant to applicable local and state regulations, which would greatly reduce the risk of wildland fire during construction. Once operational, the proposed project will have on-site firefighting infrastructure to deal with on-site fire risks. Furthermore, the access road and driveways would be paved and would not result in increased fire risk beyond existing conditions. Therefore, the proposed project would have a less-than-significant impact related to exacerbating fire risk from installation or maintenance of infrastructure. (Sources: 14, 17)

d) **No Impact**. The proposed project site is relatively flat as stated above. As a result, development of the proposed project would not result in downslope flooding on the site under post-fire conditions. No impact would occur due to downslope or downstream flooding as a result of post-fire conditions as a result of the project. (Sources: 14, 17)

4.19 Mandatory Findings of Significance

4.19.1 Environmental Impacts

MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) 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) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

4.19.2 Explanation

a) **Less-than-Significant Impact with Mitigation.** The proposed project would not 1) degrade the quality of environment, 2) substantially reduce the habitat of a fish or wildlife species, 3) cause a fish or wildlife population to drop below self-sustaining levels, 4) threaten to eliminate a plant or animal community, 5) reduce the number or restrict the range of a rare or endangered plant or animal, or 6) eliminate important examples of major periods of California history or prehistory. The proposed project could result in temporary and permanent impacts that would be mitigated to a less-than-significant level through the incorporation of mitigation measures identified in this IS/MND. Compliance with the mitigation measures contained in this document would ensure that all impacts are less-than-significant. Moreover, the proposed project would not adversely impact a cultural or historic resource that is an important example of a major period in California history with mitigation proposed in this IS/MND. Mitigation would reduce potential impacts to cultural resources resulting from ground-disturbing construction activities. With implementation of these measures, the proposed project would not have the potential to significantly degrade the quality of the environment and impacts would be less-than-significant. No additional mitigation is necessary beyond the mitigation identified in each of the respective topical CEQA sections contained in this IS/MND. (Sources: 1-33)

b) **Less-than-Significant Impact.** Under CEQA, "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. This IS/MND contains mitigation to ensure that all project-level impacts would be minimized to a less-

than-significant level. The proposed project would have air quality impacts and GHG emissions that could contribute to the overall regional and global GHG emissions. However, air quality impacts and GHG emissions would not exceed the MBARD's thresholds of significance for construction or operation. In addition, the proposed project would not induce potential population growth beyond anticipated levels; therefore, the project would not conflict with and/or obstruct the implementation of the MBARD 2012-2015 AQMP, or any other plans to address exceedance of State air quality standards. For these reasons, the proposed project would have a less-than-significant cumulative impact on air quality and GHG.

Additionally, the RDEIR prepared for the County's 2035 General Plan identified several significant unavoidable impacts that would potentially occur with buildout of the General Plan, including loss of prime farmland, light and glare, effects to sensitive species and habitats, exposure to flood hazards, noise, population growth, and transportation level of service impacts. The proposed project is consistent with the General Plan land use designation; thus, the effects of the proposed project were already considered programmatically as part of the General Plan RDEIR. While the proposed project would result in the conversion of Prime Farmland, the overall impact was found to be less-than-significant (**Appendix A**). As stated above and in topical sections of this IS/MND, in many cases, the proposed project would have no effect on impacts cited. For these reasons, the proposed project would not result in impacts that are individually limited, but cumulatively considerable. (Sources: 1-33)

c) **Less-than-Significant Impact with Mitigation**. The proposed project would not cause any adverse effects on human beings with incorporation of mitigation measures as identified throughout this document. Specifically, potentially significant impacts from seismic hazards, including strong-seismic ground shaking, would be mitigated to a less-than-significant level with implementation of **Mitigation Measure GEO-1**. All potentially significant impacts associated with the proposed project can be mitigated to a less-than-significant level. Additionally, construction-phase impacts facilitated by the proposed project would be temporary in nature and operation of the proposed project would be required to comply with all federal, state, regional, and local regulations and all potentially significant impacts associated with project operations are mitigated to a less-than-significant level. Therefore, the proposed project would not have a substantial adverse effect on human beings, either directly or indirectly. (Sources: 1-33)

Chapter 5. References

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Appendix A

Land Evaluation and Site Assessment

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LESA 2-3-2026

Stoney Farms IS/MND

Site Data:

Farmland Classification: Prime Farmland (12.21), Grazing (7.33), Farmland of Local Importance (0.46)

Site Acreage: 20 acres

Soil type: Pacheco Silty Clay (10 acres), Clear Lake clay (0.9 acres), Sorrento silty clay loam (3 acres), Diablo Clay (4.7 acres), Cropley clay (0.46 acres)

Soil Unit: Pe, Ch, SrA, DaD, CwC

Land capability classification (non-irrigated): 3w, 3s, 3c, 4e, 3e

Water availability: Not Irrigated

Surrounding farmland?: Yes

Surrounding land use types: Agricultural, rural residential, airport.

Storie Index:

Storie Index Rating = [(Factor A/100) x (Factor B/100) x (Factor C/100) x (Factor X/100)] x 100

- Factor #1 – Soil Profile Group. Score: 100 Reasoning: Class III soils, with depth to bedrock listed as more than 80 in = 200+CMs = 100 score.
- Factor #2 – Surface Texture. Score: 90. Reasoning: Surface soils consist of Silty Clay
- Factor #3 – Slope. Score: 100. Reasoning: Slope of site is 0 to 2 percent = score of 100.
- Factor #X – Dynamic Properties. Score: 70. Reasoning: 70 for somewhat poorly drained. 85 for flooding (occasional). No info on chemical/fertility so have to assume score of 100.

Storie Index Rating (Pe) = [(100/100) x (90/100) x (100/100) x (70/100)] x 100 = 63

- Factor #1 – Soil Profile Group. Score: 100 Reasoning: Class III soils, with depth to bedrock listed as more than 80 in = 200+CMs = 100 score.
- Factor #2 – Surface Texture. Score: 50. Reasoning: Surface soils consist of Clay
- Factor #3 – Slope. Score: 100. Reasoning: Slope of site is 0 to 2 percent = score of 100.
- Factor #X – Dynamic Properties. Score: 50. Reasoning: 50 for poorly drained. 100 for flooding (none). No info on chemical/fertility so have to assume score of 100.

Storie Index Rating (Ch) = [(100/100) x (50/100) x (100/100) x (50/100)] x 100 = 25

- Factor #1 – Soil Profile Group. Score: 100 Reasoning: Class III soils, with depth to bedrock listed as more than 80 in = 200+CMs = 100 score.
- Factor #2 – Surface Texture. Score: 90. Reasoning: Surface soils consist of Silty Clay Loam
- Factor #3 – Slope. Score: 100. Reasoning: Slope of site is 0 to 2 percent = score of 100.
- Factor #X – Dynamic Properties. Score: 100. Reasoning: 100 for well drained. 100 for flooding (none). No info on chemical/fertility so have to assume score of 100.

Storie Index Rating (SrA) = [(100/100) x (90/100) x (100/100) x (100/100)] x 100 = 90

- Factor #1 – Soil Profile Group. Score: 80 Reasoning: Class IV soils, with depth to bedrock listed as between 40 and 59 in = approx. 150 CMs = 80 score.
- Factor #2 – Surface Texture. Score: 50. Reasoning: Surface soils consist of Clay
- Factor #3 – Slope. Score: 95. Reasoning: Slope of site is 5 to 9 percent = score of 95.
- Factor #X – Dynamic Properties. Score: 100. Reasoning: 100 for well drained. 100 for flooding (none). No info on chemical/fertility so have to assume score of 100.

Storie Index Rating (DaD) = [(80/100) x (50/100) x (95/100) x (100/100)] x 100 = 38

- Factor #1 – Soil Profile Group. Score: 100 Reasoning: Class III soils, with depth to bedrock listed as more than 80 in = 200+CMs = 100 score.
- Factor #2 – Surface Texture. Score: 50. Reasoning: Surface soils consist of Clay
- Factor #3 – Slope. Score: 95. Reasoning: Slope of 2 to 9 percent = score of 95.
- Factor #X – Dynamic Properties. Score: 90. Reasoning: 90 for moderately well drained. 100 for flooding (none). No info on chemical/fertility so have to assume score of 100.

Storie Index Rating (CwC) = [(100/100) x (50/100) x (95/100) x (90/100)] x 100 = 42.75

LESA Model Rating Factors

Land Evaluation Factors:

- Land Capability Classification (25%)
- Storie Index rating (25%)
    - **Land Evaluation Subtotal (50%)**

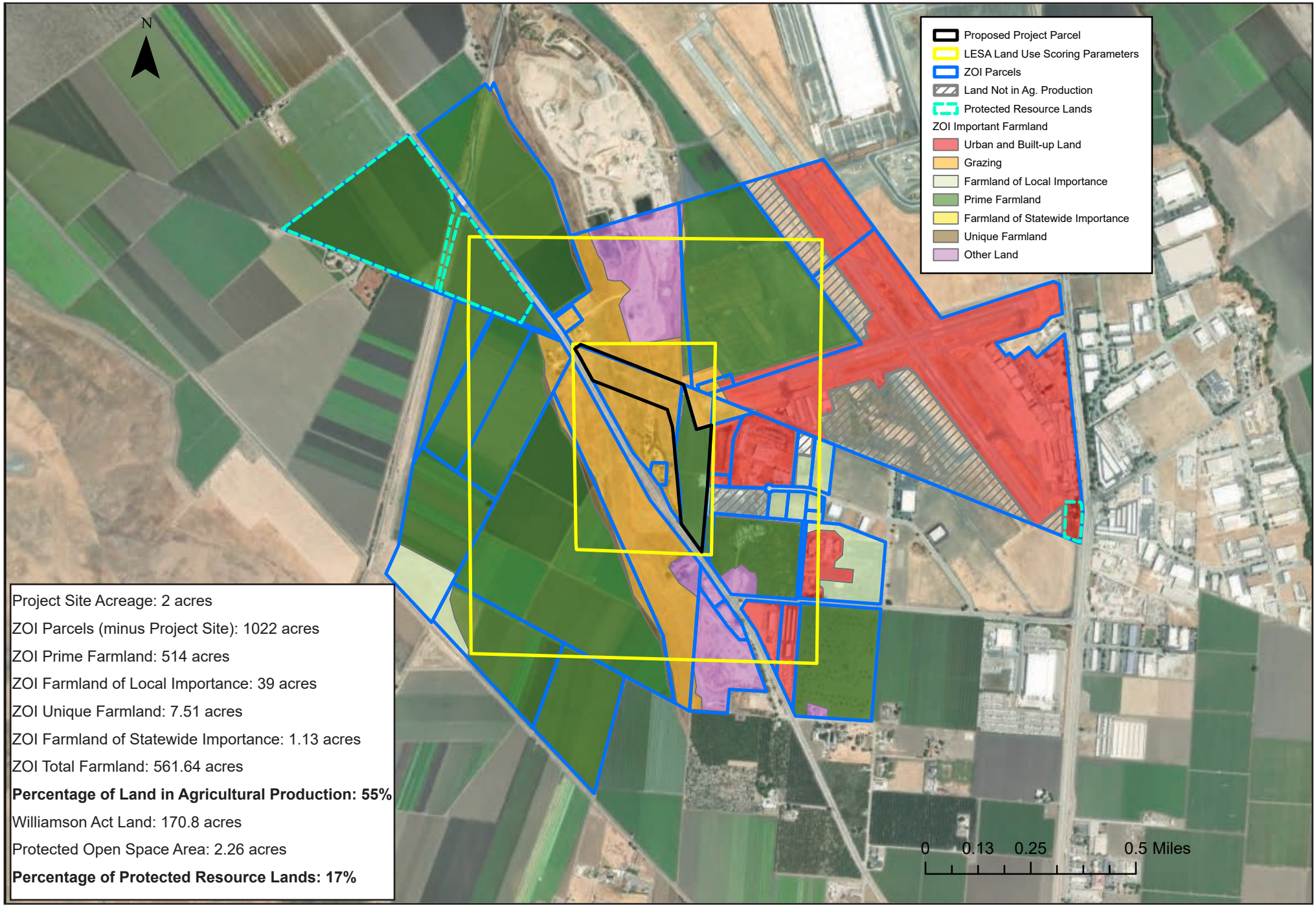
Site Assessment Factors:

- Project Size (15%)
- Water Resource Availability (15%)
- Surrounding Agricultural Lands (15%)
- Surrounding Protected Resource Lands (5%)
    - **Site Assessment Subtotal (50%)**

LESA Score: 48.11

40 to 59 Points Considered Significant only if LE and SA subscores are each greater than or equal to 20 points

Conclusion: Less than Significant Impact. SA subscore is below 20 points.



Project Site Acreage: 2 acres
ZOI Parcels (minus Project Site): 1022 acres
ZOI Prime Farmland: 514 acres
ZOI Farmland of Local Importance: 39 acres
ZOI Unique Farmland: 7.51 acres
ZOI Farmland of Statewide Importance: 1.13 acres
ZOI Total Farmland: 561.64 acres
Percentage of Land in Agricultural Production: 55%
Williamson Act Land: 170.8 acres
Protected Open Space Area: 2.26 acres
Percentage of Protected Resource Lands: 17%

Title:
Land Evaluation & Site Assessment

Date 2/2/2026
Scale N/A
Project 2025.50

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure
9

Project Site (acres)	All Parcels (acres)	ZOI (All Parcels - Project Site)
2	19	1022
	2	
	28	
	13	
	29	
	29	
	2	
	1	
	15	
	197	
	2	
	83	
	24	
	4	
	1	
	3	
	57	
	52	
	1	
	3	
	27	
	33	
	23	
	60	
	6	
	1	
	6	
	21	
	2	
	6	
	5	
	2	
	39	
	31	
	70	
	1	
	13	
	2	
	2	
	1	
	107	
	1	
	All Parcels Total:	
	1024	

	ZOI Prime Farmland	ZOI Local Importance	ZOI Unique Farmland	ZOI Statewide Importance	ZOI Total Farmland	Percent in Ag. Production
	32	13	0.01	0.19	561.64	55%
	22	19	5	0.1		
	78	1	0.5	0.1		
	372	6	1	0.5		
	10		1	0.24		
Total Farmland in Production or Available for Ag. Uses:	514	39	7.51	1.13		

Williamson Act Lands	CNRA Protected Areas	ZOI Total Protect Resource Lands	Percent under Resource Protection
170.8	2.26	173.06	17%

NOTES

Calculation of the Land Evaluation (LE) Score

Part 1. Land Capability Classification (LCC) Score:

(1) Determine the total acreage of the project.
(2) Determine the soil types within the project area and enter them in **Column A** of the **Land Evaluation Worksheet** provided on page 2-A.
(3) Calculate the total acres of each soil type and enter the amounts in **Column B**.
(4) Divide the acres of each soil type (**Column B**) by the total acreage to determine the proportion of each soil type present. Enter the proportion of each soil type in **Column C**.
(5) Determine the LCC for each soil type from the applicable Soil Survey and enter it in **Column D**.
(6) From the LCC Scoring Table below, determine the point rating corresponding to the LCC for each soil type and enter it in **Column E**.

LCC Scoring Table

LCC Class	I	IIe	IIs,w	IIIe	IIIs,w	IVe	IVs,w	V	VI	VII	VIII
Points	100	90	80	70	60	50	40	30	20	10	0

(7) Multiply the proportion of each soil type (**Column C**) by the point score (**Column E**) and enter the resulting scores in **Column F**.
(8) Sum the LCC scores in **Column F**.
(9) Enter the LCC score in box <1> of the **Final LESA Score Sheet** on page 10-A.

Part 2. Storie Index Score:

(1) Determine the Storie Index rating for each soil type and enter it in **Column G**.
(2) Multiply the proportion of each soil type (**Column C**) by the Storie Index rating (**Column G**) and enter the scores in **Column H**.
(3) Sum the Storie Index scores in **Column H** to gain the Storie Index Score.
(4) Enter the Storie Index Score in box <2> of the **Final LESA Score Sheet** on page 10-A.

Land Evaluation Worksheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
Pe	9.7	0.497	iiiw	60	29.82	63	31.31
Ch	0.9	0.044	iiis	60	2.4	25	1
CwC	0.9	0.073	iiie	70	5.11	42.75	3
DaD	2.6	0.236	ive	50	11.8	38	9
SrA	3.5	0.15	iiic	70	10.5	90	13.5
Totals	20	(Must Sum to 1.0)		***LCC Total Score***	59.63	***Storie Index Total Score***	57.81

Site Assessment Worksheet 1.

Project Size Score

	I	J	K
	LCC Class I - II	LCC Class III	LCC Class IV - VIII
	0	9.7	0.236
		0.044	
		0.073	
		0.15	
Total Acres	0	9.967	0.236
Project Size Scores	0	10	0

Highest Project Size Score 10

NOTES

Calculation of the Site Assessment (SA) Score

Part 1. Project Size Score:.

(1) Using **Site Assessment Worksheet 1** provided on page 2-A, enter the acreage of each soil type from **Column B** in the **Column - I, J or K** - that corresponds to the LCC for that soil. (Note: While the Project Size Score is a component of the Site Assessment calculations, the score sheet is an extension of data collected in the Land Evaluation Worksheet, and is therefore displayed beside it).
(2) Sum **Column I** to determine the total amount of class I and II soils on the project site.
(3) Sum **Column J** to determine the total amount of class III soils on the project site.
(4) Sum **Column K** to determine the total amount of class IV and lower soils on the project site.
(5) Compare the total score for each LCC group in the Project Size Scoring Table below and determine which group receives the highest score.

Project Size Scoring Table

Class I or II		**Class III**		**Class IV or Lower**	
Acreage	Points	Acreage	Points	Acreage	Points
>80	100	>160	100	>320	100
60-79	90	120-159	90	240-319	80
40-59	80	80-119	80	160-239	60
20-39	50	60-79	70	100-159	40
10-19	30	40-59	60	40-99	20
10<	0	20-39	30	40<	0
		10-19	10		
		10<	0		

(6) Enter the **Project Size Score** (the highest score from the three LCC categories) in box <3> of the **Final LESA Score Sheet** on page 10-A.

NOTES

Part 2. Water Resource Availability Score:

(1) Determine the type(s) of irrigation present on the project site, including a determination of whether there is dryland agricultural activity as well.

(2) Divide the site into portions according to the type or types of irrigation or dryland cropping that is available in each portion. Enter this information in **Column B** of **Site Assessment Worksheet 2. - Water Resources Availability**.

(3) Determine the proportion of the total site represented for each portion identified, and enter this information in **Column C**.

(4) Using the Water Resources Availability Scoring Table, identify the option that is most applicable for each portion, based upon the feasibility of irrigation in drought and non-drought years, and whether physical or economic restrictions are likely to exist. Enter the applicable Water Resource Availability Score into **Column D**.

(5) Multiply the Water Resource Availability Score for each portion by the proportion of the project area it represents to determine the weighted score for each portion in **Column E**.

(6) Sum the scores for all portions to determine the project's total Water Resources Availability Score

(7) Enter the Water Resource Availability Score in box <4> of the **Final LESA Score Sheet** on page 10-A.

Site Assessment Worksheet 2. - Water Resources Availability

A	B	C	D	E
Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Availability Score (C x D)
1	Off-site Well	0.6	100	60
2	None	0.4	0	0
3				
4				
5				
6				
		(Must Sum to 1.0)	***Total Water Resource Score***	60

Water Resource Availability Scoring Table

Option	Non-Drought Years			Drought Years			WATER RESOURCE SCORE
	RESTRICTIONS			RESTRICTIONS			
	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	
1	YES	NO	NO	YES	NO	NO	100
2	YES	NO	NO	YES	NO	YES	95
3	YES	NO	YES	YES	NO	YES	90
4	YES	NO	NO	YES	YES	NO	85
5	YES	NO	NO	YES	YES	YES	80
6	YES	YES	NO	YES	YES	NO	75
7	YES	YES	YES	YES	YES	YES	65
8	YES	NO	NO	NO	-- --	-- --	50
9	YES	NO	YES	NO	-- --	-- --	45
10	YES	YES	NO	NO	-- --	-- --	35
11	YES	YES	YES	NO	-- --	-- --	30
12	Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years						25
13	Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years)						20
14	Neither irrigated nor dryland production feasible						0

NOTES

Part 3. Surrounding Agricultural Land Use Score:

(1) Calculate the project's Zone of Influence (ZOI) as follows:

(a) a rectangle is drawn around the project such that the rectangle is the smallest that can completely encompass the project area.

(b) a second rectangle is then drawn which extends one quarter mile on all sides beyond the first rectangle.

(c) The ZOI includes all parcels that are contained within or are intersected by the second rectangle, less the area of the project itself.

(2) Sum the area of all parcels to determine the total acreage of the ZOI.

(3) Determine which parcels are in agricultural use and sum the areas of these parcels

(4) Divide the area in agriculture found in step (3) by the total area of the ZOI found in step (2) to determine the percent of the ZOI that is in agricultural use.

(5) Determine the Surrounding Agricultural Land Score utilizing the Surrounding Agricultural Land Scoring Table below.

Surrounding Agricultural Land Scoring Table

Percent of ZOI in Agriculture	Surrounding Agricultural Land Score
90-100	100
80-89	90
75-79	80
70-74	70
65-69	60
60-64	50
55-59	40
50-54	30
45-49	20
40-44	10
<40	0

(5) Enter the Surrounding Agricultural Land Score in box <5> of the **Final LESA Score Sheet** on page 10-A.

Site Assessment Worksheet 3.
Surrounding Agricultural Land and Surrounding Protected Resource Land

A	B	C	D	E	F	G
Zone of Influence						
Total Acres	Acres in Agriculture	Acres of Protected Resource Land	Percent in Agriculture (A/B)	Percent Protected Resource Land (A/C)	Surrounding Agricultural Land Score (From Table)	Surrounding Protected Resource Land Score (From Table)
1,022	561.64	173.06	55	17	40	0

NOTES

Part 4. Protected Resource Lands Score:

The Protected Resource Lands scoring relies upon the same Zone of Influence information gathered in Part 3, and figures are entered in Site Assessment Worksheet 3, which combines the surrounding agricultural and protected lands calculations.

(1) Use the total area of the ZOI calculated in Part 3. for the Surrounding Agricultural Land Use score.

(2) Sum the area of those parcels within the ZOI that are protected resource lands, as defined in the California Agricultural LESA Guidelines.

(3) Divide the area that is determined to be protected in Step (2) by the total acreage of the ZOI to determine the percentage of the surrounding area that is under resource protection.

(4) Determine the Surrounding Protected Resource Land Score utilizing the Surrounding Protected Resource Land Scoring Table below.

Surrounding Protected Resource Land Scoring Table

Percent of ZOI Protected	Protected Resource Land Score
90-100	100
80-89	90
75-79	80
70-74	70
65-69	60
60-64	50
55-59	40
50-54	30
45-49	20
40-44	10
<40	0

(5) Enter the Protected Resource Land score in box <6> of the **Final LESA Score Sheet** on page 10-A.

LESA Worksheet (cont.)

