



# San Benito County Resource Management Agency

## Public Works / Planning & Building / Parks / Integrated Waste

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### SAN BENITO COUNTY NOTICE OF PROPOSED MITIGATED NEGATIVE DECLARATION

**TO:** Responsible agencies, Trustee agencies, other County Departments, and interested parties  
**FROM:** San Benito County Resource Management Agency

This notice is to inform you that the San Benito County Resource Management Agency has prepared an Initial Study and intends to recommend filing a Mitigated Negative Declaration for the project identified below. The public review period for the Initial Study is from **October 21<sup>th</sup> to November 19<sup>th</sup>, 2019**. The document is available for review at the address listed below. Comments may be addressed to the contact person, **Richard Felsing**. Written comments are preferred. Please use the project file number in all communication.

1. **Project title & file number:** Panoche RV Resort  
PLN180033
2. **Lead agency name & address:** San Benito County Resource Management Agency  
2301 Technology Parkway  
Hollister, CA 95023-2513
3. **Contact person & phone number:** Richard Felsing  
831-902-2289
4. **Project location:** 29960 Panoche Road, Paicines, CA 95043
5. **Project sponsor's name & address:** Frank Saunders  
4 West Gabilan St.  
Salinas, CA 93901
6. **General Plan designation:** Rangeland
7. **Zoning:** C-2/AR Commercial/Agricultural Rangeland
8. **Description of project:** The Panoche RV Resort proposes to construct a 21-stall RV Park behind the Panoche Inn on a maximum 2.5 acres of the same 6.53-acre parcel. Internal circulation consists of aggregate base (AB) drive aisles, RV stalls, and dual access driveways located at the northeast and northwest corners of the property. Initially only the first row of seven (7) RV stalls will have full hookups (water, sewer, electricity), while the last two rows of seven RV stalls will start with water hook ups only. A sewage pump-out station will serve all stalls without full hookups, as well as the entire facility, until extension of electrical and sewer hookups is justified by demand. Septic and water systems improvements include installation of new septic tank and leach field, water well for drinking, and fire suppression equipment such as wharf hydrants. Trees will be planted to shade the RV stalls, act as a windbreak, and screen the RV Park to maintain/enhance the visual aesthetic from the road.

The applicants observe that off-road enthusiasts haul trailers and motorcycles through Panoche Valley on the way to New Idria and the Clear Creek area on weekends—but must drive back over the hill at the end of each day. With no places for campers or RVs to park, frequent bird watching visitors also must make the round-trip in a single day. The applicants report that their own farm employees commute each day from Hollister or the San Joaquin Valley, as do many employees of the nearby Panoche Solar Facility. Any weekday commuters and weekend visitor staying overnight would cut their daily VMT in half, while gaining time to more fully explore the Panoche Valley at a more leisurely pace.

The subject parcel has been heavily impacted from nearly a century of use as a bar-residence and by standard accessory uses (see Phase I Environmental Site Assessment).

**9. Surrounding land uses and setting:** Grazing on rangeland, one solar farm, private glider landing strip

<u>Seismic zone:</u>	Not within an Alquist Priolo Earthquake Fault Zone.
<u>Fire hazard:</u>	Moderate Fire Hazard Severity Zone.
<u>Floodplain:</u>	Flood Zone X. No statistical likelihood of flooding.
<u>Archaeological sensitivity:</u>	High Sensitivity
<u>Habitat conservation area:</u>	Within Habitat Conservation Plan Fee area.
<u>Landslide:</u>	0 to 2% slopes on-site and immediately adjacent to property.
<u>Grade 1 Soils:</u>	Yes: Panoche loam.

**10. Planning and zoning:** The subject parcel is in an area with an RG Rangeland General Plan land use designation and is zoned C-2 Neighborhood Commercial according to the County zoning map.

**General Plan.** Prior General Plans state that “In some limited cases, isolated commercial uses will continue to be permitted as overlay zoning without a general plan amendment” (Land Use Element: Commercial, County of San Benito 1984 General Plan, 1992 Update). This language appears to refer to preexisting and ongoing commercial uses, though it may not exclude proposed new uses. County records indicate and local knowledge confirms that a bar has operated continuously on the Panoche Inn site for at least the past 86 years. A 2003 Commercial District Review (CDR 48-03) of a proposal to add a second floor and expand the Inn’s living quarters stated that continuing commercial operations had spanned 70 years at the point of County approval.

Previous County General Plans state that “commercial lands in unincorporated areas of the County will be designed to serve existing markets and reduce unnecessary trips to the major retail centers in the incorporated areas of the County” (Hollister and San Juan Bautista).

**Zoning.** RV Parks are allowed with a conditional use permit under C-2 and AR zoning alike (Neighborhood Commercial, §25.16.043(G) Recreational trailer parks; Agricultural Rangeland §25.07.005(G) Private parks and camps).

**11. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):** In addition to permits and approvals from County departments and agencies, regional bodies may review this document and use it in their permitting actions: Central Valley Regional Water Quality Control Board (Region 5), Monterey Bay Air Pollution Control District, San Benito County Water District.





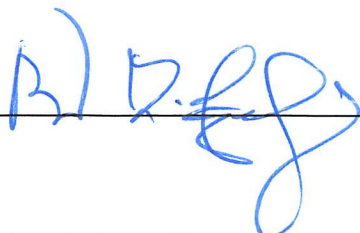
**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                | <input checked="" type="checkbox"/> Agriculture / Forestry Resources | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources                          | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology / Soils           | <input type="checkbox"/> Greenhouse Gas Emissions                    | <input type="checkbox"/> Hazards and Hazardous Materials               |
| <input checked="" type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning                         | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                                | <input checked="" type="checkbox"/> Population / Housing             | <input checked="" type="checkbox"/> Public Services                    |
| <input checked="" type="checkbox"/> Recreation                | <input checked="" type="checkbox"/> Transportation                   | <input type="checkbox"/> Tribal Cultural Resources                     |
| <input type="checkbox"/> Utilities / Service Systems          | <input checked="" type="checkbox"/> Wildfire                         | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

