

Initial Study/Negative Declaration
John Smith Road Landfill Soil Stockpile Project



Prepared for:
County of San Benito

Initial Study/Negative Declaration

John Smith Road Landfill Soil Stockpile Project



Prepared for:

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NEGATIVE DECLARATION

Pursuant to Division 6, Title 14, Chapter 3, Article 6, Sections 15070 and 15071 of the California Administrative Code, the County of San Benito does cause to be filed with the State of California, this Negative Declaration.

1. Title and Short Description of Project: John Smith Road Landfill Soil Stockpile Project

The proposed project includes the temporary stockpiling of approximately 300,000 cubic yards of native soils on approximately 11 acres of grazing land located outside of the permitted boundary of the John Smith Road Landfill. The source of the soil is from the excavation of a waste disposal module within the permitted landfill boundary, which is an already approved activity at the landfill. The stockpiled soil would be used as a source for daily and intermediate landfill cover until it is depleted, which is expected to take approximately 15 years.

The construction of an approximately one-acre stormwater detention basin to capture stormwater runoff from the soil stockpile would be included as a component of erosion control. The detention pond would be located directly southeast of the proposed soil stockpile, directly north of John Smith Road, and directly east of the permitted landfill boundary.

2. Location of Project: The proposed project site is located directly east of the John Smith Road Landfill, which is located north of John Smith Road and approximately five miles southeast of the City of Hollister in unincorporated San Benito County. Surrounding land uses are rural in character and include agricultural and grazing lands. No residential or other structures are located within 1,000 feet of the project site. The nearest residence is approximately 0.7 mile southeast of the project site. The San Benito County General Plan Land Use Element (San Benito County 2015) identifies the land use designation of the proposed project as Rangeland (RF).

3. Project Proponent: San Benito County Integrated Waste Management Department, 3220 Southside Road, Hollister, CA 95023

4. Said project will not have a significant effect on the environment for the following reasons:

Based on the analysis included in the attached Initial Study, the John Smith Road Landfill Soil Stockpile Project would not be expected to cause significant, adverse environmental impacts. Therefore, the impacts associated with the proposed project would remain less than significant.

5. As a result thereof, the preparation of an Environmental Impact Report pursuant to the California Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

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1 INTRODUCTION

1.1 OVERVIEW

This document is the Initial Study for the proposed John Smith Road Landfill Soil Stockpile Project (proposed project) located in the San Benito County, California. This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. and the State CEQA Guidelines, California Code of Regulations Section 15000 et seq. An Initial Study is prepared by a lead agency to determine if a project may have a significant effect on the environment. In accordance with State CEQA Guidelines Section 15064(a), an Environmental Impact Report (EIR) must be prepared if there is substantial evidence that a project may have a significant effect on the environment. A Negative Declaration is prepared if the lead agency determines that the proposed project would not have a significant effect on the environment, and therefore, that it would not require the preparation of an EIR (State CEQA Guidelines Section 15070).

This Initial Study will be used to examine the potential environmental impacts of the proposed project. In general, this document describes the proposed project, the existing environment that could be affected, potential impacts from the proposed project, and proposed mitigation measures in compliance with the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.).

The Initial Study is divided into four chapters: Chapter 1 includes this introduction, Chapter 2 provides a description of the project setting and characteristics; Chapter 3 includes an environmental evaluation/checklist that identifies the potential environmental impacts associated with implementation of the project and a discussion of checklist responses and findings; and Chapter 4 includes references used in the preparation of this report.

1.2 LEAD AGENCY

The lead agency is the public agency with primary responsibility over the proposed project. In accordance with CEQA Guidelines Section 15051(b)(1), “the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose...” Because the project is being proposed by San Benito County, the County is the lead agency for the proposed project.

1.3 PROJECT LOCATION

The proposed project site is located directly east of the John Smith Road Landfill, which is located north of John Smith Road and approximately five miles southeast of the City of Hollister in unincorporated San Benito County (Exhibit 1). Surrounding land uses are rural in character and include agricultural and grazing lands. No residential or other structures are located within 1,000 feet of the project site. The nearest residence is approximately 0.7 mile southeast of the project site. The San Benito County General Plan Land Use Element (San Benito County 2015) identifies the land use designation of the proposed project as Rangeland (RF). Exhibit 2 identifies the site plan for the John Smith Road Landfill with the proposed soil stockpile location identified with shading adjacent to the northeastern edge of the permitted landfill.



Exhibit 1 Project Vicinity Aerial

Source: Google Maps 2020

1.4 PURPOSE OF THIS DOCUMENT

Prior to approving the proposed project, San Benito County must evaluate the project's potential environmental impacts as required by CEQA. The County, as the lead agency under CEQA, will consider the proposed project's environmental impacts when considering whether to approve project implementation. This Initial Study is an informational document to be used in the local planning and decision-making process; it does not recommend approval or denial of the proposed project.

This Initial Study will be available for public review for 20 days consistent with the requirements of CEQA Guidelines Section 15105(b). The County will take into consideration comments received during the public review period and will factor these comments into their assessment of the environmental impacts associated with the proposed project prior to making their decision related to project approval.

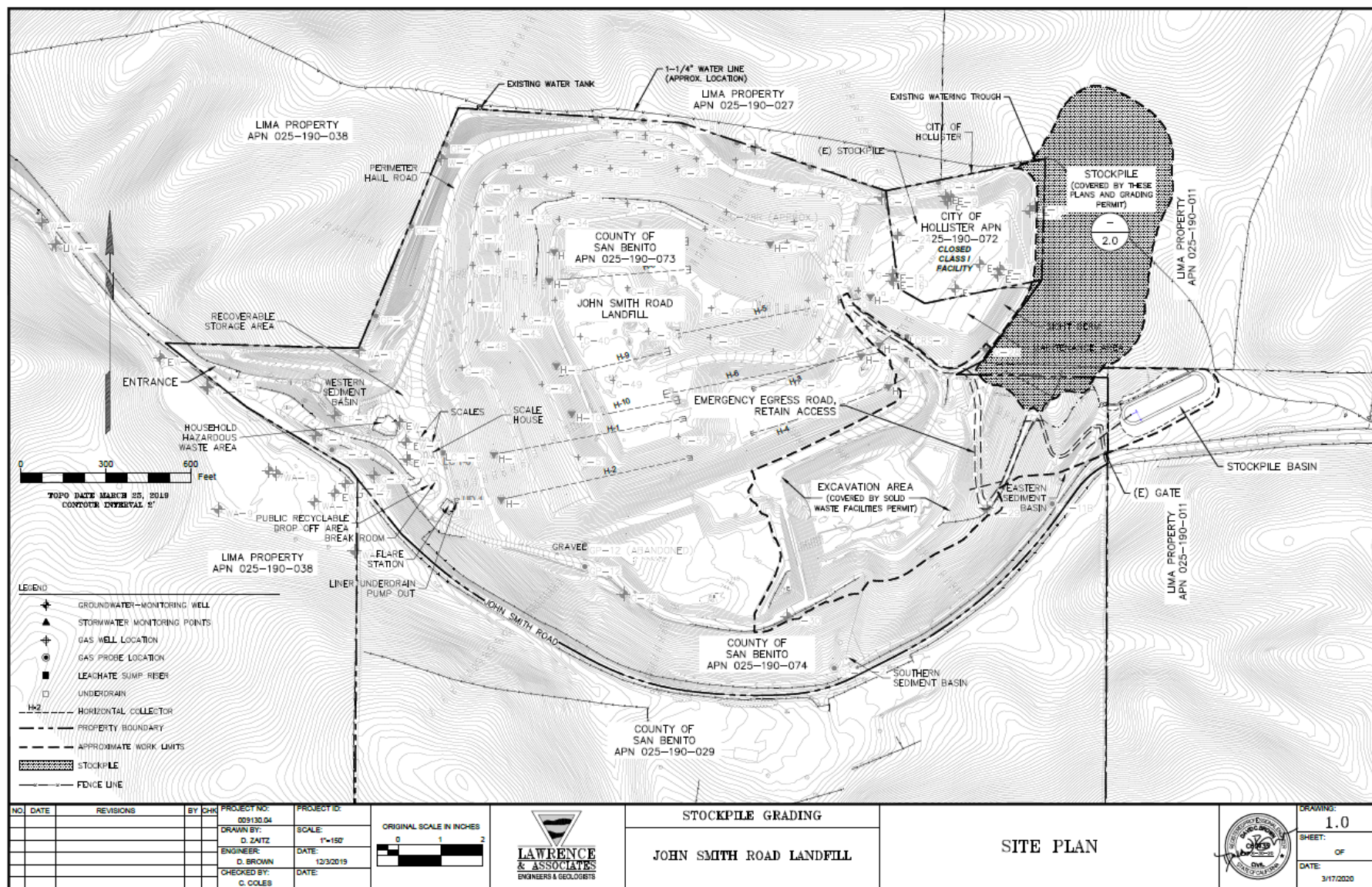


Exhibit 2 Site Plan with Soil Stockpile Shaded in Upper Right Hand Corner

Source: Lawrence & Associates 2020

2 PROPOSED PROJECT DESCRIPTION

2.1 PROJECT COMPONENTS

The proposed project includes the temporary stockpiling of approximately 300,000 cubic yards of native soils on approximately 11 acres of grazing land located outside of the permitted boundary of the John Smith Road Landfill. The source of the soil is from the excavation of a waste disposal module within the permitted landfill boundary, which is an already approved activity at the landfill. The stockpiled soil would be used as a source for daily and intermediate landfill cover until it is depleted, which is expected to take approximately 15 years.

The excavation of soil is required to construct waste disposal modules at landfills to provide an area within which a liner system can be constructed, which protects the underlying soil and groundwater from contamination, and to provide an area for waste disposal. The excavated soil is typically stockpiled directly adjacent to the module that is excavated and within an area permitted for solid waste disposal operations. The stockpiled soil is then used to provide daily landfill cover, which is the soil that is applied at the end of the operating day over the top of the waste that has been placed in the waste disposal module. The application of daily cover helps minimize odors and reduces vectors at the landfill working face. In addition, when the module is filled to its capacity, the remaining stockpiled soil is used to create an intermediate cover that is more substantial than the daily cover (typically one foot of soil versus six inches). This intermediate cover helps ensure buried waste is not inadvertently exposed. However, when the landfill is nearing its capacity, there is not always sufficient space within the permitted landfill boundary to stockpile soil from the last modules to be constructed. This is the situation for Module 7/8C, which is one of the last modules being constructed at the landfill.

The proposed project includes stockpiling soil from Module 7/8C on land located directly east and outside of the landfill's permitted boundary. Approximately 300,000 cubic yards of material would be excavated from Module 7/8C, which is located within the southeastern portion of the permitted landfill and transported to the stockpile site. The excavated soil would be transported using 20 cubic yard haul trucks. A total of 250 one-way trips would be conducted per day, resulting in the transport of approximately 5,000 cubic yards per day. At this rate, the project would require approximately 3 months to complete, assuming the construction activities occur for ten hours per day and five days per week. Because the landfill operator is currently permitted to excavate landfill modules and create soil stockpiles within the landfill's permitted boundary, the proposed project being evaluated in this Initial Study is limited to the placement of soil on an area that was not previously consider for soil placement. The project does not include the excavation of Module 7/8C, as this is an already approved activity at the landfill.

The proposed project also includes accessing the soil stockpile over an approximately 15-year timeframe as a source for daily and intermediate landfill cover. This would typically require just one to two haul truck trips per day between the stockpile and landfill working face for daily cover. The application of the intermediate cover would be expected to occur over several weeks. Because portions of the stockpile would be in place for

approximately 15 years, it would be constructed similar to a permanent fill including the installation of benches, down drains, rock-lined ditches, and other appropriate erosion control.

The construction of an approximately one-acre stormwater detention basin to capture stormwater runoff from the soil stockpile would be included as an erosion control component. The detention pond would be located directly southeast of the proposed soil stockpile, directly north of John Smith Road, and directly east of the permitted landfill boundary. The pond would act as a sediment and water quality control best management practice (BMP) and would include a 36-inch outflow riser connected to an eight-inch Faircloth Skimmer. The skimmer allows for controlled drainage of the pond while allowing storage and sediment drip-out to be maximized (Lawrence & Associates 2020a). Discharge from the pond would flow west into the existing “eastern sediment basin” within the permitted landfill boundary. This eastern sediment basin discharges into an existing drainage that parallels John Smith Road. The project includes a detailed Erosion Control Plan that would be required to be implemented with project construction (Lawrence & Associates 2020b).