NOTES

Final LESA Score Sheet

Calculation of the Final LESA Score:

(1) Multiply each factor score by the factor weight to determine the weighted score and enter in Weighted Factor Scores column.
(2) Sum the weighted factor scores for the LE factors to determine the total LE score for the project.
(3) Sum the weighted factor scores for the SA factors to determine the total SA score for the project.
(4) Sum the total LE and SA scores to determine the Final LESA Score for the project.

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	<1> 59.63	0.25	14.91
Storie Index	<2> 57.81	0.25	14.45
LE Subtotal		***0.50***	29.36
SA Factors			
Project Size	<3> 10	0.15	1.5
Water Resource Availability	<4> 60	0.15	9
Surrounding Agricultural Land	<5> 55	0.15	8.25
Protected Resource Land	<6> 0	0.05	0
SA Subtotal		***0.50***	18.75
		Final LESA Score	48.11

For further information on the scoring thresholds under the California Agricultural LESA Model, consult Section 4 of the Instruction Manual.

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Appendix B

Air Quality Memorandum

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Denise Duffy & Associates, Inc.
PLANNING AND ENVIRONMENTAL CONSULTING

MEMORANDUM

TO: Stephanie Reck, Senior Planner, San Benito County Resource Management Agency

CC: Robyn Simpson, Deputy Project Manager, Denise Duffy & Associates

FROM: Luke Hiserman, Assistant Planner Denise Duffy & Associates

DATE: December 19, 2025

SUBJECT: Stoney Farms Project – Air Quality & Greenhouse Gas Memorandum

I. Introduction

This memorandum presents the results of Denise Duffy & Associates' ("DD&A") Air Quality ("AQ") and Greenhouse Gas ("GHG") modeling for the Stoney Farms Project ("Proposed Project") for the County of San Benito ("County"). This memorandum includes 1) a brief description of the Proposed Project and regulatory background, 2) the AQ and GHG modeling results, and 3) a conclusion. Additionally, the *Stoney Farms Detailed Emissions Report* is attached to this memorandum and presents a detailed list of data inputs and estimated air quality and GHG emissions for the Proposed Project.

II. Proposed Project & Regulatory Background

The Proposed Project is seeking a conditional use permit for an indoor commercial cannabis cultivation and microbusiness (manufacture, distribution, and non-storefront retail) facility (County Planning File CAN230001). The Proposed Project would include a new 34,560 square foot combined greenhouse/warehouse building, a 43 stall parking lot, paved access driveway, trash enclosure, and septic system. Water service to the proposed project would be provided by an existing unpermitted well located on an adjacent parcel via a shared well agreement and access easement. The Proposed Project would require an encroachment permit from Caltrans due to the access road connecting with State Route 25.

Below is a synopsis of the AQ and GHG thresholds of significance used to determine the significance of a project's environmental effects.

Air Quality

The Proposed Project is in the North Central Coast Air Basin ("NCCAB"), which encompasses Santa Cruz, San Benito, and Monterey counties. The NCCAB is under the jurisdiction of the Monterey Bay Air Resources District ("MBARD"). MBARD is responsible for producing an Air Quality Management Plan ("AQMP") that reports air quality and regulates stationary air pollution sources throughout the NCCAB. MBARD is also responsible for

measuring the concentration of pollutants and comparing those concentrations against the Ambient Air Quality Standards ("AAQS"). AAQS establish levels of air quality maintenance required to protect the public from the adverse effects of air pollution and are established for "criteria air pollutants," which include ozone, carbon monoxide, particulate matter less than 10 microns in diameter, fine particulate matter less than 2.5 microns in diameter, nitrogen dioxide, sulfur dioxide, and lead. MBARD is responsible for monitoring criteria pollutants to determine whether they are in attainment or not in attainment with the AQMP. **Table 1** illustrates the attainment status for criteria pollutants.

Table 1
Attainment Status for the NCCAB

Pollutants	State Designation	Federal Designation
Ozone (O_3)	Nonattainment – Transitional	Attainment
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
	San Benito Co. – Unclassified	Attainment
	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment

Source: Monterey Bay Air Resources District, 2017. 2012 – 2015 Air Quality Management Plan

MBARD has set air quality thresholds of significance for the evaluation of projects. **Table 2** illustrates the thresholds of significance used to determine if a project would have a significant air quality effect during construction. In addition to these thresholds, MBARD has also determined a significant short-term construction generated impact would occur if more than 2.2 acres of major grading or excavation, or 8.1 acres of minimal earthmoving per day was to occur.

Table 2
Thresholds of Significance Construction Emissions

Pollutant	Threshold of Significance (lb./day)
Nitrogen Oxides (NO_x)	137
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550

Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.

Table 3 illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during operation.

Table 3
Thresholds of Significance Operational Emissions

Pollutant	Threshold of Significance (lb./day)
Nitrogen Oxides (NO_x)	137
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550

Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.

Greenhouse Gases

Both naturally occurring and anthropogenic-generated atmospheric gasses effect global temperatures. These gases include water vapor, carbon dioxide, methane, and nitrous oxide (Intergovernmental Panel on Climate Change, 2007). Gases that trap heat in the atmosphere are known as greenhouse gases ("GHGs"). Solar radiation enters the earth's atmosphere from space, and a portion of the radiation is absorbed at the surface. The earth emits this radiation back toward space as infrared radiation. Greenhouse gases, which are mostly transparent to incoming solar radiation, are effective in absorbing infrared radiation and redirecting some of this back to the earth's surface. As a result, radiation that otherwise would have escaped back into space is retained, resulting in a warming of the atmosphere. This process is known as the greenhouse effect. The greenhouse effect helps maintain a habitable climate. Emissions of GHGs from human activities, such as electricity production, motor vehicle use, and agriculture, are elevating the concentration of GHGs in the atmosphere. GHG emissions from Anthropogenic sources are causing a trend of unnatural warming of the earth's climate, known as global warming or global climate change.

Climate change has a cumulative impact; a project contributes to this impact through its incremental contribution of GHG emissions combined with the cumulative increase of all other sources of GHGs. MBARD defines their GHG threshold in terms of carbon dioxide equivalent ("CO2e"), a metric that accounts for emissions from various GHGs based on their global warming potential. If annual emissions of GHGs exceed these threshold levels, the Proposed Project would result in a cumulatively considerable contribution of GHG emissions and must implement mitigation measures (MBARD, 2016). MBARD has not yet adopted a threshold for construction-related GHG emissions but recommends utilizing thresholds set by neighboring districts (e.g., Sacramento Metropolitan Air Quality Management District ["SMAQMD"]). SMAQMD adopted an updated threshold based on the 2030 target year in April 2020. SMAQMD adopted the current GHG thresholds of significance, which include a construction threshold (1,100 metric tons of CO2e/year) and a land use operational threshold (1,100 metric tons of CO2e/year). Projects whose emissions are expected to meet or exceed the significance criteria will have a potentially significant adverse impact on global climate change (SMAQMD, 2020).

III. Air Quality & GHG Modeling Results

Project Assumptions & Model Inputs

The Proposed Project would construct a 34,560 square foot (0.79 acre) greenhouse/warehouse building for the following uses: cultivating cannabis, manufacture of cannabis products, and distribution. Additionally, the CEQA analysis for the Proposed Project also assesses the impacts of two (2) unpermitted storage structures on the property totaling 4,320 square feet. The Proposed Project would construct and operate a 52,707.6 square foot (1.21 acre) parking lot and access driveway.

To quantify air quality and GHG emissions for the Proposed Project, DD&A relied on information from the Applicant, Stoney Farms, LLC. and the California Emissions Estimator Model ("CalEEMod") project assumptions under the "General Light Industry," "Manufacturing," "Unrefrigerated Warehouse," and "Parking Lot" land uses.[1] CalEEMod provides project assumptions based on land use type, factoring in aggregate statewide emissions data from anticipated equipment, energy, and water use intensities during construction and operation.

The analysis selected three (3) separate land use types for the greenhouse/warehouse building since the Applicant is proposing to use this structure for separate defined purposes. Specifically, the Applicant indicated that the 34,560 square foot greenhouse/warehouse building would accommodate 9,600 square feet of greenhouse space, 2,400 square feet of warehouse space, a combined 7,200 square feet of cultivation and processing space, and 15,360 square feet of unused space. CalEEMod provides specific construction and operation data by land use type throughout the analysis, especially to fill in potential gaps in data. Combining areas anticipated to have similar uses provides a more accurate estimate of the potential emissions associated with the Proposed Project. This air quality analysis combined the 15,360 square feet of unused space with the 9,600 square feet of greenhouse space under the "General Light Industry" land use to accommodate potential future uses associated with the overall operation of the greenhouse/warehouse building. Additionally, this analysis combined the additional 4,320 square feet of storage space from the two (2) unpermitted storage structures with the proposed warehouse space of 2,400 square feet.

The air quality analysis analyzes the 7,200 square feet of cultivation and processing space under the "Manufacturing" land use type, and the parking lot and access driveway under the "Parking Lot" land use type. **Table 4** summarizes the Project components, their size, and their associated CalEEMod land use types.

[1] CalEEMod land uses describe the types of actions for a given project as opposed to describing the official General Plan land use designations of a project site. While the Proposed Project site carries an Agricultural land use designation, land use types of "General Light Industry," "Manufacturing," "Unrefrigerated Warehouse," and "Parking Lot" were selected to capture the anticipated emissions more accurately from the proposed greenhouse/warehouse building, two (2) storage structures, and adjacent parking lot and access driveway.

Table 4
Project Components and Assigned CalEEMod Land Use Types

Project Component	Size (square feet)	Total (square feet)	CalEEMod Land Use Type
Greenhouse Space	9,600	24,960	General Light Industry
Unused Space	15,360		
Warehouse Space	2,400	6,720	Unrefrigerated Warehouse
Storage Structures	4,320		
Cultivation and Processing Space	7,200	7,200	Manufacturing
Parking Lot and Access Driveway	52,707.6	52,707.6	Parking Lot

In addition to the land use types discussed above, the following project inputs were included in the CalEEMod analysis to quantify air quality and GHG emissions: 1) approximately two (2) acres for the total area of disturbance, 2) 300 cubic yards ("cy") of cut and 300 cy of fill during grading, 3) 10,890 square feet (0.25) acres of landscaped area, 4) an approximately 5 month construction schedule beginning in July 2026, 5) approximately six (6) construction workers, 6) approximately 10 operational staff, and 7) operations beginning in 2027. Additionally, the air quality analysis combined Applicant provided information with the CalEEMod project assumptions based on land use type to estimate vehicle trips during construction and operation of the Proposed Project. CalEEMod also includes project assumptions for the operation of the Proposed Project under the "General Ligh Industry," "Manufacturing," "Unrefrigerated Warehouse," and "Parking Lot" land use types and this analysis relied on said assumptions where no Project-specific information was available. The attached *Stoney Farms Detailed Emissions Report* includes a detailed list of project inputs and air quality and GHG emissions for the Proposed Project.

Air Quality Emissions

DD&A used CalEEMod to quantify air quality emissions during construction and operation of the Proposed Project. **Table 5** includes the emissions of criteria air pollutants during construction against the established MBARD thresholds.

Table 5
Construction Emissions of Criteria Air Pollutants

	Emissions (lbs./day)					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions:	3.2	29	29	0.05	31	12
MBARD Significance Threshold:	137	137	550	150	82	55
Exceeds Threshold/Significant Impact?	No	No	No	No	No	No

Source: CalEEMod 2025, Denise Duffy & Associates, Inc. 2025 CalEEMod.
See Appendix A for full CalEEMod Report.
1. To be conservative, maximum daily emissions are based on the highest daily emissions for summer or winter conditions.

Construction of the Proposed Project would result in minor emissions of criteria air pollutants and would not exceed applicable thresholds established by MBARD. Therefore, the Proposed Project's impacts related to air quality emissions would be less than significant during construction.

Table 6 shows the emissions of criteria air pollutants during operation against the established MBARD thresholds.

Table 6
Operational Emissions of Criteria Air Pollutants

	Emissions (lbs./day)					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions:	4.4	4.7	31	0.07	5.7	1.5
MBARD Significance Threshold:	137	137	550	150	82	55
Exceeds Threshold/Significant Impact?	No	No	No	No	No	No

Source: CalEEMod 2025, Denise Duffy & Associates, Inc. 2025 CalEEMod.
See Appendix A for full CalEEMod Report.
1. To be conservative, maximum daily emissions are based on the highest daily emissions for summer or winter conditions.

Operation of the Proposed Project would result in minor emissions of criteria air pollutants and would not exceed applicable thresholds established by MBARD. Therefore, the Proposed Project's impacts related to air quality emissions would be less than significant during operation.

Greenhouse Gas Emissions

DD&A also evaluated construction and operational GHG emissions using CalEEMod. As shown in **Table 7**, construction of the Proposed Project would generate 111.80 MTCO2e/year. Amortized over a 30-year period, construction of the Proposed Project would generate annual emissions of 3.73 MTCO2e/year. This would be well below MBARD's threshold of 1,100 MTCO2e/year.

Table 7
Construction Emissions of GHGs

Construction Phase	Annual Emissions ($MTCO_2e$/Year)
Site Preparation (2026)	24.41
Grading (2026)	19.57
Building Construction (2026)	47.60
Paving (2026)	19.20
Architectural Coating (2026)	1.02
Total Annual Construction Emissions:	111.80
Amortized Construction Emissions[1]:	3.73

Source: CalEEMod 2025, Denise Duffy & Associates, Inc. 2025 CalEEMod.
See Appendix A for full CalEEMod Report.
1. Amortized emissions are quantified based on an estimated 30-year project life.

As shown in **Table 8**, operation of the Proposed Project would generate 974.30 MTCO2e/year of GHG. When accounting for the amortized construction GHG emissions, the Proposed Project would generate 978.03 MTCO2e/year of GHG.

Table 8
Operational Emissions of GHGs

Source	Annual Emissions ($MTCO_2e$/Year)
Year 2027	
Area	1.90
Energy Use	41
Natural Gas	74
Mobile	825
Waste	14
Water	17
Refrigerants	1.40
Total:[1]	974.30
Total with Amortized Construction Emissions:[2]	978.03
Significance Threshold:	1,100
Exceeds Significance Threshold?:	No

Source: CalEEMod 2025, Denise Duffy & Associates, Inc. 2025 CalEEMod.
See Appendix A for full CalEEMod Report.

1. Yearly GHG emissions quantified for buildout conditions.
2. Yearly GHG operational emissions factoring in the 30 amortized construction emissions.

The construction and operational GHG emissions are below the established SMAQMD threshold of 1,100 MTCO2e/year of GHG. Therefore, the Proposed Project's impacts related to GHG emissions would be less than significant during both construction and operation.

IV. Conclusion

The Proposed Project would result in increases for criteria air quality pollutants and GHG emissions during construction and operation. The emissions during both construction and operation would not, however, exceed MBARD's thresholds of significance for criteria air quality pollutants or GHG emissions. Therefore, the Proposed Project would have a less than significant impact with regards to air quality and GHG. Please refer to the attached *Stoney Farms Detailed Emissions Report* for specific data inputs and estimated air quality and GHG emissions for the Proposed Project.

References

Denise Duffy & Associates. 2025. *Stoney Farms Detailed Report – California Emission Estimator Model Results.* Dated December 2025.

Monterey Bay Air Resources District. 1996. *Guidelines for Implementing the California Environmental Quality Act.* Dated February 2016.

Monterey Bay Air Resources District. 2017. *2012 – 2015 Air Quality Management Plan.* Dated September 2017.

Sacramento Metropolitan Air Quality Management District. 2020. *Greenhouse Gas Thresholds for Sacramento County.* Dated June 2020.

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Stoney Farms
Construction Start Date	7/1/2026
Operational Year	2027
Lead Agency	County of San Benito
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.6
Precipitation (days)	16
Location	2639 Bolsa Rd, Hollister, CA 95023, USA
County	San Benito
City	Unincorporated
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3102
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.35

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Light Industry	25	1000sqft	0.79	24,960	10,890	—	—	—

Parking Lot	53	1000sqft	1.2	52,700	0.00	—	—	—
Manufacturing	7.2	1000sqft	0.79	7,200	0.00	—	—	—
Unrefrigerated Warehouse-No Rail	6.7	1000sqft	0.79	6,720	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.8	3.2	29	29	0.05	1.2	29	31	1.1	11	12	—	5,392	5,392	0.22	0.05	0.34	5,412
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.97	0.90	6.3	9.3	0.01	0.26	9.6	9.9	0.24	0.97	1.2	—	1,438	1,438	0.06	0.01	0.01	1,444
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.43	0.37	3.1	3.8	0.01	0.12	3.4	3.6	0.11	0.67	0.78	—	676	676	0.03	0.01	0.04	679
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.07	0.56	0.69	< 0.005	0.02	0.63	0.65	0.02	0.12	0.14	—	112	112	< 0.005	< 0.005	0.01	112
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	137	137	550	—	—	—	82	—	—	55	—	—	—	—	—	—	—

Unmit.	—	No	No	No	—	—	Yes	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	137	137	550	—	—	—	82	—	—	55	—	—	—	—	—	—	—
Unmit.	—	No	No	No	—	—	Yes	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,100
Unmit.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	No

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.8	3.2	29	29	0.05	1.2	29	31	1.1	11	12	—	5,392	5,392	0.22	0.05	0.34	5,412
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.97	0.90	6.3	9.3	0.01	0.26	9.6	9.9	0.24	0.97	1.2	—	1,438	1,438	0.06	0.01	0.01	1,444
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.43	0.37	3.1	3.8	0.01	0.12	3.4	3.6	0.11	0.67	0.78	—	676	676	0.03	0.01	0.04	679
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.08	0.07	0.56	0.69	< 0.005	0.02	0.63	0.65	0.02	0.12	0.14	—	112	112	< 0.005	< 0.005	0.01	112

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.7	4.4	4.2	31	0.07	0.10	5.6	5.7	0.10	1.4	1.5	42	7,480	7,522	4.6	0.42	31	7,794
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.0	3.7	4.7	26	0.07	0.10	5.6	5.7	0.09	1.4	1.5	42	7,166	7,208	4.6	0.45	8.9	7,466
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.7	3.4	3.5	21	0.05	0.08	4.2	4.3	0.08	1.1	1.1	42	5,614	5,657	4.5	0.34	16	5,887
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.67	0.63	0.64	3.9	0.01	0.02	0.76	0.78	0.01	0.19	0.21	7.0	930	937	0.75	0.06	2.6	975
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	137	137	550	—	—	—	82	—	—	55	—	—	—	—	—	—	—
Unmit.	—	No	No	No	—	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	137	137	550	—	—	—	82	—	—	55	—	—	—	—	—	—	—
Unmit.	—	No	No	No	—	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,100
Unmit.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	No

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.1	2.8	3.8	26	0.07	0.07	5.6	5.6	0.06	1.4	1.5	—	6,742	6,742	0.23	0.38	22	6,882
Area	1.6	1.6	0.03	4.0	< 0.005	0.01	—	0.01	0.01	—	0.01	—	16	16	< 0.005	< 0.005	—	16
Energy	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	695	695	0.08	0.01	—	698
Water	—	—	—	—	—	—	—	—	—	—	—	17	27	45	1.8	0.04	—	102
Waste	—	—	—	—	—	—	—	—	—	—	—	25	0.00	25	2.5	0.00	—	87
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.4	8.4
Total	4.7	4.4	4.2	31	0.07	0.10	5.6	5.7	0.10	1.4	1.5	42	7,480	7,522	4.6	0.42	31	7,794
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.1	2.8	4.3	26	0.06	0.07	5.6	5.6	0.06	1.4	1.5	—	6,444	6,444	0.27	0.40	0.58	6,570
Area	0.90	0.90	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	695	695	0.08	0.01	—	698
Water	—	—	—	—	—	—	—	—	—	—	—	17	27	45	1.8	0.04	—	102
Waste	—	—	—	—	—	—	—	—	—	—	—	25	0.00	25	2.5	0.00	—	87
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.4	8.4
Total	4.0	3.7	4.7	26	0.07	0.10	5.6	5.7	0.09	1.4	1.5	42	7,166	7,208	4.6	0.45	8.9	7,466
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.3	2.1	3.1	18	0.05	0.05	4.2	4.2	0.05	1.1	1.1	—	4,881	4,881	0.19	0.29	7.2	4,981
Area	1.4	1.3	0.02	2.7	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11	11	< 0.005	< 0.005	—	11
Energy	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	695	695	0.08	0.01	—	698
Water	—	—	—	—	—	—	—	—	—	—	—	17	27	45	1.8	0.04	—	102
Waste	—	—	—	—	—	—	—	—	—	—	—	25	0.00	25	2.5	0.00	—	87

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.4	8.4
Total	3.7	3.4	3.5	21	0.05	0.08	4.2	4.3	0.08	1.1	1.1	42	5,614	5,657	4.5	0.34	16	5,887
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.41	0.38	0.56	3.4	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	808	808	0.03	0.05	1.2	825
Area	0.25	0.25	< 0.005	0.50	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.9	1.9	< 0.005	< 0.005	—	1.9
Energy	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	115	115	0.01	< 0.005	—	116
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	4.6	7.4	0.29	0.01	—	17
Waste	—	—	—	—	—	—	—	—	—	—	—	4.1	0.00	4.1	0.41	0.00	—	14
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.4	1.4
Total	0.67	0.63	0.64	3.9	0.01	0.02	0.76	0.78	0.01	0.19	0.21	7.0	930	937	0.75	0.06	2.6	975

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.80	0.79	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.54	0.54	—	0.28	0.28	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24	24	< 0.005	< 0.005	—	24
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.51	0.00	0.00	9.6	9.6	0.00	0.97	0.97	—	94	94	< 0.005	< 0.005	0.34	96
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	0.25	0.25	0.00	0.03	0.03	—	2.4	2.4	< 0.005	< 0.005	< 0.005	2.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	0.05	0.05	0.00	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.41
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.0	1.6	15	17	0.03	0.65	—	0.65	0.59	—	0.59	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	7.1	7.1	—	3.4	3.4	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.08	0.06	0.57	0.67	< 0.005	0.02	—	0.02	0.02	—	0.02	—	114	114	< 0.005	< 0.005	—	114
Dust From Material Movement	—	—	—	—	—	—	0.27	0.27	—	0.13	0.13	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.51	0.00	0.00	9.6	9.6	0.00	0.97	0.97	—	94	94	< 0.005	< 0.005	0.34	96
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.35	0.35	0.00	0.04	0.04	—	3.4	3.4	< 0.005	< 0.005	0.01	3.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	0.56	0.56	< 0.005	< 0.005	< 0.005	0.57
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	11	13	0.02	0.33	—	0.33	0.30	—	0.30	—	2,535	2,535	0.10	0.02	—	2,544
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.2	1.4	< 0.005	0.04	—	0.04	0.03	—	0.03	—	278	278	0.01	< 0.005	—	279
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.21	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46	46	< 0.005	< 0.005	—	46