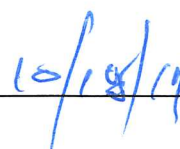
#### DETERMINATION

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

Signature



Date

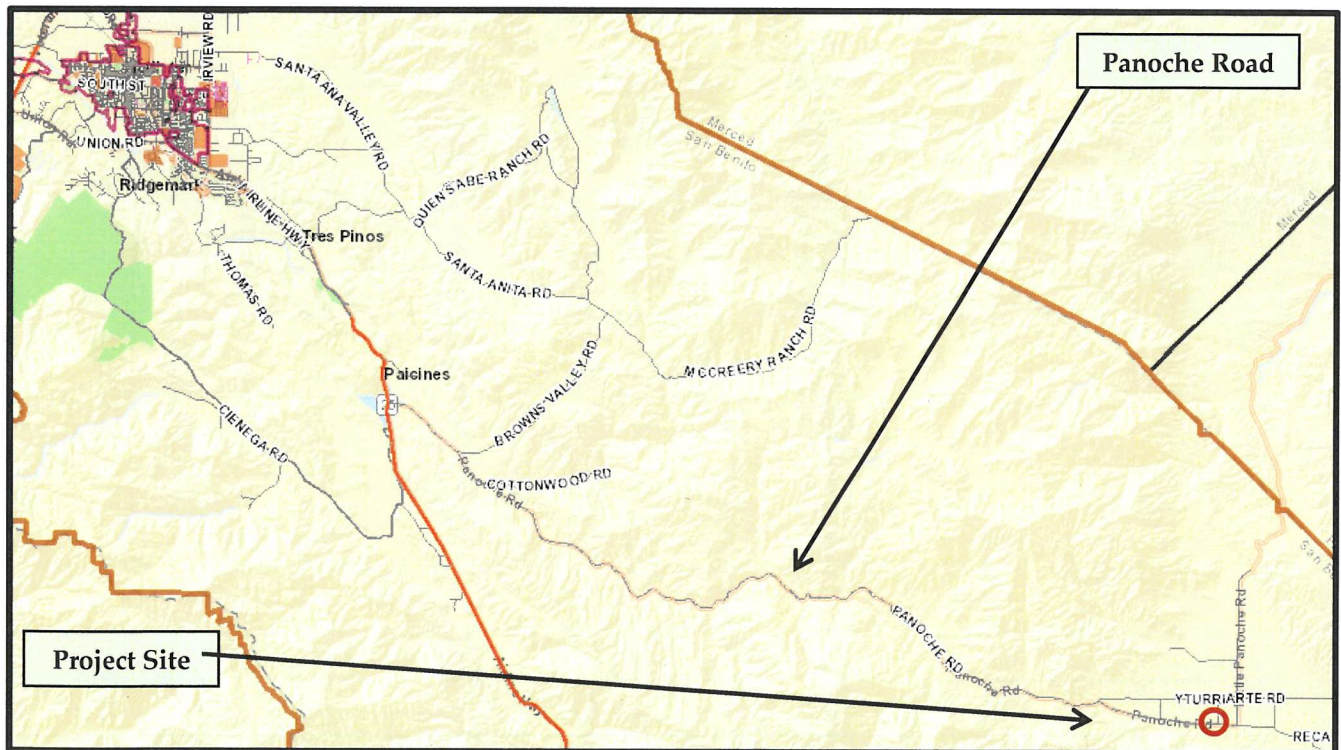
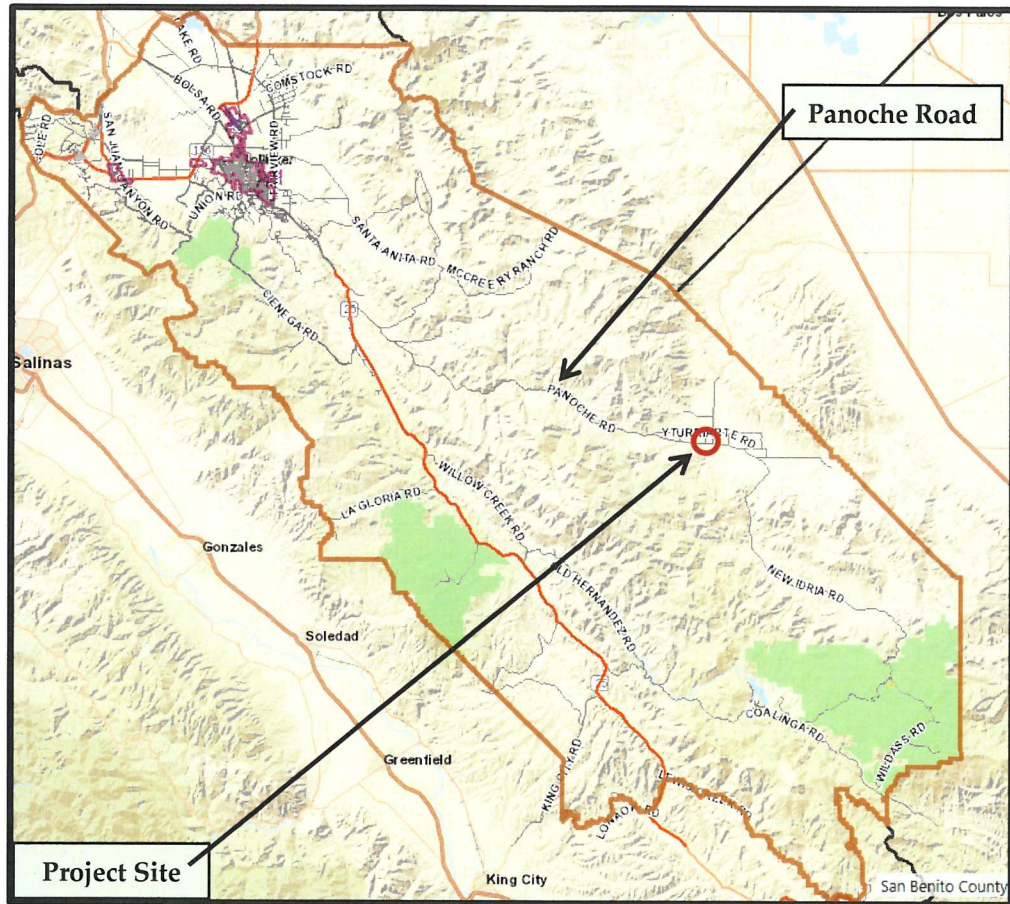


Richard Felsing, Assistant Planner

San Benito County Department of Planning and Building Inspection Services

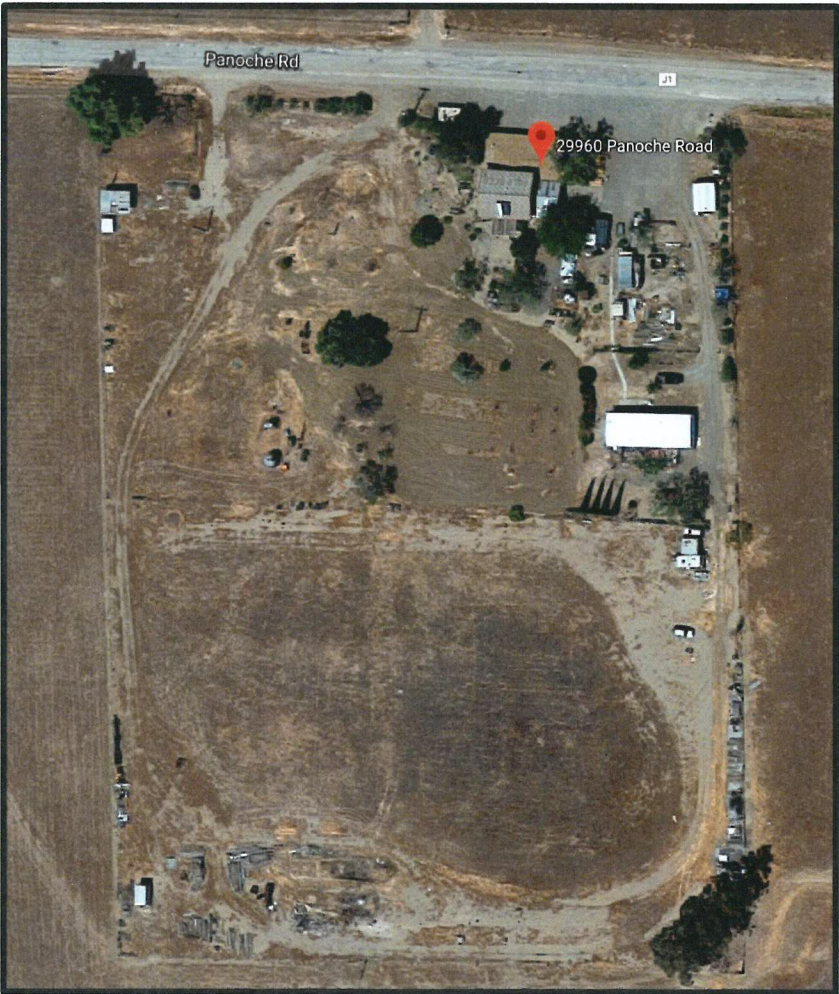
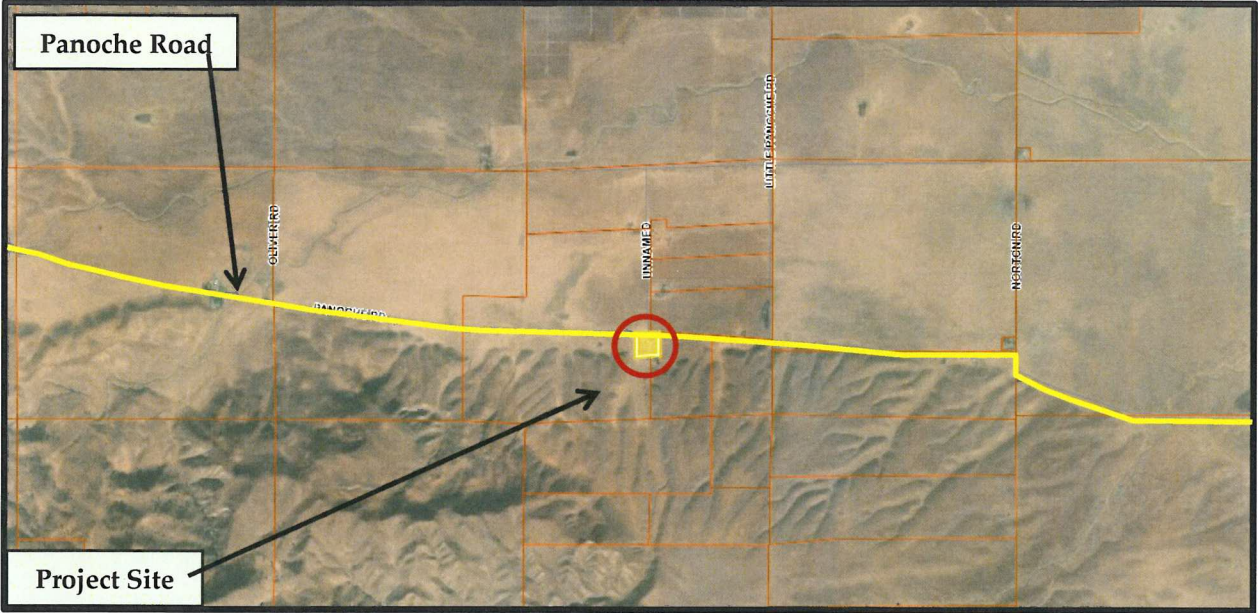