During construction, temporary fencing would be installed to prevent cattle from the stockpile property from entering the landfill property. In addition, the grassland vegetation and topsoil within the stockpile area would be cleared and grubbed down approximately six inches prior to placing any soil. For areas with existing slopes steeper than 10 percent, the existing surface would be benched prior to placing any soil to ensure a stable surface and good bonding is provided for the soil stockpile. The stockpile slopes would not be steeper than 2 feet horizontal to 1 foot vertical with a 20-foot wide bench constructed no less frequently than every 50 vertical feet. In most locations, the stockpile would have a gentler 3:1 slope. The top deck of the stockpile would slope to the southwest at between 3 and 5 percent to ensure ponding does not occur on the top surface. Drainage features would be installed and the slopes would be seeded and mulched on the completed stockpile prior to the rainy season (September 30). This would include the placement of straw wattles, as necessary around the soil stockpile.

The soil stockpile would be located adjacent to a closed Class 1 landfill area that is owned by the City of Hollister. Permanent fencing is in place to separate the Class 1 area from the soil stockpile property and other areas of the landfill. No activities associated with the proposed project would occur within the closed Class 1 area.

2.2 REQUIRED PERMITS AND APPROVALS

The proposed project would require the adoption of this Initial Study/Negative Declaration and approval of an administrative permit by the San Benito County Planning Director. In addition, the County would be required to issue a grading permit, consistent with the requirements of the San Benito County Code of Ordinances (SBCC) Section 19.17.011, and the project construction would be subject to a Construction General Stormwater permit including preparation of a Storm Water Pollution Prevention Plan.

3 ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION	
1. Project Title:	John Smith Road Landfill Soil Stockpile Project
2. Lead Agency Name and Address:	San Benito County Integrated Waste Management Department 3220 Southside Road Hollister, CA 95023
3. Contact Person and Phone Number:	Kathleen Gallagher (831) 636-4110
4. Project Location:	Five miles southeast the City of Hollister and north of John Smith Road in unincorporated San Benito County, California
5. Project Sponsor's Name and Address:	San Benito County Integrated Waste Management Department 3220 Southside Road Hollister, CA 95023
6. General Plan Designation:	Rangeland (RG)
7. Zoning:	Agricultural Rangeland (AR)
8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)	See the project description included in Section 2 above.
9. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings)	The project site is surrounded by rural land uses including agricultural and grazing lands to the north, east and south. The John Smith Road Landfill is located directly to the west. No residential or other structures are located within 1,000 feet of the project site.
10. Other public agencies whose approval is required: (e.g., permits, financing approval, or participation agreement)	The project would require a grading permit from San Benito County, consistent with SBCC Section 19.17.011, and would be subject to a Construction General Stormwater permit including preparation of a Storm Water Pollution Prevention Plan.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	No tribes have requested consultation per Public Resources Code section 21080.3.1 requirements.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☒ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that although the proposed project **COULD** have a significant effect on the environment, there **WILL NOT** be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

Title

Agency

EVALUATION OF ENVIRONMENTAL IMPACTS

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

3.1 AESTHETICS

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

AFFECTED ENVIRONMENT

The project site is rural in character, consisting of gently sloping, open grassland and grazing land ranging from approximately 715 feet in the southeastern portion to approximately 812 feet along its northwestern edge. The project site is similar in character to the gently rolling topography found throughout San Benito County. The site is not comprised of particularly outstanding or unique visual features, such as trees, rock outcroppings, bluffs or historical buildings or landmarks. The site is not included as a component of a designated County scenic resource or located along a designated scenic highway (San Benito County 2012). The site is primarily visible to travelers on John Smith Road. However, the views from John Smith Road and surrounding residences are partially obstructed by the surrounding rolling hills. No unique scenic resources or notable vistas are present within or within the viewshed of the project area (San Benito County 2012).

DISCUSSION

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

A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Although many scenic vistas are located throughout the mountain ranges in San Benito County, no designated scenic vistas are located in the project vicinity. Therefore, the project would have **no impact** on scenic vistas.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is not located within a state scenic highway and is not visible from a state scenic highway. Although State Route 25 in the project vicinity is an eligible State Scenic Highway, it is not officially designated as such (Caltrans 2020). Therefore, the proposed project would have **no impact** on the scenic resources of a state scenic highway.

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

The proposed project would alter the site's existing visual character by constructing a soil stockpile that would be visible from John Smith Road, which provides public views of the site. To represent the anticipated visual changes, three visual simulations were prepared by Lawrence & Associates. These simulations represent views from three viewpoints located along John Smith Road southeast of the project site, as identified in Exhibit 3. Visual simulations were not prepared for locations along John Smith Road to the west because the existing landfill mound would obscure the soil stockpile from these locations. Visualization Photo 1 was taken looking west along John Smith Road toward the proposed soil stockpile (Exhibit 4). As represented in this simulation, the top of the stockpile would be approximately 50 feet below the top of the existing landfill mound. The top elevation of the soil stockpile would be 832 feet. Visualization Photo 2 was taken looking northwest from John Smith Road toward the proposed soil stockpile and across the proposed detention basin (Exhibit 5). Visualization Photo 3 was taken looking north from just north of John Smith Road toward the eastern end of the proposed soil stockpile (Exhibit 6). The proposed detention basin is visible in the left foreground.

Although these visual simulations represent a substantial increase in land surface elevations, as viewed from John Smith Road, these visual changes would be consistent with the continual changes in surface elevations that occur at the adjacent landfill. Also, although these changes would be clearly visible for westbound travelers on John Smith Road as they approach the landfill from the east, the number of vehicles that use this roadway segment is quite limited. The soil stockpile would not be visible along John Smith road west of the landfill. It may be visible from Fairview Road north of its intersection with John Smith Road. However, from this viewpoint, which is more than a mile to the west, it would be indistinguishable from the views of the ongoing landfill operations. Additionally, the soil stockpile is not intended to be permanent, as it will be used for daily and intermediate cover for a period of approximately 15 years, which would result in its visual appearance continually being reduced. Portions of the stockpile would likely be visible to residences located east of the project site both north and south of John Smith Road. However, the intervening rolling hills would be expected to obstruct portions of the stockpile from these residences. Because the construction of a soil stockpile would not be inconsistent with the regular surface elevation changes at the adjacent landfill, would generally only be visible to a small number of travelers on John Smith Road, would be obscured by the existing landfill mound from viewpoints to the west, and would not be a permanent fixture, it would not be expected to substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, this impact would be **less than significant**.

The project would not include any new sources of light or glare. Construction would occur during daylight hours and there would be no need for nighttime lighting associated with the new soil stockpile. Therefore, **no impact** on light or glare would occur with project implementation.



Source: Lawrence & Associates 2020



Exhibit 4 Visualization – Photo 1

Source: Lawrence & Associates 2020

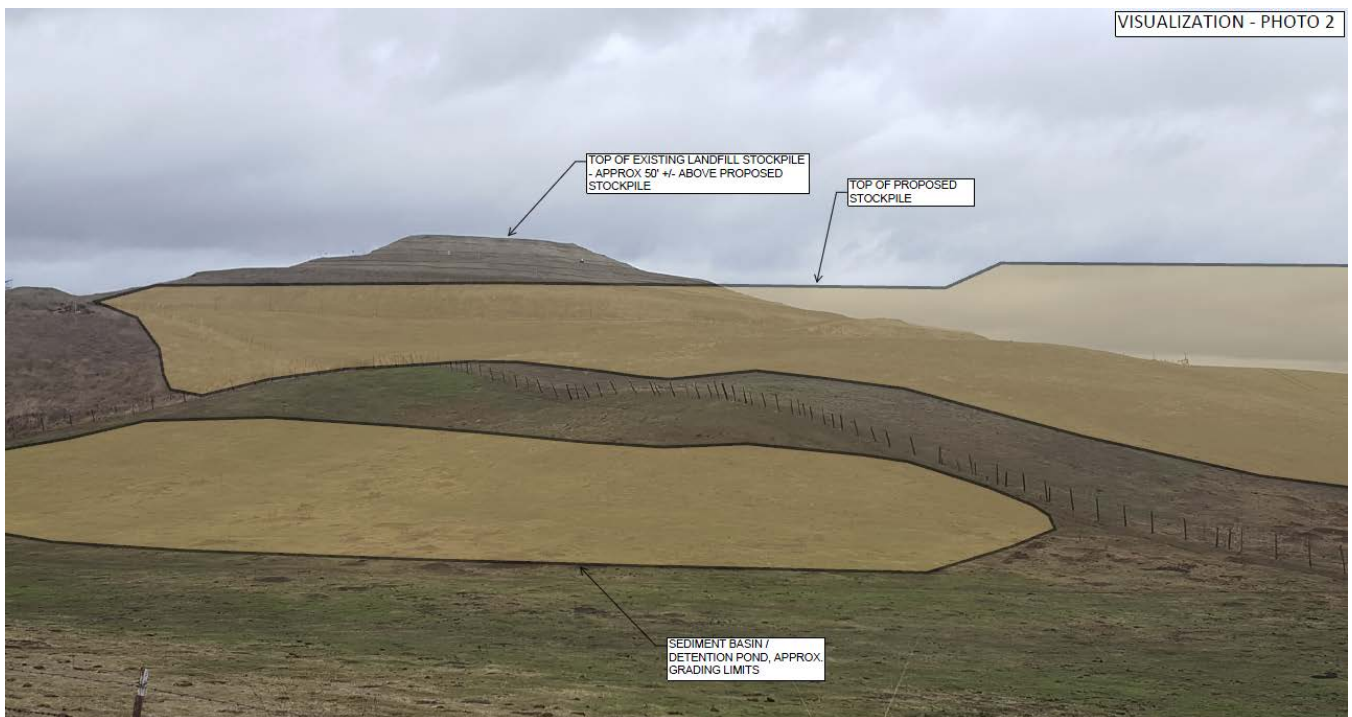


Exhibit 5 Visualization – Photo 2

Source: Lawrence & Associates 2020

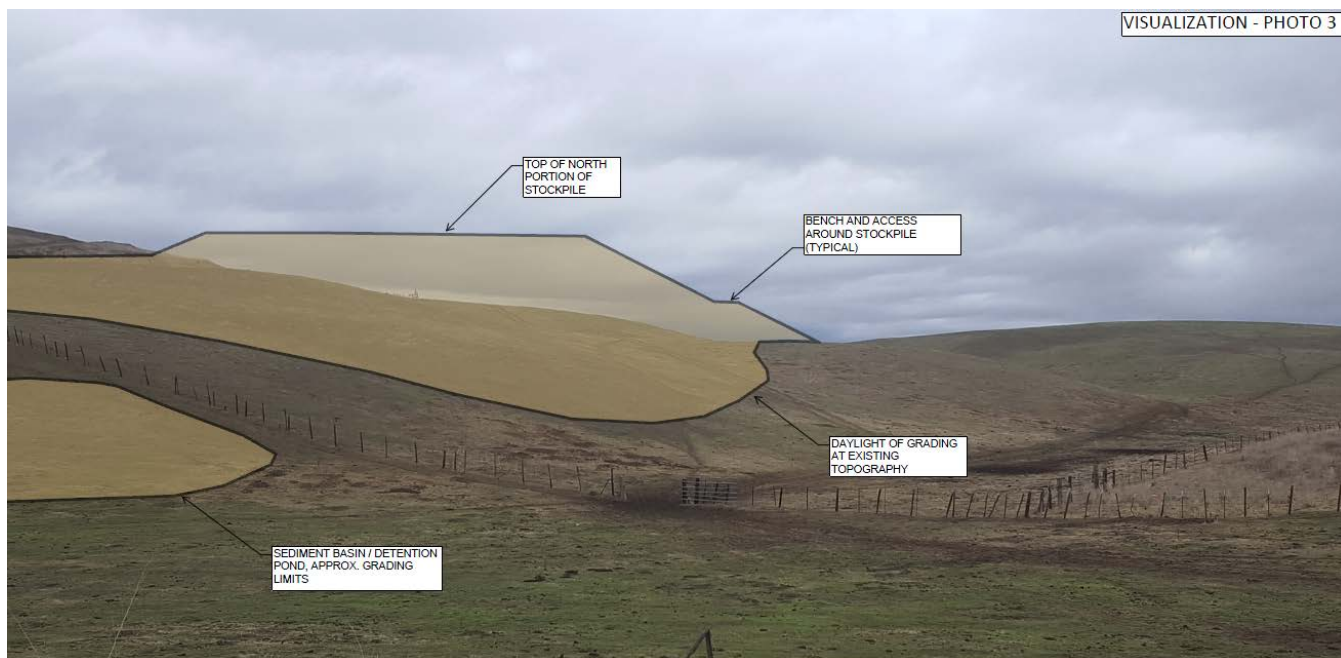


Exhibit 6 Visualization – Photo 3

Source: Lawrence & Associates 2020

3.2 AGRICULTURAL AND FOREST RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. 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, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

The project site includes non-native grasslands that support cattle grazing. The San Benito County General Plan land use designation for the soil stockpile site is Rangeland (RG) and its zoning designation is Agricultural Rangeland (AR). The site does not contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, timber land, or timberland zoned Timberland Production.