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.51	0.00	0.00	9.6	9.6	0.00	0.97	0.97	—	94	94	< 0.005	< 0.005	0.34	96
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.05	0.00	0.00	1.0	1.0	0.00	0.10	0.10	—	9.7	9.7	< 0.005	< 0.005	0.02	9.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	0.18	0.18	0.00	0.02	0.02	—	1.6	1.6	< 0.005	< 0.005	< 0.005	1.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.81	0.68	6.2	8.8	0.01	0.26	—	0.26	0.24	—	0.24	—	1,350	1,350	0.05	0.01	—	1,355
Paving	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81	0.68	6.2	8.8	0.01	0.26	—	0.26	0.24	—	0.24	—	1,350	1,350	0.05	0.01	—	1,355
Paving	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.51	0.72	< 0.005	0.02	—	0.02	0.02	—	0.02	—	111	111	< 0.005	< 0.005	—	111
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18	18	< 0.005	< 0.005	—	18
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.51	0.00	0.00	9.6	9.6	0.00	0.97	0.97	—	94	94	< 0.005	< 0.005	0.34	96
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.48	0.00	0.00	9.6	9.6	0.00	0.97	0.97	—	88	88	< 0.005	< 0.005	0.01	89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.76	0.76	0.00	0.08	0.08	—	7.3	7.3	< 0.005	< 0.005	0.01	7.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	0.14	0.14	0.00	0.01	0.01	—	1.2	1.2	< 0.005	< 0.005	< 0.005	1.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.1	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	0.73	0.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.7	3.7	< 0.005	< 0.005	—	3.7
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.48	0.00	0.00	9.6	9.6	0.00	0.97	0.97	—	88	88	< 0.005	< 0.005	0.01	89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	0.25	0.25	0.00	0.03	0.03	—	2.4	2.4	< 0.005	< 0.005	< 0.005	2.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	0.05	0.05	0.00	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.41
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Light Industry	2.8	2.6	3.5	24	0.06	0.06	5.1	5.2	0.06	1.3	1.4	—	6,168	6,168	0.21	0.34	20	6,296
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Manufacturing	0.21	0.19	0.26	1.8	< 0.005	< 0.005	0.38	0.38	< 0.005	0.10	0.10	—	458	458	0.02	0.03	1.5	467
Unrefrigerated Warehouse-No Rail	0.05	0.05	0.07	0.45	< 0.005	< 0.005	0.10	0.10	< 0.005	0.02	0.03	—	116	116	< 0.005	0.01	0.38	118
Total	3.1	2.8	3.8	26	0.07	0.07	5.6	5.6	0.06	1.4	1.5	—	6,742	6,742	0.23	0.38	22	6,882
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	2.8	2.6	3.9	23	0.06	0.06	5.1	5.2	0.06	1.3	1.4	—	5,896	5,896	0.24	0.37	0.53	6,011
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Manufacturing	0.21	0.19	0.29	1.7	< 0.005	< 0.005	0.38	0.38	< 0.005	0.10	0.10	—	437	437	0.02	0.03	0.04	446
Unrefrigerated Warehouse-No Rail	0.05	0.05	0.07	0.44	< 0.005	< 0.005	0.10	0.10	< 0.005	0.02	0.03	—	111	111	< 0.005	0.01	0.01	113
Total	3.1	2.8	4.3	26	0.06	0.07	5.6	5.6	0.06	1.4	1.5	—	6,444	6,444	0.27	0.40	0.58	6,570
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	0.38	0.34	0.52	3.1	0.01	0.01	0.70	0.70	0.01	0.18	0.19	—	739	739	0.03	0.04	1.1	754
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Manufacturing	0.03	0.02	0.04	0.21	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	50	50	< 0.005	< 0.005	0.07	51

Unrefrig Warehouse-No Rail	0.01	0.01	0.01	0.08	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	18	18	< 0.005	< 0.005	0.03	19
Total	0.41	0.38	0.56	3.4	0.01	0.01	0.76	0.77	0.01	0.19	0.20	—	808	808	0.03	0.05	1.2	825

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	141	141	0.02	< 0.005	—	142
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	26	26	< 0.005	< 0.005	—	26
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	41	41	0.01	< 0.005	—	41
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	40	40	0.01	< 0.005	—	40
Total	—	—	—	—	—	—	—	—	—	—	—	—	247	247	0.04	< 0.005	—	249
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	141	141	0.02	< 0.005	—	142
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	26	26	< 0.005	< 0.005	—	26

Manufac	—	—	—	—	—	—	—	—	—	—	—	—	41	41	0.01	< 0.005	—	41
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	40	40	0.01	< 0.005	—	40
Total	—	—	—	—	—	—	—	—	—	—	—	—	247	247	0.04	< 0.005	—	249
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	23	23	< 0.005	< 0.005	—	24
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.3	4.3	< 0.005	< 0.005	—	4.3
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	6.7	6.7	< 0.005	< 0.005	—	6.8
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	6.6	6.6	< 0.005	< 0.005	—	6.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	41	41	0.01	< 0.005	—	41

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	0.03	0.02	0.28	0.24	< 0.005	0.02	—	0.02	0.02	—	0.02	—	338	338	0.03	< 0.005	—	338
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Manufacturing	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	97	97	0.01	< 0.005	—	98
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Total	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	448	448	0.04	< 0.005	—	449
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	0.03	0.02	0.28	0.24	< 0.005	0.02	—	0.02	0.02	—	0.02	—	338	338	0.03	< 0.005	—	338
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	97	97	0.01	< 0.005	—	98
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Total	0.04	0.02	0.38	0.32	< 0.005	0.03	—	0.03	0.03	—	0.03	—	448	448	0.04	< 0.005	—	449
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	56	56	< 0.005	< 0.005	—	56
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	16	16	< 0.005	< 0.005	—	16
Unrefrigerated Warehouse-No Rail	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.1	2.1	< 0.005	< 0.005	—	2.1

Total	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	74	74	0.01	< 0.005	—	74

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.84	0.84	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.71	0.65	0.03	4.0	< 0.005	0.01	—	0.01	0.01	—	0.01	—	16	16	< 0.005	< 0.005	—	16
Total	1.6	1.6	0.03	4.0	< 0.005	0.01	—	0.01	0.01	—	0.01	—	16	16	< 0.005	< 0.005	—	16
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.84	0.84	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.90	0.90	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.09	0.08	< 0.005	0.50	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.9	1.9	< 0.005	< 0.005	—	1.9
Total	0.25	0.25	< 0.005	0.50	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.9	1.9	< 0.005	< 0.005	—	1.9

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	11	18	29	1.1	0.03	—	65
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	3.2	5.0	8.2	0.33	0.01	—	19
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.0	4.7	7.7	0.31	0.01	—	18

Total	—	—	—	—	—	—	—	—	—	—	—	17	27	45	1.8	0.04	—	102
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	11	18	29	1.1	0.03	—	65
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	3.2	5.0	8.2	0.33	0.01	—	19
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.0	4.7	7.7	0.31	0.01	—	18
Total	—	—	—	—	—	—	—	—	—	—	—	17	27	45	1.8	0.04	—	102
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.8	2.9	4.8	0.19	< 0.005	—	11
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.53	0.83	1.4	0.05	< 0.005	—	3.1
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.49	0.78	1.3	0.05	< 0.005	—	2.9
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	4.6	7.4	0.29	0.01	—	17

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	17	0.00	17	1.7	0.00	—	58
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	4.8	0.00	4.8	0.48	0.00	—	17
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.4	0.00	3.4	0.34	0.00	—	12
Total	—	—	—	—	—	—	—	—	—	—	—	25	0.00	25	2.5	0.00	—	87
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	17	0.00	17	1.7	0.00	—	58
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	4.8	0.00	4.8	0.48	0.00	—	17
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.4	0.00	3.4	0.34	0.00	—	12
Total	—	—	—	—	—	—	—	—	—	—	—	25	0.00	25	2.5	0.00	—	87
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.8	0.00	2.8	0.28	0.00	—	9.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.80	0.00	0.80	0.08	0.00	—	2.8
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	0.56	0.00	0.56	0.06	0.00	—	2.0
Total	—	—	—	—	—	—	—	—	—	—	—	4.1	0.00	4.1	0.41	0.00	—	14

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.5	6.5
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.4	8.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.5	6.5

Manufac	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.4	8.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.4	1.4

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	7/1/2026	7/14/2026	5.0	10.0	—
Grading	Grading	7/15/2026	8/3/2026	5.0	14	—
Building Construction	Building Construction	8/4/2026	9/28/2026	5.0	40	—
Paving	Paving	9/29/2026	11/9/2026	5.0	30	—
Architectural Coating	Architectural Coating	11/10/2026	11/23/2026	5.0	10.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Excavators	Diesel	Average	1.00	8.0	36	0.38
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.0	8.0	84	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	8.0	82	0.20

Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.0	7.0	84	0.37
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Building Construction	Aerial Lifts	Diesel	Average	3.0	8.0	46	0.31
Paving	Cement and Mortar Mixers	Diesel	Average	2.0	6.0	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	6.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	6.0	36	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.0	84	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	12	11	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.9	HHDT,MHDT
Site Preparation	Hauling	0.00	20	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	12	11	LDA,LDT1,LDT2
Grading	Vendor	—	7.9	HHDT,MHDT
Grading	Hauling	0.00	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	12	11	LDA,LDT1,LDT2
Building Construction	Vendor	0.00	7.9	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT

Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	12	11	LDA,LDT1,LDT2
Paving	Vendor	—	7.9	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	12	11	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.9	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	0.00	0.00	3,162

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	15	0.00	0.00
Grading	300	300	14	0.00	0.00
Paving	0.00	0.00	0.00	0.00	2.0

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	General Light Industry	0.79	0%
Paving	Parking Lot	1.2	100%
Paving	Manufacturing	0.00	0%
Paving	Unrefrigerated Warehouse-No Rail	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
General Light Industry	623	50	125	171,523	7,155	570	1,433	1,969,824
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Manufacturing	28	46	37	11,698	325	531	421	134,348
Unrefrigerated Warehouse-No Rail	12	12	12	4,268	134	134	134	49,014

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
General Light Industry	Wood Fireplaces	0	0
General Light Industry	Gas Fireplaces	0	0
General Light Industry	Propane Fireplaces	0	0
General Light Industry	Electric Fireplaces	0	0
General Light Industry	No Fireplaces	0	0
General Light Industry	Conventional Wood Stoves	0	0
General Light Industry	Catalytic Wood Stoves	0	0
General Light Industry	Non-Catalytic Wood Stoves	0	0
General Light Industry	Pellet Wood Stoves	0	0
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0
Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0
Manufacturing	Wood Fireplaces	0	0
Manufacturing	Gas Fireplaces	0	0
Manufacturing	Propane Fireplaces	0	0
Manufacturing	Electric Fireplaces	0	0
Manufacturing	No Fireplaces	0	0
Manufacturing	Conventional Wood Stoves	0	0
Manufacturing	Catalytic Wood Stoves	0	0
Manufacturing	Non-Catalytic Wood Stoves	0	0

Manufacturing	Pellet Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Wood Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Gas Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Propane Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Electric Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	No Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Conventional Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Non-Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	0.00	0.00	58,320	19,440	3,162

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
General Light Industry	251,751	204	0.0330	0.0040	1,053,169
Parking Lot	46,172	204	0.0330	0.0040	0.00

Manufacturing	72,620	204	0.0330	0.0040	303,799
Unrefrigerated Warehouse-No Rail	71,205	204	0.0330	0.0040	39,938

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
General Light Industry	5,772,000	143,673
Parking Lot	0.00	0.00
Manufacturing	1,665,000	0.00
Unrefrigerated Warehouse-No Rail	1,554,000	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
General Light Industry	31	0.00
Parking Lot	0.00	0.00
Manufacturing	8.9	0.00
Unrefrigerated Warehouse-No Rail	6.3	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Light Industry	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.0	4.0	18

Manufacturing	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.0	4.0	18

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	14	annual days of extreme heat
Extreme Precipitation	3.9	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	25	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	22

AQ-PM	1.2
AQ-DPM	10
Drinking Water	76
Lead Risk Housing	25
Pesticides	89
Toxic Releases	21
Traffic	37
Effect Indicators	—
CleanUp Sites	58
Groundwater	56
Haz Waste Facilities/Generators	92
Impaired Water Bodies	98
Solid Waste	99
Sensitive Population	—
Asthma	68
Cardio-vascular	95
Low Birth Weights	4.4
Socioeconomic Factor Indicators	—
Education	59
Housing	12
Linguistic	44
Poverty	49
Unemployment	77

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—

Above Poverty	63.87783909
Employed	58.62953933
Median HI	70.4478378
Education	—
Bachelor's or higher	35.2239189
High school enrollment	100
Preschool enrollment	35.76286411
Transportation	—
Auto Access	65.16104196
Active commuting	10.6249198
Social	—
2-parent households	84.0626203
Voting	64.36545618
Neighborhood	—
Alcohol availability	90.63261902
Park access	4.606698319
Retail density	2.900038496
Supermarket access	18.42679328
Tree canopy	36.96907481
Housing	—
Homeownership	70.96111895
Housing habitability	81.27807006
Low-inc homeowner severe housing cost burden	68.26639292
Low-inc renter severe housing cost burden	90.32465033
Uncrowded housing	51.23829077
Health Outcomes	—
Insured adults	41.30630053
Arthritis	0.0

Asthma ER Admissions	35.8
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	80.2
Cognitively Disabled	52.2
Physically Disabled	55.6
Heart Attack ER Admissions	19.1
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	82.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	87.0
Elderly	32.8
English Speaking	67.8
Foreign-born	30.0

Outdoor Workers	8.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	95.5
Traffic Density	26.4
Traffic Access	0.0
Other Indices	—
Hardship	52.9
Other Decision Support	—
2016 Voting	75.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	64
Healthy Places Index Score for Project Location (b)	59
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Applicant provided information: Greenhouse Building would be 34,560 sf (0.79 acres). The Greenhouse will have separate areas serving different purposes, so the model characterizes each area of the Greenhouse based on the specified uses. General Light Industry, Manufacturing, and Warehouse best characterize the specified uses. The size of each component is measured by 1,000 sf. Building sf provided by applicant. Landscaping would occur in one 10,890 sf area around the Greenhouse and Parking Lot. To avoid double counting, the model includes landscape area for only one of the land uses. The Project site includes two unpermitted storage areas. The CEQA document, and this air quality analysis, are analyzing the construction and operation of these previously unpermitted structures so that they may receive permits. For land use calculations, these storage areas are combined with the greenhouse storage area.
Construction: Construction Phases	Applicant estimates a 4-5 month construction schedule. No demolition is proposed. The Greenhouse building would be prefabricated and would not require painting on-site (architectural coating). However, striping the parking lot would constitute architectural coating.
Construction: Off-Road Equipment	Applicant provided information that construction would require 1 forklift and 3 aerial lifts. Instead of removing defaults, this model assumes that the Applicant provided equipment would be used in addition to typical construction equipment needed for site clearing, grading, building, and paving. Modified forklift pre-set from 3 forklifts/day to 1 forklift/day based on Applicant provided information.
Construction: Dust From Material Movement	Total cut and fill for the project would be 300 cy of cut and 300 cy of fill.
Construction: Trips and VMT	Maximum of 6 workers on site. Assuming workers would drive construction trucks to the site instead of personal vehicles. All other construction equipment would be stored on site for the duration of construction.
Construction: On-Road Fugitive Dust	Most roads along the construction route would be paved as would the access road on-site.
Construction: Architectural Coatings	Architectural coating would only apply to the parking lot since the Greenhouse building will be prefabricated and not require painting on-site.
Construction: Paving	A total of two acres would be paved consisting of 0.79 acres for the Greenhouse building and 1.21 for the Parking Lot.
Operations: Vehicle Data	The Project would employ 10 workers who would travel to and from the site. The Project site would accommodate truck trips for shipping and delivery; however, the Applicant does not have a trip estimate at this time. To be conservative, this model relies on the CalEEMod inputs estimated by land use and adds an additional 20 trips for the 10 employees. The 10 employees' trips are only applied to one land use (General Light Industry) to avoid double counting.

Operations: Fleet Mix	Mobile homes have been removed since they would not be used as part of the Project. No buses are anticipated to visit the Project site either.
Operations: Road Dust	All off-site roads that lead to the Project site are paved. Additionally, the Project site would include a new paved parking lot and access driveway leading to the public roadway (Hwy 25).

Appendix C

Biological Resources Report

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Stoney Farms
Biological Resources Report

February 2026

Prepared for

M. Abraham Prado
County of San Benito
2301 Technology Parkway
Hollister, California 95023

Prepared by

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1. INTRODUCTION

1.1 Project Description

Denise Duffy & Associates, Inc. (DD&A) was contracted by the County of San Benito (County) to prepare this Biological Resources Report for the Stoney Farms Project (project), located at 2639 Bolsa Road, Hollister, CA 95023, in unincorporated San Benito County, California, on County Parcel 019-010-010 (**Figure 1**). The project site is in the County's Agricultural Productive (AP) zoning district. The project site has historically been used for row crop farming and was disked at the time of the initial field survey.

The project involves construction of a new 34,560 square foot greenhouse structure intended for cannabis cultivation, processing, and distribution, a new 43 stall parking lot, and a paved access driveway connecting with SR 25. The proposed structure would include approximately 9,600 square feet of greenhouse space, 2,400 square feet of warehouse space, 2,400 square feet of processing space, and 4,800 square feet of restrooms for employees, and a 20-foot-wide loading gate. In addition, the project would include a new trash enclosure, connections to an existing well on a neighboring parcel, and septic system. Other site improvements would include surveillance cameras, exterior security lighting, and fencing. The remainder of the parcel would remain row crop farming.

This report describes the existing biological resources within and adjacent to the property, including any special-status species or sensitive habitats known or with the potential to occur. This report also assesses the potential impacts to biological resources that results from operation of the project, and recommends appropriate avoidance, minimization, and mitigation measures necessary to reduce those impacts to a less-than-significant level in accordance with the California Environmental Quality Act (CEQA). In addition, this report includes an overview of applicable federal, state, and local regulations; the regulatory and responsible agencies with jurisdiction over sensitive resources within the survey area; and the relevant permits that could be required for impacts sensitive resources.

1.2 Summary of Results

The project site is located primarily within active agricultural land, adjacent to Hollister Airport. The survey area was defined by the proposed project parcel (**Figure 2**). Two habitat types were identified within the survey area; active agriculture (consisting or row crop and agricultural roads) and ruderal. The remainder of the survey area was developed. The field review determined there are no potential wetlands or waters of the U.S. or state, or other sensitive habitats within the project parcel.

Several special-status wildlife species have the potential to occur within the project site. These species include the Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus),* western red bat (*Lasiurus blossevillii*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus),* Swainson's hawk (*Buteo swainsoni*), California tiger salamander (*Ambystoma californiense,* CTS). California red-legged frog (*Rana draytonii,* CRLF), and San Joaquin coachwhip *(Masticophis flagellum ruddocki*). Additionally, trees within and adjacent to the project site may provide suitable nesting habitat for protected avian species. Avoidance, minimization, and mitigation measures are included in this report to avoid or reduce impacts to these sensitive biological resources to a less than significant level under CEQA. All other species evaluated have a low potential to occur, are assumed unlikely to occur, or were determined not present within the survey area for the species-specific reasons presented in **Appendix C.**



Title:

Regional Map

Date	7/29/2025
Scale	N/A
Project	2025.50

Monterey | San Jose

Denise Duffy and Associates, Inc.

Environmental Consultants Resource Planners

947 Cass Street, Suite 5
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Figure 1

2. METHODS

2.1 Personnel and Survey Methods

DD&A Senior Environmental Scientist Patric Krabacher and Assistant Environmental Scientist Tess Echevarria evaluated the survey area on December 9, 2025, to characterize present habitats and to identify any special-status plant or wildlife species, or suitable habitat for these species. The survey methods included walking the survey area to identify general and sensitive vegetation types and conducting a reconnaissance-level habitat survey to identify suitable habitat for, or presence of, any special-status plant or wildlife species. Data collected during the surveys were used to assess the environmental conditions of the survey area and its surroundings, evaluate environmental constraints at the site and within the local vicinity, and provide a basis for recommendations to minimize and avoid impacts.

The survey area was evaluated for botanical resources following the applicable guidelines outlined in: Guidelines for Conducting and Reporting Botanical Inventories for Federally listed, Proposed and Candidate Plants (U.S. Fish and Wildlife Service [USFWS], 2000), Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (California Department of Fish and Wildlife [CDFW], 2021), and CNPS Botanical Survey Guidelines (California Native Plant Society [CNPS], 2001).

2.2 Data Sources

The primary literature and data sources reviewed to determine the occurrence or potential for occurrence of special-status species within the survey area are as follows:

- Current agency status information from USFWS and CDFW for species listed, proposed for listing, or candidates for listing as threatened or endangered under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA), and those considered CDFW "species of special concern", including:
    - California Natural Diversity Database (CNDDB) occurrence data from the Hollister quadrangle and the seven surrounding quadrangles, including Gilroy, Gilroy Hot Springs, Pacheco Peak, Chittenden, San Felipe, Three Sisters, San Juan Bautista, and Tres Pinos (CDFW, 2025b; **Appendix A**);
    - The USFWS's Information for Planning and Consulting (IPaC) Resource List (USFWS, 2025a: **Appendix B**);
    - CDFW's Special Animals List (CDFW, 2025c);
- The CNPS Inventory of Rare and Endangered Vascular Plants of California (CNPS, 2025)
- eBird occurrences[1] (Cornell Lab of Ornithology, 2024)

From these resources, a list of special-status plant and wildlife species known or with the potential to occur in the vicinity of the survey area was created (**Appendix C**). This list presents these species along with their legal status, habitat requirements, and a brief statement of the likelihood to occur.

[1] eBird is a citizen science platform for documenting avian observations. eBird data is reviewed by volunteer birding experts; however, most reviews are of rare or unusual observations only. Because the data is not verifiable, eBird occurrences are used in this document to supplement verifiable data provided in the CNDDB and other resources.



Survey Area

Date
1/9/2026

Scale
1 in = 292 ft

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Planning and Environmental Consulting

Figure
2

Path: C:\GIS\GIS_Projects\2025-50 Stoney Farms\BRR Figures\BRR Figures.aprx

In addition, the following literature and data sources were reviewed to determine the occurrence or potential for occurrence of other sensitive natural resources within the survey area:

- *California Natural Communities List* (CDFW, 2025a);
- Biogeographic Information and Observation System (BIOS) (CDFW, 2025d);
- The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA-NRCS, 2025;
- The National Wetlands Inventory Wetlands Mapper (USFWS, 2025b); and
- The National Hydrography Dataset (U.S. Geologic Survey [USGS], 2023).

