



San Benito County Resource Management Agency

Public Works / Planning & Building / Parks / Integrated Waste

Notice of EIR Preparation (Revised)

Project Title: Ridgemark Subdivision Project (SCH#2020109022)

Project Applicant: Angels Company, LLC/Mr. John Wynn

The County of San Benito as the Lead Agency will prepare an environmental impact report (EIR) in accordance with California Environmental Quality Act (CEQA) for the Ridgemark Subdivision project (revised) as described below. A revised Notice of Preparation is being recirculated because the project description has changed and we are interested to know your views as to the scope and content of the environmental information for the proposed revised project.

Pursuant to the public participation goals of CEQA, the County in its role as lead agency, held a virtual public scoping meeting on Thursday, November 5, 2020 during which the originally proposed project was presented and input on the scope of the EIR was received from the public and representatives of public agencies and other organizations.

The proposed Ridgemark Subdivision project as revised would include; amending the zoning map for the site as needed, a vesting tentative subdivision map, residential and commercial/non-residential development, recreational/open space improvements, roadway improvements, and utility improvements. The proposed vesting tentative map would re-subdivide the project site to create 190 new single-family residential lots, five new commercial/non-residential lots, nine buffer zone lots, six undeveloped lots, five golf course lots, and one lot for a park; all within the proposed development area.

The revised project is similar to the originally proposed project but incorporates a revised site plan that better responds to existing geological characteristics of the site. The revised project also includes two additional components: a 38-unit affordable housing component and an additional access route between the project site and Southside Road by way of the streets within the adjacent Promontory at Ridgemark project site. A map of the project area is shown on the reverse side of this notice. A detailed project description, location, and the potential environmental effects of the revised proposed project are contained in the materials posted on the County web site at <https://www.cosb.us/departments/resource-management-agency/planning-and-land-use-division>.

Due to the time limits mandated by State CEQA law, your written response comments must be sent no later than October 15, **2021** or 30 days after receipt of this notice. Please send your response to Michael Kelly, Associate Planner at the RMA address shown below or email to mkelly@cosb.us. Please be sure to include your contact information so the County can keep you informed of future meetings for this project.

Date: September 15, 2021

Signature:

A handwritten signature in blue ink that reads "Michael Kelly".

Title: Associate Planner

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Ridgemark Subdivision EIR

Notice of Preparation

PROJECT LOCATION AND SETTING

The proposed project is located on approximately 253 acres within the approximately 618-acre Ridgemark Golf Course and Country Club property (“project site”), south of State Route 25 (Airline Highway) in unincorporated San Benito County, and southeast of the City of Hollister. [Figure 1, Location Map](#), shows the regional setting of the project site. Regional access to the site is provided by State Route 25 and Fairview Road. The project site is presented on [Figure 2, Aerial Photograph](#). The areas of the project site that would be developed are identified in Figure 2 as “Development Area” (hereinafter “development area”). The development area boundary represents the general locations of the Ridgemark property that would be subdivided and modified by future residential and commercial development. Direct access to the site is provided from three gated entry points off of State Route 25: Ridgemark Drive, Dan Drive, and South Ridgemark Drive. Ridgemark Drive provides the primary access route into the project site. Dan Drive provides emergency access to the site.

Surrounding Land Uses

[Figure 3, Project Site and Surrounding Land Uses](#), presents an aerial view of the project site. Land uses in the vicinity of the project site are presented in [Table 1, Surrounding Land Uses](#).

Existing Developed Site Conditions

The project site has seen many changes since 1972, when what used to be a turkey farm was subdivided and developed with a gated residential community with a 36-hole, PGA-quality golf course. Existing development on the Ridgemark property was approved in phases with multiple final maps and environmental documents over many years. In April 2014, when drought conditions forced the Sunnyslope County Water District to reduce water supply to the project site, 18-holes were eliminated, with many of the former fairways left fallow. Existing development on the project site includes single-family and multi-family homes on 697 residential lots, one 18-hole golf course, 32 transient occupancy guest rooms, clubhouse, banquet rooms, restaurant, pro shop, driving range, six tennis courts, playground, and ponds.

Table 1 Surrounding Land Uses

Direction	Land Uses
North	Quail Hollow and Oak Creek Neighborhoods; Sunnyslope County Water District Office; Future Ridgemark Assisted Care Facility; State Route 25 (Airline Highway); Future Roberts Ranch Subdivision; Cielo Vista Neighborhood; Future Gavilan College – San Benito Campus; Fairview Corners Residential Specific Plan; and Vacant Land
South	Southside Road; Future Promontory at Ridgemark Subdivision; Agricultural Land; Rural Residential; and Vacant Land
East	Vacant Land; Orchard; and Proposed Vintage Specific Plan Residential Development
West	Vacant Land and Rural Residences.