DISCUSSION

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site does not include land designated by the California Farmland Mapping and Monitoring Program (FMMP) as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The FMMP designates the site as Grazing Land, which is land on which the existing vegetation is suited to the grazing of livestock (California Department of Conservation 2020). Therefore, project implementation would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. There would be **no impact** on Farmland.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

The project site is zoned as Agricultural Rangeland (AR) in the San Benito County Zoning Code. Per Section 25.29.109 through 25.29.111 of the Zoning Code, the Planning Director may issue administrative permits for certain types of projects that are minor to expedite workflow. Because the proposed project would be subject to an administrative permit, it would not conflict with the site's AR zoning designation. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract and there would be **no impact**.

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))?

The project site does not include forest land or any land zoned for forest land. Therefore, there would be **no impact**.

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

The proposed soil stockpile would be located entirely within grazing lands and does not include any forest land. Therefore, implementation of the proposed project would not result in the loss of forest land or the conversion of forest land to a non-forest use. There would be **no impact**.

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?

The proposed project includes the storage of soil on grazing lands and the removal of that soil over approximately 15 years, at which time it could be used again as grazing lands. The proposed project does not include any components that would cause the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, there would be **no impact**.

3.3 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

Air Basin

The proposed project is located in San Benito County, which is in the North Central Coast Air Basin (NCCAB). In addition to San Benito County, the NCCAB includes Monterey and Santa Cruz Counties. The basin lies along the central coast of California and covers an area of 5,159 square miles. The northwest sector of the basin is dominated by the Santa Cruz Mountains. The Diablo Range marks the northeastern boundary and together with the southern extent of the Santa Cruz Mountains forms the Santa Clara Valley, which extends into the northeastern tip of the Basin. Further south, the Santa Clara Valley evolves into the San Benito Valley, which runs northwest-southeast and has the Gabilan Range as its western boundary. To the west of the Gabilan Range is the Salinas Valley, which extends from Salinas at its northwestern end to King City at its southeastern end. The western side of the Salinas Valley is formed by the Sierra de Salinas, which also forms the eastern side of the smaller Carmel Valley. The coastal Santa Lucia Range defines the western side of the Carmel Valley (San Benito County 2012).

The City of Hollister, which is located at the northern end of the San Benito Valley, experiences west winds nearly one-third of the time. The prevailing air flow during the summer months originates in the Monterey Bay area and enters the northern end of the San Benito Valley through the air gap through the Gabilan Range occupied by the Pajaro River. In addition, a northwesterly air flow frequently transports pollutants into the San Benito Valley from the Santa Clara Valley (San Benito County 2012).

The ambient concentrations of air pollutant emissions are determined by the amount of emissions released by pollutant sources and the atmosphere's ability to transport and dilute such emissions. Natural factors which affect transport and dilution include terrain, wind, atmospheric stability, and the presence of sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources, as discussed separately below.

Criteria Pollutants

Concentrations of the following air pollutants are used as indicators of ambient air quality conditions: ozone; carbon monoxide; nitrogen dioxide; sulfur dioxide; respirable and fine particulate matter, PM₁₀ (respirable particulate matter with an aerodynamic diameter of 10 micrometers or less) and PM_{2.5} (fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less); and lead. These pollutants are commonly referred to as "criteria air pollutants" because they are the most prevalent pollutants known to be deleterious to human health; extensive documentation is available on health effects criteria for these pollutants.

Attainment Status of the Air Basin

Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) designate areas of the state as attainment, nonattainment, maintenance, or unclassified for the various pollutant standards. An "attainment" designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A "nonattainment" designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as identified in the criteria. A "maintenance" designation is assigned to areas where monitored pollutant concentrations exceeded an air quality standard in the past but which are no longer in violation of that standard. An "unclassified" designation signifies that data do not support either an attainment or nonattainment status. In addition, each agency has several levels of classification used to further describe the severity of nonattainment conditions. For instance, the CARB classifies nonattainment areas into moderate, serious, or severe air pollution categories, with increasingly strict control requirements mandated for each.

The 2016 State Strategy for the State Implementation Plan (State SIP Strategy) describes CARB staff's strategy to attain health-based federal air-quality standards over the next 15 years as part of the SIPs due in 2016 (CARB 2018a). The 2016 SIPs consist of a combination of State and local air-quality planning documents that must show how California will meet federal air quality standards for both ozone and fine particulate matter (PM_{2.5}). Measures contained in the SIP include, but are not limited to, deploying cleaner technologies, lowering NO_x engine standards, incentive funding to achieve further emissions reductions from on-road heavy duty vehicles, and low-emission diesel requirements for off-road equipment.

Locally, the Monterey Bay Air Resources District (MBARD) is required to meet air quality standards set by CARB. The MBARD is responsible for developing regulations governing emissions of air pollution, permitting and inspecting stationary sources of air pollution, monitoring of ambient air quality, and air quality planning activities, including implementation of transportation control measures. The MBARD does not regulate the emissions of dust and other construction emissions, except to require that each project's relevant CEQA document quantify the emissions of particulate matter and provide mitigation, if the relevant threshold of significance is exceeded.

Ambient air quality in the project area and vicinity is monitored and regulated by the MBARD. Table 1 summarizes the attainment status of the MBARD.

Odors

Objectionable or offensive odors rarely cause physical harm; however, because they are unpleasant they may lead to distress among the public and can generate citizen complaints to local governments. Odor impacts vary in frequency and severity, depending on the nature of the source, the wind direction, and the location of sensitive receptors. The primary source of odors within the project area is the landfill waste receiving and disposal operations.

Table 1 Federal and State Attainment Status

Pollutant	National Attainment Status ¹	California Attainment Status ¹
Carbon monoxide	Attainment	Attainment
Lead	Attainment	Attainment
Nitrogen Dioxide	Attainment	Attainment
Particulate matter (PM ₁₀) ⁴	Attainment	Unclassified
Fine particulate matter (PM _{2.5})	Attainment	Attainment
Ozone (8-hour average)	Attainment	Nonattainment - Transitional
Sulfur dioxide	Attainment	Attainment
Hydrogen sulfide	No national standards	Unclassified
Sulfates	No national standards	Attainment
Vinyl Chloride	No national standards	No data available
Visibility-reducing particles	No national standards	Unclassified
1 Source: California Air Resources Board 2020, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations .		

Sensitive Receptors

Sensitive receptors are areas where human populations (especially children, seniors, and sick persons) are located and where there is reasonable expectation of continuous human exposure to air pollutants of concern. Typical sensitive receptors are residential subdivisions, schools, or hospitals. There are no sensitive receptors within the project area. The nearest sensitive receptors include four residences located within one mile of the project site with the nearest located approximately 0.7 mile to the southeast.

Toxic Air Contaminants

Air quality regulations also focus on toxic air contaminants (TACs) or in federal parlance, hazardous air pollutants (HAPs). The EPA and ARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the maximum or best available control technology for toxics (MACT and BACT)

to limit emissions. These, in conjunction with additional rules set forth by the MBARD, establish the regulatory framework for TACs. To date, CARB has identified over 21 TACs and has adopted the EPA's list of HAPs as TACs. Most recently, diesel PM was added to the CARB list of TACs.

DISCUSSION

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

The MBARD attains and maintains air quality conditions in San Benito County through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The most recently adopted Air Quality Management Plan for the District is the 2012-2015 AQMP. The 2012-2015 AQMP documents the MBARD's progress toward attaining the State 8-hour ozone standard. Any project that could conflict with the MBARD's goal of attaining the State 8-hour ozone standard would be considered to conflict with the intent of the 2012-2015 AQMP. The proposed project would not contribute to population growth not accounted for in the 2012-2015 AQMP. Therefore, to determine whether construction would conflict with the intent of the 2012-2015 AQMP, construction emissions were compared to the MBARD thresholds for the ozone precursors NO_x and ROG.

As represented in the impact discussion in response to question "b" below, the project-related short-term construction emissions would not exceed the MBARD significance thresholds identified for the criteria air pollutants (Table 2). Therefore, the proposed project would not conflict with or obstruct implementation of any applicable air quality plan. There would be **no impact**.

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?

Construction emissions are described as "short term" or temporary in duration and have the potential to represent a significant impact with respect to air quality, especially fugitive PM₁₀ and PM_{2.5} dust emissions. Fugitive dust emissions are primarily associated construction vehicle travel on unpaved roads and vary as a function of such parameters as soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on-site and off-site. ROG and NO_x emissions are primarily associated with gas and diesel equipment exhaust and the application of architectural coatings. Construction activities associated with soil stockpile activities would result in the temporary generation of ROG, NO_x, and PM₁₀ emissions from soil haul trucks traveling between the excavation site and the soil stockpile. Because the landfill is currently permitted to excavate modules and construction soil stockpiles, the analysis included in this section focused on the additional distance haul trucks would travel with the placement of a soil stockpile outside of the landfill boundary. The estimated daily volume of ROG, NO_x, PM₁₀, PM_{2.5} and CO emissions from the haul truck activities has been identified in Table 2. The project would be expected to generate negligible emissions following stockpile construction associated with haul truck trips necessary to transport daily and intermediate landfill cover from the soil stockpile to the landfill.

As represented in Table 2, the MBARD construction emission significance thresholds are not anticipated to be exceeded. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated as non-attainment under an applicable federal or state ambient air quality standard. This impact would be **less than significant**.

Table 2 Estimated Maximum Daily Short-term Construction-Generated Emissions

Source	ROG (lb/day)	NO _x (lb/day)	PM ₁₀ (lb/day)	PM _{2.5} (lb/day)	CO (lb/day)
Total Unmitigated Construction Emissions ¹	4.1	39.5	14.1	3.1	23.81
MBARD Significance Threshold	137	137	82	52	550
Exceed Threshold?	No	No	No	No	No
¹ Emissions estimates based on CalEEMod computer modeling (Version 2016.3.2). Source: Data calculated by Douglas Environmental 2020.					

c) Expose sensitive receptors to substantial pollutant concentrations?

Construction activities within the project site would result in short-term emissions of diesel exhaust from on-site heavy-duty construction equipment. Particulate exhaust emitted from diesel-fueled engines (diesel PM) was identified as a TAC by the California Air Resources Board in 1998. The dose to which receptors are exposed (a function of construction and duration of exposure) is a primary factor used to determine health risk (i.e. potential exposure to TAC emission levels that exceed applicable standards). Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period of time.

According to the state Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. In addition, since diesel PM is known to be highly dispersive, emissions would diffuse rapidly from the source, thus resulting in lower concentrations to which receptors could be exposed. Also, the nearest residence is located approximately 0.7 mile from the site. Thus, because the use of mobilized equipment would be temporary (approximately 0.35% of the exposure period), the diesel PM would quickly disperse, and no sensitive receptors are located in close proximity to the construction activities, the proposed project activities would not result in exposure of sensitive receptors to substantial pollutant concentrations. Therefore, this impact would be **less than significant**.

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

Implementation of the proposed project would include the transport of soil to a stockpile area directly adjacent to the landfill and the use of that soil for daily and intermediate landfill cover. These activities would not be expected to generate odors that would affect a substantial number of people. Therefore, there would be **no impact**.

3.4 BIOLOGICAL RESOURCES

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

AFFECTED ENVIRONMENT

Sensitive biological resources include species and habitats that are protected by federal, state, or local resource conservation agencies and organizations. Within California, special-status plant and wildlife species are generally defined as those species that are legally protected or otherwise considered sensitive by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and California Native Plant Society (CNPS). This includes species covered under the federal and California Endangered Species Acts, those designated as species of concern by USFWS, and/or CDFW, and those identified in the CNPS Inventory of Rare and Endangered Vascular Plants in California.

Sensitive habitats include sensitive natural communities designated by CDFW and listed in the California Natural Diversity Database, as well as wetlands and other waters of the United States subject to the jurisdiction of the United States Army Corps of Engineers (USACE) and lakes, rivers, and streams subject to jurisdiction of CDFW.

The project site consists solely of annual grassland habitat. Therefore, it does not include any sensitive biological resources or sensitive habitats.