2.2.1 Botany

A Manual of California Vegetation (Sawyer et al., 2009) was utilized to determine if vegetation types identified as sensitive on CDFW's *California Natural Communities List* (CDFW, 2025a) are present within the survey area. Information regarding the distribution and habitats of local and state vascular plants was also reviewed (Howitt and Howell, 1964 and 1973; Munz and Keck, 1973; Baldwin et al., 2012; Matthews and Mitchell, 2015; Jepson Flora Project, 2025). All plants observed within the survey area during the evaluation were identified to species or intraspecific taxon necessary to eliminate them as being special-status species using keys and descriptions in The Jepson Manual: Vascular Plants of California, Edition 2 (Baldwin et al., 2012) and The Plants of Monterey County an Illustrated Field Key (Matthews and Mitchell, 2015). Scientific nomenclature for plant species identified within this document follows Baldwin, et. al, (2012); common names follow Matthews and Mitchell (2015). A full botanical inventory was not recorded for the survey area but the dominant species within each habitat were noted. Dominant plant species are those which are more numerous than their competitors in an ecological community or makes up more of the biomass; generally, the species that are most abundant. Most ecological communities are defined by their dominant species. Additionally, the California Invasive Plant Council (Cal-IPC) Inventory (Cal-IPC, 2025) was reviewed to determine if any invasive plant species were present within the survey area.

2.2.2 Wildlife

The following literature and data sources were reviewed: CDFW reports on special-status wildlife (Remsen, 1978; Williams, 1986; Thelander, 1994); California Wildlife Habitat Relationships Program species-habitat models (Zeiner et al., 1988 and 1990); and general wildlife references (Stebbins, 1972, 1985, and 2003).

2.3 Definitions

2.3.1 Sensitive Habitats

Sensitive habitats include riparian corridors, wetlands, habitats for legally protected species, areas of high biological diversity, areas supporting rare or special-status wildlife habitat, and unusual or regionally restricted vegetation types. Vegetation types considered sensitive include those listed on the CDFW's *California Natural Communities List* (i.e., those habitats that are rare or endangered within the borders of California) (CDFW, 2025a), those that are occupied by species listed under the ESA or are critical habitat in accordance with the ESA, and those that are defined as Environmentally Sensitive Habitat Areas under the California Coastal Act. Specific habitats may also be identified as sensitive in city or county general plans or ordinances. Sensitive habitats are regulated under federal regulations (such as the Clean Water Act [CWA] and Executive Order [EO] 11990 – Protection of Wetlands), state regulations (such as CEQA and the CDFW Streambed Alteration Program), or local ordinances or policies (such as city or county tree ordinances and general plan policies).

2.3.2 Special-Status Species

Special-status species are those plants and animals that have been formally listed or proposed for listing as endangered or threatened or are candidates for such listing under the ESA or the CESA. Listed species are afforded legal protection under the ESA and CESA. Species that meet the definition of rare or endangered under the CEQA Section 15380 are also considered special-status species. Animals identified as "species of special concern" (most of which are species whose breeding populations in California may face extirpation if current population trends continue) on CDFW's "Special Animals List" (CDFW, 2025c) meet this definition and are typically provided management consideration through the CEQA process, although they are not legally protected under the ESA or CESA. CDFW also includes some animal species that are not assigned any of the other status designations on their "Special Animals" list; however, these species have no legal or protection status and are not analyzed in this document.

Plants listed as rare under the California Native Plant Protection Act (CNPPA) or included in CNPS California Rare Plant Ranks (CRPR) 1A, 1B, 2A, and 2B are also treated as special-status species as they meet the definitions of Sections 2062 and 2067 of the CESA and in accordance with CEQA Guidelines Section 15380. In general, the CDFW requires that plant species on CRPR 1A (Plants presumed extirpated in California and Either Rare or Extinct Elsewhere), CRPR 1B (Plants rare, threatened, or endangered in California and elsewhere), CRPR 2A (Plants presumed extirpated in California, but more common elsewhere); and CRPR 2B (Plants rare, threatened, or endangered in California, but more common elsewhere) of the CNPS *Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 2025) be fully considered during the preparation of environmental documents relating to CEQA. CRPR 3 (plants about which more information is needed) and CRPR 4 species (plants of limited distribution) may, but generally do not, meet the definitions of Sections 2062 and 2067 of the CESA and are not typically considered in environmental documents relating to CEQA, and therefore are not analyzed in this document.

Raptors (e.g., eagles, hawks, and owls) and their nests are protected under the Migratory Bird Treaty Act (MBTA), the California Migratory Bird Treaty Act (CMBTA), and Fish and Game Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except otherwise provided by this code or any regulation adopted pursuant thereto." In addition, fully protected species under the Fish and Game Code Section 3511 (birds), Section 4700 (mammals), Section 5515 (fish), and Section 5050 (reptiles and amphibians) are also considered special-status animal species. Species with no formal special-status designation but thought by experts to be rare or in serious decline may also be considered special-status animal species in some cases, depending on project-specific analysis and relevant, localized conservation needs or precedence.

2.4 Regulatory Setting

The following regulatory discussion describes the major federal, state, and local laws that may be applicable to the project.

2.4.1 Federal Regulations

Federal Endangered Species Act

Provisions of the ESA of 1973 (16 USC 1532 et seq., as amended) protect federally listed threatened or endangered species and their habitats from unlawful take. Listed species include those for which proposed and final rules have been published in the Federal Register. The ESA is administered by USFWS or the National Oceanic and Atmospheric Administration - National Marine Fisheries Service (NMFS). In

general, the NMFS is responsible for the protection of ESA-listed marine species and anadromous fish, whereas other listed species are under USFWS jurisdiction.

Section 9 of ESA prohibits the take of any fish or wildlife species listed under ESA as endangered or threatened. Take, as defined by ESA, is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." Harm is defined as "any act that kills or injures the fish or wildlife…including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife." In addition, Section 9 prohibits removing, digging up, and maliciously damaging or destroying federally listed plants on sites under federal jurisdiction. Section 9 does not prohibit take of federally listed plants on sites not under federal jurisdiction. If there is the potential for incidental take of a federally listed fish or wildlife species, take of listed species can be authorized through either the Section 7 consultation process for federal actions or a Section 10 incidental take permit process for non-federal actions. Federal agency actions include activities that are on federal land, conducted by a federal agency, funded by a federal agency, or authorized by a federal agency (including issuance of federal permits).

Clean Water Act

The U.S. Army Corps of Engineers (ACOE) and U.S. Environmental Protection Agency (EPA) regulate discharge of dredged and fill material into waters of the U.S. under Section 404 of the CWA. Waters of the U.S. are defined broadly as waters susceptible to use in commerce (including waters subject to tides, interstate waters, and interstate wetlands) and other waters (such as interstate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds) (33 CFR 328.3). Potential wetland areas are identified as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soils conditions."

Under Section 401 of the CWA, any applicant receiving a Section 404 permit from the ACOE must also obtain a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB). A Section 401 Water Quality Certification is issued when a project is demonstrated to comply with state water quality standards and other aquatic resource protection requirements.

Migratory Bird Treaty Act

The MBTA of 1918 prohibits killing, possessing, or trading migratory birds except in accordance with regulation prescribed by the Secretary of the Interior. Most actions that result in taking or in permanent or temporary possession of a protected species constitute violations of the MBTA. The USFWS is responsible for overseeing compliance with the MBTA and implements Conventions (treaties) between the United States and four countries for the protection of migratory birds – Canada, Mexico, Japan, and Russia. The USFWS maintains a list of migratory bird species that are protected under the MBTA.

2.4.2 State Regulations

California Endangered Species Act

The CESA was enacted in 1984. The California Code of Regulations (Title 14, §670.5) lists animal species considered endangered or threatened by the state. Section 2090 of CESA requires state agencies to comply with endangered species protection and recovery and to promote conservation of these species. Section 2080 of the Fish and Game Code prohibits "take" of any species that the commission determines to be an

endangered species or a threatened species. “Take” is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." A Section 2081 Incidental Take Permit from the CDFW may be obtained to authorize “take” of any state listed species.

California Native Plant Protection Act

The CNPPA of 1977 directed CDFW to carry out the legislature’s intent to “preserve, protect and enhance rare and Endangered plants in the State.” The CNPPA prohibits importing rare and Endangered plants into California, taking rare and Endangered plants, and selling rare and Endangered plants. The CESA and CNPPA authorized the Fish and Game Commission to designate endangered, threatened, and rare species and to regulate the taking of these species (§2050-2098, Fish and Game Code). Plants listed as rare under the CNPPA are not protected under CESA; however, these plants may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research.

California Fish and Game Code

Birds. Section 3503 of the Fish and Game Code states that it is “unlawful to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Section 3503.5 prohibits the killing, possession, or destruction of any birds in the orders Falconiformes or Strigiformes (birds-of-prey). Section 3511 prohibits take or possession of fully protected birds. Section 3513 (i.e., the CMBTA) prohibits the take or possession of any migratory nongame birds designated under the federal MBTA. Section 3800 prohibits take of nongame birds.

Fully Protected Species. The classification of fully protected was the state's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish (§5515), mammals (§4700), amphibians and reptiles (§5050), and birds (§3511). Most fully protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

Species of Special Concern. As noted above, the CDFW also maintains a list of wildlife “species of special concern.” Although these species have no legal status, the CDFW recommends considering these species during analysis of project impacts to protect declining populations and avoid the need to list them as endangered in the future.

Sensitive Habitats. CDFW has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations (§1802). As a trustee agency under CEQA Guidelines Section 15386, CDFW provides expertise in reviewing and commenting on environmental documents and provides protocols regarding potential negative impacts to those resources held in trust for the people of California.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne) is California’s statutory authority for the protection of water quality and applies to surface waters, wetlands, and groundwater, and to both point and nonpoint sources. Under the Porter-Cologne, the State Water Resources Control Board (State Board) has the ultimate authority over State water rights and water quality policy. However, Porter-Cologne

also establishes nine RWQCBs to oversee water quality on a day-to-day basis at the local/regional level. The survey area is located within Region 3 – Central Coast RWQCB. Porter-Cologne incorporates many provisions of the federal CWA, such as delegation to the State Board and RWQCBs of the National Pollutant Discharge Elimination System (NPDES) permitting program.

Under Porter-Cologne, the state must adopt water quality policies, plans, and objectives that protect the state's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegate to the nine RWQCBs. The regional boards are required to formulate and adopt water quality control plans for all areas in the region and establish water quality objectives in the plans. The Porter-Cologne sets forth the obligations of the State Board and RWQCBs to adopt and periodically update water quality control plans (basin plans). The act also requires waste dischargers to notify the RWQCBs of such activities through filing of Reports of Waste Discharge (RWD) and authorizes the State Board and RWQCBs to issue and enforce waste discharge requirements (WDRs), NPDES permits, Section 401 water quality certifications, or other approvals. The RWQCBs also have authority to issue waivers to RWD requirements and WDRs for broad categories of "low threat" discharge activities that have minimal potential for adverse water quality effects, when implemented according to prescribed terms and conditions.

The term "Waters of the State" is defined by Porter-Cologne as "any surface water or groundwater, including saline waters, within the boundaries of the state." The RWQCB protects all waters in its regulatory scope but has special responsibility for wetlands, riparian areas, and headwaters, including isolated wetlands, and waters that many not be regulated by the ACOE under Section 404 of the CWA. Waters of the State are regulated by RWQCB under the State Water Quality Certification Program, which regulates discharges of fill and dredged material under Section 401 of the CWA and the Porter-Cologne.

2.4.3 Local Regulations

San Benito County Code § 25.07.018

County Code § 25.07.018 (Tree Protection) requires a tree removal permit in the County's Single Family Residential (R-1) and Residential Mixed (RM) zones to trench, grade, or fill within the dripline of any protected tree or destroy, kill, remove, or seriously harm any protected tree. County Code defines a protected tree as "any living tree having at least one (1) trunk of eight (8) inches or more in diameter measured four and one-half (4.5) feet above the ground, or a multi-trunked tree having an aggregate diameter of ten inches or more, measured four and one-half (4.5) feet above the ground (DBH), excluding a variety of fruit and nut trees which are cultivated for edible fruit production. County Code provides additional protections for "trees of special protection," which include heritage trees with a trunk diameter of 36 inches or greater measured four and one-half feet above ground, trees required to be preserved or planted under an approved development plan or as a condition of approval, trees planted as mitigation or replacement for protected tree removal, and landmark trees or groves designated by the Board of Supervisors to be of historical or cultural value, an outstanding specimen, an unusual or native species and/or of significant community benefit.

Tree removal permits are valid for one year and may be extended once for an additional year upon written request. Applications must identify the number, species, size, and location of affected trees, state the reason for removal, and include any additional information required by the Planning Director. Generally, one tree per parcel may be removed every five years without detailed review by the Planning Director, except for trees of special protection; otherwise, review considers factors such as tree health and safety risks, impacts on structures, utilities, adjacent trees, erosion and drainage, neighborhood character, historical and

ecological value, view preservation, property enjoyment, and proposed mitigation measures (e.g., replacement planting). Exemptions to County Code § 25.07.018 include, but are not limited to, hazardous or diseased trees, trees which interfere with utilities or public safety, trees which are part of licensed nursery operations or public infrastructure projects, trees whose removal are authorized under state or federal permits, trees which are located within fully fenced residential side or rear yards (excluding trees of special protection), and trees which removed as part of a development project that has been considered under the California Environmental Quality Act (CEQA), and (a) the project considered the removal of those trees, or (b) the removal of those trees is contained in a landscape plan submitted in compliance with a condition of approval for the approved project.

2.4.4 San Benito County Code Chapter 19.33

County Code Chapter 19.33 (Management and Conservation of Woodlands) establishes regulations to conserve and protect woodlands in the unincorporated areas of San Benito County while allowing for reasonable use and enjoyment of private property. Chapter 19.33 regulates the removal, modification, and disturbance of trees and woodland areas through a discretionary permit process, with standards intended to retain a minimum level of woodland canopy and prevent excessive or unnecessary tree loss. A discretionary permit is generally required when proposed tree removal would reduce woodland canopy below the retention thresholds established in Table 19.33.007(1), when removal occurs on slopes of 30 percent or greater, or when activities would otherwise significantly impact protected woodland resources.

3. RESULTS

3.1 Habitat Types

The survey results include mapping and quantification of the acreage of each habitat type within the survey area (**Figure 3**). Approximately 22 acres of the survey area consist of actively cultivated agricultural fields. Areas where the habitat type is not cultivated agriculture land are either ruderal or developed roads and buildings. Due to the disturbed (mowed, sprayed, landscaped) nature of the survey area, no vegetation associations identified in *A Manual of California Vegetation* (Sawyer et al., 2009) are present, therefore these areas are not considered sensitive by any regulatory agency. A description of each habitat type is provided below.

3.1.1 Ruderal

- *A Manual of California Vegetation* classification(s): None
- *California Natural Communities List*: Not sensitive

Approximately 1.2 acres of the survey area can be classified as ruderal habitat. Ruderal areas are those areas which have been developed or have been subject to historic and ongoing disturbance by human activities and area devoid of vegetation or dominated by non-native and/or invasive weed species. Within the survey area, ruderal land consisted primarily of areas along the fence line and locations of old, staged farm equipment. Ruderal habitat was dominated by non-native grasses and forbs.

Ruderal areas are considered to have low biological value as they are generally denuded of vegetation or are dominated by non-native plant species and consist of relatively low-quality habitat from a wildlife perspective. However, some common wildlife species that do well in urbanized areas, including European starling (*Sturnus vulgaris*), western fence lizard (*Sceloporus occidentalis*), ground squirrel (*Otospermophilus beecheyi*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), American crow (*Corvus brachyrhynchos*), California scrub jay (*Aphelocoma californica*), and rock pigeon (*Columba livia*), may be found foraging within these areas. Plants in the ruderal habitat lack continuous flowers necessary to support insect species of special concern; however, trees may provide nesting habitat for raptor and other avian species.

3.1.2 Active Agriculture

- *A Manual of California Vegetation* classification(s): None
- *California Natural Communities List*: Not sensitive

Approximately 22 acres of the survey area are active agricultural consisting of the majority of the parcel (**Figure 3**). These areas are regularly disturbed, disked, maintained, and cultivated for crops. As such, it provides poor habitat for most plant and wildlife species of concern. However, several special-status species, such as CTS and CRLF, have the potential to disperse through active agricultural land.

3.1.3 Developed

- *A Manual of California Vegetation* classification(s): None
- *California Natural Communities List*: Not sensitive

Developed areas, approximately 0.8 acres, within the survey area consist of buildings for farm equipment storage and an access road (**Figure 3**). Developed areas are considered to have low biological value as they are generally denuded of vegetation and consist of relatively low-quality habitat from a wildlife perspective.



Title:

Habitat Map

Date 9/22/2026

Scale N/A

Project 2025.50

Monterey | San Jose

Denise Duffy and Associates, Inc.

Environmental Consultants Resource Planners

947 Cass Street, Suite 5
Monterey, CA 93940
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Figure 9

However, the common wildlife species identified above for ruderal communities may be found foraging within these areas. No vegetation is present in developed areas aside from non-native grasses and forbs and thus do not have the necessary continuous flowers to support insect species of concern.

3.2 Sensitive Habitats

A seasonal wetland feature is present approximately 220 feet southwest of the survey area, across Bolsa Road. The location is identified as a freshwater pond with the classification code PUSA (Palustrine, Unconsolidated Shore, Temporarily Flooded) on the USFWS National Wetlands Mapper (USFWS, 2024b); however it is outside the survey area and will not be directly impacted by construction. While outside the construction limits, there is the potential for federally-listed wildlife to utilize this habitat as a breeding resource. No hydrophytic vegetation or hydrological indicators were identified within areas surveyed. Therefore, the project is not anticipated to impact wetlands or waters of the U.S or State. No other habitats identified as sensitive on CDFW's *Natural Communities List* or riparian habitat are present within the survey area.

3.3 Special-Status Species

Published occurrence data within the survey area and surrounding USGS quadrangles were evaluated to compile a table of special-status species known to occur in the vicinity of the survey area (see "Methods"). Each of these species was evaluated for their likelihood to occur within and immediately adjacent to the survey area (**Appendix C**). The initial field survey was conducted outside the blooming period for most special-status plants presented in **Appendix C**; however, due to current disturbance regime associated with agricultural land cultivation, including disking, it was determined that no special-status plant species have the potential to occur. A review of suitable habitat and occurrence data determined several special-status wildlife species have the potential to occur within the survey area including Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus),* western red bat (*Lasiurus blossevillii*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus),* Swainson's hawk (*Buteo swainsoni*), California tiger salamander – (*Ambystoma californiense*). California red-legged frog (*Rana draytonii*), and San Joaquin Coachwhip *(Masticophis flagellum ruddocki*). Raptors and other protected avian species have the potential to nest within trees present within and adjacent to the survey area. These species are discussed further below. All other species are assumed unlikely to occur or have a low potential to occur based on the species-specific reasons presented in **Appendix C**, are therefore unlikely to be impacted by the project, and are not discussed further.

3.3.1 Special-Status Wildlife Species

Townsend's Big Eared Bat

The Townsend's big-eared bat (*Corynorhinus townsendii*) is a CDFW species of special concern. The Townsend's big-eared bat is a year round resident in California occurring from low desert to mid-elevation montane habitats. It is found primarily in rural settings from inland deserts to coastal redwoods, oak woodland of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. Townsend's big-eared bats typically roost during the day in caves and mines, but can roost in buildings that offer suitable conditions. Night roosts are in more open settings and include bridges, rock crevices, and trees. This species hibernates in mixed sex aggregations of a few to several hundred individuals. Hibernation is more prolonged in colder areas. This species arouses periodically and moves to alternative roosts and actively forages and drinks throughout the winter. A single young is born per year between May and July. Females form maternity colonies of 35 to 200 individuals, while males roost individually. Townsend's big-eared bats feed primarily on small moths that are gleaned from vegetation.

The CNDDB reports 4 occurrences of the Townsend's big-eared bat within the quadrangles reviewed, the nearest of which is located approximately 8 miles north of the survey area, from 2017. This species may forage over the entire survey area and trees within the survey area may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the survey area. Therefore, this species has a moderate potential to occur within the survey area.

Pallid Bat

The pallid bat (*Antrozous pallidus*) is a CDFW species of special concern, and is a year round resident in California. This species of bat occurs in a wide variety of habitats including grasslands, shrublands, arid desert areas, oak savanna, coastal forested areas, and coniferous forests of the mountain regions of California and forests ranging from sea level up through mixed conifer forests. Pallid bats are most common in open, dry habitats with rocky areas for roosting. Day roosts of this species include caves, crevices, mines, and occasionally hollow trees and buildings. This species seems to prefer rocky outcrops, cliffs, and crevices with access to open habitats for foraging. Pallid bats make use of similar structures for night roosting and will use more open sites such as eaves, awnings, and open areas under bridges for feeding roosts. Pallid bats feed on large insects (20 to 70 mm in length). Foraging takes place over open ground, at heights generally not greater than 7.5 feet, although prey is most often caught on the ground. Jerusalem crickets, scorpions and beetles make up most of the diet of pallid bats in central California. Copulation occurs in the fall, October through December. Females store the sperm and ovulation occurs in the following spring. Parturition timing is determined by local climate and embryonic development usually takes about 9 weeks with birth occurring in May or June. Twins are the norm in northern California but in other areas they are known to have triplets. Maternity colonies range from 20 to 200 individual adult bats. Males roost in much smaller groupings (Hermanson and O'Shea, 1983).

The CNDDB reports 3 occurrences of the pallid bat within the quadrangles reviewed, the nearest of which is from 1949 and located approximately 10.6 miles west of the survey area. This species may forage over the entire survey area and trees within the survey area may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the survey area. Therefore, this species has a moderate potential to occur within the survey area.

Western Mastiff Bat

The western mastiff bat (*Eumops perotis californicus*) is a CDFW species of special concern. Mastiff bats occur across the southwestern United States to central Mexico (Western Bat Working Group, 2005). In California, this species is an uncommon resident in southeastern San Joaquin Valley and Coastal Ranges from Monterey County southward through southern California. This species occurs in many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, agricultural, and urban environments. Western mastiff bats are reliant on crevices in cliff faces, high buildings, trees, and tunnels for roosting. When roosting in rock crevices, this species requires a vertical face to drop off and take flight. Western mastiff bats roost alone or in small colonies, usually of less than 100 individuals. Although nursery roosts for many bat species contain only adult females and their young, some western mastiff bat colonies contain adult males and females at all times of year. Mating occurs most often in early spring and young may be born from early April through August or September as parturition dates for this species varies more than any other bat in the United States. The primary diet of western mastiff bat is moths, although beetles, crickets, and katydids are also taken (Western Bat Working Group, 2005). Prey are caught in flight, generally from ground to tree-level.

The CNDDB reports 1 occurrence of the western mastiff bat within the quadrangles reviewed from 1998 located approximately 3 miles south of the survey area. This species may forage over the entire survey area and trees within the survey area may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the survey area. Therefore, this species has a moderate potential to occur within the survey area.