Figures 2 and 3. Vicinity Maps





Figures 4 and 5. Vicinity Map and Aerial of Subject Parcel





## EVALUATION OF ENVIRONMENTAL IMPACTS

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

- a. Less Than Significant Impact — The term ‘scenic vista’ is not defined in the County of San Benito General Plan or Code of Ordinances. The standard dictionary definition of “scenic vista” refers to “a distant view or prospect, especially one seen through an opening, as between rows of buildings or trees.” A representative CEQA definition of “the term vista generally implies an expansive view, usually from an elevated point or open area. A scenic vista is a view that possesses visual and aesthetic qualities of high value to the community.” Though *vista* generally refers to broad sweeping views of the kind you might see from a mountaintop, a scenic vista may be thought of as a broad seeping view of an aesthetically pleasing landscape on which the community places great value. The Panoche Valley provides this kind of broad, sweeping view, of an aesthetically valued landscape, in every direction.

The project would not have a substantial adverse effect on a scenic vista due to topography, scale, and distance. At 2.5 acres of the 6.53-acre subject parcel, the proposed RV Park would sit on the southern flank of the roughly (very conservatively estimated) 12 x 4-mile Panoche Valley floor and would not impair a scenic landscape consisting of far more than 21,000 acres. The project’s 2.5 acres amounts to 0.00119% of that estimated land area (total official acreage may be 2 or 3 times as large). Closer in, the RV Park will be screened by landscape plantings; it is not situated in a way that could obstruct views of surrounding the landscape (consistent with Policy NCR-8.11 Landscaping in Areas Designated for Agriculture or Rural Land Uses, County of San Benito 2035 General Plan).

Visitors to the Panoche Inn gazing out at the mountain ranges demarcating the Valley rim would have their backs to the proposed project. From the public right-of-way of Panoche Road, the existing Panoche Inn is not visible until drivers are in very close proximity, as the Inn is (and proposed project would be) tucked into the rolling topography flanking the valley floor. Publicly available viewsheds would not be impaired or obstructed by the project. Though it could be *seen* when nearby, planned landscaping and tree plantings will buffer and screen the RV Park from view. (NCR-8.11 Landscaping in Areas Designated for Agriculture or Rural Land Uses, 2035 General Plan)

- b. No Impact — The proposed project is not located within a designated scenic corridor—US Route 101 and State Routes 129 and 146—identified by County ordinance and the General Plan (SBCC §25.15.060; NCR-8, County of



San Benito 2035 General Plan). It will not damage nor substantially damage any scenic resources within any designated or eligible scenic highway corridor.

- c. Less Than Significant Impact — The project would not substantially degrade the existing visual character or quality of public views of the site, or of its surroundings. Public vantage points will retain the same unobstructed views of the site proper, which does not contain quality aesthetic or historic resources. The Panoche Inn while characteristic of the area was substantially modified in 2003 when expanded living quarters involved adding a second story and enlarging the ground floor. Further, the RV Park is to be situated behind the Panoche Inn, and will be screened by landscape plantings to include up to 91 trees. The property has been substantially impacted by an array of accessory uses and structures over the years, and the proposed project would not substantially alter or degrade the site's existing visual character. The project will not impair or obstruct public views of the site surroundings, highlands, or scenic vistas. Public views from the road by travelers, or from the Inn/RV Park by patrons, would retain existing unimpaired views of the surrounding landscape and of the Panoche Inn.
- d. Less Than Significant Impact — Daytime glare reflected from vehicles could potentially be the most noticeable daytime element affecting views; however, these impacts will be reduced by landscaping and sit design. Landscape plantings including 91 trees to screen vehicles from view and reduce glare are planned by the applicant and required by County ordinance. Nighttime views could be adversely affected by lighting; however, the SBCC development lighting ordinance ensures that shielded, downward-directed lighting fixtures will minimize any substantial nighttime light sources and protect the 'dark skies' character of the area (SBCC §19.31.001–17: Development Lighting Standards; NCR-9.1 Light Pollution Reduction, County of San Benito 2035 General Plan).

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**II. AGRICULTURE AND FORESTRY RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. 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 nonagricultural use?                            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a. Less Than Significant Impact — The site is not used for agricultural purposes. At 6.53 acres the parcel is too small to support a viable agricultural operation now or in the future. The property is not known to have been used as pasture for grazing livestock, despite its grazing land label in the 2016 Farmland Mapping and Monitoring Program. At least two-thirds (2/3) of the subject parcel has historically been occupied by the Panoche Inn, residence, and standard accessory uses. The property does contain Grade 1 soils; however, the rear and less-impacted one-third (1/3) portion of the subject parcel, at 2.2 acres, is too small to support any viable agricultural operation—and as the vast scale of the surrounding rangeland, characterized by enormous parcel size and allocated to grazing purposes, indicates—local ranchers will not rent that relatively intact 2.2 acres to run livestock. No loss of farmland or Grade 1 soils, now in cultivation or potentially arable, would occur as a result of this project.
- b. No Impact — The property is not subject to a Williamson Act contract. The project does not conflict with existing zoning.
- c. No Impact — There is no timberland on the subject parcel, and few trees. The project does not propose rezoning, nor would approval result in rezoning of forest land or timberland.
- d. No Impact — No forest land exists in the Panoche Valley, or on this parcel. No new development is expected in the vicinity. No conversion of forest land would occur, near-term or as an eventual consequence of this project. One tree is to be removed, and 91 trees would be planted.
- e. No Impact — The project does not “[i]nvolve other changes in the existing environment” that could result in conversion of farmland or forest land to non-farmland or non-forestland uses. The property is not identified as Farmland or Important Farmland in the 2016 Farmland Mapping and Monitoring Program, and does not and will not qualify as a viable agricultural unit based on size and current use.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**III. AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

- 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? ☐ ☐ ☐ ☒



Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

The Monterey Bay Unified Air Pollution Control District (MBUAPCD) and the California Air Resources Board develop programs to meet minimum air quality standards—and *District CEQA Air Quality Guidelines* (2008, MBUAPCD) provides guidelines for municipal use in conducting CEQA analysis.