Vegetation

Typical vegetation associated with the annual grassland community on the site includes non-native species such as soft chess brome (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), wild oat (*Avena fatua*), Italian ryegrass (*Lolium multiflorum*), farmer's foxtail (*Hardeum murinum ssp. Leporinum*), rose clover (*Trifolium hirtum*), vetch (*Vica spp.*), mustard (*Brassica spp.*), cut-leaf geranium (*Geranim dissectum*), and red-stemmed filaree (*Erodium cicutarium*). In addition to the non-native grasses and herbs, several native species occur within the annual grassland including purple owls-clover (*Castilleja exserta ssp. Exerta*), miniature lupine (*Lupinus bicolor*), California man-root (*Marah fabaceus*), and rancher's fireweed (*Amsinckia menziesii*) (ESP 2011).

Wildlife

Annual grassland habitat typically provides forage and cover for small mammals. Species typically found on annual grasslands include California vole (*Microtus californicus*), deer mice (*Peromyscus maniculatus*), ground squirrels (*Spermophilus beecheyi*), and pocket gophers (*Thomomys bottae*). These species, in turn, provide the prey base that attracts predators such as red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*), gopher snake (*Pituophis melanoleucus*), western rattlesnake (*Crotalis veridis*), and coyote (*Canis latrans*). Typical birds species include western meadowlark (*sturnella neglecta*), brewer's blackbird (*Euphagus cyanocephalus*), western kingbird (*Tyrannus verticalis*), mourning dove (*Zenaida macroura*), and black phoebe (*Sayornis nigricans*). Other animals common to this habitat include western fence lizard (*Sceloporus occidentalis*), alligator lizard (*Elgaria sp*), house finch (*Carpodacus mexicanus*), wintering raptors, and a variety of sparrows (ESP 2011).

Special Status Species

For purposes of this assessment, special status means any species that is:

- Listed as endangered or threatened under the federal Endangered Species Act (or formally proposed, or candidates, for listing);
- Listed endangered or threatened under the California Endangered Species Act (or candidates for listing);
- Designated as endangered or rare, pursuant to California Fish and Game Code (Section 1901);
- Designated as fully protected, pursuant to California Fish and Game Code (Sections 3511, 4700, or 5050);
- Designated as species of special concern by CDFW;
- Plants or animals that meet the definitions of rare or endangered under CEQA;
- Plants listed as rare under the California Native Plant Protection Act; or

- Plants considered by the California Native Plant Society to be rare, threatened, or endangered in California (Lists 1A, 1B, and 2).

Based on a review of prior environmental documents prepared for the John Smith Road Landfill, a number of special-status species have been reported in the general area of the project site; however, only one species has been recorded within one mile of the project site. This occurrence, for the San Joaquin kit fox (*Vulpes macrotis mutica*), was recorded prior to 1975. The site provides potential habitat for other special-status species known to occur in the project vicinity including: round-leaved filaree (*Erodium macrophyllum*), Pinnacles buckwheat (*Eriogonum nortonii*), San Joaquin spearscale (*Atriplex joaquiniana*), alkali milk vetch (*Astragalus t. var. tener*), Douglas' fiddleneck (*Amsinckia douglasiana*), Hoover's button-celery (*Eryngium aristulatum var. hooveri*), California tiger salamander (*Ambystoma tigrinum*), California red-legged frog (*Rana draytonii*), western spadefoot toad (*Spea hammondi*), northern Pacific pond turtle (*Actinemys marmorata marmorata*), San Joaquin whipsnake (*Masticophis flagellum fuddocki*), California condor (*Gymnogyps californianus*), Golden eagle (*Aquila chrysaetos*), loggerhead shrike (*Lanius ludovicianus*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), western burrowing owl (*Athene cunicularia hypugaea*), tricolored blackbird, and American badger (*Taxidea taxus*) (ESP 2011).

DISCUSSION

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?**

Plant surveys were conducted for the proposed Resource Recovery Park Project that was proposed in 2011 that concluded no special-status plants were present in the project vicinity with the nearest recorded observance being five miles away from the landfill (ESP 2011). Also, due to the extensive grazing that occurs on the site, it would be highly unlikely that any special-status plant species would be located on the project site.

For special-status wildlife species, the list of possible species that could be present on the site was narrowed down to four based on species requirements. For the raptor species, the project site does not provide nesting habitat. The site could provide foraging habitat but these species were not observed during prior species surveys including a survey conducted in 2020 (GEI 2020). For several of these species, the lack of water features on or adjacent to the site precludes their use. The four remaining species include American badger, San Joaquin kit fox, San Joaquin whipsnake, and western burrowing owl. A site survey was conducted for these species in 2020 (GEI 2020). Neither evidence nor sign of these special-status species were observed within the survey area; however, several burrows of varying sizes were identified. California ground squirrel, which are common to the area, were observed entering and existing burrows typical of medium-sized mammals, but these burrows were too small (approximately 4 inches in diameter) to be suitable for kit fox or badger use. A red fox (*Vulpes vulpes*), known to outcompete kit foxes for resources, was observed foraging in the area. Additionally, a coyote, a primary predator of kit fox, was observed foraging in the area. Negative survey results and supporting observations indicate that special-status species are not present on or adjacent to the project site. Therefore, project implementation would not adversely affect any species either directly or through habitat modifications and this impact would be **less than significant**.

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

The proposed project would not have an adverse effect on riparian habitat or any other sensitive natural communities, as identified by CDFW or USFWS. The project site is comprised of annual grassland. No riparian habitat or sensitive natural communities are present within the project area. Therefore, there would be **no impact**.

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

As discussed in response to question b) above, the project site is comprised of annual grassland and does not contain any federally protected wetlands. Therefore, the project would not result in the direct removal, filling, or hydrological interruption of federally protected wetlands and there would be **no impact**.

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?

Because the project site does not contain any water features, project implementation would have no effect on fish migration. Deer are known to occur in the area but the proposed project would be located directly adjacent to an active landfill. Therefore, the construction of the soil stockpile would not be expected to have any effect on deer migration. Also, no wildlife nursery sites are located in the project area. Therefore, there would be **no impact**.

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

The San Benito County General Plan Open Space and Conservation Element contains a number of policies that when implemented, would protect biological resources. However, the proposed project would not conflict with these policies. Therefore, there would be **no impact**.

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?

The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plan and there would be **no impact**.

3.5 CULTURAL RESOURCES

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

AFFECTED ENVIRONMENT

Historic and Unique Archaeological Resources

Under CEQA, historical resources and “unique archaeological resources” are recognized as a part of the environment (Public Resources Code Sections 21001(b), 21083.2, 21084(e), 21084.1). In 1992, the Public Resources Code was amended as it affects historical resources. The amendments included creation of the California Register of Historical Resources (Public Resources Code Sections 5020.4, 5024.1 and 5024.6).

The California Register is an authoritative listing and guide for state and local agencies and private groups and citizens in identifying historical resources. This listing and guide indicates which resources should be protected from substantial adverse change.

Under CEQA Guidelines Section 15064.5, an “historical resource” includes: (1) a resource 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 listed in a local register of historical resources or identified in a historical resource survey meeting the requirements in Section 5024.1(g) of the Public Resources Code; and (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines is historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the determination is supported by substantial evidence in light of the whole record; or a resource determined by a lead agency to be “historical,” as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

CEQA is also concerned with effects of a project on “unique archaeological resources.” If an archaeological site meets the definition of a unique archaeological resource (Public Resources Code Section 21083.2), then the site must be treated in accordance with the special provisions for such resources, which include time and cost limitations for implementing mitigation. “Unique archaeological resource” is defined as “an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person. [Public Resources Code Section 21083.2 (g)]”

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment are described in the code. To the extent that unique archaeological resources are not preserved in place or left in an undisturbed state, mitigation measures shall be required as provided in the code. The code also places limitations on the extent, cost and timing of mitigation measures that can be required by the lead agency.

Records Search

On January 12, 2012, Pacific Legacy conducted a records search through the North West Information Center for the landfill expansion property directly adjacent and west of the project site. This records search was conducted as part of the CEQA compliance for the landfill expansion project that was approved by the County in 2012. The North West Information Center maintains the official records of the California Historical Resources Information System of previous cultural resource studies and recorded cultural resources for San Benito County, among other counties. The record search included the landfill expansion area and a ½ mile around the expansion area, which encompassed the soil stockpile area. In addition, Pacific Legacy reviewed records and maps of previously recorded prehistoric and historic site as well as maps of previously recorded cultural resources surveys in the region. No previously recorded archaeological resources were recorded within the area of potential effect, which included the soil stockpile site (San Benito County 2012).

A letter was sent to the Native American heritage Commission on January 12, 2012 requesting to search their Sacred Lands Inventory File and to provide a list of Native American representatives for the project area. The Commission responded on January 24, 2012 that no sacred lands were present within the project area and provided a list of interested Native American tribes near the project area. A letter was sent to all tribes on the Commission list on January 26, 2012. Follow up phone calls were conducted on February 2, 2012. No written responses were received within 30 days of transmittal of the letters to the tribes (San Benito County 2012).

Pacific Legacy archaeologists conducted a pedestrian survey for cultural resources on January 25, 2012. The surface of the area of potential effect was inspected by walking 15 meter transects. The survey was designed to identify both historic and prehistoric cultural resources present within the survey area. No historic era or ancestral Native American cultural resources were identified as a result of the cultural resources survey (San Benito County 2012).

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

The project site consists of sloping grazing land that lacks evidence of historic resources based on the records search and pedestrian survey conducted on the site in 2012. In addition, only limited disturbance of the site would occur prior to the formation of the soil stockpile and the stockpile would eventually be removed as the soil is used for daily and intermediate landfill cover. Therefore, significant subsurface disturbance would not be anticipated. For these reasons, project construction would not be expected to have any effect on historical resources and there would be **no impact**.

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

Based on the lack of evidence in the records search and pedestrian survey of archaeological resources on the site and the lack of any unique characteristics that would indicate it was historically occupied, the project site is not anticipated to contain any archaeological resources. In addition, only limited disturbance of the site would occur prior to the formation of the soil stockpile and the stockpile would eventually be removed as the soil is used for daily and intermediate landfill cover. Therefore, significant subsurface disturbance would not be anticipated. For these reasons, the proposed project would not be expected to cause a substantial adverse change in the significance of an archaeological resource. There would be **no impact**.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Based on the lack of evidence in the records search and pedestrian survey of cultural resources on the site and the lack of any unique characteristics that would indicate it was historically used for the burial of humans, the project site is not anticipated to contain human remains. In addition, only limited disturbance of the site would occur prior to the formation of the soil stockpile and the stockpile would eventually be removed as the soil is used for daily and intermediate landfill cover. Therefore, significant subsurface disturbance would not be anticipated. For these reasons, the disturbance of human remains during project construction would not be expected. There would be **no impact**.

3.6 ENERGY

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

AFFECTED ENVIRONMENT

The project site is used as grazing land. Therefore, no energy sources are currently used at the site.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The proposed soil stockpiling would be conducted using construction techniques that are consistent with industry standards and that would not be considered wasteful, inefficient, or requiring the unnecessary consumption of energy resources. During construction, the use of petroleum products would be necessary to fuel and maintain construction equipment. The operational use of the soil stockpile for daily and intermediate cover would also require the use of petroleum products for heavy equipment vehicles. However, this energy use would support the long-term solid waste management operations at the landfill. Therefore, it would not be considered a wasteful, inefficient, or unnecessary consumption of energy. There would be **no impact**.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project includes stockpiling soil excavated from a new landfill module and using that soil as the source for the module's daily and intermediate cover while it receives waste. The creation of a soil stockpile and the use of that soil for daily and intermediate cover is consistent with the current waste management operations at the landfill. The implementation of these activities would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency. Therefore, there would be **no impact**.

3.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in the California Building Code (2019, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

Geology

The project site is located within the Coast Ranges geomorphic province of California. The Coast Ranges stretch approximately 600 miles from the Oregon border to the Santa Ynez River and fall into two sub-provinces: the ranges north of the San Francisco Bay and those from the Bay south to Santa Barbara County. The northern ranges lie east of the San Andreas Fault Zone, whereas most of the southern ranges are to the west. The dominant characteristic of the Coast Ranges is its division into elongate topographic and lithographic strips underlain by discrete basement rocks that are separated by profound structural discontinuities. The pattern continues east and probably also west onto the sea floor (San Benito County 2012).

Site Geology

The project site lies within the San Benito Valley and is bounded by the Gabilan Range on the southwest and the Diablo Range northeast. Quaternary age (Pleistocene/Holocene) non-marine terrace deposits underlie the project site. Three major geologic units have been mapped at the site including the Cretaceous age Panoche Formation, Pleistocene age older terrace deposits, and Quaternary age surficial deposits. The Panoche Formation is composed of interbedded marine sandstones, siltstones, claystones, and shales with bedding thicknesses ranging from less than one inch to several feet (San Benito County 2012).