SOURCES: Google Earth 2019, EMC Planning 2020

Existing Site Conditions

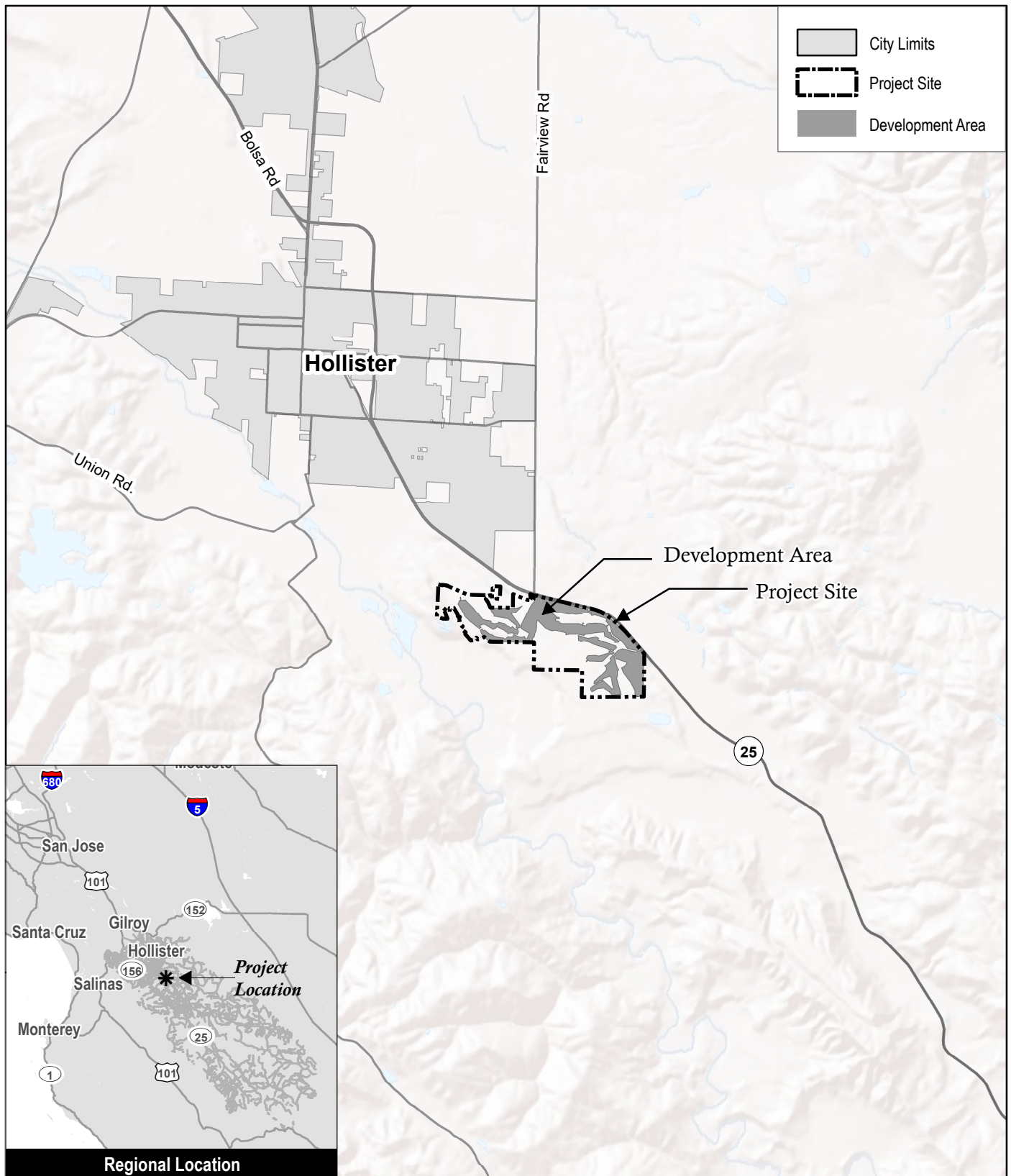
The project site consists of several areas within and adjacent to the existing gated residential subdivision, clubhouse and driving range.

Areas of the project site outside the gated residential community consist of the following:

- Areas located east of Ridgemark Drive including the existing clubhouse and cottages on 7.36 acres; a 3.36-acre parking lot, a 15.1-acre driving range; and 3.39 acres with landscaping and a drainage pond located between the existing clubhouse and State Route 25; and
- An additional 3.79 acres located on both sides of Dan Road between the residential community and State Route 25. An existing maintenance yard is located within this area on the east side of Dan Road.

Areas of the project site within the gated residential community consist of the following:

- East of Ridgemark Drive, the site includes the existing active golf course and adjacent single-family development. A number of water features/hazards are present on the fairways. Several of the water features and drainages include locations where the California tiger salamander (*Ambystoma californiense*) listed by CDFW and USFWS as a threatened species, have been observed in the past, and these features may provide suitable habitat for special status plant and wildlife species;