- a. No Impact — The project would not have the potential to conflict with or obstruct the Air Quality Management Plan. The proposed project involves minimal grading—not to exceed 12”—of about 2.5 acres (of the 6.53-acre property) to construct aggregate base (AB) driveways, RV stalls, and runoff swale. The project scope and scale does not exceed the threshold of significance established by the MBUAPCD for PM<sub>10</sub> criteria pollutants. Projects are below the threshold of significance that involve minimal earthmoving of less than 8.1 acres per day, or extensive earthmoving/excavation of less than 2.2 acres per day. The project involves minimal earthmoving under 8.1 acres/day, and is not extensive in scope.
- b. No Impact — The project would not violate state AAQS or federal NAAQS for criterial pollutants (PM<sub>10</sub>, PM<sub>2.5</sub>, O<sub>3</sub>, CO, NO<sub>x</sub>, SO<sub>x</sub>) with non-attainment status in the North Central Coast Air Basin (NCCAB). The NCCAB only carries non-attainment status for Inhalable Particulates (PM<sub>2.5</sub>), and is in nonattainment-transitional status for Ozone (O<sub>3</sub>)—indicating the Air Basin is subject to more stringent State AAQS ozone standards. However, the Air Basin Management Plan notes that ambient ozone levels in the NCCAB are driven by windblown precursors from sources at the regional level. The state “ARB has determined that emissions transported into the NCCAB from urban areas outside the air basin can have a significant impact on violations of the ozone standard.” The Air Basin Plan notes that (emissions-heavy) population centers in the District are attaining the ozone standard while data from the remote Pinnacles National Park monitoring station does not meet that standard, indicating that nonattainment is primarily attributable to ozone and precursor emissions transported into the region from the Bay Area. Transport from sources outside the region are primarily responsible for NCCAB and San Benito County ozone nonattainment, which would have occurred in many cases even with no local/county contribution of ozone and ozone precursors. Motor homes and RVs are classified as light trucks, and projected growth of the light truck fleet is accounted for by the emissions inventory; in the operations phase the project is then not expected to cumulatively considerable net increase of PM<sub>2.5</sub> or O<sub>3</sub>.
- c. No Impact — The project will not expose sensitive receptors to substantial pollutant concentrations. Grading to a 12” depth for the 2.5-acre RV Park would have negligible impact on air quality, since it involves minimal earthmoving of less than 8.1 acres per day. Even if the project required extensive excavation, spread over two days it falls well below the 2.2 acres per day threshold of significance for PM<sub>10</sub> emissions. The Panoche School is situated 1.45 miles due east, and would not be exposed to substantial pollutant concentration. Fewer than a half-dozen residences are scattered in the vicinity but are located well beyond 500 feet of the project site.
- d. No Impact — The project would not generate other emissions, such as those leading to odors, that could affect a substantial number of people. Panoche Valley is sufficiently sparsely populated that the project could not affect a large number of people, and an RV Park will not generate any other emissions than from construction equipment or patron vehicles.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES.</b> Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Background.** The proposed project is situated in the Ciervo-Panoche Region, where the variable terrain of the Panoche Valley provides a range of distinct habitats that support a many federally or state-listed plants and animals. “There is an abundant scientific, regulatory, and historic literature” recognizing the importance of the area “to the conservation of a significant portion of California’s rare and sensitive biological resources,” according to the SolarGen EIR. The precarious status of these species and habitats are the result of geographically expansive large-scale agricultural, urban, and infrastructure development in the San Joaquin Valley, “which has left only a few intact natural areas” that continue to support these species, one of which is the Panoche Valley in San Benito County. Essentially, this upland valley now serves as a refugia or reservoir of biodiversity for the San Joaquin Valley, which has largely converted native ecosystems and critical habitat in the San Joaquin Valley proper to human use.

The unique ecosystems, differential habitats, and biodiversity local to the Panoche Valley, however, are critically important in their own right. The Valley is not only a notable stopover for migratory birds, it’s home to many endemic avian species, and both aspects factor heavily in its listing as a globally significant Important Bird Area by the National Audubon Society. Further, instead of merely hosting remnant populations at the periphery of their core original range, local



populations of at least three key rare species bear unique genotypes or genetic structures that differentiate them from core populations.

This genetic diversity nests within and supports species survival and biodiversity, which in turn relies on the many different and unusual habitats supported by the Panoche Valley region generally. In short, the unique/differential genetic makeup of three umbrella &/or keystone species discussed below (San Joaquin kit fox, giant kangaroo rat, and blunt nose leopard lizard) makes their Panoche Valley subpopulations *more* critical to the survival of each species as a whole; and all the rarer and more valuable in their own right.

*The Recovery Plan for Upland Species of the San Joaquin Valley, California* (U.S. Fish & Wildlife, 1998) highlights the Ciervo-Panoche Region as an crucial conservation area, and identifies the San Joaquin kit fox, giant kangaroo rat, and blunt nose leopard lizard as important umbrella species or keystone species critical to broader conservation efforts. Effective conservation of an umbrella species such as the kit fox necessarily conserves even more vulnerable and less-recognizable rare endemic species: by conserving species with a large home range, less noticeable species ranging within the broader territory are conserved as well.

In the same manner the radial burrow systems of the giant kangaroo rat (GKR) has been used by blunt-nosed leopard lizards as shelter, while the GKR itself is a keystone species in its role as prey for owls (3 species), kit foxes (2 spp.), and snakes (3 spp.)—and in its role gathering and storing seeds on the surface of its burrow system, which engineers a plant community favorable to the GKR and to associated species.

Giant kangaroo rat. The first and last site visit by Counter Planning staff found none of the distinctive radial burrow systems that are characteristic of the giant kangaroo rat presence and territory. None was found during consulting biologist Ed Mercurio's field survey. This is not unexpected, as the *Recovery Plan for Upland Species* observes that the GKR requires friable soil, as was readily observed by County Planning staff during the 10/12/19 site visit, at much greater elevations in the Panoche Hills. In contrast, the bare dirt on the subject parcel at the Panoche Inn is hard-packed and entirely unsuitable for giant kangaroo rat radial burrow systems. Likewise the vinegar weed- and tarplant-dominated plant communities hosting numerous GKR radial burrow systems in the Panoche Hills are markedly different from the proposed parcel's "non-native grassland plant community" dominated by "naturalized, non-native annual grasses and other naturalized, non-native annual plants.

Blunt nose leopard lizard. The project site was also recognizably not suitable as blunt-nosed leopard lizard (BNLL) habitat. Absence of stream cut-banks, riparian rocks/rock-beds, or GKR burrow systems preferred by the BNLL, indicates the species would not be present on-site. The *Recovery Plan for Upland Species* observes that blunt-nosed leopard lizards prefer to reside in areas with 15% to 30% vegetated ground cover—corresponding to the native plant communities of the Panoche Hills also hosting the GKR burrows. The non-native grasses and forbs grow very thickly on the RV Park project site, a condition avoided by the BNLL: the *Recovery Plan for Upland Species* notes that areas with ground cover greater than 50% are generally avoided by/ not suitable for blunt-nosed leopard lizards. The nearby intermittent stream is at a higher elevation than the Panoche Creek, where the nearest occurrence of BNLL, where cut banks and alluvial rock fields flank the creek at regular intervals. The unnamed creek—dry gulch—is fully vegetated with annual grasses, is characterized by smoothly-curved riparian sides and floor, hosting no rock deposits, and is situated one step up above the level valley floor—markedly distinct from the environs approximately 1.5 miles to the north.