Seismicity

The project site is in an area of high seismicity and earthquakes strong enough to cause damage to occur frequently in the Hollister area. Of the faults known to exist in the project vicinity, the San Andreas, Quien Sabe, Calaveras and small segments of the Tres Pinos faults are classified by the California Geologic Survey as active or potentially active locally. The San Andreas Fault passes through the Gabilan Mountains about six miles to the southwest of the project site. The Calaveras fault is located approximately three miles west of the project site. The Quien Sabe fault crosses the edge of the Hollister Valley at the base of the Diablo Range about 1.5 miles to the northeast. The Tres Pinos fault crosses the southern edge of the Hollister Valley, with several splays extending out into the valley. This fault is the closest to the site, being located approximately 1.2 miles to the south-southwest (San Benito County 2012).

Site Soils

The site soils consist of San Benito clay loam, 15 to 30 percent slopes and San Benito clay loam, 30 to 50 percent slopes. The soils are well drained, have medium to very rapid runoff and have moderately slow permeability (San Benito County 2012).

Liquefaction

Liquefaction is a phenomenon where loose, saturated, non-cohesive soils such as silts, sands, and gravels undergo a sudden loss of strength during earthquake shaking. Under certain circumstances, seismic ground shaking can temporarily transform an otherwise solid, granular material to a fluid state. Liquefaction is a serious hazard because buildings in areas that experience liquefaction may suddenly subside and suffer major structural damage. Liquefaction is most often triggered by seismic shaking, but it can also be caused by improper grading, landslides, or other factors. In dry soils, seismic shaking may cause soil to consolidate rather than flow, a process known as densification.

Paleontological Resources

Fossil remains of prehistoric plant and animal life have the potential to be found in the rock formations present in San Benito County. No inventory or other information source exists that characterizes the extent, sensitivity, or significance of paleontological resources in San Benito County.

DISCUSSION

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)**

Surface rupture is an actual cracking or breaking of the ground along a fault during an earthquake. Structures built over an active fault can be torn apart if the ground ruptures. Surface rupture along faults is generally limited to a linear zone a few meters wide. The Alquist-Priolo Act was created to prohibit the location of structures designed for human occupancy across the traces of active faults, thereby reducing the loss of life and property from an earthquake. No Alquist Priolo zones have been established in the project area. Therefore, ground rupture due to faulting is considered unlikely within the soil stockpile area and there is **no impact**.

ii) **Strong seismic ground shaking?**

Ground shaking occurs as a result of energy released during faulting, which could potentially result in the damage or collapse of buildings and other structures, depending on the magnitude of the earthquake, the location of the epicenter, and the character and duration of the ground motion. The project site is in an area of high seismicity with a number of faults classified by the California Geologic Survey as active or potentially active locally. Therefore, the soil stockpile has the potential to be exposed to strong seismic ground shaking.

In evaluating the landfill expansion that was approved by San Benito County in 2012 for the adjacent John Smith Road Landfill, RMC Geoscience conducted a slope stability analysis of the landfill slopes at closure (RMC Geoscience 2011). Although evaluating slope stability for a landfill differs a bit from evaluating it for a soil stockpile because of material differences and the inclusion of cover systems within the landfill mound, the evaluation is informative for soil stockpiles.

RMC Geoscience first characterized the Maximum Probable Earthquake (MPE). An MPE, as defined by the California Division of Mines and Geology, is an earthquake that is likely to occur in 100 years but it is not to be smaller than the largest historical earthquake. RMC Geoscience characterized the MPE as an event with a 33 percent chance of occurrence in 100 years (RMC Geoscience 2011).

Title 27 California Code of Regulations (CCR) requires that landfills be designed with a factor of safety of 1.5 under the seismic acceleration from a MPE. A factor of safety is defined as forces that tend to resist a slope failure (e.g., friction at the base of the slope) divided by forces that tend to create a slope failure (e.g., the weight of the soil mound pushing down the slope). A slope that has a factor of safety of one is just barely stable. A slope with a factor of safety of less than one is unstable and likely to fail. A slope with a factor of safety greater than one is considered stable. The “dynamic” (under seismic acceleration) factor of safety of 1.5 contains a significant safety factor (RMC Geoscience 2011).

RMC Geoscience then performed the slope stability analysis including analyzing critical slopes for slope stability under both static (without seismic acceleration) and dynamic conditions. Critical slopes are those that are the steepest, longest and/or most likely to fail. If the critical slopes are stable, then other flatter or shorter slopes are

less likely to fail. Because of the relatively close proximity to nearby faults, RMC Geoscience also performed a displacement analysis. Based on these analyses, RMC Geoscience found that the displacement from a design earthquake was well within acceptable displacement limits. Based on this analysis and the assumption that the landfill slopes would be constructed in accordance with applicable seismic standards, the landfill slopes were predicted to remain stable during an MPE event (RMC Geoscience 2011).

For the soil stockpile, design slopes are not expected to be steeper than the steepest slopes evaluated by RMC Geoscience at the landfill. Also, the construction of the soil stockpile would be subject to similar seismic design standards. For example, because portions of the stockpile would be in place for approximately 15 years, it would be constructed similar to a permanent fill including the installation of benches, down drains, rock-lined ditches, and other appropriate erosion control. The grassland vegetation and topsoil within stockpile area would be cleared and grubbed down approximately six inches prior to placing any soil to ensure a stable surface and good bonding is provided for the soil stockpile. For areas with existing slopes steeper than 10 percent, the existing surface would be benched prior to placing any soil. The stockpile slopes would not be steeper than 2 feet horizontal to 1 foot vertical (2:1) with a 20-foot wide bench constructed no less frequently than every 50 vertical feet. In most locations, the stockpile would have a gentler 3:1 slope. The top deck of the stockpile would slope to the southwest at between 3 and 5 percent to ensure ponding does not occur on the top surface. Drainage features would be installed and the slopes would be seeded and mulched on the completed stockpile prior to the rainy season (September 30) to minimize slope erosion. This would include the placement of straw wattles, as necessary around the soil stockpile. A stormwater basin would be constructed to capture stormwater runoff, further reducing erosive forces (Lawrence & Associates 2020b). For these reasons, the soil stockpile is not expected to be adversely affected by strong ground shaking, including liquefaction, and this impact would be **less than significant**.

iii) Seismic-related ground failure, including liquefaction?

The primary factors in determining liquefaction potential are soil type, the level and duration of seismic ground motions, and the depth to groundwater. Sandy, loose, or unconsolidated soils are susceptible to liquefaction hazards. Liquefaction and other seismically-induced forms of ground movement have historically occurred throughout California during major earthquake events. These phenomena generally consist of lateral movement, flow, or vertical settlement of saturated, unconsolidated soil in response to strong ground motion. Due to the clay loam character of the site soils, the applicability of the displacement analysis performed by RMC Geoscience (2011) for the adjacent landfill, and the assumption that the soil stockpile design would be required to comply with applicable seismic design standards, the proposed project would not be expected to be adversely affected by liquefaction. Therefore, seismic-related ground failure is considered unlikely at the soil stockpile site and this impact would be **less than significant**.

iv) Landslides?

The proposed project includes the construction of a large soil stockpile on land with slopes greater than 10 percent. In these areas, benching would be implemented in a stair-step fashion. The horizontal surface of the benches would be a minimum of three feet wide and the vertical drop would not exceed four feet. In addition, the soil to be stockpiled would be placed and compacted in horizontal layers to ensure no unstable areas are created. With the implementation of these measures and the design of the soil stockpile consistent with applicable seismic

design standards, the proposed project would not be expected to contribute to landslides. Therefore, people and structures would not be exposed to adverse effects from landslides and this impact would be **less than significant**.

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

Construction of the proposed project would include the placement of soil within a stockpile. Exposed soil within a large stockpile has the potential to result in substantial soil erosion if appropriate erosion control measures are not put into place. However, because portions of the stockpile would be in place for approximately 15 years, it would be constructed similar to a permanent fill including the installation of benches, down drains, rock-lined ditches, and other appropriate erosion control. Drainage features would be installed and the slopes would be seeded and mulched on the completed stockpile prior to the rainy season (September 30) to minimize slope erosion. This would include the placement of straw wattles, as necessary around the soil stockpile. A stormwater basin would be constructed to capture stormwater runoff, further reducing erosive forces. In addition, the project includes a detailed erosion control plan that would be required to be implemented with project construction (Lawrence & Associates 2020b). For these reasons, the soil stockpile is not expected to result in substantial soil erosion or the loss of topsoil and this impact would be **less than significant**.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As described in responses to questions “a.ii” and “a.iv” above, the proposed project is proposed to be designed to minimize instability of the underlying soil and the soil stockpile. In areas with slopes greater than 10 percent, benching would be implemented in a stair-step fashion. The horizontal surface of the benches would be a minimum of three feet wide and the vertical drop would not exceed four feet. In addition, the soil to be stockpiled would be placed and compacted in horizontal layers to ensure no unstable areas are created. With the implementation of these measures and the design of the soil stockpile consistent with applicable seismic design standards, the proposed project would not be expected to create unstable conditions that would result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, this impact would be **less than significant**.

d) Be located on expansive soil, as defined in the California Building Code (2019, as updated), creating substantial direct or indirect risks to life or property?

Expansive soils, also known as shrink-swell soils, refer to the potential of soil to expand when wet and contract when dry. The San Benito series on the project site is identified as having moderate to high shrink-swell potential. Although these soils can exert pressure on building foundations that are not designed for such soil movements, resulting in building damage, the expansion and contraction of these soils would not be expected to adversely affect the soil stockpile, as it would have the ability to move with the expansion or contraction. If the slopes of the soil stockpile were steep, this movement could cause the soil slopes to slip, resulting in unwanted slumping. However, the stockpile slopes have been designed to minimize the potential for any slope failures. Therefore, the soils on the site would not be expected to create substantial risks to life or property and this would be a **less than significant impact**.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

The project would not include components that would require the use of septic tanks or alternative wastewater disposal systems, such as restroom facilities. Therefore, there would be **no impact**.

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

The proposed project only includes minor clearing and grubbing of the existing soil surface within the stockpile area and the soil would be removed from the stockpile when it is needed for daily and intermediate landfill cover. Any paleontological resources that are present within the underlying geologic formations would not be affected by project construction activities due to the limited surface disturbance. Therefore, the construction of the soil stockpile would not cause a substantial adverse change in the significance of any unique paleontological resources. There would be **no impact**.

3.8 GREENHOUSE GAS EMISSIONS

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

AFFECTED ENVIRONMENT

Greenhouse gases (GHG) are gases that trap heat in the atmosphere. These gases are emitted by both natural processes and human activities. The accumulation of GHG in the atmosphere regulates the earth's temperature. Without natural GHG, the Earth's surface would be approximately 61 degrees Fahrenheit cooler (IPCC 2007). However, scientific studies have determined that the combustion of fossil fuels (coal, petroleum, natural gas, etc.) for human activities, such as electricity production and vehicle use, has elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations. The increase in atmospheric concentrations of GHG has resulted in more heat being held within the atmosphere, which contributes to global climate change.

Global Warming Potentials (GWPs) are one type of simplified index (based upon radiative properties) that can be used to estimate the potential future impacts of emissions of various gases. GWP is based on a number of factors, including the heat-absorbing ability of each gas relative to that of carbon dioxide, as well as the decay rate of each gas relative to that of carbon dioxide. Common GHG components include water vapor, carbon dioxide, methane, nitrous dioxide, chlorofluorocarbons, hydro-fluorocarbons, perfluorocarbons, sulfur hexafluoride, and ozone.

The Monterey Bay Air Resources District (MBARD) recommends a threshold of 10,000 metric tons (MT) of carbon dioxide equivalent per year (CO₂e/year). GHG emissions from projects that exceed 10,000 MT CO₂e/year would be deemed to have a cumulatively considerable contribution to global climate change. For a land use project, this level of emissions is equivalent to a project size of approximately 646 single-family dwelling units, or a 323,955 square feet commercial building.

DISCUSSION

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

Project construction would include haul trucks traveling slightly longer distances when compared to current landfill operations to transport soil to the stockpile site. The GHG emissions associated with these haul truck trips would only be slightly higher than the emissions associated with placing the soil stockpile within the permitted landfill boundary. Using the CalEEMod (Version 2016.3.2) emissions model, the proposed project is estimated to

generate a total of approximately 220 metric tons of CO₂e during the three-month construction period. Similar levels of CO₂e emissions would be anticipated with the operational life of the soil stockpile, which would be depleted gradually as it is used for daily and intermediate landfill cover. These GHG emission levels would be substantially below the thresholds typically used by the MBARD of 10,000 MT/year of CO₂e. Therefore, the construction and operation of the project would not generate substantial greenhouse gas emissions, either directly or indirectly, that may be considered to have a significant impact on the environment. This impact would be **less than significant**.