Western Red Bat

The western red bat (*Lasiurus blossevillii*) is a CDFW species of special concern. This species occurs in California, Arizona, and New Mexico, south to South America (Cryan, 2003). In California, western red bats occur from Shasta County to the Mexican border, west of the Sierra Nevada/Cascade crest and deserts. Although this species is migratory, western red bats are known to reside in California year-round and there is evidence that California populations do not migrate out of the state (Cryan, 2003). Western red bats are associated with forests and woodlands from sea level up through mixed conifer forests; however riparian areas appear to be favored, particularly willows, cottonwoods, and sycamores (Western Bat Working Group, 2005), and larger-leafed trees. Roost sites are often in edge habitat adjacent to streams, fields, or urban areas. Preferred sites are hidden from above, with few branches below, and have ground cover of low reflectivity. This nocturnal species emerges from roosting sites one to two hours after dark (AGFD, 2003) and feeds over a variety of habitats, including grasslands, shrublands, open woodlands, forests, and croplands. Moths, beetles, crickets, and cicadas are the typical prey species. Western red bats are typically a solitary species, but they often feed with other bat species, may migrate in groups (AGFD, 2003), and may form nursery colonies. Mating occurs in the fall and sperm is stored over winter. Fertilization occurs in the spring and gestation is 80 to 90 days. One to five young are born in mid May to early July; however, most litters have two or three. During the rearing period, females may move the young between roost sites. Young are capable of sustained flight at after approximately three to six weeks.

The CNDDB reports 1 occurrence of the western red bat within the quadrangles reviewed from 1998 located approximately 3 miles south of the survey area. This species may forage over the entire survey area and trees within the survey area may provide suitable night roosting habitat for this species. No suitable day or maternity roost habitat is present within the survey area. Therefore, this species has a moderate potential to occur within the survey area.

White-Tailed Kite

The white-tailed kite (*Elanus leucurus*) is a CDFW fully protected species. This raptor species is a fairly common to uncommon, year-long resident in coastal and valley lowlands. This species generally utilizes herbaceous lowlands with variable tree growth and an associated high population density of voles. Nests are made of loosely piled sticks and twigs and lined with grass, straw, or rootlets. Nests are generally placed near the top of a dense oak, willow, or other tree stands (usually 6-20 meters [20-100 feet] above ground), and are often located near an open foraging area. Breeding occurs from February to October with peak activity occurring from May to August. Foraging occurs in undisturbed open grasslands, meadows, farmlands, and emergent wetlands.

The CNDDB reports 2 occurrences of the white-tailed kite within the quadrangles reviewed, the nearest of which is from 2001 and located approximately 12.5 miles west of the survey area. Additionally, several Ebird occurrences from 2024-2025 are reported along SR 25 and San Felipe Road adjacent to the survey area. Trees within and adjacent to the survey area may provide suitable nesting habitat and suitable foraging habitat is present within the annual grassland. Therefore, this species has a moderate potential to occur within the survey area.

Loggerhead Shrike

The loggerhead shrike (*Lanius ludovicianus*) is a CDFW species of special concern. This species frequents open habitats with sparse shrubs and trees, suitable perches, and low or sparse herbaceous cover. This species occurs only rarely in heavily urbanized areas, but are often found in open agricultural areas with associated fencing. Nests are built upon a stable branch in densely-foliaged shrubs or trees, usually well-concealed. Nest height averages 0.4 to 15 meters (1.3 to 50 feet) above ground. Breeding occurs from March to May, with peak activity occurring in July or August. Loggerhead shrikes mainly eat large insects, but may also take small birds, mammals, amphibians, reptiles, fish, carrion, and various invertebrates. This species frequently skewers prey on a thorn, sharp twig, wire barb, or forces it into a tree crotch as a food cache for later consumption.

The CNDDB does not report any occurrences of the loggerhead shrike within the quadrangles reviewed; however, several eBird occurrences from 2024-2025 are present along SR 25, near the Hollister Airport, and along San Felipe Road. Shrubs and trees within the survey area may provide suitable nesting habitat and this species may forage over the entire survey area. Therefore, this species has a moderate potential to occur within the survey area.

Swainson's Hawk

Swainson's Hawk is listed as a state Threatened species and is protected by the MBTA. In California, this species is found in a variety of open habitats including grasslands, desert scrub, and agricultural fields. Most breeding sites in California are limited to two disjunct populations in the Great Basin and Central Valley. This species breeds in California from late February to March, lays its eggs between April and May, and departs for its southern migration between September and October. This species forages on foot or scans for prey from a perch with a diet consisting mostly of voles, other small rodents, birds, and insects. Swainson's Hawk often nests near riparian areas but will also use isolated trees in agricultural fields and along roadsides if adjacent to suitable foraging habitat. In the Central Valley, nests are typically built in the upper canopy and lateral branches of riparian trees which offer a panoramic view for hunting.

The CNDDB reports 6 occurrences of the Swainson's hawk within the quadrangles reviewed, the nearest is from 2020 and located 1.5 miles northeast along SR 156 and San Felipe Road. Trees within and adjacent to the survey area may provide suitable nesting habitat and suitable foraging habitat is present within the annual grassland. Therefore, this species has a moderate potential to occur within the survey area.

California Red-legged Frog

The CRLF was listed as a federally Threatened species on June 24, 1996 (61 FR 25813-25833) and is also a CDFW species of special concern. Critical Habitat was designated for CRLF on April 13, 2006 (71 FR 19244-19292) and went into effect on May 15, 2006.

The CRLF is the largest native frog in California (44-131 mm snout-vent length) and was historically widely distributed in the central and southern portions of the state (Jennings & Hayes, 1994). Adults generally inhabit aquatic habitats with riparian vegetation, overhanging banks, or plunge pools for cover, especially during the breeding season (Jennings and Hayes, 1988). They may take refuge in small mammal burrows, leaf litter, or other moist areas during periods of inactivity or to avoid desiccation (Rathbun, et al., 1993; Jennings and Hayes, 1994). Radiotelemetry data indicates that adults engage in straight-line breeding season movements irrespective of riparian corridors or topography and they may move up to two miles between non-breeding and breeding sites (Bulger et. al., 2003). During the non-breeding season, a wider variety of aquatic habitats are used including small pools in coastal streams, springs, water traps, and other

ephemeral water bodies (USFWS, 1996). CRLF may also move up to one mile (1.6 km) from aquatic and riparian habitats into surrounding upland habitats for shelter or to forage. These upland habitats include various vegetation types, such as grassland, woodland, forest, and wetlands that contain structural features such as boulders, rocks, organic debris (e.g., downed trees and logs), small mammal burrows, and moist leaf litter (USFWS, 2010).

This species requires still or slow-moving water during the breeding season where it can deposit large egg masses, which are most often attached to submergent or emergent vegetation. Breeding typically occurs between December and April depending on annual environmental conditions and locality. Eggs require 6 to 12 days to hatch and metamorphosis generally occurs after 3.5 to 7 months, although larvae are also capable of over-wintering. Following metamorphosis, generally between July and September, juveniles are 25-35 mm in size. Juvenile CRLF appear to have different habitat needs than adults. Jennings and Hayes (1988) recorded juvenile frogs mostly from sites with shallow water and limited shoreline or emergent vegetation. Additionally, it was important that there be small one-meter breaks in the vegetation or clearings in the dense riparian cover to allow juveniles to sun themselves and forage, but to also have close escape cover from predators. Jennings and Hayes also noted that tadpoles have different habitat needs and that in addition to vegetation cover, tadpoles use mud. It is speculated that CRLF larvae are algae grazers, however, foraging larval ecology remains unknown (Jennings, et. al., 1993).

It has been shown that occurrences of CRLF are negatively correlated with presence of non-native bullfrogs (Moyle, 1973; Jennings and Hayes, 1986 and 1988), although both species are able to persist at certain locations, particularly in the coastal zone. It is estimated that CRLF has disappeared from approximately 75% of its former range and has been nearly extirpated from the Sierra Nevada, Central Valley, and much of southern California (USFWS, 1996).

The CNDDB reports 151 occurrences of the California red-legged frog within the quadrangles reviewed, the nearest occurrence is 2.6 miles southwest of the survey area from 2001 and 4.2 miles north along SR 156, from 1991. Adult CRLF may disperse up to two miles between breeding and non-breeding sites, and up to 1.6 km (1 mile) from aquatic to upland habitat to shelter or forage. There are no recorded breeding sites within dispersal distance; however, no data is available for the nearby aquatic resources. A seasonal pond is located 220 feet west of the survey area and a reservoir is located 130 feet east of the survey area. The hydroperiod for both of these resources is unknown which could affect their suitability as a breeding resources. Therefore, this species has a moderate potential to occur within the survey area.

California Tiger Salamander

The CTS is a federal and state threatened species. The CTS is a large, stocky salamander most commonly found in annual grassland habitat, but also occurring in the grassy understory of valley-foothill hardwood and chaparral habitats, and uncommonly along stream courses in valley-foothill riparian habitats (USFWS, 2004). Adults spend most of their lives underground, typically in burrows of ground squirrels and other animals (USFWS, 2004). The California tiger salamander has been eliminated from an estimated 55 percent of its documented historic breeding sites. Currently, about 150 known populations of California tiger salamanders remain. The CTS persists in disjunct remnant vernal pool complexes in Sonoma County and Santa Barbara County, in vernal pool complexes and isolated stock ponds scattered along a narrow strip of rangeland on the fringes of the Central Valley from southern Colusa County south to northern Kern County, and in sag ponds and human maintained stock ponds in the coast ranges from the San Francisco Bay Area south to the Temblor Range.

Above-ground migratory and breeding activity may occur under suitable environmental conditions from mid-October through May. Adults may travel long distances between upland and breeding sites; adults have been found two kilometers (1.24 miles) from breeding sites (USFWS, 2004). Breeding occurs from November to February, following relatively warm rains (Stebbins, 2003). The CTS breeds and lays eggs primarily in vernal pools and other temporary rainwater ponds. Permanent human-made ponds are sometimes utilized if predatory fishes are absent; streams are rarely used for reproduction. Eggs are laid singly or in clumps on both submerged and emergent vegetation and on submerged debris in shallow water (Stebbins, 1972; Jennings and Hayes, 1994). Males typically spend 6-8 weeks at breeding ponds, while females typically spend only 1-2 weeks (Loredo et al., 1996). Eggs hatch within 10-14 days (USFWS, 2004) and a minimum of 10 weeks is required to complete development through metamorphosis (Jennings and Hayes, 1994), although the larval stage may last up to six months and some larvae in Contra Costa and Alameda Counties may remain in their breeding sites over the summer (USFWS, 2004).

There are no recorded breeding resources within the dispersal distance of 2 kilometers (1.24 miles) of the survey area. A seasonal wetland located 220 feet from the survey area is within the dispersal distance for CTS and may provide suitable aquatic habitat; however, no data has been collected for this pond. The agricultural and ruderal habitats provide marginally suitable upland habitat for CTS, as most animal burrows have been disturbed. Yet, these habitats could also provide suitable dispersal habitat for CTS.

The CNDDB reports 102 occurrences of CTS within the quadrangles reviewed, including one occurrence from 2007 that overlaps with the survey area. One seasonal pond, for which no data is available, is located within dispersal distance to the survey area and may provide suitable aquatic habitat. Some small mammal burrows were observed within the ruderal habitat within the survey area, but most burrows have been disturbed by active agricultural use. Based on this information, there is a moderate potential of CTS to occur within the survey area.

San Joaquin Whipsnake

The San Joaquin whipsnake (*Masticophis flagellum ruddocki*) is a CDFW species of special concern. Whipsnakes seek cover in rodent burrows, bushes, trees, and rock pies. This species hibernates in soil or sand approximately 0.3 meter (1 foot) below the surface, sometimes at the bases of plants. Little is known about nest sites. In desert regions, whipsnakes may be attracted to water to drink or ambush prey. Open terrestrial habitats are preferred, but whipsnakes will occasionally climb trees and bushes to bask, seek prey, or take cover. Diet consists of rodents, lizards and their eggs, snakes (including rattlesnakes), birds and their eggs, young turtles, insects, and carrion. Whipsnakes search actively for prey, with their heads elevated. They pole their heads in burrows or climb trees, using both vision and olfaction to detect prey (Stebbins, 1985). Coachwhips are diurnal. Mating occurs in April and May, eggs are laid in June and July, and the first young appear in late August to early September.

The CNDDB includes 1 occurrence of the San Joaquin whipsnake within the quadrangles evaluated, the nearest of which is located is approximately 3 miles south of survey area from 1996. Habitat quality for San Joaquin whipsnake within the survey area is relatively low. However, ruderal areas may provide dispersal habitat for the species. Therefore, this species has a moderate potential to occur within the survey area.

Raptors and Other Protected Avian Species

Raptors, their nests, and other nesting birds are protected under Fish and Game Code, the CMBTA, and the MBTA. While the life histories of these species vary, overlapping nesting and foraging similarities allow

for their concurrent discussion. Most raptors are breeding residents throughout most of the wooded portions of the state. Stands of live oak, riparian deciduous, or other forest habitats, as well as open grasslands, are used most frequently for nesting. Breeding occurs February through September, with peak activity May through July. Prey for these species include small birds, small mammals, and some reptiles and amphibians. Many raptor species hunt in open woodland and habitat edges.

Various species of raptors and other protected species, such as red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus),* American kestrel (*Falco sparverius*), great horned owl (*Bubo virginianus*), and turkey vulture (*Cathartes aura*), have a potential to nest within the trees present within and adjacent to the survey area. Other avian species with the potential to nest in the area include but are not limited to American crow, white-crowned sparrow (*Zonotrichia leucophrys*), black phoebe (*Sayornis nigricans*), yellow-rumped warbler (*Dendroica coronata*), California gnatcatcher (*Polioptila californica*), and bushtit (*Psaltriparus minimus*).

4. IMPACTS

Thresholds of Significance
Based on the significance criteria contained in Appendix G of the CEQA Guidelines, a project may have a significant adverse impact on the environment if it will:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
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 CDFW or USFWS;
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling hydrological interruption, or other means;
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites;
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
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.

Criteria "b" and "c" were not evaluated for impacts to sensitive habitats or impacts to protected wetlands because these resources are not present within survey area. Criterion "f" was not evaluated for conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, because the survey area is not located within any such plan area.

Impact BIO-1*: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.*

Several special-status species have a moderate potential to occur within the survey area, including the Townsend's big-eared bat, pallid bat, western mastiff bat, western red bat, white-tailed kite, loggerhead shrike, Swainson's hawk, CTS, and CRLF. Potential impacts to each species are discussed below. In addition to species-specific measures provided below, implementation of **Mitigation Measures BIO-1 through BIO-3** are applicable to all special-status species to avoid or reduce impacts to a less-than significant level.

> ***Mitigation Measure BIO-1:*** Prior to construction activities, the project proponent shall retain a qualified biologist to conduct an Employee Education Program for the construction crew. The qualified biologist will meet with the construction crew at the onset of construction at the project site to educate the construction crew on the following: a) the appropriate access route(s) in and out of the construction area and a review of the project boundaries; b) how a biological monitor will examine the area and agree upon a method which will ensure the safety of the monitor during such

activities, c) and all special-status species that may be present, their habitat, and proper identification; d) the specific mitigation measures that will be incorporated into the construction effort; e) the general provisions and protections afforded by the regulatory agencies; and f) the proper procedures if a special status species is encountered within the project site.

Mitigation Measure BIO-2: During vegetation removal and ground disturbing activities, a qualified biologist shall survey appropriate areas of the construction site daily before the onset of work activities for the presence of special-status wildlife species. The qualified biologist shall remain available to come to the site if special-status wildlife are identified until all ground disturbing activities are completed. If non-listed special-status wildlife species are found and these individuals are likely to be killed or injured by work activities, the qualified biologist shall be contacted, and work shall stop in that area until the animal has moved on its own out of the work area or the qualified biologist has moved the animal outside of the work area. Measures for encounters with state and/or federally-listed species are provided below in **Mitigation Measures BIO-7a** through **7d.**

After vegetation removal and ground disturbing are complete, or earlier if determined appropriate by the qualified biologist, the qualified biologist will designate a construction monitor to oversee on-site compliance with all avoidance and minimization measures. The qualified biologist shall ensure that this construction monitor receives sufficient training in the identification of special-status species known or with the potential to occur within the project site. The construction monitor or the qualified biologist is authorized to stop work if the avoidance and/or minimization measures are not being followed.

Mitigation Measure BIO-3: The following BMPs shall be implemented to avoid and reduce impacts to special-status species:

- All construction debris and associated materials stored in staging area shall be removed from the work site upon completion of the project.
- To prevent inadvertent entrapment of wildlife during project construction, all excavated, steep-walled holes or trenches more than two feet deep will be covered at the close of each working day with plywood or similar materials. Before such holes or trenches are filled, they will be thoroughly inspected for trapped animals.
- Only tightly woven fiber netting or similar material may be used for erosion control at the project site. Coconut coir matting is an acceptable erosion control material. No plastic mono-filament matting will be used for erosion control, as this material may ensnare wildlife, including special-status amphibians.
- Because dusk and dawn are often the times when special-status amphibians are most actively foraging and dispersing, all construction activities should cease one half hour before sunset and should not begin prior to one half hour after sunrise.
- All trash that may attract predators shall be properly contained, removed from the construction site, and disposed of regularly. Following construction, all trash and construction debris shall be removed from work areas.

Pallid, Townsend's Big-Eared, Western Mastiff, and Western Red Bat

Special-status bats may utilize any of the large trees within the survey area for night roosts and may forage within the survey area. No suitable day roosting habitat is present within the survey area. Tree removal or limbing may result in direct impacts to special-status bats, if present at the time of removal. This would be considered a significant impact under CEQA. **Mitigation Measures BIO-1 through BIO-3, and BIO-4** would reduce potential impacts to a less-than-significant level.

> ***Mitigation Measure BIO-4:*** To the extent practical limbing/tree removal operations should occur between September 15 and November 1 to avoid bat maternity roosts and winter hibernacula. If tree limbing/tree must occur outside the period of September 15 through November 1 a survey for bats shall be conducted by a qualified biologist.
>
> Prior to commencement of construction related activities including tree trimming and removal and demolition of dilapidated buildings, a qualified biologist shall conduct a pre-construction survey for bats as follows:
>
> - The biologist shall determine if bats are utilizing the site for roosting. For any trees/snags/buildings that could provide roosting space for cavity or foliage-roosting bats, potential bat roost features shall be thoroughly evaluated to determine if bats are present. Visual inspection and/or acoustic surveys shall be utilized as initial techniques.
> - If roosting bats are found, the biologist shall develop and implement acceptable passive exclusion methods based on CDFW recommendations. If feasible, exclusion shall take place during the appropriate windows (September 15 and November 1) to avoid harming bat maternity roosts and/or winter hibernacula. (Authorization from CDFW is required to evict winter hibernacula for bats).
> - If established maternity colonies are found, a buffer shall be established around the colony to protect pre-volant young from construction disturbances until the young can fly; or implement other measures acceptable to CDFW.
> - If a tree or structure is determined not to be an active roost site for roosting bats, it may be immediately removed or limbed.

Raptors, Special-Status Birds and Other Protected Avian Species

Tree removal may result in direct mortality or nest destruction for raptors, special-status avian species (including Swainson's hawk, loggerhead shrike, and white-tailed kite), or other nesting birds, if present within the work area. In addition, indirect impacts from construction activities (e.g., noise, vibrations) could result in injury, nest abandonment, and/or mortality of raptors, special-status avian species, and other nesting birds, if nesting within or directly adjacent to work area during construction activities. These are potentially significant impacts that can be minimized to less-than-significant with implementation of **Mitigation Measures BIO-1** through **BIO-3,** and **BIO-5**.

- ***Mitigation Measure BIO-5:*** Construction activities that may directly (e.g., vegetation and tree removal) or indirectly (e.g., noise/ground disturbance) affect nesting raptors and other protected avian species shall be timed to avoid the breeding and nesting seasons (February 1 through September 15).

- If construction activities must occur during the breeding and nesting season (February 1 through September 15), a qualified biologist shall conduct pre-construction surveys for nesting raptors and other protected avian species within 300 feet of the proposed construction activities. Pre-construction surveys should be conducted no more than 7 days prior to the start of the construction activities during the early part of the breeding season (February through April) and no more than 14 days prior to the initiation of these activities during the late part of the breeding season (May through August).

- If raptors or other protected avian nests are identified during the pre-construction surveys, the qualified biologist shall notify the project proponent and an appropriate no-disturbance buffer would be imposed within which no construction activities or disturbance would take place (generally 300 feet in all directions for raptors; other avian species may have species-specific requirements) until the young of the year have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.

Federal- and State-Listed Amphibians

A seasonal pond and reservoir bordering the project provide potential breeding habitat for CTS and CRLF; however, no available data has been recorded on the presence of special-status amphibians in these aquatic bodies. Overlapping occurrence data for CTS within the survey area suggest presence of this species in close proximity to the project. The project is located within the dispersal range of these potential CTS and CRLF breeding resources. Upland habitat is only marginally suitable due to the reduction of burrows present as a result of the active agriculture. However, dispersal habitat is present within all areas of the project. CTS and CRLF may disperse through and in ruderal and agricultural areas and CTS may utilize mammal burrows as upland refugia.

Construction activities, including vegetation removal and excavation may result in direct mortality of individuals, if present at the time of construction. In addition, the project would result in loss of potential upland habitat for CTS and dispersal habitat for CTS/CRLF. These are potentially significant impacts that can be minimized to less-than-significant with implementation of **Mitigation Measures BIO-1** through **BIO-3, BIO-6a** through **BIO-6d**. In addition, this would be considered take of federal and/or state-listed species. The project will need to comply with the ESA and/or CESA and conduct consultation with the USFWS and/or CDFW to determine whether incidental take authorization for CRLF and/or CTS is required, as described in **Mitigation Measure 6a** below.

- ***Mitigation Measure BIO-6a:*** The project applicant will comply with the ESA/CESA and conduct consultation with the USFWS/CDFW to determine whether incidental take authorization for CRLF and/or CTS is required prior to issuance of a grading permit. If it is determined that authorization for the incidental take of this species is required from the USFW/CDFW, the project will comply with the ESA/CESA to obtain authorization from USFWS/CDFW at the project-level prior to the issuance of a grading permit. Permit requirements typically involve the preparation and implementation of a mitigation plan and mitigating impacted habitat through preservation and/or restoration. The project applicant would be required to retain a qualified biologist to prepare a mitigation plan, which will include, but is not limited to, identifying avoidance and minimization measures, and identifying a mitigation strategy that includes a take assessment, avoidance and minimization measures, compensatory mitigation lands, success criteria, and funding assurances.

The project applicant would be required to implement the approved plan and any additional permit requirements.

- ***Mitigation Measure BIO-6b:*** A qualified biologist will survey the proposed project area and immediately adjacent areas within 72 hours before and the morning of the onset of work activities for the presence of CTS/CRLF. If any life stage of CTS or CRLF is observed and take authorization has been acquired, relocation measures, as defined in applicable permits, shall be followed. If any life stage of CRLF/CTS is observed and take authorization has not been acquired, construction activities will not commence until the USFWS/CDFW are consulted and appropriate actions are taken to allow project activities to continue.