San Joaquin kit fox. Site visits were also notable for the total lack of San Joaquin kit fox tracks or scat—signs easily recognizable and hard to miss in the Panoche Hills approximately 10.5 miles north by northwest of the project site. However, the highly mobile kit fox may travel through or venture onto the 6.53-acre parcel, through interest or to seek out food sources. Recommended conditions/mitigations will be applied to

**Response:**

- a. Less Than Significant with Mitigation — The project would not have a substantial adverse effect on special status species or their habitats. This is due to the absence of habitat required by the three umbrella/keystone species discussed above, and the resulting absence of the species. Though the heavily degraded property and in particular the non-native, annual plant community now on-site makes the presence of other (non-umbrella) species very unlikely, the potential for occurrence of isolated/mobile/colonizing sensitive species will be addressed by mitigations recommended by the consulting biologist.
- b. No Impact — The site contains no riparian habitat or sensitive natural community; and the project could have no substantial adverse effect. The project would not have off-site impact.
- c. No Impact — There is no on-site or off-site protected wetlands that could be affected.
- d. No Impact — No wildlife corridors cross or nurseries or occur on the 6.53-acre parcel. The reuse of the heavily impacted property would not interfere with the movement of endemic/native resident or migratory species. Though wide -ranging species (e.g., the San Joaquin kit fox) could potentially cross the property, this is not likely or occurring now even in the property's less-developed condition. Recommended mitigations will reduce this potential.
- e. No Impact — This project will not conflict with any local regulation intended to protect biological resources. The site plan calls for planting ninety-one (91) trees and removing one (1): the County of San Benito's tree protection ordinance does not apply.
- f. Less Than Significant Impact — The project would not, or is not known to, interfere with an adopted habitat conservation plan at the local, regional or state levels. The *Recovery Plan for Upland Species of the San Joaquin Valley, California* (USFS, 1998) directly addresses the region's endemic, sensitive species, as discussed above. The proposed project does not contain, impact, or remove any sensitive habitat, as identified in the *Recovery Plan*, required for the conservation of the key umbrella or keystone species in the regional ecosystem. The three key species discussed are known to thrive in native plant communities characterized by low flooding, low precipitation, and low wildfire potential. These factors characterize the Panoche Valley generally, assuming extensive irrigated row-crop agriculture is not revived—underscoring the project potential to serve visitors drawn by native wildlife and support range expansion of these species in the process.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES.</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a-c. Less than Significant Impact — The project would reuse a previously developed site. Grading is limited to a depth of 12" inches. The use of the site is not expected to result in any ground disturbance which could impact archaeological or historic resources. The site is not identified as containing historic resources or known archaeological resources. However the area is shown as having the potential for archaeological resources, and tribal consultation now in process would resolve any concerns.

Nor would the project disturb any human remains within or outside of dedicated cemeteries. The site has been heavily disturbed from decades of use as a bar/restaurant and residence, with accessory uses such as mobile homes, equipment storage, and garbage pits impacting the property over many decades.



Discovery of any archaeological resources or sites during this project requires, as a standard condition of approval, that the owner or project manager undertake procedures in compliance with County Ordinance 610 and state law.

- a. No historic resources or historic sites for this parcel are listed with the National Register of Historic Places <https://nationalregisterofhistoricplaces.com/ca/san+benito/state.html> . Nor are any historic resources or sites registered with the California Register of Historical Resources for this parcel. <http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=35> .
- b. Tribal consultation standard to the process is being conducted, with notification letters sent to appropriate tribes and to the Native American Heritage Commission (NAHC). Though no archaeological site is identified in County of San Benito records, minimal shallow grading would be unlikely to uncover cultural resources (to a depth of 12”), and standard conditions of approval ensure proper measures are taken if archaeological resources or remains are encountered.
- c. No human remains are known to exist on-site.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. ENERGY.</b> 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a, b. No Impact — No of this project. The small scale of the facility makes it unlikely that the project would involve any excessive increase in consumption of energy. Though the project could result in an incremental increase in energy use during operations, such use would not be unnecessary, inefficient, or wasteful as patrons would also consume energy when not on-site.
- b. No Impact — No state or local plan for renewable energy or energy efficiency would be obstructed or impeded by this project. Instead, the eventual, projected RV fleet conversion to electric models would eventually likely eliminate mobile emissions sources during project operations stage (personal communication, Alan Romero, MBARD grant program manager, electric vehicle charging infrastructure).

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS.</b> Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a. The project would not directly or indirectly cause potential substantial adverse effects to persons or property, for geological reasons, nor would it cause risk of loss, injury, or death. The project is not located in or near an Alquist-Priolo Earthquake Fault Zone. The site is 5.7 miles due south of the Oligalita Fault, and 17.1 miles, 16.1 miles and 14.6 miles due east of the San Andreas, Pine Rock and San Benito Faults, respectively. The project involves no above-ground structures nor any below-ground infrastructure that could collapse or be compromised in a way that could put lives or property at risk.
- a.i. Less than Significant — The project is not near an Alquist-Priolo Earthquake Fault Zone. The site is 5.7 miles due south of the southernmost tip of the Oligalita Fault, and 17.1 miles, 16.1 miles and 14.6 miles due east of the San Andreas, Pine Rock and San Benito Faults, respectively.
- a.ii. Less than Significant — While not in close proximity to major faults, the site would experience ground shaking during a seismic event. However, no structures that could collapse, nor any below-ground hazardous fuels storage or transmission that could adversely affect persons or property, are proposed. Water lines, septic, and electric lines for RV hookups comprise the extent of the project's below-ground infrastructure.
- a.iii & iv. Less than Significant — The project would not cause substantial adverse effects from liquefaction, landslides, or seismic-related ground failures. Due to its location at or near the valley floor, no potential exists for soils to slide or



collapse below the subject property. Nearby hills are not site-adjacent and present no potential to adversely impact persons or property on-site during a seismic event.

- b. No Impact — No substantial soil erosion would occur with this project, nor is loss of topsoil expected. The site slopes gently at a 0-2% grade, and the site is designed capture runoff on-site. “The hazard of erosion is none to slight,” according to the *Soil Survey of San Benito County, 1969*. One dry gulch—intermittent stream—external to the project, runs by the southeast corner, poses no flood risk, and would have no impact on the property.
- c. No Impact — The project is not located on unstable soil or geologic unit. No potential exists for on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. *Soil Survey of San Benito County, 1969*.
- d. No Impact — Panoche loam has a moderate shrink-swell capacity and would not create substantial direct or indirect risks to life or property. *Soil Survey of San Benito County, 1969*.
- e. No Impact — Soils can support septic systems for sewage waste disposal. The County Department of Environmental Health has determined that septic leach fields are feasible.
- f. No Impact — No unique paleontological resource or unique geologic feature has been documented.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a. Less Than Significant Impact — Emissions from construction grading would be minimal, and as indicated under the air quality discussion, are well below criteria pollutants thresholds and would not violate air quality criteria. Facility patrons would use some electricity at levels equal to or less than usage levels at home. Once operational, the RV Park is not projected to induce travel demand; it is instead likely to absorb existing demand.  
Standard construction equipment will emit some greenhouse gases; grading the 2.5 acre site to 12” inches for +/- 85cy cut/fill would not exceed emissions thresholds that could have a significant impact on the environment.  
Motor homes are classified as light trucks; any expected GHG impact is accounted for by the projected light truck fleet growth under the basin emissions inventory.  
The potential to induce increased VMT into the Valley is relatively small due to remoteness, road condition, and a landscape as dry and unforgiving as it is scenic and appealing. Existing unmet demand for overnight accommodations is substantial enough that the RV Park capacity without inducing travel trips/VMT.  
Patrons of the project will reduce greenhouse gas (GHG) emissions for some commute trips; however, GHG emissions levels for some non-commute trips may remain constant while seeing a per-day decrease. Existing demand for overnight accommodations indicates that commuters coming into the County for work, and staying overnight, will cut VMT in half on those trips. Recreational visitors can likewise reduce *per-day* VMT by staying overnight to maximize time in the Panoche Valley, likely driving the same total miles, rather than risk a same-day round-trip back over a rough road in unfamiliar terrain.
- b. No Impact — The project would not conflict with any known plan, policy or regulation applicable to the project or otherwise interfere with programmatic efforts to reduce greenhouse gas emissions.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