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

The establishment of GHG emission thresholds is intended to identify the emission levels for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move towards climate stabilization. If a project would generate GHG emissions above the thresholds, it would be considered to contribute substantially to a cumulative impact, and would be considered significant. Thus, if a project generates negligible levels of GHG emissions, it stands to reason that the project would not substantially conflict with existing California legislation adopted to reduce statewide GHG emissions. Thus, the construction and operation of the project would not generate substantial greenhouse gas emissions, either directly or indirectly, that would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, there would be **no impact**.

3.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hazards and Hazardous Materials. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excess 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?	☐	☐	☒	☐

AFFECTED ENVIRONMENT

A material is considered hazardous if it appears on a list of hazardous materials prepared by a Federal, State, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined in Title 22 California Code of Regulations as follows:

“A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored transported or disposed of or otherwise managed.” (CCR, Title 22, Section 66261.10)

Chemical and physical properties cause a substance to be considered hazardous. Such properties include toxicity, ignitability, corrosivity, and reactivity. The release of hazardous materials into the environment could potentially contaminate soils, surface water, and groundwater supplies (San Benito County 2012).

The San Benito County Environmental Health Division has been designated as the Certified Unified Program Agency (CUPA) responsible for the County's hazardous materials programs and acts as the single point of contact for issuance of permits. Site inspections of all hazardous materials programs (e.g., aboveground tanks and underground tanks, hazardous waste treatment, hazardous waste generators, hazardous materials management plans, etc.) are consolidated and accomplished by a single inspection (San Benito County 2012).

The program provides emergency response to chemical events to furnish substance identification; health and environment risk assessment; air, soil, water and waste sample collection; incident mitigation and cleanup feasibility options and on-scene coordination for state superfund incidents. The program also provides for the oversight, investigation and remediation of unauthorized releases from underground tanks (San Benito County 2012).

DISCUSSION

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

The use, handling, and storage of hazardous materials is regulated by both the Federal Occupational Safety and Health Administration (Fed/OSHA) and the California Occupational Safety and Health Administration (Cal/OSHA). Cal/OSHA is responsible for developing and enforcing workplace safety regulations. Both federal and State laws include special provisions/training in safe methods for handling any type of hazardous substance. These strict regulations ensure that potential hazards associated with construction and operational activities do not create a significant hazard to the public.

During project construction, potentially hazardous liquid materials such as oil, diesel fuel, gasoline, and hydraulic fluid would be used in construction equipment. These substances are commonly used during construction projects and the risk of a spill that would create a significant hazard to the public or environment would be negligible due to the small quantities of hazardous substances used and the short duration of construction. With the compliance with existing regulations and the relatively short construction period, the proposed project would not be anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and this impact would be considered **less than significant**.

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

Similar to the analysis of question a) above, any handling, transporting, use, or disposal of hazardous or potentially hazardous materials would be required to comply with all applicable federal, state, and local agencies and regulations. Both short-term construction and long-term operation of the project would be required to adhere to the policies and programs set forth by applicable regulatory agencies. This compliance, along with the limited use of hazardous materials during construction, would minimize the potential for the accidental release of hazardous materials into the environment. Therefore, this impact would be considered **less than significant**.

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

No existing or proposed schools are located within 0.25 mile of the project site. The nearest schools to the project site include Calvary Christian School, approximately 2.6 miles to the west and Meadowlark Preschool, approximately 2.4 miles to the west. Therefore, **no impact** would occur related to emissions or handling of hazardous materials within one-quarter mile of an existing or proposed school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

According to the California Department of Toxic Substances Control Envirostor database, the John Smith Road Landfill is identified for correction action under Identification No. 80001507. A Class III correction action monitoring program is in place that is designed to evaluate the effectiveness of the onsite groundwater extraction system in controlling the migration of volatile organic compounds (VOCs) from the site (San Benito County 2012).

VOCs were detected in eight of the twelve samples taken from the on-site Class III area corrective action monitoring wells during the fourth quarter 2011 sampling event. The detected VOCs were below the maximum contaminant level (MCL) cleanup criteria for the site in five of these eight wells. Wells W-5, WA-12, and G-33 (all on-site corrective action monitoring wells) yielded samples that reported VOCs at concentrations above the MCL during the fourth quarter 2011 sampling event. The maximum VOC concentration in the WA-12 sample was 8.6 micrograms per liter for *cis*-1,2-dichloroethene, while the MCL is 6.0 micrograms per liter. No VOCs exceeded their MCL cleanup criterion in the off-site extraction wells during the third or fourth quarter (San Benito County 2012).

The proposed project includes the placement of excavated soil into a stockpile that would be located directly east of the existing landfill and the use of that soil stockpile as a source of daily and intermediate landfill cover. These activities would have no effect on the VOCs within the groundwater underlying the adjacent landfill site. The proposed project would not create a significant hazard to the public or the environment and there would be **no impact** related to listed hazardous materials sites.

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 excess noise for people residing or working in the project area?

The project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest private airstrip is Christensen Ranch, which is located approximately 3.1 miles north of the project area (San Benito County 2012). The proposed project would not expose people residing or working in the project area to a safety hazard or excess noise associated with airport or private airstrip operations. There would be **no impact**.

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

The proposed project would occur entirely on grazing land that is directly east of the John Smith Road Landfill. The project would contribute a negligible number of vehicle trips to local roads associated with construction worker trips and equipment deliveries to the site. The project would have no effect on emergency fire, police or medical vehicles accessing rural residences along John Smith Road and would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, there would be **no impact**.

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

The project is limited to the stockpiling of soil for future use as daily and intermediate cover. In the event of a wildfire at the project site, the site landfill and construction workers could evacuate either east or west on John Smith Road. In addition, the grading equipment used during construction and in landfill operations could also be used to control wildland fires. The proposed project does not include any housing and would not include any occupants that could be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, project implementation would not substantially increase the risk of loss, injury, or death involving wildland fires. This impact would be **less than significant**.

3.10 HYDROLOGY AND WATER QUALITY

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

AFFECTED ENVIRONMENT

Surface Water

The project site is located within the 1,300 square-mile Pajaro River watershed. No drainage features are located on the project site and the site is not located within a flood plain. Stormwater sheet flows off of the site toward the south and southeast to an intermittent drainage on the north side of John Smith Road. The drainage crosses through a culvert under John Smith Road at the eastern edge of the permitted landfill boundary and parallels the south side of John Smith Road as it extends west toward Santa Ana Creek. The Santa Ana Creek drains into the Pajaro River via Tequisquito Slough. The Pajaro River eventually flows into the Monterey Bay.

Groundwater

Groundwater beneath the project site flows from areas of higher elevations to areas of lower elevations at velocities ranging from approximately 5 to 2,500 feet per year. Groundwater elevations have varied with time and respond to both seasonal and longer term rainfall patterns. The seasonal variations are generally less than five feet and the longer term variations have been between five and 20 feet. The highest seasonal water levels for most of the bedrock wells in the project vicinity typically occur in the second or third quarter, when recharge of the previous wet season rain reaches the aquifer. The lowest seasonal water levels typically occur in the fourth to first quarter before the new rain begins to recharge the aquifer (ESP 2011).

Water Quality

Groundwater quality in the Gilroy-Hollister Valley Groundwater Basin is marginally acceptable for potable and irrigation use. The water quality constituents of greatest concern are salinity, sodium, chloride, sulfate, nitrate, boron, arsenic, hardness and trace elements that occasionally exceed drinking water standards. Constituents that have occasionally exceeded secondary drinking water standards include specific conductance, total dissolved solids, chloride, iron, manganese, and turbidity. Almost all groundwater in the Basin has a very high calcium and magnesium content (ESP 2011).

DISCUSSION

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

Construction of the proposed project would include the placement of soil within a stockpile, the construction of a detention basin, and the use of the stockpiled soil over approximately 15 years for daily and intermediate landfill cover. These soils could be exposed over the life of the project to wind and water erosion, which could transport sediments into local drainages. Also, accidental spills of fluids or fuels from construction vehicles and equipment, or miscellaneous construction materials and debris, could be mobilized and transported off-site in overland flow. These contaminant sources could degrade the water quality of receiving water bodies, potentially degrading surface water quality. During project construction, the implementation of the project's Erosion Control Plan (Lawrence & Associates 2020b) would be required to ensure stockpiled soils are not exposed to excessive wind and water erosion. Also, the project would require a storm water pollution prevention plan (SWPPP) with associated best management practices (BMPs), consistent with San Benito County standards. The SWPPP would be required to protect water quality pursuant to the requirements of the National Pollutant Discharge Elimination System (NPDES) stormwater permit for construction activity (Order 99-08-DWQ, as amended). The SWPPP would identify and specify:

- ▶ the use of erosion and sediment-control BMPs, including construction techniques that will reduce the potential for erosion, as well as other measures to be implemented during construction. These measures may include silt fences, staked straw bales or wattles, sediment/silt basins and traps, geofabric, and sandbag dikes;
- ▶ the means of waste disposal;
- ▶ the implementation of approved local plans, non-stormwater-management controls, permanent post-construction BMPs, and inspection and maintenance responsibilities;

- ▶ the pollutants that are likely to be used during construction that could be present in stormwater drainage and non-stormwater discharges, and other types of materials used for equipment operation;
- ▶ spill prevention and contingency measures, including measures to prevent or clean up spills of hazardous waste and of hazardous materials used for equipment operation, and emergency procedures for responding to spills;
- ▶ personnel training requirements and procedures that will be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP; and
- ▶ The appropriate personnel responsible for supervisory duties related to implementation of the SWPPP.

The implementation of BMPs and specifically a SWPPP, consistent with the NPDES stormwater permit requirements for construction activities, would ensure that the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, this impact would be considered **less than significant**.

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

The proposed project would not include the use of groundwater resources and would not be expected to measurably decrease groundwater supplies. Placing soil on these lands would still allow groundwater recharge, although to a lesser degree because of the greater separation between the groundwater aquifer and the top of the soil stockpile. However, due to the site slopes and the clay content of the site soils, only limited groundwater recharge would typically occur within the project area. Also, the construction of the detention basin may provide additional recharge that does not occur currently. Therefore, there would be **no impact**.

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?

These soils could be exposed over the life of the project to wind and water erosion, which could result in substantial erosion or siltation on- or off-site. However, as described in response to question “a” above, during project construction, the implementation of the project’s Erosion Control Plan (Lawrence & Associates 2020b) would be required to ensure stockpiled soils are not exposed to excessive wind and water erosion. Also, the project would require a storm water pollution prevention plan (SWPPP) with associated best managements practices (BMPs), consistent with San Benito County standards. For these reasons, the proposed project would not result in substantial erosion or siltation on- or off-site. Therefore, this impact would be considered **less than significant**.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

By adding material and modifying the site slopes, the proposed project has the potential to increase the rate or amount of surface runoff from the project site. Lawrence & Associates (2012a) conducted a detailed analysis of

the site drainage conditions and the potential increase in stormwater runoff from the site with project implementation. Based on this analysis, Lawrence & Associates identified the necessary size and location for a basin that would capture stormwater runoff from the soil stockpile and store it to minimize peak site discharge. Lawrence & Associates selected a design storm in conducting their calculations that was greater than the 100-year, 24-hour event. In so doing, they ensured that the detention basin was of sufficient size to ensure that existing flow rates from the site would not be exceeded. Therefore, the proposed project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite and this impact would be considered **less than significant**.

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?

As described in response to questions “a” and “ii” above, the proposed project would include the implementation of an Erosion Control Plan and SWPPP to minimize sedimentation in stormwater runoff and would include the construction of a detention basin to capture peak storm water flows. Therefore, the proposed project would not 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. This impact would be **less than significant**.

iv) Impede or redirect flood flows?

The project site is not located within a designated flood plain and would not be expected to include any components that would impede or redirect flood flows. Therefore, there would be **no impact**.

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

The project site is not located in a flood hazard, tsunami, or seiche zone. Therefore, there would be **no impact**.

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

Due to the proposed project’s limited area of impact, it would not be expected to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, there would be **no impact**.

3.11 LAND USE AND PLANNING

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

AFFECTED ENVIRONMENT

The San Benito County General Plan land use designation for the project site is Rangeland (RG) and its zoning designation is Agricultural Rangeland (AR).

DISCUSSION

a) Physically divide an established community?

The project site is located within a rural portion of northern San Benito County and is not located within an established community. Therefore, the proposed project activities would not physically divide an established community. There would be **no impact**.

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?

The proposed project would be consistent with the County land use and zoning designations for the site and would not be expected to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Per Section 25.29.109 through 25.29.111 of the Zoning Code, the Planning Director may issue administrative permits for certain types of projects that are minor to expedite workflow. Because the proposed project would be subject to an administrative permit, it would not conflict with the site's AR zoning designation. Therefore, there would be **no impact**.