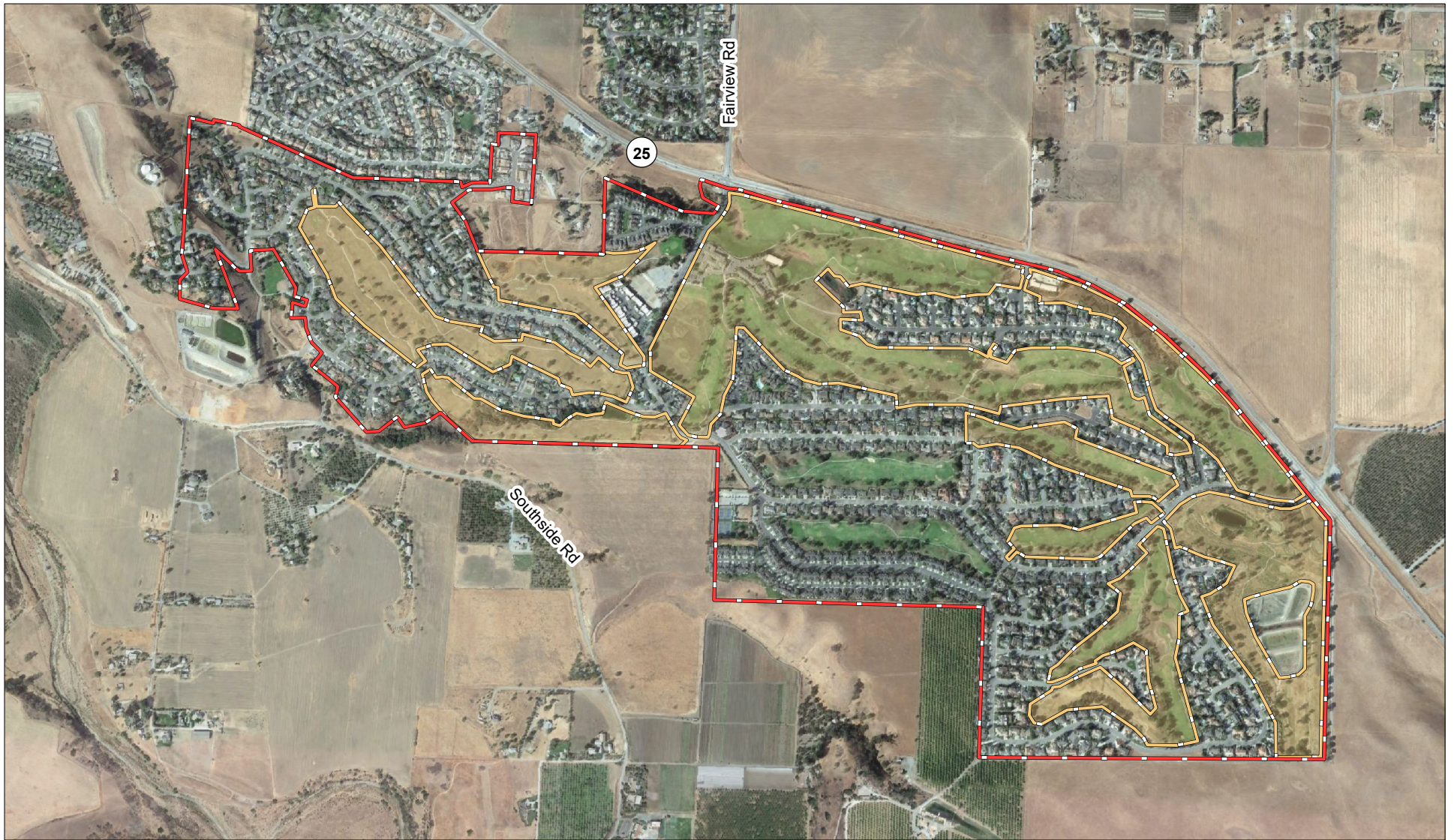


Source: ESRI 2019

Figure 1
Project Location



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0 1250 feet



Project Site



Development Area

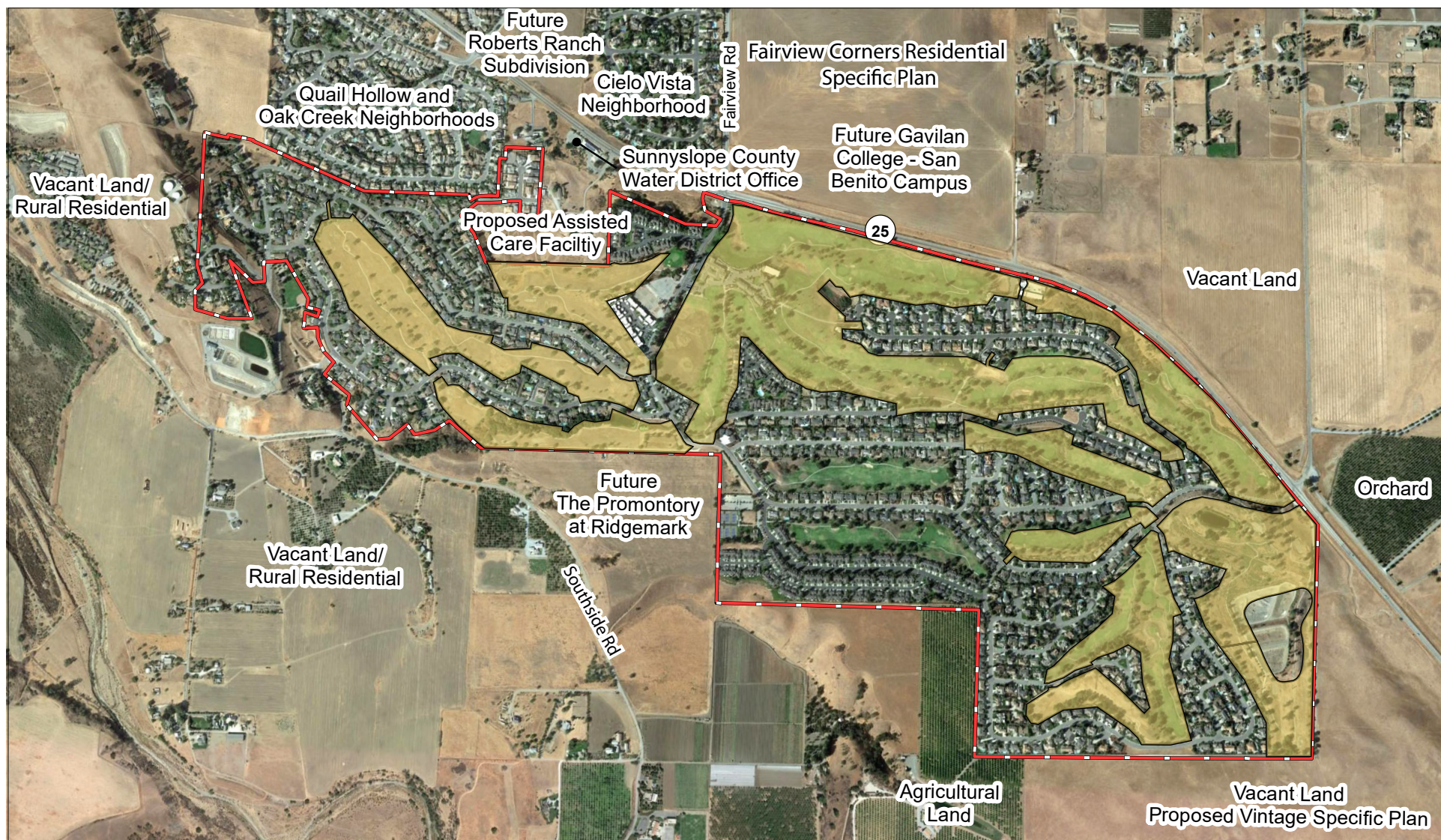
Kelley Engineering & Surveying 2019, ESRI World Imagery 2021, Aerial Date: 09/11/2019