- ***Mitigation Measure BIO-6c:*** During ground disturbing and vegetation removal activities, a qualified biologist shall survey appropriate areas of the construction site daily before the onset of work activities for the presence of CTS/CRLF. The qualified biologist shall remain available to come to the site if a CTS/CRLF if identified until all ground disturbing activities are completed. If any life stage of the CTS/CRLF is found and these individuals are likely to be killed or injured by work activities, the qualified biologist shall be contacted, and work shall stop in that area until the CTS/CRLF has moved on its own out of the work area and the USFWS/CDFW has been contacted. Construction activities will not resume until the USFWS/CDFW is consulted and appropriate actions are taken to allow project activities to continue.

- ***Mitigation Measure BIO-6d:*** After ground disturbing and vegetation removal activities are complete, or earlier if determined appropriate by the qualified biologist, the qualified biologist will designate a construction monitor to oversee on-site compliance with all avoidance and minimization measures. The qualified biologist shall ensure that this construction monitor receives sufficient training in the identification of CTS/CRLF. The construction monitor or the qualified biologist is authorized to stop work if the avoidance and/or minimization measures are not being followed. If work is stopped, the USFWS/CDFW shall be notified.

Impact BIO-2: *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 nursery sites.*

The project site has historically been used as agricultural land and is not located within a migratory wildlife corridor. The project consists of construction of infrastructure and alterations to active agriculture land and developed areas. Therefore, activities associated with the project would not interfere with the movement of any native resident or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites. This impact is less than significant, and no mitigation is required.

Impact BIO-4: *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

San Benito County Code § 25.07.018 requires a tree removal permit in the County's Single Family Residential (R-1) and Residential Mixed (RM) zones to trench, grade, or fill within the dripline of any protected tree or destroy, kill, remove, or seriously harm any protected tree. San Benito County Code Chapter 19.33 regulates the removal, modification, and disturbance of trees and woodland areas through a discretionary permit process, with standards intended to retain a minimum level of woodland canopy and

prevent excessive or unnecessary tree loss. Project activities may result in tree removal. In accordance with San Benito Count Code of Ordinances, an arborist report will be prepared for the project, which will quantify impacts to protected trees and provide avoidance, minimization, and mitigation measures as necessary to reduce impacts.

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APPENDIX A

California Natural Diversity Database Report

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Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Gilroy (3712115) OR Gilroy Hot Springs (3712114) OR Pacheco Peak (3712113) OR Chittenden (3612185) OR San Felipe (3612184) OR Three Sisters (3612183) OR San Juan Bautista (3612175) OR Hollister (3612174) OR Tres Pinos (3612173))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Actinemys marmorata northwestern pond turtle	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
Adela oplerella Opler's longhorn moth	IILEE0G040	None	None	G2	S2	
Agelaius tricolor tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S2	SSC
Ambystoma californiense pop. 1 California tiger salamander - central California DPS	AAAAA01181	Threatened	Threatened	G3T3	S3	WL
Antrozous pallidus pallid bat	AMACC10010	None	None	G4	S3	SSC
Aquila chrysaetos golden eagle	ABNKC22010	None	None	G5	S3	FP
Arctostaphylos pajaroensis Pajaro manzanita	PDERI04100	None	None	G1	S1	1B.1
Astragalus tener var. tener alkali milk-vetch	PDFAB0F8R1	None	None	G2T1	S1	1B.2
Athene cunicularia burrowing owl	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
Balsamorhiza macrolepis big-scale balsamroot	PDAST11061	None	None	G2	S2	1B.2
Bombus caliginosus obscure bumble bee	IIHYM24380	None	None	G2G3	S1S2	
Bombus crotchii Crotch's bumble bee	IIHYM24480	None	Candidate Endangered	G2	S2	
Branchinecta lynchi vernal pool fairy shrimp	ICBRA03030	Threatened	None	G3	S3	
Buteo swainsoni Swainson's hawk	ABNKC19070	None	Threatened	G5	S4	
Castilleja rubicundula var. rubicundula pink creamsacs	PDSCR0D482	None	None	G5T2	S2	1B.2
Chorizanthe pungens var. pungens Monterey spineflower	PDPGN040M2	Threatened	None	G2T2	S2	1B.2
Corynorhinus townsendii Townsend's big-eared bat	AMACC08010	None	None	G4	S2	SSC
Deinandra halliana Hall's tarplant	PDAST4R0C0	None	None	G3	S3	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Delphinium californicum ssp. interius Hospital Canyon larkspur	PDRAN0B0A2	None	None	G3T3	S3	1B.2
Dipodomys heermanni goldmani Salinas kangaroo rat	AMAFD03065	None	None	G4T2T3	S2S3	
Dipodomys venustus venustus Santa Cruz kangaroo rat	AMAFD03042	None	None	G2T1	S1	
Dudleya abramsii ssp. setchellii Santa Clara Valley dudleya	PDCRA040Z0	Endangered	None	G4T2	S2	1B.1
Elanus leucurus white-tailed kite	ABNKC06010	None	None	G5	S3S4	FP
Eremophila alpestris actia California horned lark	ABPAT02011	None	None	G5T4Q	S4	WL
Ericameria fasciculata Eastwood's goldenbush	PDAST3L080	None	None	G2	S2	1B.1
Eriogonum heermannii var. occidentale western Heermann's buckwheat	PDPGN082P6	None	None	G5T2	S2	1B.2
Eriogonum nortonii Pinnacles buckwheat	PDPGN08470	None	None	G2	S2	1B.3
Eryngium aristulatum var. hooveri Hoover's button-celery	PDAPI0Z043	None	None	G5T1	S1	1B.1
Eumops perotis californicus western mastiff bat	AMACD02011	None	None	G4G5T4	S3S4	SSC
Euphydryas editha bayensis Bay checkerspot butterfly	IILEPK4055	Threatened	None	G4G5T1	S3	
Extriplex joaquinana San Joaquin spearscale	PDCHE041F3	None	None	G2	S2	1B.2
Falco columbarius merlin	ABNKD06030	None	None	G5	S3S4	WL
Falco mexicanus prairie falcon	ABNKD06090	None	None	G5	S4	WL
Fritillaria liliacea fragrant fritillary	PMLIL0V0C0	None	None	G2	S2	1B.2
Gonidea angulata western ridged mussel	IMBIV19010	None	None	G3	S2	
Haliaeetus leucocephalus bald eagle	ABNKC10010	Delisted	Endangered	G5	S3	FP
Helminthoglypta sequoicola consors redwood shoulderband	IMGASC2421	None	None	G2T1	S1	
Hoita strobilina Loma Prieta hoita	PDFAB5Z030	None	None	G2?	S2?	1B.1
Lasiurus cinereus hoary bat	AMACC05032	None	None	G3G4	S4	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Lasiurus frantzii western red bat	AMACC05080	None	None	G4	S3	SSC
Lavinia exilicauda harengus Monterey hitch	AFCJB19013	None	None	G4T3	S3	SSC
Legenere limosa legenere	PDCAM0C010	None	None	G2	S2	1B.1
Lessingia micradenia var. glabrata smooth lessingia	PDAST5S062	None	None	G2T2	S2	1B.2
Linderiella occidentalis California linderiella	ICBRA06010	None	None	G2G3	S2S3	
Malacothamnus aboriginum Indian Valley bushmallow	PDMAL0Q020	None	None	G3	S3	1B.2
Malacothamnus hallii Hall's bushmallow	PDMAL0Q0F0	None	None	G2	S2	1B.2
Masticophis flagellum ruddocki San Joaquin coachwhip	ARADB21021	None	None	G5T2T3	S3	SSC
Monolopia gracilens woodland woollythreads	PDAST6G010	None	None	G3	S3	1B.2
Navarretia prostrata prostrate vernal pool navarretia	PDPLM0C0Q0	None	None	G2	S2	1B.2
North Central Coast Drainage Sacramento Sucker/Roach River North Central Coast Drainage Sacramento Sucker/Roach River	CARA2623CA	None	None	GNR	SNR	
Oncorhynchus mykiss irideus pop. 9 steelhead - south-central California coast DPS	AFCHA0209H	Threatened	None	G5T2Q	S2	SSC
Optioservus canus Pinnacles optioservus riffle beetle	IICOL5E020	None	None	G2	S1	
Phrynosoma blainvillii coast horned lizard	ARACF12100	None	None	G4	S4	SSC
Plagiobothrys diffusus San Francisco popcornflower	PDBOR0V080	None	Endangered	G1Q	S1	1B.1
Plagiobothrys glaber hairless popcornflower	PDBOR0V0B0	None	None	GX	SX	1A
Puccinellia simplex California alkali grass	PMPOA53110	None	None	G2	S2	1B.2
Rana boylii pop. 4 foothill yellow-legged frog - central coast DPS	AAABH01054	Threatened	Endangered	G3T2	S2	
Rana draytonii California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC
Ravenella exigua chaparral harebell	PDCAM020A0	None	None	G2	S2	1B.2
Riparia riparia bank swallow	ABPAU08010	None	Threatened	G5	S3	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Spea hammondii western spadefoot	AAABF02020	Proposed Threatened	None	G2G3	S3S4	SSC
Streptanthus albidus ssp. peramoenus most beautiful jewelflower	PDBRA2G012	None	None	G2T2	S2	1B.2
Sycamore Alluvial Woodland Sycamore Alluvial Woodland	CTT62100CA	None	None	G1	S1.1	
Taricha torosa Coast Range newt	AAAAF02032	None	None	G4	S4	SSC
Taxidea taxus American badger	AMAJF04010	None	None	G5	S3	SSC
Trifolium hydrophilum saline clover	PDFAB400R5	None	None	G2	S2	1B.2
Vireo bellii pusillus least Bell's vireo	ABPBW01114	Endangered	Endangered	G5T2	S3	
Vulpes macrotis mutica San Joaquin kit fox	AMAJA03041	Endangered	Threatened	G4T2	S3	

Record Count: 68

APPENDIX B

Information for Planning and Consulting Resource List

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IPaC U.S. Fish & Wildlife Service

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

San Benito County, California



Local office

Ventura Fish And Wildlife Office

(805) 644-1766
(805) 644-3958
FW8VenturaSection7@FWS.Gov

2493 Portola Road, Suite B
Ventura, CA 93003-7726

https://www.fws.gov/Ventura

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
San Joaquin Kit Fox Vulpes macrotis mutica Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2873	Endangered

Birds

NAME	STATUS
California Condor Gymnogyps californianus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8193	Endangered
Least Bell's Vireo Vireo bellii pusillus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/5945	Endangered
Yellow-billed Cuckoo Coccyzus americanus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3911	Threatened

NOT FOR CONSULTATION

Reptiles

NAME	STATUS
Northwestern Pond Turtle Actinemys marmorata Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

Amphibians

NAME	STATUS
California Red-legged Frog Rana draytonii Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/2891	Threatened
California Tiger Salamander Ambystoma californiense There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/2076	Threatened
Foothill Yellow-legged Frog Rana boylii There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/5133	Threatened
Western Spadefoot Spea hammondii No critical habitat has been designated for this species.	Proposed Threatened

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

Crustaceans

NAME	STATUS
Vernal Pool Fairy Shrimp Branchinecta lynchi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/498	Threatened

NOT FOR CONSULTATION

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

There are Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete
If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

Review the FAQs
The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Jan 1 to Aug 31
Golden Eagle Aquila chrysaetos This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in

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week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

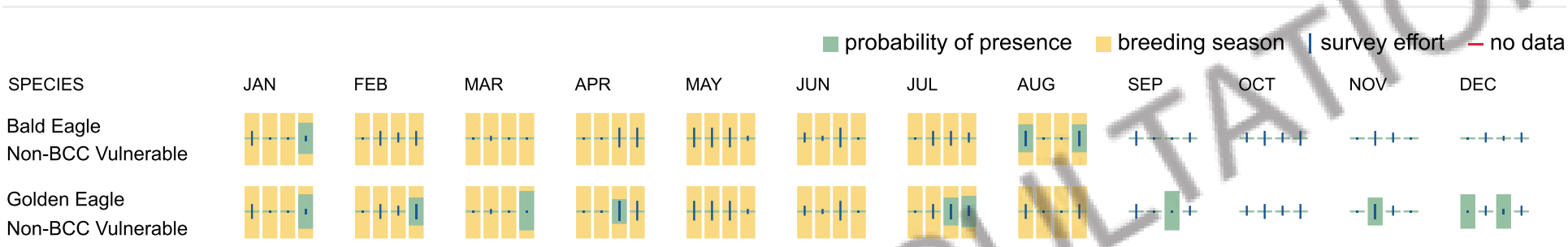
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report
On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()

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Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Migratory birds

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases birds of concern, including Birds of Conservation Concern (BCC), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the Nationwide avoidance and minimization measures for birds document, and any other project-specific avoidance and minimization measures suggested at the link Measures for avoiding and minimizing impacts to birds for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles document, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs
The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Allen's Hummingbird Selasphorus sasin This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637	Breeds Feb 1 to Jul 15
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Jan 1 to Aug 31
Belding's Savannah Sparrow Passerculus sandwichensis beldingi This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8	Breeds Apr 1 to Aug 15

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Bullock's Oriole Icterus bullockii This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 21 to Jul 25
California Gull Larus californicus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 1 to Jul 31
California Thrasher Toxostoma redivivum This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jan 1 to Jul 31
Common Yellowthroat Geothlypis trichas sinuosa This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/2084	Breeds May 20 to Jul 31
Golden Eagle Aquila chrysaetos This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31
Lawrence's Goldfinch Spinus lawrencei This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464	Breeds Mar 20 to Sep 20
Marbled Godwit Limosa fedoa This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481	Breeds elsewhere
Northern Harrier Circus hudsonius This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8350	Breeds Apr 1 to Sep 15
Nuttall's Woodpecker Dryobates nuttallii This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9410	Breeds Apr 1 to Jul 20
Oak Titmouse Baeolophus inornatus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9656	Breeds Mar 15 to Jul 15
Santa Barbara Song Sparrow Melospiza melodia graminea This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5513	Breeds Mar 1 to Sep 5
Short-billed Dowitcher Limnodromus griseus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Tricolored Blackbird Agelaius tricolor This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3910	Breeds Mar 15 to Aug 10
Willet Tringa semipalmata This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere

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Wrentit Chamaea fasciata — Breeds Mar 15 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Yellow-billed Magpie Pica nuttalli — Breeds Apr 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9726

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (▀)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

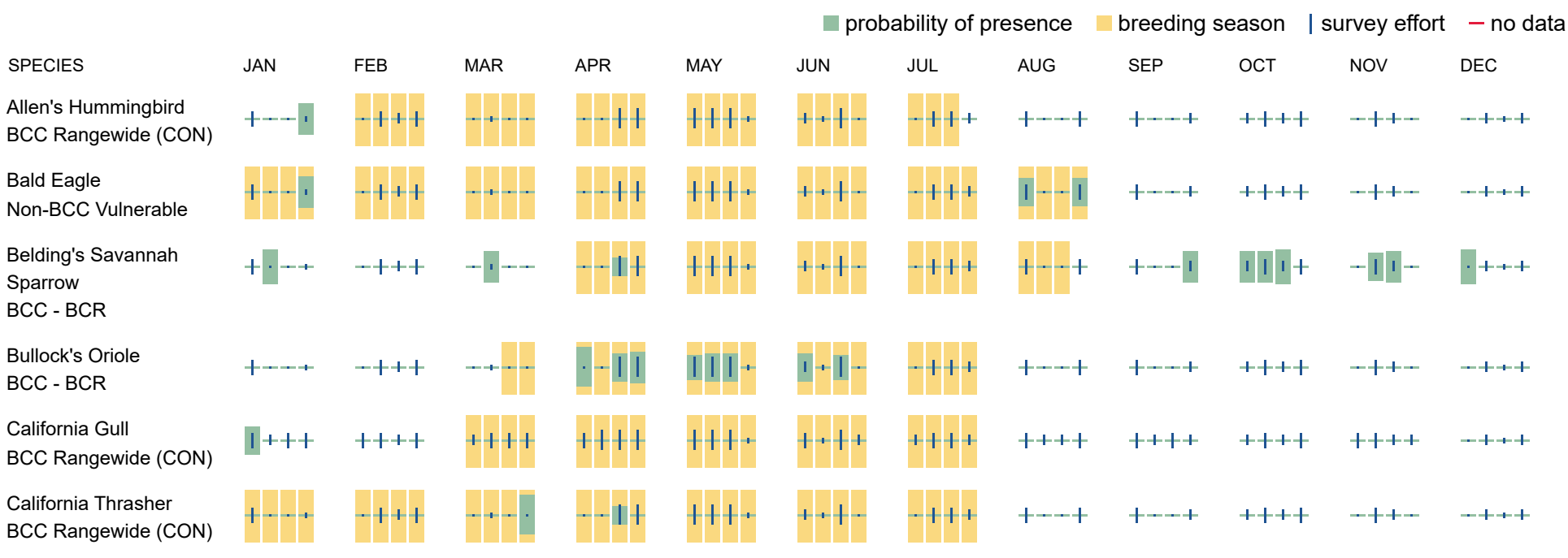
Breeding Season (▀)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

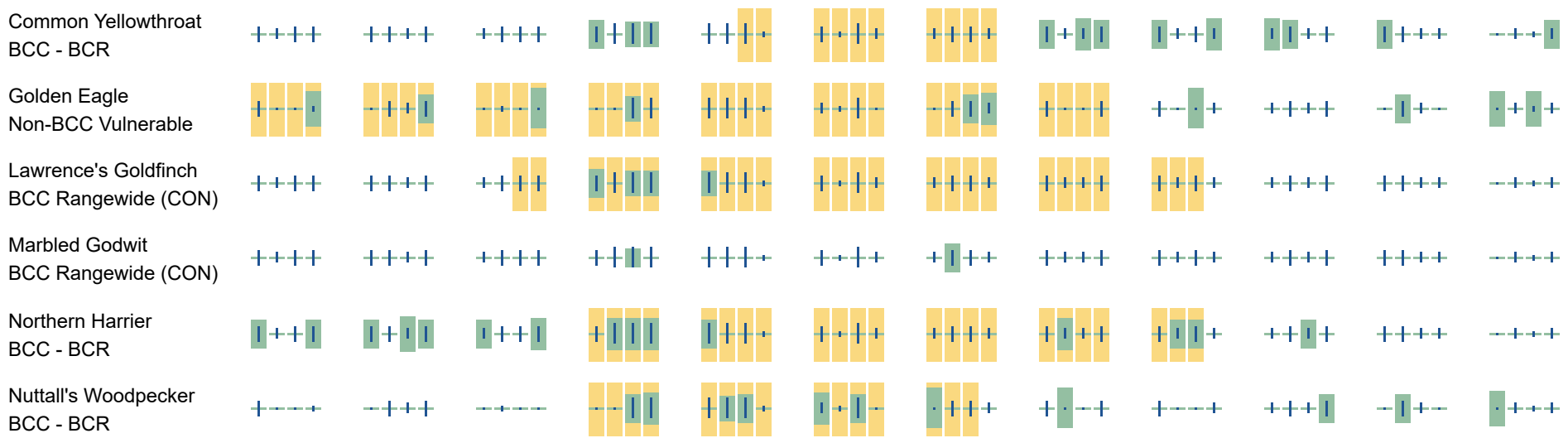
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

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To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ "Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal**.** The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs
Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

This location did not intersect any wetlands mapped by NWI.

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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APPENDIX C

Special-Status Species Table

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Special-Status Species Table

Gilroy, Gilroy Hot Springs, Pacheco Peak, Chittenden, San Felipe. Three Sisters, San Juan Bautista, Hollister, and Tres Pinos Quadrangles