***Response:***

- Less Than Significant Impact — The proposed project does not involve the routine transport, use or disposal of hazardous materials. Materials used in the standard operations of the RV Park would be limited to vehicle fuel, coolants, cleaners, and septic and related fluids. Standard usage would not likely result in a significant hazard to the public or to the environment; the facility would be required to comply with standard disposal requirements.
- Less Than Significant Impact — Some potential for improper disposal of standard materials exists; however, no reasonably foreseeable upset or accident could result in release of hazardous substances into the environment. The project would be required to comply with existing regulations relating to disposal.
- No Impact — There are no schools located within one quarter mile of the proposed project. The Panoche School is located 1.45 miles east of the project site (elementary, very small student body).
- No Impact — A search of the Department of Toxic Substances Control Envirostor databases found no hazardous waste sites within a 5-mile radius of the project, nor on the property itself. A Phase 1 Environmental Site Assessment searched eighteen (18) databases and identified zero (0) listings for the subject parcel.

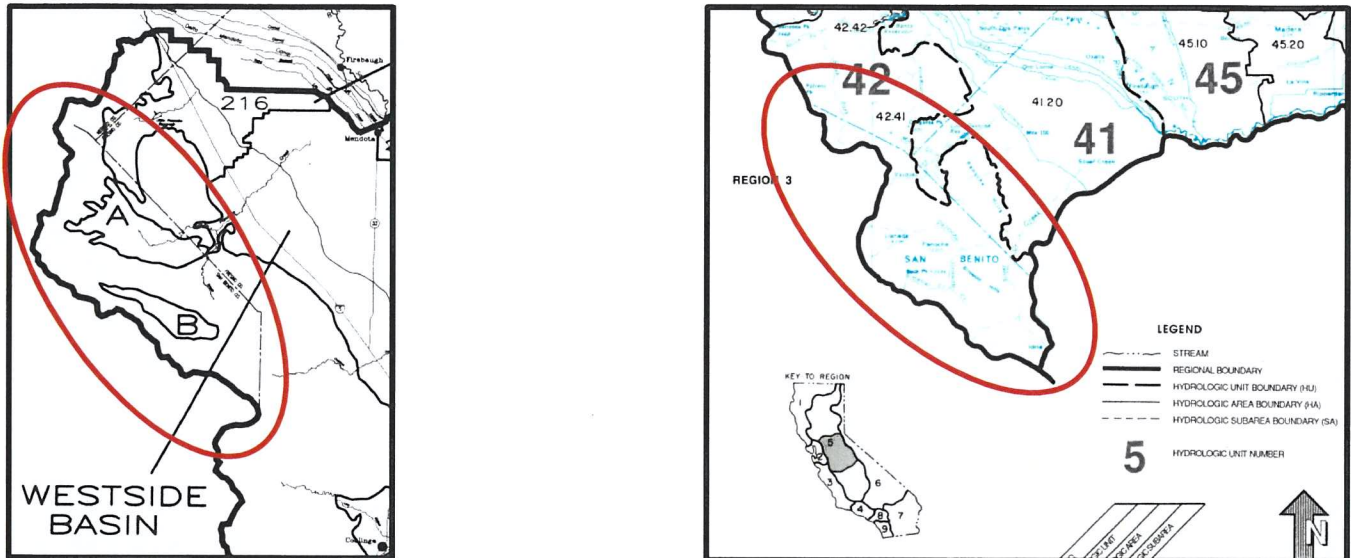


- e. No Impact — The project is not located within two miles of a public airport or public use airport. A private, seldom-used grass airstrip is located north of the project site; use is rare and limited to glider pilot landings.
- f. No Impact — There are no emergency response or evacuation plans with which the project could physically interfere, nor could in any way impair plan implementation.
- g. Less Than Significant Impact — The surrounding rangeland carries only a Moderate Fire Hazard Severity Rating: the project would not expose people or structures to significant risk of loss, injury or death. Little-to-no wildfire fuel, brush, or woody debris is generated by the surrounding arid grassland ecosystems. It is possible that an increase in people/on-site activity could potentially increase spark sources. County Fire standard conditions of approval include 1 standard and 4 wharf hydrants arrayed on site periphery, water tank, and new well will reduce risk in this Moderate Hazard–designated property. Standard use of firebreaks, defensible space, mowing, and RV Park rules will also reduce any remaining risk of loss, injury, or death due to wildfire.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

**Background.** The project site and surrounding watershed are within Region 5 and under the jurisdiction of the Central Valley Regional Water Quality Control Board (CVRWQCB) (See Figures 6 and 7, below). The Panoche Valley is situated on the southwest periphery of the Tulare Lake Basin, a closed hydrological unit under management of the Tulare Lake Basin Water Quality Control Plan, and consists of the Clough Canyon, Bitterwater, Las Aguilas, and Panoche Creek watersheds, which carry water only during periods of heavy seasonal precipitation, as well as numerous unnamed intermittent streams that drain eastward out of the County until the creek runs dry.



**Figures 6 and 7. San Benito County's Panoche Valley, within the Region 5 / Central Valley Regional Water Quality Control Board. The Panoche Valley Groundwater Basin is labeled 'A', at left.**

The project is not within a groundwater subbasin as defined by the California State Department of Water Resources and is not subject to requirements established under the Sustainable Groundwater Management Act (personal communication, Glenn O. Allen, Water & Natural Resources Section, Dept of Public Works and Planning, County of Fresno). Water budget data is sparse-to-nonexistent in the remote arid periphery of the Region 5 management unit. However, the Panoche Valley Solar Farm EIR conducted a hydrological analysis that indicates substantial groundwater supply exists to meet the current project's potable water needs and to cover projected livestock, irrigation, and domestic drinking water demand in the Panoche Valley generally (Panoche Valley Solar Farm EIR, *Geologica*). Groundwater recharge is driven by precipitation, though a significant proportion of that rainfall is lost to surface runoff and does not infiltrate to the water table. Of the 21,000 acre-feet per year (afy) in precipitation, "9,870 afy and 8,240 afy are removed by runoff and evapo-transpiration, respectively." Livestock, irrigation, and residential demand consumes about 180 afy. The remaining margin of approximately 2,700 afy percolates into the soil to recharge groundwater. Basin-wide recovery of groundwater levels is occurring due to the halting of intensive irrigation once-common in the 1940s-'70s throughout the valley for row-cropping. Total annual precipitation recorded in Panoche Valley from 1949 to 1995 averaged 9.69 inches (Western Regional Climate Center (WRCC, 2010)), with low flood risk or related hazards.

- a. **No Impact** — The project would not impair or degrade surface or ground water quality. No water quality standards will be violated, and no discharges have the potential to negatively impact water resources. A sewage pump station will properly service any/all RVs; County Environmental Health requires a new treatment system be designed.
- b. **Less Than Significant Impact** — A new well will provide water to the project. The effect would not substantially decrease groundwater supplies, given the estimated margin in the water budget (detailed above), nor would it interfere with groundwater recharge rates.