Figure 2
Aerial Photograph

Ridgemark Subdivision EIR Notice of Preparation

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0 1250 feet



Project Boundary



Development Areas

Kelley Engineering & Surveying 2019, Google Earth 2018



Figure 3
Project Site and Surrounding Land Uses
Ridgemark Subdivision EIR Notice of Preparation

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- Multifamily residential development is located near the center of the site east of the existing driving range and near the southern boundary of the project site along Duffin Drive;
- The eastern portion of the site, generally located along and east of South Ridgemark Drive and Sonny's Way, consists of existing homes and streets, natural drainages, former water hazards, drainage ponds, and fallow former fairways near the easternmost portion of the project site. Ornamental tree species and concrete golf cart paths are present within the otherwise fallow fairways;
- Two water storage ponds, one owned and operated by Ridgemark and the other owned and operated by the Sunnyslope County Water District are located within the easternmost portion of the project site. No changes are proposed to the existing Sunnyslope County Water District pond. In this portion of the project site, much of the unoccupied flat land between existing development to the south and State Route 25 to the north has been used for the disposal of landscape trimmings and construction spoils;
- West of Ridgemark Drive, the project site consists of fallow former golf course fairways west of Ridgemark Drive. A number of ornamental tree species and concrete golf cart paths are present within the otherwise fallow fairways west of Ridgemark Drive; and
- South of Marks Drive, the project site includes vacant land adjacent to two existing drainage ponds.

In addition to these areas, a drainage ditch runs east-west along the northern portion of the project site adjacent to State Route 25. There are several areas within the project site and proposed development area boundary that can support native plant and animal species.

Figure 4, [Overall Site Plan](#), presents a color-coded description of existing and proposed development on the project site.

Other Existing Conditions

Two other areas that would be affected by the proposed project are shown on Figure 4.

- The proposed project would construct its affordable housing component on approximately one acre located west of Ridgemark Drive, directly across from the existing clubhouse and parking lot. This area is part of a previously-approved conditional use permit for commercial development known as Lot A, which has not yet been constructed. Existing conditions on this portion of Lot A currently consist primarily of the 18th hole of the fallowed golf course land; and

- Second, a south leg will be added to the intersection of Ridgemark Drive and South Ridgemark Drive by the developer of the adjacent subdivision identified on Figure 4 as the Promontory at Ridgemark . Traffic impacts of the Promontory at Ridgemark project were analyzed in an EIR (SCH#2016101022) certified by the County on April 2, 2018.

General Plan Land Use Designation and Zoning

The project site has a *San Benito County 2035 General Plan* land use designation of Residential Mixed (RM), and Commercial Neighborhood (CN) at the project entrance from Highway 25. The San Benito County zoning designation for the project site is R-1, Single-family Residential, and RM, Residential Multiple. A portion of the project site identified as “Contract Zone per Rec File No. 8403420” on the Vesting Tentative Map (refer to Figure 3-7). This area is located within the RM zone district. [Figure 5, Existing Zoning](#), presents the existing zoning designations on the overall Ridgemark property.

PROJECT DESCRIPTION

The proposed project would amend the zoning on the site as needed to establish a base zone of Single-family Residential (R-1) District combined with either the Planned Unit Development (PUD) Combining District or the Neighborhood Commercial District (C-2) Combining District, a vesting tentative map, residential and commercial/non-residential development, recreational/open space improvements, roadway improvements, and utility improvements. Proposed development is summarized in [Table 2, Proposed Development](#).

Table 2 Proposed Development

Lot	Proposed Use	Acres	Building Square Feet
B	Commercial	3.39	15,000
C	Commercial	3.30	30,300
D	Hotel (154 Rooms)	7.36	107,000
E	Maintenance/Service	2.71	13,800
F	Maintenance/Service	1.08	5,400
1-190	Single-family Residential	71.68	TBD
Off-site	Apartment (38 units - Affordable Housing)	0.9	36,050