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
MAMMALS			
Corynorhinus townsendii Townsend's big-eared bat	-- / CSC / --	Found primarily in rural settings from inland deserts to coastal redwoods, oak woodland of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. Typically roost during the day in limestone caves, lava tubes, and mines, but can roost in buildings that offer suitable conditions. Night roosts are in more open settings and include bridges, rock crevices, and trees.	**Moderate** The CNDDB reports the nearest occurrence 7 miles north of the survey area. Foraging and night roost habitat is present within the survey area; however, day and maternity roost habitat is not.
Taxidea taxus American badger	-- / CSC / --	Dry, open grasslands, fields, pastures savannas, and mountain meadows near timberline are preferred. The principal requirements seem to be sufficient food, friable soils, and relatively open, uncultivated grounds.	**Low** Moderately suitable habitat is present within the survey area; however, the active cultivation of the agricultural land would make it unlikely for badgers to burrow. The CNDDB reports the nearest occurrence as 2.8 miles south of the survey area within the city of Hollister.
Antrozous pallidus Pallid Bat	-- / CSC / --	Occurs in a wide variety of habitats including grasslands, shrublands, arid desert areas, oak savanna, coastal forested areas, and coniferous forests of the mountain regions of California. Most common in open, dry habitats with rocky areas for roosting. Day roosts include caves, crevices, mines, and occasionally hollow trees and buildings. Seems to prefer rocky outcrops, cliffs, and crevices with access to open habitats for foraging. Similar structures are used for night roosting and will also use more open sites such as eaves, awnings, and open areas under bridges for feeding roosts.	**Moderate** The CNDDB reports the nearest occurrence as 10.6 miles west of the survey area, along Highway 156. Foraging and night roost habitat is present within the survey area; however, day and maternity roost habitat is not.
Eumops perotis californicus Western mastiff bat	-- / CSC / --	Many open habitats including conifer and deciduous woodlands, coastal scrub, grassland, and chaparral. Roost in crevices in cliff faces, high buildings, trees, and tunnels.	**Moderate** The CNDDB reports the nearest occurrence 3 miles south of the survey area; however, this occurrence is mapped generally within the city of Hollister from 1998. Foraging and night roost habitat is present within the survey area; however, day and maternity roost habitat is not.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Lasiurus blossevillii Western red bat	-- / CSC / --	Roosting habitat includes trees and sometimes shrubs in forests and woodlands from sea level up through mixed conifer forests. Riparian forests appear to be favored. Roost sites are often in edge habitats adjacent to streams, fields, or urban areas. Feeds over a wide variety of habitats, including grasslands, shrublands, open woodlands and forests, and croplands.	**Moderate** The CNDDB reports the nearest occurrence 3 miles south of the survey area; however, this occurrence is mapped generally within the city of Hollister from 1998. Foraging and night roost habitat is present within the survey area; however, day and maternity roost habitat is not.
Vulpes macrotis mutica San Joaquin Kit fox	FE / ST / --	Open, level areas with loose-textured soils supporting scattered, shrubby vegetation with little human disturbance. Live in annual grasslands or grassy open stages dominated by scattered brush, shrubs, and scrub.	**Low** The survey area is within the known range of this species. However, only marginally suitable dispersal habitat is present within the survey area. The CNDDB reports 10 occurrences within quadrangles reviewed, with the nearest occurrence reported 3.41 miles west of the survey area.
BIRDS			
Agelaius tricolor Tricolored blackbird (nesting colony)	-- / ST / --	Nest in colonies in dense riparian vegetation, along rivers, lagoons, lakes, and ponds. Forages over grassland or aquatic habitats.	**Not Present** No suitable habitat is present within the survey area. There is an ephemeral pond, 500 feet adjacent to the survey area; however, the vegetation cover is not dense enough to provide adequate nesting habitat. The nearest CNDDB occurrence is located 2.6 mi west as well as an occurrence 3.1 mi north from 2014.
Athene cunicularia Burrowing owl (burrowing sites & some wintering sites)	-- / CSC / --	Year-round resident of open, dry grassland and desert habitats, and in grass, forb and open shrub stages of pinyon-juniper and ponderosa pine habitats. Frequent open grasslands and shrublands with perches and burrows. Use rodent burrows (often California ground squirrel) for roosting and nesting cover. Pipes, culverts, and nest boxes may be substituted for burrows in areas where burrows are not available.	**Unlikely** No suitable nesting or foraging habitat is present within the survey area. The CNDDB reports that the nearest occurrence is 2.13 miles northwest from 1991.
Coccyzus americanus Yellow-billed cuckoo	FT / SE / --	Inhabits extensive deciduous riparian thickets or forests with dense, low-level or understory foliage, slow-moving watercourses, backwaters, or seeps. Willow almost always a dominant component of the vegetation.	**Not Present** Survey area lacks the specialized habitat features to support the species.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Elanus leucurus White-tailed kite (nesting)	-- / CFP / --	Open groves, river valleys, marshes, and grasslands. Prefer such area with low roosts (fences etc.). Nest in shrubs and trees adjacent to grasslands.	**Moderate** Trees within the survey area may provide suitable nesting habitat and all open areas provide suitable foraging habitat. The nearest CNDDB occurrence is 12.5 miles west of the survey area, from 2001; however, several eBird occurrences from 2024-2025 are reported along SR 25 and near San Felipe Road, adjacent to the survey area.
Gynogyps californianus California condor	FE / SE / --	Roosting sites in isolated rocky cliffs, rugged chaparral, and pine covered mountains 2000-6000 feet above sea level. Foraging area removed from nesting/roosting site (includes rangeland and coastal area - up to 19 mile commute one way). Nest sites in cliffs, crevices, potholes.	**Not Present** Survey area lacks the specialized habitat features to support the species.
Lanius ludovicianus Loggerhead shrike	-- / CSC / --	Resident in dry open grasslands and agricultural areas. Scattered shrubs or trees, particularly thick or thorny species, serve as nesting substrates and hunting perches. Fences, utility wires, grasses, and forbs also may be used as perches.	**Moderate** Suitable habitat is present within the survey area. The CNDDB does not report occurrences of this species; however, several eBird occurrences from 2024-2025 are present along SR 25, near the Hollister Airport, and along San Felipe Road.
Riparia riparia Bank swallow (nesting)	-- / ST / --	Nest colonially in sand banks. Found near water; fields, marshes, streams, and lakes.	**Not Present** Survey area lacks the specialized habitat features to support the species. The nearest CNDDB occurrence is 3 miles south, from 1932.
Vireo bellii pusillus Least bells vireo (nesting)	FE / SE / --	Riparian areas and drainages. Breed in willow riparian forest supporting a dense, shrubby understory. Oak woodland with a willow riparian understory is also used in some areas, and individuals sometimes enter adjacent chaparral, coastal sage scrub, or desert scrub habitats to forage.	**Not Present** Survey area lacks the specialized habitat features to support the species. The nearest CNDDB occurrence is 7.22 miles west, from 1932.
Aquila chrysaetos Golden eagle (nesting & wintering)	--/ CFP / --	Use rolling foot-hills, mountain terrain, wide arid plateaus deeply cut by streams and canyons, open mountain slopes, cliffs, and rocky outcrops. Nest in secluded cliffs with overhanging ledges as well as large trees.	**Low** No suitable nesting habitat is present within the survey area.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Buteo swainsoni Swainson's hawk (nesting)	-- / ST / --	Generally found associated with plains, range, open hills, and sparse trees. Suitable nesting habitat includes trees within mature riparian forest or corridors, lone oak trees and oak groves, and mature roadside trees. Nest sites are generally adjacent to, or within easy flying distance to suitable foraging habitat that provides available prey resources. Within California, the majority of breeding for this species occurs within the Central Valley.	**Moderate** Suitable habitat is present within the survey area. The nearest CNDDB occurrence is reported 1.5 miles northeast along SR 156 and San Felipe Road.
Haliaeetus leucocephalus Bald eagle (nesting & wintering)	-- / SE & CFP / --	Perches high in large, stoutly limbed trees, on snags or broken-topped trees, or on rocks near waters. Roosts communally in winter in dense, sheltered, remote conifer stands. Nests in large, old-growth, or dominant live tree with open branchwork, especially ponderosa pine. Often chooses largest tree in a stand on which to build stick platform nest. Require large bodies of water, or free flowing rivers with abundant fish.	**Low** Marginally suitable habitat is present within the survey area. The nearest CNDDB occurrences is 9 miles north along Highway 152, from 2018.
REPTILES AND AMPHIBIANS			
Actinemys marmorata Northwestern pond turtle	FC / CSC / --	Associated with permanent or nearly permanent water in a wide variety of habitats including streams, lakes, ponds, irrigation ditches, etc. Require basking sites such as partially submerged logs, rocks, mats of vegetation, or open banks. During spring and early summer females move overland for up to 100 meters to lay eggs, typically in compact, dry soils in areas with sparse vegetation. The range for this species is from Washington south to approximately Castroville, the foothills of the Salinas Valley from Salinas to Soledad, and into the central valley and eastern foothills to Lancaster, California.	**Unlikely** No suitable habitat is present within the survey area. The nearest CNDDB occurrence is located 2.5 mi southwest, from 2001.
Ambystoma californiense pop. 1 California tiger salamander - central California DPS	FT / ST / --	Annual grassland and grassy understory of valley-foothill hardwood habitats in central and northern California. Need underground refuges and vernal pools or other seasonal water sources.	**High** CNDDB reports an occurrence from 2007 that overlaps with the survey area. There are no reported breeding resources within the dispersal distance of two kilometers (1.24 miles) for adult CTS; however, a vernal pond 67 m (220ft) from the survey area may provide aquatic habitat for CTS. Upland habitat and burrows are actively disturbed by disking agriculture equipment. Still, the survey area provides suitable dispersal habitat within the open fields.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Phrynosoma blainvillii Coast horned lizard	-- / CSC / --	Associated with open patches of sandy soils in washes, chaparral, scrub, and grasslands.	**Unlikely** No suitable habitat is present within the survey area. CNDDB reports 1 occurrence within the quadrangles reviewed, located 14 miles north within Henry Coe State Park, from 1994.
Rana boylii pop. 6 Foothill yellow-legged frog - south coast DPS	FT / SE&CSC / --	Partly shaded, shallow streams and riffles with a rocky substrate in a variety of habitats, including hardwood, pine, and riparian forests, scrub, chaparral, and wet meadows. Rarely encountered far from permanent water.	**Unlikely** No suitable habitat is present within the survey area and the nearest CNDDB occurrence is 11.8 miles northwest along Pacheco Pass, from 1950.
Rana draytonii California red-legged frog	FT / CSC / --	Lowlands and foothills in or near permanent or late-season sources of deep water with dense, shrubby, or emergent riparian vegetation. During late summer or fall adults are known to utilize a variety of upland habitats with leaf litter or mammal burrows.	**Moderate** Only marginally suitable upland habitat is present within the survey area as the agriculture land is actively disturbed. Adult CRLF may disperse up to two miles between breeding and non-breeding sites, and up to 1.6 km (1 mile) from aquatic to upland habitat to shelter or forage. There are no recorded breeding sites within dispersal distance; however, no data is available for the nearby pond (220 feet west) and reservoir (130 ft east) immediately adjacent to the survey area. The nearest CNDDB occurrence is 2.6 mi southwest from 2001 and 4.2 miles north along SR 156, from 1991.
Spea hammondii Western spadefoot	FC / CSC / --	Grasslands with shallow temporary pools are optimal habitats for the western spadefoot. Occur primarily in grassland habitats, but can be found in valley and foothill woodlands. Vernal pools are essential for breeding and egg laying.	**Low** Marginally suitable habitat may be present within the ponds adjacent to the survey area; however, the nearest CNDDB occurrence is located 4 miles south across SR 25, and San Juan Road, from 2006.
Taricha torosa Coast Range newt (Monterey County South only)	-- / CSC / --	Occurs mainly in valley-foothill hardwood, valley-foothill hardwood-conifer, coastal scrub, and mixed chaparral but is known to occur in grasslands and mixed conifer types. Seek cover under rocks and logs, in mammal burrows, rock fissures, or man-made structures such as wells. Breed in intermittent ponds, streams, lakes, and reservoir.	**Unlikely** No suitable habitat is present within the survey area.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Masticophis flagellum ruddocki San Joaquin whipsnake	-- / CSC / --	Variety of habitats-deserts, scrub land, juniper-grassland, woodland, thorn forest, and farmland. Generally avoids dense vegetation. Ranges from Arbuckle in the Sacramento southward to the Grapevine in the Kern County portion of the San Joaquin Valley and westward into the inner South Coast Ranges. An isolated population also occurs in the Sutter Buttes.	**Moderate** Marginally suitable habitat is present within the survey area. CNDDB reports 1 occurrence of the species 3 miles south, from 1996.
FISH			
Lavinia exilicauda harengus Monterey hitch (Pajaro/Salinas hitch)	-- / CSC / --	Found only within the Pajaro and Salinas River systems. Can occupy a wide variety of habitats, however, they are most abundant in lowland areas with large pools or small reservoirs that mimic such conditions. May be found in brackish water conditions within the Salinas River lagoon during the early summer months when the sandbar forms at the mouth of the river.	**Not Present** Survey area lacks the specialized habitat features to support the species.
Oncorhynchus mykiss irideus pop. 9 Steelhead (south-central California coast DPS)	FT / -- / --	Coastal perennial and near perennial streams, with suitable spawning and rearing habitat and no major barriers. Found from the Russian River to and including Aptos Creek, and all drainages of San Francisco and San Pablo Bays eastward to Chipps Island at the confluence of the Sacramento and San Joaquin Rivers.	**Not Present** Survey area lacks the specialized habitat features to support the species.
INVERTEBRATES			
Bombus crotchii Crotch bumble bee	-- / SC / --	Occurs in open grassland and scrub at relatively warm and dry sites. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late October. Generally nests underground, often in abandoned mammal burrows. Within California this species is known to occur in the Mediterranean, Pacific Coast, Western Desert, as well as Great Valley and adjacent foothill regions.	**Low** Flowering resources within the survey area may provide foraging habitat; however land cultivation by agriculture equipment disturbs small mammal burrows necessary for nesting habitat. The CNDDB reports 13 occurrences of the species within the quadrangles reviewed, with the nearest occurring 7 miles south along Cienge Road, from 2025. In addition, the Bumble Bee Watch reports two occurrences 10 miles northeast along Pacheco Pass (SR 156) as well as 8 within Henry Coe State Park. The survey area is located within the historic range of the species.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Bombus occidentalis Western bumble bee	-- / SC / --	Occurs in open grassy areas, urban parks, urban gardens, chaparral, and meadows. This species generally nest underground. Western bumble bee populations are currently largely restricted to high elevation sites in the Sierra Nevada.	**Unlikely** Flowering resources within the survey area may provide foraging habitat and small mammal burrows may provide nesting habitat; however, the survey area is outside the historic and current range of the species. The CNDDB and Bumble Bee Watch did not report any occurrences within the quadrangles reviewed.
Branchinecta lynchi Vernal pool fairy shrimp	FT / -- / --	Require ephemeral pools with no flow. Associated with vernal pool/grasslands from near Red Bluff (Shasta County), through the central valley, and into the South Coast Mountains Region. Require ephemeral pools with no flow.	**Not Present** Survey area lacks specialized habitat features to support this species.
Danaus plexippus Monarch butterfly (Overwintering)	FC / -- / --	Overwinters in coastal California using colonial roosts generally found in Eucalyptus, pine and acacia trees. Overwintering habitat for this species within the Coastal Zone represents ESHA. Local ordinances often protect this species as well.	**Not Present** Survey area lacks the specialized habitat features to support overwintering of this species.
Euphilotes enoptes smithi Smith's blue butterfly	FE / -- / --	Most commonly associated with coastal dunes and coastal sage scrub plant communities in Monterey and Santa Cruz Counties. Plant hosts are *Eriogonum latifolium* and *E. parvifolium*.	**Not Present** Survey area lacks the specialized habitat features to support this species (i.e., host plants were not observed during the field survey on December 9th, 2025).
Euphydryas editha bayensis Bay checkerspot butterfly	FT / -- / --	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of the San Francisco Bay. *Plantago erecta* is the primary host plant; *Castilleja densiflorus* and *Castilleja exserta* are secondary host plants.	**Unlikely** Actively cultivated land does not provide suitable habitat for host plant species *Plantago erecta, Castilleja densiflorus*, and *Castilleja exserta*.
PLANTS			
Ericameria fasciculata Eastwood's goldenbush	-- / -- / 1B	Openings in closed-cone coniferous forest, maritime chaparral, coastal dunes, and coastal scrub on sandy soils at elevations of 30-275 meters. Evergreen shrub in the Asteraceae family; blooms July-October.	**Unlikely** No suitable habitat is present within the survey area.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Arctostaphylos pajaroensis Pajaro manzanita	-- / -- / 1B	Chaparral on sandy soils at elevations of 30-760 meters. Evergreen shrub in the Ericaceae family; blooms December-March.	**Unlikely** No suitable habitat is present within the survey area.
Astragalus tener var. *tener* Alkali milk-vetch	-- / -- / 1B	Playas, valley and foothill grassland on adobe clay, and vernal pools on alkaline soils at elevations of 1-60 meters. Annual herb in the Fabaceae family; blooms March-June.	**Unlikely** No suitable habitat is present within the survey area.
Balsamorhiza macrolepis Big-scale balsamroot	-- / -- / 1B	Chaparral, cismontane woodland, and valley and foothill grassland, sometimes on serpentinite soils, at elevations of 90-1555 meters. Perennial herb in the Asteraceae family; blooms March-June.	**Unlikely** No suitable habitat is present within the survey area.
Castilleja rubicundula ssp. *rubicundula* Pink creamsacs	-- / -- / 1B	Openings in chaparral, cismontane woodlands, meadows and seeps, and valley and foothill grasslands on serpentinite soils, at elevations of 20-910 meters. Annual herb in the Orobanchaceae family; blooms April-June.	**Unlikely** No suitable habitat is present within the survey area.
Chorizanthe pungens var. *pungens* Monterey spineflower	FT / -- / 1B	Maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grassland on sandy soils at elevations of 3-450 meters. Annual herb in the Polygonaceae family; blooms April-July.	**Unlikely** No suitable habitat is present within the survey area.
Deinandra halliana Hall's tarplant	-- / -- / 1B	Chenopod scrub, cismontane woodland, and valley and foothill grassland on clay soils at elevations of 260-950. Annual herb in the Asteraceae family; blooms April-May.	**Unlikely** No suitable habitat is present within the survey area.
Delphinium californicum ssp. interius Hospital Canyon California larkspur	-- / -- / 1B	Openings in chaparral, coastal scrub, and mesic areas of cismontane woodland at elevations of 230-1095 meters. Perennial herb in the Ranunculaceae family; blooms April-June.	**Unlikely** No suitable habitat is present within the survey area.
Dudleya abramsii ssp. setchellii Santa Clara Valley dudleya	FE / -- / 1B	Cismontane woodland and valley and foothill grasslands on rocky serpentinite soils, at elevations of 60-455 meters. Perennial herb in the Crassulaceae family; blooms April-October.	**Unlikely** No suitable habitat is present within the survey area.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Eriogonum heermannii var. occidentale Western Heermann's buckwheat	-- / -- / 1B	Often serpentinite; usually roadsides or alluvium floodplains, rarely clay or shale slopes. Cismontane woodland (openings). 102-986 meters, blooms July-October.	**Unlikely** No suitable habitat is present within the survey area.
Eriogonum nortonii Pinnacles buckwheat	-- / -- / 1B	Chaparral and valley and foothill grassland on sandy soils, often on recent burns, at elevations of 300-975 meters. Annual herb in the Polygonaceae family; blooms May-September.	**Unlikely** No suitable habitat is present within the survey area.
Eryngium aristulatum var. hooveri Hoover's button-celery	-- / -- / 1B	Vernal pools at elevations of 3-45 meters. Annual/perennial herb in the Apiaceae family; blooms June-August.	**Unlikely** No suitable habitat is present within the survey area.
Extriplex joaquinana San Joaquin spearscale	-- / -- / 1B	Meadows and seeps, playas, chenopod scrub, and valley and foothill grassland on alkaline soils at elevations of 1-835 meters. Annual herb in the Chenopodiaceae family; blooms April-October.	**Unlikely** No suitable habitat is present within the survey area.
Hoita strobilina Loma Prieta hoita	-- / -- / 1B	Mesic areas of chaparral, cismontane woodland, and riparian woodland, usually on serpentinite soils, at elevations of 30-860 meters. Perennial herb in the Fabaceae family; blooms May-October.	**Unlikely** No suitable habitat is present within the survey area.
Legenere limosa Legenere	-- / -- / 1B	Vernal pools and wetlands, generally in areas of low vegetation, at elevations of 1-880 meters. Annual herb in the Campanulaceae family; blooms April- June.	**Unlikely** No suitable habitat is present within the survey area.
Lessingia micradenia var. glabrata Smooth lessingia	-- / -- / 1B	Chaparral and cismontane woodlands on serpentinite soils, often on roadsides, at elevations of 120-420 meters. Annual herb in the Asteraceae family; blooms July-November.	**Unlikely** No suitable habitat is present within the survey area.
Malacothamnus aboriginum Indian Valley bushmallow	-- / -- / 1B	Chaparral and cismontane woodland on rocky or granitic soils, often in burned areas, at elevations of 150-1700. Deciduous shrub in the Malvaceae family; blooms April-October.	**Unlikely** No suitable habitat is present within the survey area.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence within Survey Area
Malacothamnus hallii Hall's bushmallow	-- / -- / 1B	Chaparral and coastal scrub at elevations of 10-760 meters. Perennial evergreen shrub in the Malvaceae family; blooms May-October.	**Unlikely** No suitable habitat is present within the survey area.
Monolopia gracilens Woodland wollythreads	-- / -- / 1B	Openings of broadleaved upland forest, chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland on serpentinite soils at elevations of 100-1200 meters. Annual herb in the Asteraceae family; blooms February-July.	**Unlikely** No suitable habitat is present within the survey area.
Navarretia prostrata Prostrate vernal pool navarretia	-- / -- / 1B	Meadows, seeps, vernal pools, and mesic areas of coastal scrub and valley and foothill grassland at elevations of 15-2110 meters. Annual herb in the Polemoniaceae family; blooms April-July.	**Unlikely** No suitable habitat is present within the survey area.
Plagiobothrys diffusus San Francisco popcornflower	-- / SE / 1B	Seeps and mesic areas of coastal prairie and valley and foothill grassland at elevations of 60-360 meters. Annual herb in the Boraginaceae family; blooms March-June.	**Unlikely** No suitable habitat is present within the survey area.
Plagiobothrys glaber Hairless popcornflower	-- / -- / 1A	Alkaline meadows and seeps, and coastal salt marshes and swamps at elevations of 15-180 meters. Annual herb in the Boraginaceae family; blooms March-May.	**Unlikely** The CNDDB reports occurrence data overlapping with the survey area from 1954; however, the species is likely extirpated from this area due to development and agricultural use. No suitable habitat is present within the survey area.
Ravenella exigua Chaparral harebell	-- / -- / 1B	Chaparral on rocky, usually serpentinite soils at elevations of 275-1,250 meters. Annual herb in the Campanulaceae family; blooms May-June.	**Unlikely** No suitable habitat is present within the survey area.
Streptanthus albidus ssp. *peramoenus* Most beautiful jewelflower	-- / -- / 1B	Chaparral, cismontane woodlands, and valley and foothill grasslands on serpentinite soils at elevations of 94-1000 meters. Annual herb in the Brassicaceae family; blooms March-October.	**Unlikely** No suitable habitat is present within the survey area.
Trifolium hydrophilum Saline clover	-- / -- / 1B	Marshes and swamps, mesic and alkaline valley and foothill grassland, and vernal pools at elevations of 0-300 meters. Annual herb in the Fabaceae family; blooms April-June.	**Unlikely** No suitable habitat is present within the survey area.

STATUS DEFINITIONS

Federal

FE = listed as Endangered under the federal Endangered Species Act
FT = listed as Threatened under the federal Endangered Species Act
FC = Candidate for listing under the federal Endangered Species Act
-- = no listing

State

SE = listed as Endangered under the California Endangered Species Act
ST = listed as Threatened under the California Endangered Species Act
SC = Candidate for listing under California Endangered Species Act
SR = listed as Rare under the California Native Plant Protection Act
CFP = California Fully Protected Species
CSC = CDFW Species of Concern
-- = no listing

California Native Plant Society

1A = California Rare Plant Rank 1A species; plants presumed extinct or extirpated in California
1B = California Rare Plant Rank 1B species; plants rare, threatened, or endangered in California and elsewhere
2B = California Rare Plant Rank 2B species; plants rare, threatened, or endangered in California, but more common elsewhere
-- = no listing

POTENTIAL TO OCCUR

Present = known occurrence of species within the site and presence of suitable habitat conditions; or observed during field survey
High = known occurrence of species in the immediate vicinity; presence of suitable habitat conditions
Moderate = known occurrence of species in the vicinity; presence of suitable habitat conditions
Low = species known to occur in the vicinity; presence of marginal habitat conditions
Unlikely = species not known to occur in the vicinity, no suitable habitat conditions
Not Present = species was not observed during survey; or site lacks specialized habitat features to support the species

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Appendix D

Arborist Report

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Arborist Report for the Stoney Farms Conditional Use Permit Project San Benito County, California

January 2026

Prepared for

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1. INTRODUCTION

Denise Duffy & Associates, Inc. (DD&A) is contracted by Stoney, LCC (project proponent) to provide arboricultural consulting services for the Stoney Farms Conditional Use Permit Project (project or proposed project) in unincorporated San Benito County, California. Impacts to trees, including tree removal, may be required as part of the project. DD&A conducted a tree assessment of the property in December 2025 to evaluate current conditions. Based on the results of the assessment, tree removal may be required to complete the project.

Tree removal within the project site is subject to County's jurisdiction under the San Benito County Code of Ordinances (County Code). This arborist report was prepared in accordance with the requirements of County Code and identifies the trees which may be removed as part of the project and describes the necessary tree removal permitting requirements. This report also recommends measures, where necessary, to avoid, minimize, or mitigate potential impacts to trees and other biological resources (i.e., nesting birds) which may result from tree removal.

1.1 Property Location

The project is located near 2639 Bolsa Road in unincorporated San Benito County, California, on County Parcel 0190100150. The project site is in the County's Agricultural Productive (AP) zoning district. The project site has historically been used for row crop farming and was disked at the time of the tree assessment. The proposed project would be located on the northeast portion of the parcel. The project site is in a rural area and is surrounded by agricultural and rural residential land uses, as well as the Hollister Municipal Airport.