- c. No drainage patterns would be altered by the project, which is not within any dry, wet, or intermittent stream drainage system. The project is situated on level/gently sloping terrain, above and well outside a nearby dry gulch: a small intermittent stream (per Llanada USGA top map) located outside the project site and running past the southeast corner of the property is called a riverine wetland by the <https://www.fws.gov/wetlands/data/Mapper.html>. However, that feature may not be extant and will not be affected. Site design following natural terrain directs surface runoff to a mitigation swale on the northeast corner of the site, away from the ephemeral creek. It's a dry gully shows no evidence of erosion.
- c.i. No Impact — The project will not result in substantial on-site or off-site erosion.
- c.ii. No Impact — No flooding could result from the project. The area is designated by FEMA as Flood Zone X. The project will not increase surface runoff; any project-related runoff will be directed to on-site drainage facilities.
- c.iii. No Impact — The project would not create large volumes of surface runoff. There are no existing or planned stormwater drainage systems that could be affected.
- c.iv. No Impact — The vicinity will not flood. The project will not impede or redirect any flood flows. Unforeseen precipitation levels would drain to the on-site mitigation swale, while higher-than-expected off-site runoff waters would effectively drain to nearby dry streambeds and gulches with little chance of impacting the project site.
- d. No Impact — The project is not in a flood hazard, tsunami, or seiche zone; and would not be inundated.
- e. No Impact — The project would not conflict with or obstruct any water quality or groundwater plan. The area bears little-to-no mention in applicable basin management plans; groundwater is in recovery.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING.</b> Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a. No Impact — The 6.53-acre project could not/ will not physically divide an established community. The very low-population community of Panoche is widely dispersed across the Panoche Valley.
- b. No Impact — The project does not conflict with a land use plan or policy used to avoid an environmental effect. Consistent with C-2 Commercial zoning, the project conforms with the C-2 overlay district that is allowed without a General Plan amendment. RV Parks are conditional uses under C-2 and AR zoning.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES.</b> Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a, b. No Impact — There is no known occurrence of mineral resources on the 6.53-acre site. No resource of value, nor any resource recovery site in a general or specific plan, would be lost, obstructed, or made unavailable.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE.</b> 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a) Less Than Substantial Impact — Temporary increases in ambient noise levels would occur but not in excess of applicable county standards. SBCC § 19.39.051(H) Exemptions: “[t]emporary construction” activities ... between 7:00a.m. and 7:00 p.m.” are exempt. General Plan Policy HS-8.12 Construction Noise Control Plans requires “all construction projects ...within 500 feet of sensitive receptors to develop and implement construction noise control plans.” This project is not within 500 feet of any sensitive receptor.
- b) No Impact — Grading a maximum 2.5 acres to a depth of 12” may generate ground-borne vibrations. Standard construction equipment, small project size, and no neighboring residents within 500 feet would indicate that little impact is likely, and no impact is likely to be excessive.
- c) No Impact —There is a private, seldom-used grass airstrip to the north, used primarily by glider pilots. While grading would generate expected noise levels, it would not expose people residing or working in the project area to excessive noise levels, due to scale of the project, distance, and few-to-no nearby workers or residents.



Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING.</b> 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a) No Impact — The project would not induce substantial unplanned population growth, proposes no new housing, and does not involve the extension of roads or any other infrastructure; nor any improvements.
- b) No Impact — The project does not displace any people or housing. It provides overnight accommodations.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XV. PUBLIC SERVICES.</b> Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

- a. Less than Significant Impact / No Impact — *Fire protection, Police protection / Schools, Parks* — No substantial adverse physical impacts could be associated with the project, which will not result in any need for new facilities, nor would the project require physically altered governmental facilities. The Antelope Creek CalFire station is 9.1 miles west along Panoche Road, about 14 minutes away. Police protection is provided by the County of San Benito Sheriff. Increasing people on-site could increase fire and police calls; however service levels would remain unchanged. The project would have no impact on local schools, nor substantially impact nearby parks.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION.</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***Response:***

- a. No Impact — The project has some potential to increase the use of remote regional parks such as BLM recreation lands (e.g., the Griswold Hills or Clear Creek areas)—but not “such that substantial physical deterioration would occur.” The scale of the project is small relative to the many, widely dispersed recreational resources available. The project would not substantially increase the use of these parks; instead, it’s likely to improve access to BLM lands for limited numbers of people.  
The RV Park would draw from existing users without increasing overall demand for the park system. The project would not cause substantial or accelerated physical deterioration of any of the parks, due to the small project scale and the large scale of the regional recreational lands.
- b. No Impact — The project does not include or require the construction or expansion of recreational facilities, and so could not have an adverse physical effect on the environment.



Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION.</b> Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Background. When operating, this project is likely to reduce VMT to the degree that existing commuters and day-trippers eliminate daily round-trips out of the valley in favor of overnight stays (reducing VMT by half where employees drive back in the next workday, with smaller VMT decreases for day-trippers on multi-day outings). Other existing visitors may travel fewer VMT *per day*, but drive the same total vehicle miles traveled. It's likely that some commuters accessing jobs and visitors attracted by area amenities will not choose to make the arduous return trip back home over the hills on the same day. Sufficient demand exists by commuters during the work-week and by weekend visitors to indicate that overnight RV accommodations would reduce daily roundtrips and lengthen stays in-valley.

Induced demand is not at issue, due to sizable unmet demand. Over the long-haul

Trip generation. Using Land Use #416: Campground/Recreational Vehicle Park (ITE Trip Generation Manual), which indicates a rate of 0.32 'trip ends' per occupied RV stall, or 6.72 trip ends per weekday A.M peak commute hour. That's ~3.4 round trips per hour (in-out or out-in). This number should be adjusted downward significantly due to remoteness, poor condition of roads, and near-total lack of nearby destinations (Panoche Inn being the only restaurant in 50 miles in any direction). The 3.4 trips per peak hour is calculated on full capacity and assumes all 21 stalls are occupied. Staff cannot project the RV Park will operate at full capacity. It may take a number of years to build the business.

Road damage would be negligible-to-none, given low traffic volumes, negligible impact of light truck/RV axles, and condition of road (personal communication, Gregory J. Bucknell, County Engineer (contract)). Traffic Impact Fees apply.

**Response:**

- No Impact — The proposed project does not conflict with any transportation program, plan, policy or ordinance.
- Less Than Significant Impact — The project would not conflict nor be inconsistent with CEQA Guidelines § 15064.3, subdivision (b), Criteria for Analyzing Transportation Impacts. Pursuant to §15064.3(b)(3), a qualitative analysis is provided above—immediately above in the *Background* section—indicating that VMT may be reduced by half for existing commuters driving into the Panoche Valley who work at the solar facility or area farms and who choose to stay overnight rather than driving back that same day, and indicating that *per-day* VMT may be reduced among visitors making the same journey but preferring fewer daily round-trips.
- No Impact — The project does not propose any geometric design features and will not increase hazards.
- No Impact — The project will not reduce access nor result in inadequate emergency access.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES.</b>				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:			<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) 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 § 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***Response:***

- a. No Impact — Tribal Consultation will ensure no impact could occur. The project would not cause a substantial adverse change in the significance of a tribal cultural resource, given the information available at this time. Although no tribal cultural resource is *known* to exist on this site, it is mapped as an area with High Sensitivity for archaeological resources. Standard conditions of approval ensure that any archaeological sites encountered will be addressed in accordance with standard protocols. The site has been heavily disturbed over time: a bar/saloon has operated continuously on the property for the past 85 years, minimum, and associated uses (gas station) and accessory structures (storage sheds, mobile homes) have impacted surface soils through discing/scarifying for fire prevention, excavation, and minor grading for building pads and driveways have occurred around the property off-and-on throughout these years.