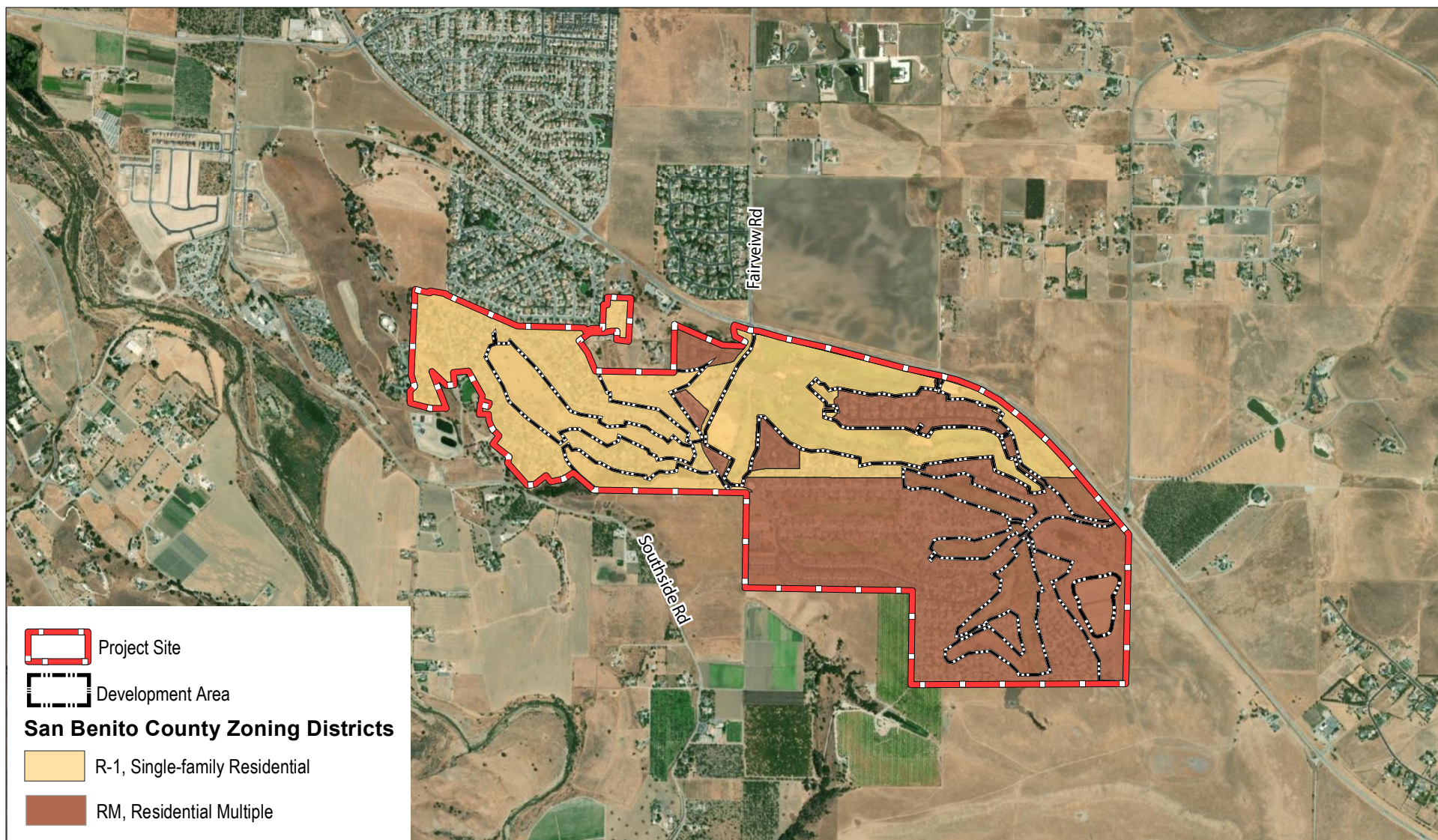
SOURCE: Kelly Engineering and Surveying 2021, T-Square Consulting Group 2021



Source: Kelley Engineering & Surveying 2021

Figure 4
Overall Site Plan

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Source: Google Earth 2020, ESRI 2017

Figure 5
Existing Zoning

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Rezone

The proposed project includes rezoning, as necessary, on all or a portion of the project site to establish a base zone of Single-family Residential (R-1) District combined with either the Planned Unit Development (PUD) Combining District or the Neighborhood Commercial District (C-2) Combining District consistent with, and at the development intensity identified in the vesting tentative map. The PUD District allows flexibility from the residential development standards of the R-1 District.

Vesting Tentative Map

The proposed vesting tentative map would re-subdivide the project site to create 190 new residential lots, five new commercial/non-residential lots, nine buffer zone lots, six undeveloped lots, five golf course lots, and one lot for a park; all within the proposed development area. Lot A, upon which the development of affordable housing is proposed, is an existing lot and is not part of the subdivision. The vesting tentative map is presented in [Figure 6, Vesting Tentative Map](#). Greater details of the proposed development (refer also to Figure 3) are presented in [Table 3, Subdivision Components](#).

Table 3 Subdivision Components

Land Use	Number of Lots	Acreage ^{1,2}
Residential	190	71.68
Commercial	5	17.84
Buffer Zone	9	12.28
Pond or Other Undeveloped	6	19.33
Golf Course	5	115.32
Park	1	4.00
Right-of-Way	-	12.67
Total	216	253.12

SOURCE: Kelly Engineering and Surveying 2019

NOTES:

1. Numbers may vary due to rounding.
2. Acreages are approximate.

Residential Development

Single-family Residential

The proposed 190 new residential lots would comprise approximately 71.68 acres of land that was previously used as a golf course/driving range. Most of the proposed lots would enable new residential units to be located a minimum of 50 feet distant from any existing

residential lot; however, there are several new lots proposed (lots 31, 32, 38, 43, 94, 95, and 102) where a 50-foot building separation from existing lots may not be possible. All new proposed residential lots are a minimum of 10,000 square feet in size. Development of residential lots, related support access and utility infrastructure improvements will be phased, depending on market demand.

Affordable Housing

An offsite 38-unit affordable housing complex and parking lot is proposed west of Ridgemark Drive, shown in blue near the center of the site in Figure 4. The affordable units would be housed in a three-story apartment building and would consist of 11 one-bedroom units, 21 two-bedroom units, and six three-bedroom units. The location of the apartment complex is outside the boundary of the project site and occupies a portion of Lot A, which was the subject of a separate development application to the County. The County Board of Supervisors made findings for and adopted a negative declaration and approved a use permit for commercial development of Lot A on July 12, 2011, with an amendment to the use permit approved April 18, 2018. The previous environmental analysis did not analyze the effects of an increase in residential population resulting from development of Lot A. The EIR will evaluate the environmental impacts that would result from additional population housed in the proposed apartment building on Lot A.