3.12 MINERAL RESOURCES

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

AFFECTED ENVIRONMENT

Mineral resources in San Benito County include significant aggregate resources in the northern part of the County that have been classified and mapped by the Department of Conservation through the authority of the Surface Mining and Reclamation Act (SMARA). These resources include sand and gravel in the San Benito River and the San Andreas Fault zone. Tres Pinos Creek helps recharge sand and gravel in the San Benito River, and extraction of these resources has taken place on Tres Pinos Creek south of the project area (San Benito County 2012). No active quarried or mining sites are known to exist in or near the project site.

DISCUSSION

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The proposed project would include the placement of excavated soil into a stockpile and the use of that soil over several years (approximately 15) for daily and intermediate cover. Because the project site is not known as a source of mineral resources, the proposed project would not result in the loss of known mineral resources of value to the region or residents of the state. In addition, the temporary storage of soils on the site would not preclude accessing the site in the future. No adverse effect on mineral resources would be anticipated. There would be **no impact**.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The project site has not been designated as a locally important mineral resource recovery site. Therefore, the proposed project would have no effect on locally important mineral resource recovery sites. There would be **no impact**.

3.13 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. Noise. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
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?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

Noise Fundamentals

Noise is generally defined as sound that is loud, disagreeable, unexpected, or unwanted. Sound is mechanical energy transmitted in the form of a wave because of a disturbance or vibration, and as any pressure variation in air that the human ear can detect.

Because of the ability of the human ear to detect a wide range of sound-pressure fluctuations, sound-pressure levels are expressed in logarithmic units called decibels (dB) to avoid a very large and awkward range in numbers. The sound-pressure level in decibels is calculated by taking the log of the ratio between the actual sound pressure and the reference sound pressure squared. The reference sound pressure is considered the absolute hearing threshold (California Department of Transportation 2013). Use of this logarithmic scale reveals that the total sound from two individual 65-dBA sources is 68 dBA, not 130 dBA (i.e., doubling the source strength increases the sound pressure by 3 dBA).

Community noise is commonly described in terms of the ambient noise level, which is defined as the all-encompassing noise level associated with a given environment. A common statistical tool to measure the ambient noise level is the average, or equivalent, sound level (L_{eq}), which correspond to a steady-state A-weighted sound level containing the same total energy as a time varying signal over a given time period. (usually one hour). The L_{eq} is the foundation of the composite noise descriptor, L_{dn} , and shows very good correlation with community response to noise (San Benito County 2012).

Table 3 identifies typical A-weighted sound levels that are used to estimate ambient noise levels.

Table 3 Typical A-Weighted Sound Levels

Common Outdoor Activities	Sound Levels (dBA)	Common Indoor Activities
Jet flyover at 1,000 feet	110	Rock band
Gas lawnmower at 3 feet	100	
	90	
Diesel truck at 50 mph at 50 feet	80	Food blender at 3 feet Garbage disposal at 3 feet
Noisy urban area, daytime	70	Vacuum cleaner at 3 feet Normal speech at 3 feet
Gas lawnmower at 100 feet	60	
Commercial area	50	Large business office
Heavy traffic at 300 feet	40	Dishwasher in next room
Quiet urban area, daytime	30	Theater, large conference room (background)
Quiet urban area, nighttime	20	
Quiet suburban area, nighttime	10	Library
	0	Bedroom at night, concert hall (background)
Quiet rural area, nighttime		Broadcast/recording studio
Rustling leaves		
Source: Caltrans 2013		
Note: dBA = A-weighted decibel		

Table 4 identifies the typical noise levels generated from construction equipment that may be used at the site. The maximum sound levels ($L_{\max}$) measured during monitoring at 50 feet are provided in addition to the typical acoustical use factors. The acoustical use factor is the percentage of time each piece of construction equipment is assumed to be operating at full power (i.e., its noisiest condition) during construction and is used to estimate the equivalent continuous sound level (L_{eq}) values from $L_{\max}$ values.

Table 4 Typical Construction Noise Levels

Equipment	Typical L _{max} Noise Level at 50 Feet (dBA)	Acoustical Use Factor	L _{eq} Noise Level at 50 Feet (dBA)
Backhoe	78	40	76
Bulldozer	82	40	81
Chainsaw	84	20	80
Compactor	83	20	76
Compressor (air)	78	40	76
Crane	81	16	80
Dump truck	76	40	80
Excavator	81	40	81
Front end loader	79	40	75
Generator	73	50	67
Grader	85	40	81
Pump	81	50	74
Scraper	84	40	81
Tractor	84	40	80
Vibratory pile driver	101	20	90

Source: Federal Highway Administration 2006

Note: dBA = A-weighted decibel, L_{eq} = equivalent sound level (Specification 721.560), L_{max} = maximum sound levels (Federal Highway Administration 2006)

Vibration

Vibration is like noise in that it involves a source, a transmission path, and a receiver. While vibration is related to noise, it differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to the vibration will depend on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system which is vibrating (San Benito County 2012).

Vibration can be measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration measures in terms of peak particle velocities in inches per second. Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of peak particle velocities (San Benito County 2012).

Existing Sensitive Receptors

Some land uses are considered more sensitive to ambient noise levels than others. Land uses often associated with sensitive receptors generally include residences, schools, libraries and hospitals. Noise sensitive land uses are typically given special attention in order to achieve protection from excessive noise.

Sensitivity is a function of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities involved. In the vicinity of the project site, the primary noise sensitive land uses include large lot single-family residences. The nearest residence is approximately 0.7 mile southeast of the project site. Three other residences are located within one mile of the project site including two to the east and one to the northwest.

The project includes construction within unincorporated San Benito County. Therefore, for the purpose of this analysis, the County's applicable noise level standards are described below.

San Benito County Zoning Ordinance Noise Level Standards

Title 25, Chapter 25.37, Article III of the San Benito County Code identifies exterior noise level standards (hourly average L_{eq}) for non-transportation noise sources based on land use designations. For Rural Residential uses, the standards are 45 dBA L_{eq} between 7:00 a.m. and 10:00 p.m., and 35 dBA L_{eq} between 10:00 p.m. and 7:00 a.m.

Article III of the Code presents a list of noise sources that are exempt from the provisions. Exemption E.2 states that temporary construction between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday is exempt.

Vibration Standards

San Benito County does not have specific policies related to vibration levels. However, according to the California Department of Transportation, the threshold for damage to structures ranges from 2 to 6 inches per second peak particle velocity. One inch per second is considered a safe criterion to protect against architectural or structural damage (Federal Transit Administration 2006).

DISCUSSION

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction activities associated with soil stockpiling would be limited to the use of large dump trucks to transport the soil to the stockpile site and a bulldozer to form the stockpile mound. As indicated in Table 5, operational noise levels associated with these types of equipment would generate typical noise levels ranging from 88 to 87 dBA, respectively, at a distance of 50 feet. Typical operating cycles for these types of construction equipment involve limited periods of full power operation followed by periods of lower power settings.

The nearest noise-sensitive receptor is a rural residence located approximately 0.7 mile to the southeast. At this distance and accounting for the intervening topography, which reduces noise levels, the noise associated with construction activities would be less than 45 dBA L_{eq} at this residence.

The occurrence of elevated construction noise during noise-sensitive evening and nighttime hours would be considered a nuisance for local residents due to the potential for sleep disruption. However, most residents recognize that construction activities are inevitable from time to time and that short-term daytime noise impacts associated with construction activities are expected on occasion. This fact is reflected in the San Benito County Zoning Ordinance, which consider noise levels associated with construction activities to be exempt from the provisions of the Ordinance, provided such activities are limited to the hours of 7 a.m. and 7 p.m. Monday through Saturday.

Table 5 Construction Equipment Noise Emission Levels

Equipment Type	Typical Noise Level (dB) @ 50 feet
Air Compressor	81
Backhoe	85
Compactor	82
Concrete Pump	82
Concrete Breaker	82
Truck Crane	88
Dozer	87
Generator	78
Grader	85
Front-end Loader	84
Asphalt Paver	88
Pneumatic Tools	85
Water Pump	76
Power Hand Saw	78
Power Shovel	82
Trucks	88

*All equipment fitted with properly maintained and operational noise control device, per manufacturer specifications.

Source: Bolt, Beranek and Newman, FTA 2006.

Project construction noise impacts would be temporary in character, as they would extend over a period of approximately three months. In addition, the construction would be limited to the required daylight hour timeframes identified in the Zoning Ordinance. These limitations are generally considered to be reasonable for purposes of ensuring that temporary noise impacts occur in hours when most people are at work or, if at home, are awake. For these reasons, the project's construction noise impacts would be considered **less than significant**.

CONSTRUCTION-GENERATED TRAFFIC NOISE

Implementation of the proposed project would result in a negligible effect on traffic volumes along local roads due to the addition of construction-generated traffic. Construction-generated traffic volumes would be limited to several construction equipment operators coming to and from the site on a daily basis for the three-month soil stockpiling period. In addition, construction trips would be generated from the delivery of heavy equipment to the site. However, these trips would occur over just a couple of days and would be limited to just a few pieces of construction equipment. Increases in construction traffic attributable to the project would result in a negligible and imperceptible increase in roadway noise. Typically, traffic volumes have to double before the associated increase in noise levels is noticeable along roadways. As a result, there would be **no impact** related to project-generated construction traffic noise levels.

LONG-TERM OPERATIONAL NOISE

The proposed intensive construction activities are short-term in nature (i.e., approximately three months). Following construction, the soil stockpile would be access on a daily bases to provide daily soil cover of waste materials during landfill module filling operations. However, the daily cover soil demand would be very limited, only requiring between one and two trips per day between the soil stockpile and the landfill working face. The noise generated from these trips would be negligible and would be consistent with other permitted operations at the site. Therefore, the proposed project would not result in the exposure of people to long-term operational noise levels exceeding applicable noise standards and there would be **no impact**.

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

The proposed project's construction activities would include large dump trucks transporting and dumping soil and a bulldozer used to shape the soil stockpile. The vibration levels associated with this construction activities would be expected to generate peak particle velocities of 0.076 and 0.089 inches per second at 25 feet. The peak particle velocities would decrease the further the receptor is from the activities. Because these levels would be substantially below the one inch per second threshold, would be short term, and the nearest residence is approximately 0.7 mile from the project site, these vibration impacts would be considered negligible and there would be **no impact**.

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

The project site is not located within the vicinity of a private airstrip or an airport land use plan and is not located within two miles of a public airport or public use airport. The nearest private airstrip is Christensen Ranch, which is located approximately 3.1 miles north of the project area (San Benito County 2012). The proposed project would not expose people residing or working in the project area to excessive noise levels associated with airport or private airstrip operations. There would be **no impact**.

3.14 POPULATION AND HOUSING

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

AFFECTED ENVIRONMENT

The project site is located adjacent to and directly east of the John Smith Road Landfill within a rural area of unincorporated San Benito County that consists primarily of grazing lands. The nearest residence is approximately 0.7 mile southeast of the project site. Three other residences are located within one mile of the project site including two to the east and one to the northwest.

DISCUSSION

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

The proposed project does not involve the construction of any components (i.e. roads, residential homes) that would induce population growth. The proposed project includes stockpiling soil excavated during the construction of a landfill module and using that soil as the source for the module's daily and intermediate cover while it receives waste. These waste management activities would not induce growth beyond what has been planned for under the adopted San Benito County General Plan. In addition, the proposed project would not create new permanent jobs. There would be **no impact** on population growth in the area.

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

The proposed project would not result in the demolition of any homes and does not include any components that would result in the displacement of any homes or create the need for replacement housing. There would be **no impact**.

3.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

Public Utilities include fire and police protection, schools, parks, and other public facilities. Fire protection and emergency response services are provided to the project area by the California Department of Forestry and Fire Protection (Cal Fire). The closest Cal Fire station to the site is located on Fairview Road, approximately 2.5 miles northwest of the project site. The station is staffed by two full-time fire fighters and is supplemented by 25 on-call volunteer fire fighters (San Benito County 2012). Law enforcement services for the project area are provided by the San Benito County Sheriff's Department, which operates from its headquarters at 451 Fourth Street in Hollister, approximately five miles northwest of the project site. The nearest schools to the project site include Calvary Christian School, approximately 2.6 miles to the west and Meadowlark Preschool, approximately 2.4 miles to the west. The nearest public park is Cerra Vista School Park, located approximately 2.4 miles to the west (San Benito County 2012).