1.2 Project Description

The proposed project is a conditional use permit for an indoor commercial cannabis cultivation and microbusiness (manufacture, distribution, and non-storefront retail) facility (County Planning File CAN230001). The proposed project would include a new 34,560-square-foot combined greenhouse and warehouse structure, a 43-stall parking lot, a paved access driveway, a trash enclosure, and a septic system.

2. METHODS

2.1 Limitations

It is not the intent of this report to provide a monetary valuation of the trees or provide risk assessment for any tree, as any tree can fail at any time. The inspection of these trees consisted solely of a visual inspection from the ground. While more thorough techniques are available for inspection and evaluation, they were neither requested nor considered necessary or appropriate at this time. No clinical diagnosis was performed on any pest or pathogen that may or may not be present within the site. In addition to an inspection of the property, DD&A relied on information provided by the project proponent (e.g., survey boundaries, property boundaries, project description) to prepare this report, and must reasonably rely on the accuracy of the information provided. Trees can be managed but not controlled. To live near trees, regardless of their condition, is to accept some degree of risk. The only way to eliminate all risks associated with trees is to eliminate all trees. DD&A shall not be responsible for another's means, methods, techniques, schedules, or procedures, or for contractor safety or any other related programs, or for another's failure to complete work in accordance with approved plans and specifications.

2.2 Regulatory Setting

2.2.1 San Benito County Code (Tree Protection)

County Code § 25.07.018 (Tree Protection) requires a tree removal permit in the County's Single Family Residential (R-1) and Residential Mixed (RM) zones to trench, grade, or fill within the dripline of any protected tree or destroy, kill, remove, or seriously harm any protected tree. County Code defines a protected tree as "any living tree having at least one (1) trunk of eight (8) inches or more in diameter measured four and one-half (4.5) feet above the ground, or a multi-trunked tree having an aggregate diameter of ten inches or more, measured four and one-half (4.5) feet above the ground (DBH), excluding a variety of fruit and nut trees which are cultivated for edible fruit production. County Code provides additional protections for "trees of special protection," which include heritage trees with a trunk diameter of 36 inches or greater measured four and one-half feet above ground, trees required to be preserved or planted under an approved development plan or as a condition of approval, trees planted as mitigation or replacement for protected tree removal, and landmark trees or groves designated by the Board of Supervisors to be of historical or cultural value, an outstanding specimen, an unusual or native species and/or of significant community benefit.

Tree removal permits are valid for one year and may be extended once for an additional year upon written request. Applications must identify the number, species, size, and location of affected trees, state the reason for removal, and include any additional information required by the Planning Director. Generally, one tree per parcel may be removed every five years without detailed review by the Planning Director, except for trees of special protection; otherwise, review considers factors such as tree health and safety risks, impacts on structures, utilities, adjacent trees, erosion and drainage, neighborhood character, historical and ecological value, view preservation, property enjoyment, and proposed mitigation measures (e.g., replacement planting). Exemptions to County Code § 25.07.018 include, but are not limited to, hazardous or diseased trees, trees which interfere with utilities or public safety, trees which are part of licensed nursery operations or public infrastructure projects, trees whose removal are authorized under state or federal permits, trees which are located within fully fenced residential side or rear yards (excluding trees of special protection), and trees which removed as part of a development project that has been considered under the California Environmental Quality Act (CEQA), and (a) the project considered the removal of those trees, or (b) the removal of those trees is contained in a landscape plan submitted in compliance with a condition of approval for the approved project.

2.2.2 San Benito County Code (Management and Conservation of Woodlands)

County Code Chapter 19.33 (Management and Conservation of Woodlands) establishes regulations to conserve and protect woodlands in the unincorporated areas of San Benito County while allowing for reasonable use and enjoyment of private property. Chapter 19.33 regulates the removal, modification, and disturbance of trees and woodland areas through a discretionary permit process, with standards intended to retain a minimum level of woodland canopy and prevent excessive or unnecessary tree loss. A discretionary permit is generally required when proposed tree removal would reduce woodland canopy below the retention thresholds established in Table 19.33.007(1), when removal occurs on slopes of 30 percent or greater, or when activities would otherwise significantly impact protected woodland resources.

2.2.3 California Fish and Game Code

Sections 3503, 3503.5, 3511, 3513, and 3800 of the California Fish and Game Code collectively prohibit the take, possession, killing, or destruction of birds, nests, or eggs, except as specifically allowed by law. These provisions protect active nests and eggs of all birds, prohibit harm to birds of prey (including raptors and owls), prohibit the take or possession of fully protected bird species, and extend protections to migratory nongame birds covered under the federal Migratory Bird Treaty Act, as well as to other nongame bird species within the state.

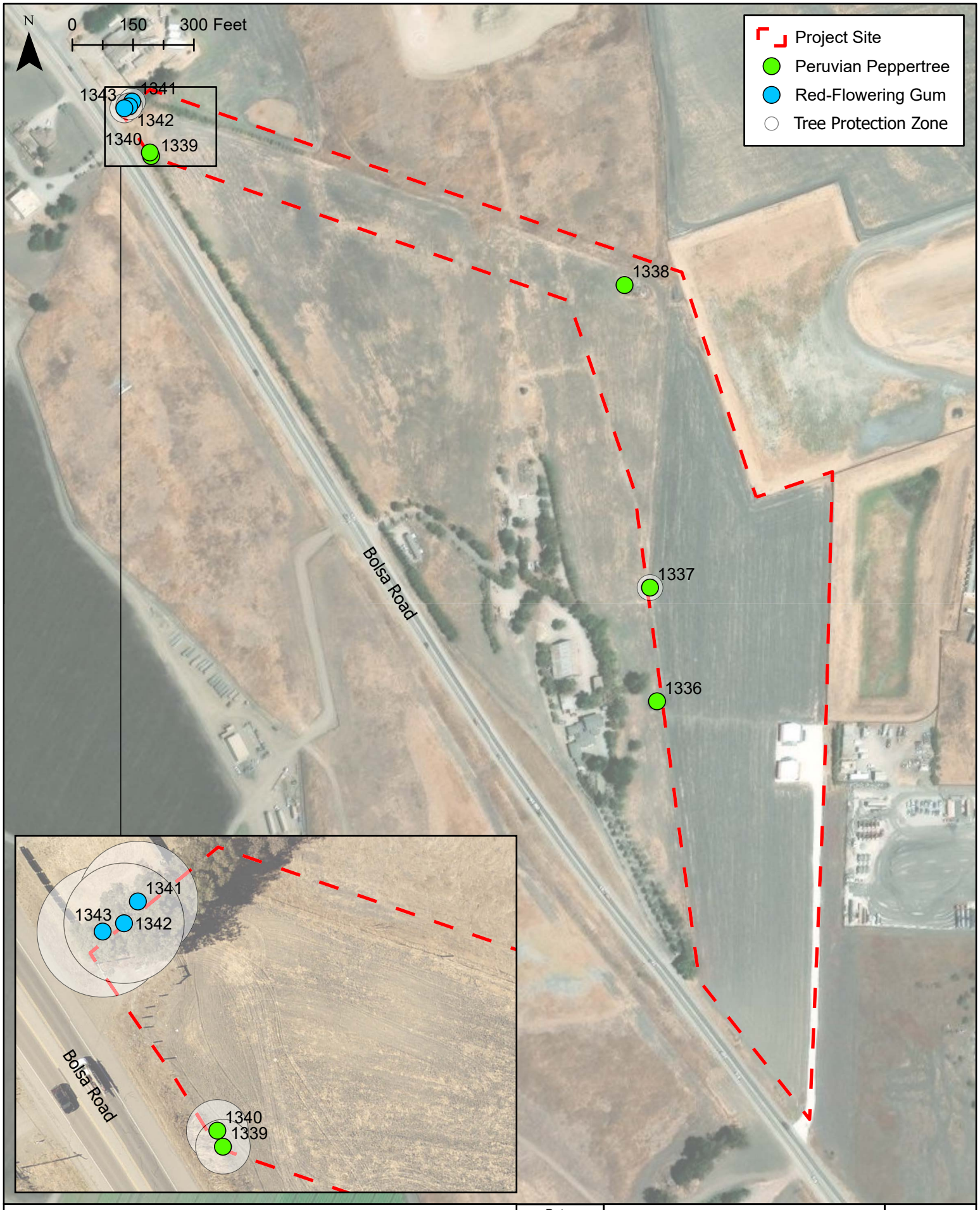
2.3 Survey Methods

DD&A biologists, led by International Society of Arboriculture (ISA)-certified (#11759) and Registered Consulting Arborist (RCA #887) arborist Patric Krabacher, conducted a tree assessment of the project site on December 9, 2025. Trees within the project site were inventoried in accordance with the following protocol, which was designed to meet the requirements of County Code:

- Tree diameter (DBH) was recorded at breast height (or 4.5 feet above native grade) or (for multi-stemmed trees) at the most representable location.
- Multi-stemmed trees, if present, were recorded as one (1) tree if the root crown (the point where the trunk meets natural grade) was contiguous. Multi-stemmed tree DBH was calculated by taking the square root of the squared sum of all stems measured (√[Stem 1 DBH2+ Stem 2 DBH2+ Stem 3 DBH2...]). This equation returns to the diameter at the base of the tree (Chojnacky, 1999).
- The critical root zone (CRZ) was calculated as one (1) foot for every one (1) inch DBH in accordance with American National Standards Institute (ANSI) A300 Part 8 & Part 5 (ANSI, 2023).
- The tree protection zone (TPZ, also known as the dripline) was calculated as 1.5 feet for every one (1) inch DBH.
- Species, size, and health class were recorded for each tree. Tree health was determined as good, fair, or poor and are defined below:
  - *Good*. Tree is healthy and vigorous as indicated by color of foliage and density, has no apparent signs of insect, disease, structural defects or mechanical injury. Tree has good form and structure.
  - *Fair*. Tree is in average condition and vigor for the area, but may show minor insect, disease, or physiological problems. Trees rated as Fair may be improved with correctional pruning.
  - *Poor*. Tree is in a general state of decline and may show severe structural or mechanical defects which may lead to failure, and may have insect or disease damage, but is not dead.
  - *Dead/Snags*. Dead standing trees.

3. RESULTS

Eight (8) trees—five (5) Peruvian peppertrees (*Schinus molle*) and three (3) red-flowering gums (*Corymbia ficifolia*)—were inventoried during the tree assessment (**Figure 1**). Both species are non-native in California. Detailed field data for each tree is included in **Table 1**.



Tree Survey Results

Date
1/5/2026

Scale
1 in = 300 ft

Denise Duffy & Associates, Inc.
Planning and Environmental Consulting

Figure
1

Path: C:\GIS\GIS_Projects\2025-50 Stoney Farms\ArcPro\Arborist\Arborist.aprx

Table 1. Tree Survey Results

Tree ID	Species	Common Name	DBH (in)	CRZ (ft)	TPZ (ft)	Health	Notes
1336	*Schinus molle*	Peruvian Peppertree	13	13	20	Fair	Trunk in neighboring property.
1337	*Schinus molle*	Peruvian Peppertree	21	21	32	Fair	Tree along margin of property.
1338	***Schinus molle***	**Peruvian Peppertree**	**10**	**10**	**15**	**Fair**	**Inside project grading limits.**
1339	***Schinus molle***	**Peruvian Peppertree**	**10**	**10**	**15**	**Poor**	**Ant infestation (typical for health response of another health-related issue related to the tree).**
1340	*Schinus molle*	Peruvian Peppertree	11	11	17	Fair	Tree along margin of property.
1341	*Corymbia ficifolia*	Red-Flowering Gum	22	22	33	Fair	Trunk in neighboring property.
1342	*Corymbia ficifolia*	Red-Flowering Gum	22	22	33	Fair	Trunk in neighboring property.
1343	*Corymbia ficifolia*	Red-Flowering Gum	24	24	36	Fair	Trunk in neighboring property.
Bold indicates tree is required or recommended for removal.							

4. DISCUSSION

As noted in **Table 1**, Tree 1338 is located within the project's grading limits; therefore, removal of this tree is required to facilitate construction of the project. Tree 1339 is in poor condition and infested with ants; this is a typical signal when a tree has underlying decay and/or disease. Trees 1336, 1340, 1341, 1342, and 1343 are located within neighboring properties and some (Trees 1341, 1342, and 1343) provide visual barriers and privacy for the neighboring property. Impacts to more than 25 percent of a tree's TPZ (i.e., grading within these areas) may result in decline or death of the tree. Therefore, avoidance of the TPZs of Trees 1336, 1340, 1341, 1342, and 1343 is recommended to avoid potential adverse impacts to trees on neighboring properties. To minimize tree removal, avoidance of the TPZs of healthy trees (i.e., trees in good or fair condition) along the margins of the project site (Trees 1337 and 1340) is recommended to the extent feasible; however, these trees may be removed if necessary to facilitate construction of the project.

The project is not subject to the County's tree removal ordinances as the project site is outside the County's Single Family Residential (R-1) and Residential Mixed (RM) zones and no oak woodlands are present within the site. Therefore, a tree removal permit and associated compensatory mitigation are not required for removal of trees within the project site. However, mitigation is recommended below to avoid impacts to trees on neighboring properties and to nesting birds protected by California Fish and Game Code and the federal Migratory Bird Treaty Act.

5. MITIGATION

The following mitigation measures are recommended to avoid or minimize impacts to nesting birds and neighboring trees during tree removal and construction activities within the project site:

1. **Nesting Bird Avoidance:** Work shall be timed to avoid the breeding and nesting season for raptors and other protected avian species. If work must occur during the avian breeding and nesting season (approximately February 1 through September 15), the project proponent shall retain a qualified biologist to conduct surveys for nesting birds. Surveys shall be conducted no more than 15 days

prior to project activities in all areas of the project that may provide suitable nesting habitat. If nesting birds are identified during surveys, an appropriate buffer shall be imposed within which no work or disturbance will take place (generally 300 feet in all directions). A qualified biologist shall be on-site during work re-initiation in the vicinity of the nest offset to ensure that the buffer is adequate and that the nest is not stressed and/or abandoned. No work shall proceed in the vicinity of an active nest until such time as all young are fledged, as determined by a qualified biologist, or until after September 16, when young are assumed fledged.

2. **Adjacent Tree Protection:** All trees which will be retained during construction but whose Tree Protection Zone (TPZ) lies within or partially within the project site shall be protected prior to and during construction per the following specifications:

   - Fencing or barricades shall be installed along the entire perimeter of a tree's TPZ to the extent feasible; generally, no less than 75 percent of a tree's TPZ shall be within the fenced area. However, fencing location may be adjusted or omitted in coordination with a certified arborist.
   - Fencing shall consist of either chain link, supported snowdrift or plastic mesh, hay bales, or field fence. Fencing shall have cross bracing (typically 2x4 material) on both the top and lower edges of the fencing material to prevent sagging and provide lateral support. Fencing shall stand a minimum height of five (5) feet above grade.
   - Fenced areas and the trunk protection materials shall remain in place during the entire construction period. Torn or damaged roots shall be cleanly cut to sound wood wherever possible to minimize decay entry points. Any root found that must be cut should be cut by manually digging a trench and cutting exposed roots with a saw, vibrating knife, rock saw, narrow trencher with sharp blades, or other approved root pruning equipment. No tree seals shall be used as seal material promotes decay.
   - Equipment staging, vehicle parking and access, and stockpiling or dumping of construction materials shall be prohibited within the TPZs of trees.
   - Soil disturbance (e.g., over excavation, sub excavation, grading, compaction or trenching) within TPZs shall be avoided to the extent feasible. If avoidance of a tree's entire TPZ is not possible, or if the TPZ is reduced from the dripline by a qualified arborist, work within the TPZ shall be conducted only under the supervision of a qualified arborist. In no instance shall permanent improvements exceed the following distances towards a tree's trunk: 12 inches for curbs, gutters, and walkways, and 24 inches for retaining walls, foundations, and concrete pads.
   - For trees where the TPZ was reduced from the dripline, a mulch layer up to approximately four (4) inches deep shall be applied to the ground following construction under the supervision of a qualified arborist. Only one (1) to two (2) inches of mulch should be applied within one (1) to two (2) feet of the trunk, and under no circumstances should any soil or mulch be placed against the root crown (base) of trees. The best source of mulch would be from chipped material generated on-site.

6. REFERENCES

County of San Benito Code of Ordinances, 2026. Available online at https://codelibrary.amlegal.com/codes/sanbenitocounty/latest/sanbenito_ca/0-0-0-1.

Dunster and Dunster, 1996. Dictionary of Natural Resource Management, Dunster and Dunster.

7. GLOSSARY

Definitions provided by Dunster and Dunster, 1996.

Critical Root Zone (CRZ): The area of soil around a tree's trunk that contains most of its important, fine, and absorbing roots which are vital for water and nutrient uptake. This zone is essential for the tree's health and stability.

Tree Protection Zone (TPZ): A designated area surrounding a tree, established during construction or development, that must be kept free from disturbance to protect the tree's health and structural stability

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Appendix E

Water Management Plan

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MH engineering Co.
16075 Vineyard Blvd. Morgan Hill, CA 95037 (408) 779-7381

Water Management Plan
Stoney LLC – Bolsa Road
CAN230001
APN 019-010-015 San Benito County, CA

Introduction:
This report is being provided in accordance with San Bentio County Code of Ordinances Section 1943.050(A)(5), Supplemental Requirements for Certain Cannabis Businesses, and per the request of County staff. This code requires the applicant to provide the following information, which is provided in the discussion below.

1. Proposed water supply,
2. Water demand estimate and proposed conservation measures, and
3. Water demand off-set requirements, if required.

Discussion:

1. Proposed Water Supply:

The project site (APN 019-010-015) is served by a private well on APN 019-010-013, both of these parcels are under a common ownership such that a well agreement is not necessary. This existing well is immediately adjacent to the westerly project property line and is the source of water for the residences and agricultural operations on both of these parcels. The agricultural operation on the project site currently uses 18.3 acre feet per year (AFY) (5.96 million gallons of water annually).

Therefore, the existing water use on the project site is tabulated as follows:

Table A: Existing Water Use

#	Area Description	Area (square feet)	Existing Water Use Rate (AFY/acre)	Existing Water Use (AFY)
A1	row crop farming	798,640	1.0	18.3
A2	farm access roads	72,560	0.0	0.0
Total		**871,200**		**18.3**

2. Water Demand Estimate and proposed conservation measures:

Water Demand Estimate

For the purposes of this water demand estimate, it is assumed that indoor cannabis cultivation requires 1.0 AFY of water per acre of cultivation. Note that there is a lack of measured data for cannabis water use and the high degree of variability in estimates of cannabis water use yet this 1.0 AFY is based on approved CEQA analyses for similar indoor cannabis grow operations in Monterey and San Luis Obispo Counties, as well as a Monterey County Agricultural Commissioner's report, and anecdotal evidence from the UC Berkely Cannabis Research Center that an assumption of 1.0 AFY of water per acre of indoor cultivation is appropriate.

It is also critical to note that the proposed building, parking, and driveway areas reduce the amount of water use areas on the site. Thus, the proposed water use on the project site is tabulate as follows:

Table B: Estimated Project Water Use

#	Area Description	Area (square feet)	Estimated Water Use Rate (AFY/acre)	Estimated Water Use (AFY)
B1	warehouse portion of greenhouse	2,400	0.0	0.0
B2	processing portion of greenhouse	2,400	0.0	0.0
B3	cultivation portion of greenhouse	4,800	1.0	0.1
B4	unused portion of greenhouse*	24,960	1.0	0.6
B5	landscaped area around greenhouse	12,800	1.0	0.3
B6	sidewalks around greenhouse	2,370	0.0	0.0
B7	driveway and parking areas	42,813	0.0	0.0
B8	access roads and buffer around building	77,784	0.0	0.0
B9	row crop farming south of greenhouse	199,490	1.0	4.6
B10	row crop farming west of greenhouse	23,900	1.0	0.5
B11	row crop farming north of greenhouse	421,086	1.0	9.7
B12	storm water mitigation swale	7,200	0.0	0.0
B13	farm access roads	49,197	0.0	0.0
Total		**871,200**		**15.8**

Water Conservation Measures

The operation would be using a pulse watering technique, which is an improved method of spaghetti tube irrigation. Instead of watering plants once or twice a day with a large amount of water, plants are watered more frequently with small amounts of water. This allows the water to be redistributed within the pots between watering, resulting in a more uniform water distribution within the pots and makes it possible to thoroughly wet the growing medium without irrigation run-off. The pulse watering systems would be designed more carefully than regular spaghetti tubing. In regular spaghetti tube systems, it is not uncommon that tubes on one end of a bench start dripping 10-15 seconds before tubes at the other end emit water. This may not be significant if the plants are watered for several minutes. However, with pulse irrigation, plants are watered multiple times per

day for short periods and the system layout is designed so that all pots receive similar amounts of water.

3. Water Demand Estimate and proposed conservation measures:

As shown in Tables A & B above, the proposed project would require approximately 2.5 AFY less water than is currently used at the project site. Therefore, no new or additional water supply is required for the proposed project and off-set is not required per County Code Section 19.43.050(A)(5).

Please let me know if you have any questions or need any additional information.
Thanks

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Appendix F

Sample AB 52 Letter

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San Benito County Resource Management Agency

Public Works / Planning & Building / Parks / Integrated Waste

[redacted]

RE: Assembly Bill 52 Consultation, Stoney Farms Conditional Use Permit Initial Study (IS/MND), 2639 Bolsa Road, San Benito County, California, APN 019-010-015 (County File No. CAN230001)

Dear [redacted],

The San Benito County Resource Management Agency (SBCRMA) is preparing an Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Stoney Farms Conditional Use Permit at 2639 Bolsa Road in unincorporated San Benito County.

The proposed project is a conditional use permit for an indoor commercial cannabis cultivation and microbusiness (manufacture, distribution, and non-storefront retail) facility (County Planning File CAN230001). The proposed project would include a new 34,560 square foot combined greenhouse/warehouse structure, a 43-stall parking lot, paved access driveway, trash enclosure, and septic system. Water service to the proposed project would be provided by an existing unpermitted well located on an adjacent parcel via a shared well agreement and access easement. The proposed project would require an encroachment permit from Caltrans due to the access road connecting with SR 25.

Pursuant to Assembly Bill 52 (Public Resources Code §21080.3.1), the County is providing formal notice to your Tribe. AB 52 requires lead agencies to notify and, upon request, consult with California Native American Tribes that are traditionally and culturally affiliated with the project area. Please note, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed, and the results were positive in reference to the [redacted].

If your Tribe wishes to engage in consultation on this project, please notify the County within 30 days of receipt of this letter. If no response is received within that period, the County may proceed without formal consultation.

If you have any questions or would like additional information, please contact me at (831) 902-2289 or by email at sreck@sanbenitocountyca.gov.

Respectfully,

Stephanie Reck
Senior Planner
County of San Benito Resource Management Agency

Enclosure: Project Site Plan

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