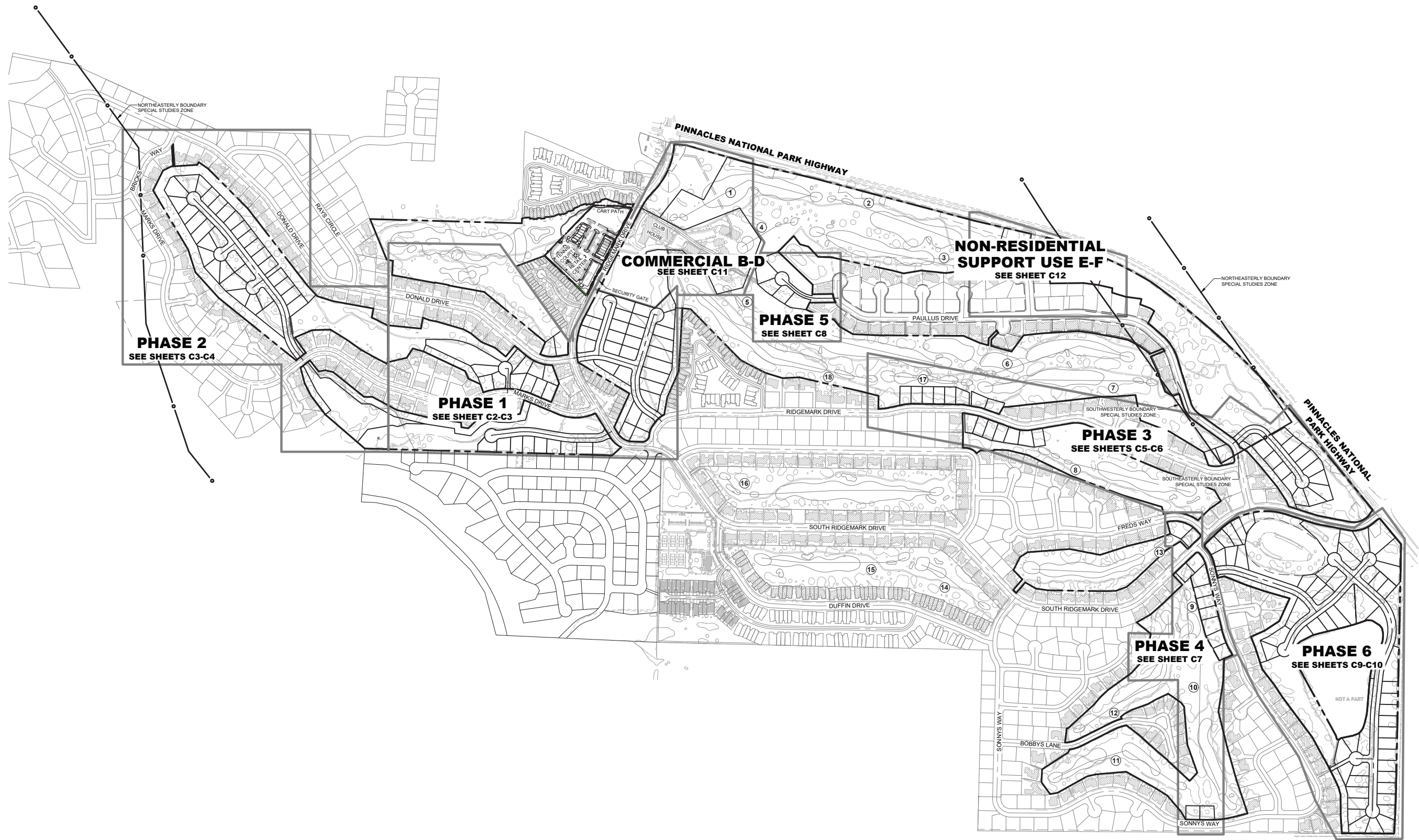
Commercial/Non-residential Development

The proposed commercial/non-residential development includes five lots, Lot B through Lot F, totaling 17.84 acres (refer to Figure 3). Commercial development of Lot A shown on the tentative map has already been approved and therefore, is not included in the proposed project. New commercial development is proposed on Lots B and C, which are located between the existing developed areas and State Route 25. Existing uses on Lot D include the club house, pro-shop, food and bar service, overnight cottages, office and meeting room areas.

A 154-room hotel is proposed to replace the existing cottages on Lot D. Lots E and F, located farther east along State Route 25, would be developed for maintenance and service support facilities for the project site.

Use Permit

The commercial and non-residential development will require the approval of use permits in accordance with County Zoning Code requirements. An amendment to the approved use permit for Lot A will be required for the development of the affordable housing complex. Use permit applications and specific development proposals have not been submitted at this time pending approval of the rezoning and vesting tentative map. The EIR is intended to provide environmental clearance for the affordable housing project, and subsequent commercial and non-residential specific development to the maximum extent possible.



Source: Kelley Engineering and Surveying 2021

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Parks and Open Space

Approximately 36 acres of open space is proposed. A four-acre park is proposed on the currently abandoned golf course area between Marks Drive and Donald Drive.

Improvements will include a tot lot, picnic area, tables, hard surface court for basketball and turf field, with connecting walking and bike trails. The park and trail system improvements will be designed in conjunction with the Ridgemark Homes Association (RHA). Improved areas are intended to be dedicated to the RHA for their ownership and use. The existing tennis center would remain as a private facility, accessible to the residents of RHA and their guests.

Access and Circulation

A new entry gate feature is proposed on Ridgemark Drive. A new intersection would be constructed prior to entering the gate area that provides access to Lot A and Lot B. In order to accommodate project-generated traffic, Ridgemark Drive between State Route 25 and Marks Drive will be widened from two to four lanes where possible, and to three lanes if adequate room is not available for a four-lane road design. All proposed roadways would be developed consistent with existing street standards within the project site area. Project residents would be able to access Southside Road by way of a gated access road in the adjoining Promontory at Ridgemark subdivision south of the project site. The access route is shown on [Figure 7, Access to Southside Road](#). Circulation improvements that enable project traffic to use this route are being constructed by the developer of the Promontory at Ridgemark project. The EIR analysis will assume that the access route is fully operational and available to project residents.

Utility Infrastructure

Sewer and water services will be provided by Sunnyslope County Water District. On-site storm water facilities would be developed according to County standards. The volume of water demand for the various proposed uses may require the preparation of a Water Supply Assessment. If required, the assessment will be prepared and included in the EIR.