DISCUSSION

- a) **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services listed above:**

The proposed project would not directly or indirectly increase the population of San Benito County. The proposed project would not include any components that would increase the service requirements for Cal Fire or require additional fire protection facilities be constructed. The project area would continue to be served by the San Benito County Sheriff's Department and project implementation would not require an increase in police protection services or the construction of additional police facilities. The proposed project does not include any uses that

would increase the demands on local schools or local park facilities. Therefore, the proposed project would not be expected to result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities in San Benito County. There would be **no impact**.

3.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

No recreational facilities are located near the project site. The nearest recreational area is the Ridgemark Golf and Country Club, located approximately 1.5 miles to the southwest. The nearest public park is Cerra Vista School Park, which is located approximately 2.4 miles to the west (San Benito County 2012).

DISCUSSION

- a) **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

The project does not include any components that would directly result in an increased use of Ridgemark Golf and Country Club, Cerra Vista School Park, or other park or recreational facilities in San Benito County. Therefore, the proposed project would not be expected to increase the use of parks such that substantial physical deterioration would occur. **No impact** would occur.

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

The project would not include any recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. As described above, the proposed project would not be expected to increase the use of recreational facilities such that substantial physical deterioration would occur and **no impact** would be expected.

3.17 TRANSPORTATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Transportation. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

Regional access to the project area is provided by Fairview Road, which extends south to State Route 25 and north to State Route 156. Fairview Road connects to John Smith Road approximately two miles west of the project site and 1.1 miles north of State Route 25. Fairview Road is a two-lane arterial roadway. John Smith Road, which provides direct access to the John Smith Road Landfill, is a two-lane rural road that terminates at its intersection with Santa Ana Valley Road approximately 2 miles east of the project site. In addition to providing access to the landfill, John Smith Road also provides regional access for rural residences located along the roadway.

DISCUSSION

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

The proposed project includes stockpiling soil excavated during the construction of a landfill module and using that soil as the source for the module's daily and intermediate cover while it receives waste. Therefore, vehicle trips associated with project implementation would consist almost exclusively of haul trucks transporting excavated soil from the landfill module to the soil stockpile and returning to the landfill module. The other trips would consist of the equipment operators driving to and from the site on a daily basis and the original delivery of construction equipment to the site and the removal of that equipment once soil stockpiling ends. Therefore, the generation of new vehicle trips on the local roadway network associated with equipment hauling and construction worker transportation to and from the site would be negligible. These trips would represent a minor and temporary increase in traffic volumes on Fairview Road and John Smith Road.

The proposed project would not require any new employees for the long-term use of the soil stockpile for daily and intermediate cover at the landfill. Therefore, landfill operations would not generate any new vehicle trips.

Transit service is not provided to the project site and the project would have no effect on transit service operations within the area. Also, because the proposed project would generate few vehicle trips on local roadways, it would have no effect on bicycle travel in the area.

The proposed project would not be expected to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, there would be **no impact**.

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

CEQA Guidelines Section 15064.3(b) applies to land use and transportation projects that would be expected to increase vehicle miles driven during their operations. For construction activities, CEQA Guidelines Section 15064.3(b)(3) allows a qualitative analysis to be conducted. The proposed project would result in a temporary increase in vehicle miles traveled during construction due to worker trips to the site, the delivery of materials, and trips generated by construction vehicles on the site. However, once the excavated soil has been stockpiled, it would no longer generate vehicle trips other than when the soil stockpile is accessed for daily and intermediate cover. The temporary increase in vehicle mileage travelled during construction would not be expected to increase vehicle miles travelled over the long term and would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). Therefore, there would be **no impact**.

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

The project does not include any components that would alter the geometric design of Fairview Road or John Smith Road. Therefore, there would be **no impact**.

d) Result in inadequate emergency access?

The project's contribution of vehicle trips to Fairview Road and John Smith Road would be negligible and would not be expected to cause any emergency vehicle access delays. Therefore, there would be **no impact**.

3.18 TRIBAL CULTURAL RESOURCES

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

AFFECTED ENVIRONMENT

Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: 1) included or determined to be eligible for inclusion in the California Register of Historic Resources (CRHR); or 2) included in a local register of historical resources. Tribal cultural resources are also resources determined by the lead agency (i.e., San Benito County), in its discretion and supported by substantial evidence, to be significant. In making this determination, the lead agency is required to consider the significance of the resource to a California Native American tribe.

The CRHR includes resources listed in or formally determined eligible for listing in the National Register of Historic Places (NRHP). Pursuant to Public Resources Code, Section 21084.1, a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” Demolition, replacement, substantial alteration, and relocation of historic properties are actions that would change the significance of an historic resource (California Code of Regulations, Title 14, 15064.5).

The soil stockpile is proposed to be located on grazing land directly east of the John Smith Road Landfill. No evidence of historic buildings, sites, structures or objects is present within these grazing lands.

DISCUSSION

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

The soil stockpile area does not include 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). The proposed project would include scraping the surface of the soil stockpile area prior to soil placement to ensure the stability of the stockpiled soil. However, substantial subsurface soil disturbance would not be anticipated and the stockpiled soil would ultimately be removed from this site as it is used for daily and intermediate landfill cover. Therefore, the proposed project would not be expected to result in the long-term alteration of the soil stockpile area. Due to the short-term disturbance of the stockpile area, the lack of existing historic resources, and the relatively small footprint of the stockpile, the proposed project would not be expected to cause a substantial adverse change in the significance of a Tribal Cultural Resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. Therefore, there would be **no impact**.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Based on the lack of features that would have been attractive to historic habitation (e.g., drainages or other food sources), the short-term disturbance of the stockpile area, and the lack of physical evidence of tribal cultural resources, the proposed project would be expected to have **no impact** on tribal cultural resources.

3.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have 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 that 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?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

Non-potable water is obtained for landfill operations from a fire hydrant within the Sunnyslope County Water District and trucked to the site. The water is stored in two 2,500-gallon water tanks on the western side of the landfill property. Bottled water is brought to the site for employee consumption purposes and is available in both the landfill office and the scalehouse. Pacific Gas & Electric (PG&E) provides electrical supply to the project vicinity. Aboveground, pole-mounted electrical lines are located along the south side of John Smith Road. In July 2010, PG&E completed a 3-phase power system upgrade for the landfill and the parcel south of John Smith Road (San Benito County 2012). Wastewater generated at the landfill (from the scalehouse, leachate, condensate, and the extraction well water) is routed to the sewer system for treatment at the City of Hollister publicly owned treatment works (POTW) (San Benito County 2012). Solid waste generated in the project area is disposed of at the John Smith Road Landfill, which is managed by the San Benito County Integrated Waste Management Department.

DISCUSSION

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication**

facilities, the construction or relocation of which could cause significant environmental effects?

The proposed project includes stockpiling soil excavated during the construction of a landfill module and using that soil as the source for the module's daily and intermediate cover while it receives waste. Therefore, the project would not require or result in any changes to water, wastewater treatment, electric power, natural gas, or telecommunication facilities. For a discussion of the project's effects on stormwater drainage, refer to Section 3.10 - Hydrology and Water Quality of this Initial Study. There would be **no impact**.

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

The proposed project would require the use of water for dust suppression purposes during soil excavation and stockpiling activities. Water is trucked to the site from the Sunnyslope County Water District. The use of water for construction dust suppression occurs regularly at the site and implementation of the proposed project would not create new water demands. The use of imported water for dust suppression during the soil stockpiling activities would have no effect on the availability of water supplies for reasonably foreseeable future development during normal, dry or multiple dry years. Therefore, there would be **no impact**.

c) Result in a determination by the wastewater treatment provider that 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?

The proposed project would not be expected to increase demand for wastewater services, as it includes stockpiling soil excavated during the construction of a landfill module and using that soil as the source for the module's daily and intermediate cover while it receives waste. Therefore, there would be **no impact**.

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?

Project construction would not be expected to generate significant volumes of solid waste because construction activities would be primarily limited to stockpiling soil. Negligible volumes of debris would be generated during project construction that would be disposed of at the John Smith Road Landfill. The proposed project would not generate solid waste in excess of State or local standards or in excess of the landfill's remaining capacity and would not otherwise impair the attainment of solid waste reduction goals. Therefore, there would be **no impact**.

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

Because project construction would not be expected to generate significant volumes of solid waste, the project would not be expected to conflict with any reduction statutes or regulations related to solid waste. The proposed project would be conducted consistent with the landfill's Solid Waste Facilities Permit. There would be **no impact**.

3.20 WILDFIRE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Wildfire. Would the project:				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

AFFECTED ENVIRONMENT

The severity of wildland fires is influenced primarily by vegetation, topography, and weather (temperature, humidity, and wind). The California Department of Forestry and Fire Protection (CAL FIRE) has developed a fire hazard severity scale that considers vegetation, climate, and slope to evaluate the level of wildfire hazard. CAL FIRE designates three levels of Fire Hazard Severity Zones (Moderate, High, and Very High) to indicate the severity of fire hazard in a particular geographical area. Fire hazard zoning is used to indicate both the likelihood for a fire (e.g., prevalence of fuels) and the potential for damage (e.g., proximity to residences). Local fire departments also use these severity zone designations within their jurisdictions. As identified by the San Benito County General Plan, the project site is located within a Moderate Fire Hazard Severity Zone (San Benito County 2012).

Five Cal Fire stations and bases are located in the County, and a sixth is located on the San Benito/Santa Clara County border (Pacheco). Stations within the County include the Bear Valley Helitack Base in Bear Valley, the Beaver Dam Station near Bitterwater, the Antelope Station in Antelope Valley, the Hollister Station, and the Hollister Air Attack Base. The Bear Valley, Beaver Dam, Antelope, and Hollister Fire Cal Fire Stations are all in full operation during the fire season, which runs from May 1st to November 1st. The agency has air tankers housed at the Hollister Airport, a bulldozer housed at Hollister Station, and two battalion chiefs dedicated to the operations within the County. One acts as the County department head and the other acts as an as needed chief officer for emergency scene management (San Benito County 2012).

DISCUSSION

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

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

The proposed project would occur entirely on grazing land that is directly east of the John Smith Road Landfill. The project would contribute a negligible number of vehicle trips to local roads associated with construction worker trips and equipment deliveries to the site. Prior to project implementation, the project site plans would be reviewed by the fire agencies with jurisdiction over the site to ensure that adequate access is provided for fire and emergency vehicles (width, compaction, etc.) and to determine whether any additional firefighting requirements need to be put in place. The fire agencies would evaluate how the stockpile may affect firefighting activities. With this fire agency review and implementation of any fire suppression recommendations that come out of the review, the project would not be expected to adversely affect emergency fire, police or medical vehicles accessing rural residences along John Smith Road and would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, there would be **no impact**.

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?

The project is limited to the stockpiling of soil for future use as daily and intermediate landfill cover. In the event of a wildfire at the project site, the site landfill and construction workers could evacuate either east or west on John Smith Road. In addition, the grading equipment used during construction and in landfill operations could also be used to control wildland fires. The proposed project does not include any housing and would not include any occupants that could be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, site factors would not be expected to exacerbate wildfire risks. This impact would be **less than significant**.

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The proposed project would not require the installation of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The project is limited to the stockpiling of soil adjacent to the landfill for future use as daily and intermediate landfill cover. Therefore, there would be **no impact**.

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?

The proposed project would not expose people or structures to significant risks due to post-fire slope instability, runoff, or drainage changes. The proposed soil stockpile would not increase wildland fire hazards in the project area. Therefore, there would be **no impact**.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. Mandatory Findings of Significance.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐
Authority: Public Resources Code Sections 21083, 21083.5. Reference: Government Code Sections 65088.4. Public Resources Code Sections 21080, 21083.5, 21095; <i>Eureka Citizens for Responsible Govt. v. City of Eureka</i> (2007) 147 Cal.App.4th 357; <i>Protect the Historic Amador Waterways v. Amador Water Agency</i> (2004) 116 Cal.App.4th at 1109; <i>San Franciscans Upholding the Downtown Plan v. City and County of San Francisco</i> (2002) 102 Cal.App.4th 656.				

DISCUSSION

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

Based on the information and analysis provided in the questions above, implementation of the proposed project would not substantially degrade the quality of the environment and would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of California history or prehistory. Therefore, the proposed project’s impacts would be considered **less than significant**.

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

The impacts associated with the proposed project are anticipated to be localized at the project site and would not be expected to combine with other projects to cause cumulatively considerable environmental impacts. Given the limited impacts anticipated with project implementation, the proposed project would not be expected to cause cumulatively considerable impacts. Therefore, the proposed project's impact would be considered **less than significant**.

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

As discussed in this Initial Study, implementation of the proposed project would not be expected to cause substantial adverse effects on human beings, either directly or indirectly. Therefore, the proposed project's impact would be considered **less than significant**.

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