The below findings are subject to consultation with relevant Native American nations:

- a.i. No Impact — The project would not cause a substantial adverse change to a resource of cultural value to a California Native American tribe that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources.
- a.ii. No Impact — No tribal cultural resource is *known* to exist on this site. The project would not cause a substantial adverse change to a known tribal cultural resource, of value to a California Native American tribe, determined to be significant using substantial evidence, pursuant to criteria Public Resources Code § 5024.1(c). Through consultation with Native American nations, County of San Benito RMA staff intends to hear and take into account the cultural value of the site to California Native American tribes, and shall consider the significance of the resource in this process.



Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a. Less Than Significant Impact — No connection to off-site utilities or external agencies is required. The project would not result in the relocation, construction, or expansion of external waste treatment systems, water systems or other infrastructure. Improved on-site services could not cause any significant environmental effects.
- b. Less Than Significant Impact — A new well would supply water as required. Ample groundwater exists and is recharging; see Section X: Hydrology & Water Quality. No reasonably foreseeable future development is likely.
- c. No Impact — The project is served by an existing on-site septic system, subject to Environmental Health review.
- d, e. No Impact — No waste in excess of standards or infrastructure capacity would be generated. The project is required to comply with all federal, state, and local statutes and regulations related to solid waste. Sufficient capacity to accommodate any solid waste generated exists at the John Smith Landfill, San Benito County's primary site for solid waste disposal.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE.</b> 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:**

- a–d. **No Impact / Less Than Significant Impact** — The site is in a Moderate Fire Hazard Severity Zone, as is the entire Panoche Valley. Nothing in the proposed project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires. However, this is a State Responsibility Area.
- a. **No Impact** — The project would not impair emergency response or evacuation plans.
- b. **Less Than Significant Impact** — Low fuel loads from the arid grassland’s limited biotic potential lower fire severity risk to the Moderate Fire Hazard Severity rating. The project would not exacerbate wildfire risks, nor expose project occupants to pollutant concentrations or uncontrolled spread of wildfire. Prevailing winds do expose San Benito County to poor air quality driven by wildfires elsewhere in the state; however, project occupants would be at the same or higher risk levels at home. Prevailing winds bring cool clean marine air into the County, and into the Panoche Valley by evening, resulting in better air quality, generally, than the rest of the state, as amply documented by recent statewide air quality hazards / warnings.
- c. **No Impact** — Site improvements would not exacerbate fire risk or result in temporary impacts to the environment. Existing fire-suppression measures serve the Panoche Inn and would be improved in proportion to increased site occupancy. Wharf hydrants and water tank is standard and by definition would not exacerbate fire risk here.
- d. **No Impact** — Post-fire effects would not expose people or structures to significant risks. The site will not be subject to flooding, landslides, nor any drainage changes or slope instability that sometimes occur in the aftermath of wildfires. No flooding could occur due to arid climate, minimal precipitation, and absence of surface waters. Nearby hills could not affect the site and are not a landslide risk.



Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***Response:***

- a. Less Than Significant Impact — County staff has reached a determination that the project would **not** have the potential to substantially degrade the quality of the environment, substantially reduce fish or wildlife habitat, or cause a fish or wildlife population to drop below self-sustaining levels. *However*, it is possible that an endemic plant or animal species could be reduced in population, even though no evidence has been identified during field surveys that would support such a conclusion.
- b. Less Than Significant Impact — Staff has determined that the project would **not** have cumulatively considerable impacts. No other past, current, or future projects could contribute to the cumulative effects of this project. Over the long-term this project has potential to be successful, though incremental effects would not be considerable.
- c. No Impact — The project will not have adverse effects on human beings, directly or indirectly.

## XXII. LIST OF REFERENCES

1. San Benito County General Plan
  - a. Land Use Element
  - b. Transportation Element
  - c. Noise Element
  - d. Open Space and Conservation Element
  - e. Scenic Roads and Highways Element
  - f. Seismic Safety/Safety Element
  - g. Housing Element
  - h. Environmental Resources and Constraints Inventory
2. San Benito County Ordinances
  - a. Zoning Ordinance
  - b. Grading Ordinance
3. Project Description
4. Soil Survey for San Benito County, 1969, US Dept. of Agriculture, Soil Conservation Service
5. Historic Registries, State and Federal
  - a. National Register of Historic Places  
<https://nationalregisterofhistoricplaces.com/ca/san+benito/state.html>
  - b. California Register of Historical Resources  
<http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=35>
6. Air Quality Management Plan 2012-2015, Monterey Bay Air Resources District
7. CEQA Air Quality Guidelines, Monterey Bay Unified Air Pollution Control District, 2008
8. Personal communication, Alan Romero. MBARD. Electric Vehicle Charging Infrastructure Program. 2019.
9. Personal communication, Hannah Muegge. MBARD. 2019.
10. Water Quality Control Plan (Basin Plan) for the Central Valley Region, Fifth Edition. California Regional Water Quality Control Board. Revised May 2018.
11. Water Quality Control Plan for the Tulare Lake Basin, Third Edition. California Regional Water Quality Control Board Central Valley Region. Revised May 2018.
12. Personal communication, Glenn O. Allen, Division Manager, Water & Natural Resources, Fresno County.
13. Panoche Valley Solar Farm Hydrological Study. Geologica. 2010.
14. Phase I Environmental Site Assessment & Limited Phase II Subsurface Reconnaissance. Nov. 2016. Phase-I Environmental Services, San Jose, CA.
15. Recovery Plan for Upland Species of the San Joaquin Valley, California. U.S. Fish & Wildlife. 1998.
16. Biology Section, Panoche Valley Solar Farm Final Environmental Impact Report (FEIR).  
[http://www.cosb.us/Solargen/feir/c06\\_biology.pdf](http://www.cosb.us/Solargen/feir/c06_biology.pdf)



17. Panoche Valley Solar Farm (SolarGen) Final Environmental Impact Report (FEIR).

- a. Aesthetics
- b. Agriculture
- c. Air Quality
- d. Climate Change
- e. Biology
- f. Cultural and Archaeological
- g. Geology and Soils
- h. Hazardous Materials
- i. Land Use and Recreation
- j. Noise
- k. Population and Housing
- l. Public Services
- m. Traffic
- n. Water

18. Maps

- a. General Plan Land Use Map, San Benito County
- b. Zoning Map, San Benito County
- c. Landslide Hazard Identification Maps: Relative Susceptibility Map
- d. Alquist-Priolo Fault Hazard Maps, 1986
- e. Fire Hazard Severity Zones in State Responsibility Areas
- f. FEMA Flood Insurance Rate Map dated September 27, 1991
- h. San Benito County Application Project Plan Set
- i. U.S.G.S. San Felipe Quadrangle
- j. San Benito County Important Farmland 2009 Map, California Department of Conservation, Office of Land Conservation, Farmland Mapping and Monitoring Program

19. California Scenic Highway Mapping System, California Department of Transportation

20. Web Soil Survey, National Cooperative Soil Survey, Natural Resources Conservation Service

21. National Wetlands Inventory, Fish and Wildlife Service

22. ITE Trip Generation Manual. Institute of Transportation Engineers.

23. Personal communication, Gregory J. Bucknell, County of San Benito Public Works. 2019.

**XXIII. Figures**

- 1. Project Site Plan
- 2. & 3. Vicinity Maps
- 4. & 5. Vicinity Map and Aerial View of Subject Parcel
- 6. & 7. San Benito County's Panoche Valley, eastern portion within the Region 5 / Central Valley Regional Water Quality Control Board. The Panoche Valley Groundwater Basin is labeled 'A', at left.