POTENTIAL ENVIRONMENTAL EFFECTS

The County has determined that an EIR be prepared to evaluate the direct and indirect physical environmental impacts resulting from the proposed project. Therefore, the County will prepare an EIR. There are no agricultural, timberland, forestland, or mineral resources on the project site. The types of probable environmental effects and the scope of analysis associated with construction and implementation of the proposed project are summarized below.

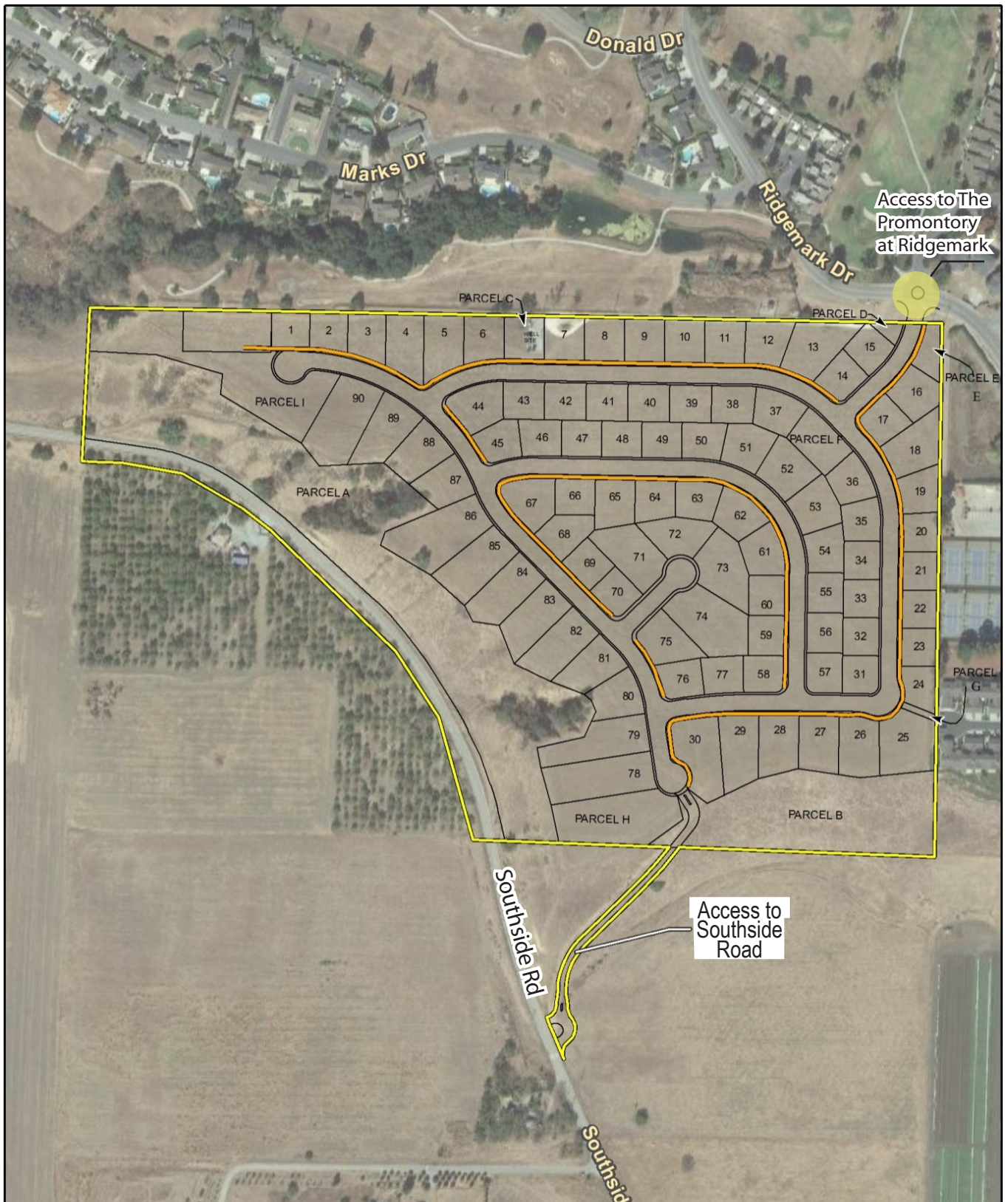
Aesthetics

Caltrans has listed State Route 25 as an eligible scenic route in the State Scenic Highway Program. The proposed project may alter the visual character of the project site when viewed from State Route 25 and other public areas outside the project boundary. The EIR will identify the potential for the proposed project to alter visual resource conditions in the project vicinity. The EIR will discuss the existing and proposed visual character and quality of public viewsheds, including State Route 25, Southside Road, and the project site, identify sensitive viewer groups and the duration of exposures to visual changes including light and glare. The EIR will identify visual resources and potential impacts to them and, if necessary, present mitigation measures to reduce significant impacts to a less-than-significant level.

Air Quality

The project site is located in the North Central Coast Air Basin (air basin), which is under the jurisdiction of the Monterey Bay Air Resources District (air district). The proposed project is anticipated to result in an increase in criteria air pollutant emissions during its operations, primarily through new vehicle trips generated by the proposed project and during construction of the proposed project. The EIR will describe the physical and climatological characteristics of the air basin, and provide a general overview of regulatory requirements (federal, state, regional, and local) related to air quality. The discussion will include quantification and evaluation of project air quality impacts using San Benito County and the air district's air quality management plans and CEQA guidance documents.

Modeling will be conducted using the California Emissions Estimator Model (CalEEMod) to provide an estimate of criteria air pollutant emissions based on the proposed land uses, including the affordable housing component. Modeling results will be compared with air district thresholds. Both construction and operational impacts will be addressed, and the results of the modeling will be incorporated into the EIR. The EIR discussion will also evaluate consistency of the proposed project with applicable air quality plans, and will identify any project sources of hazardous air pollutants or odors, as well as any existing or planned nearby sensitive receptors that could be affected. The EIR analysis will identify potential impacts related to air quality and present mitigation measures, as necessary, to reduce significant impacts to a less-than-significant level.



Source: San Benito County 2017

Figure 7

Access to Southside Road

Ridgemark Subdivision EIR Notice of Preparation

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Biological Resources

The project site is located within an existing residential development and golf course. Pockets of annual grassland, ponds, and riparian areas are present within the project boundary. Former golf course holes and fairways have been disked and allowed to go fallow, resulting in open bare areas or the establishment of annual grasses and non-native species. Urban development typically precludes the presence of most special-status species listed by the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), however potential habitat for the following special-status species remains present:

- California tiger salamander (*Ambystoma californiense*), state listed as threatened, federally listed as threatened (CTS);
- California red-legged frog (*Rana draytonii*), federally listed as threatened;
- San Joaquin kit fox (*Vulpes macrotis mutica*), state listed as threatened, federally listed as endangered;
- Western pond turtle (*Emys marmorata*), state listed as a species of special concern;
- Spadefoot toad (*Spea hammondi*), state listed as a species of special concern;
- Burrowing owl (*Athene cunicularia*), state listed as a species of special concern;
- Nesting and roosting bat species, many listed by the state as species of special concern; and
- Protected nesting birds and raptors.

Construction of the golf course and original residential development began in the early 1980s, with subsequent phases further modifying the landscape over the years. This has resulted in a long history of biological evaluation and permitting activities. For the purposes of the proposed project, preliminary consultation with USFWS and CDFW has been initiated by the applicants. The USFWS survey protocol for CTS requires two years of aquatic and winter upland surveys. Based on the results of previous studies, protocol-level survey work for special-status amphibian species on the project site was initiated by Bryan Mori Biological Consulting Services in 2019.

Several ponds on the western portion of the Ridgemark property (west of the pond at the end of Paullus Drive), have now been studied for two years, including a survey conducted for a different project adjacent to the Ridgemark property. Ponds on the east side of Ridgemark Drive were studied during the 2019-2020 winter season. During the 2019-2020 winter survey, one CTS was recorded at the Ridgemark in the irrigation pond located east of South Ridgemark Drive. No CTS were recorded elsewhere during the studies. Western pond turtle, a state species of special concern, was recorded at several of the ponds.

Although CTS presence was confirmed on the site, the second year of surveys may be warranted at Pond 8 and its vicinity to obtain a more comprehensive understanding of the status of CTS at the eastern section of the property. The survey conclusions recommend a second year of surveys on several southern ponds to provide more definitive conclusions regarding the status of CTS at these locations and if/how they move on and off the Ridgemark property.

The EIR will consider potential impacts to these and other biological resources as a result of the proposed project and within a cumulative context of the historical development and the region. The EIR analysis will identify significant impacts to biological resources and present mitigation measures as appropriate.

Cultural Resources

A cultural resource evaluation has been prepared for the project site, including archival research, a sacred lands search, and site investigation. The cultural resource evaluation determined that although historic, archaeological, tribal, and cultural resources have been identified within 1/8 mile of the project site, none have been found within the project site. A surface reconnaissance of the project area has also been performed as a means of evaluating potential adverse effects on cultural resources. The findings of the evaluation will be summarized in the EIR. The EIR will identify potential impacts to cultural resources, including tribal cultural resources, and present mitigation measures as appropriate.

Energy

The three primary sources of energy consumption from the proposed project will be the use of fuel in the vehicles traveling to and from the project site, on-site use of natural gas, and on-site use of electricity in buildings and for other ancillary uses such as lighting. The EIR section will include an overview of the standard of review for evaluation of energy effects of the project, an overview of related state legislation and regulations, and summarize energy demand results from the air quality and greenhouse gas emissions analysis. Energy demand from onsite use of natural gas and electricity at buildout of the proposed project will be estimated using CalEEMod. Transportation fuel demand resulting from project development will be estimated using the EMFAC model. Mitigation measures that result in reduced energy consumption, if necessary, as well as any applicant-proposed measures that reduce energy consumption, will be identified in the EIR section.

Geologic Hazards

A portion of the project site is located within an Alquist-Priolo Special Studies Zone on the Tres Pinos Quadrangle official map. The EIR will describe the geologic and soils conditions of the project site, provide an overview of regulations and standards for geology and soil

conditions, and utilize available information from the site-specific geological report. The EIR analysis will identify potential impacts related to geology and soils, and present mitigation measures as appropriate.

Greenhouse Gas Emissions

The EIR discussion will include a general overview of climate change science, climate change issues in California, and regulatory (federal, state, regional, and local) requirements with respect to GHG emissions. To date, the air district has not adopted CEQA guidance for analysis of GHG effects of land use projects (e.g., numerical thresholds of significance) nor has it prepared a qualified GHG reduction plan for use/reference by local agencies. Further, San Benito County has not adopted a GHG reduction emissions plan or climate action plan that is applicable to new development within the county. In the absence of local guidance, an efficiency-based threshold will be derived that represents the rate of emissions (tons of GHG emissions per service population) from projects within the land use sector at or below which an individual land use project would not impede the State of California's ability to achieve the GHG emissions reduction target established under SB 32. The proposed project would generate greenhouse gas (GHG) emissions during construction and operations. The EIR section will quantify the project's construction and operational emissions using CalEEMod and EMFAC. The net project GHG emissions will be compared to the efficiency-based threshold of significance for evaluating the significance of project-related GHG emissions. The EIR analysis will identify potential impacts related to GHG emissions and present mitigation measures as appropriate.

Noise

The proposed project will increase mobile- and stationary-source ambient noise levels that may exceed acceptable noise standards. The EIR will analyze project-related noise levels generated by the proposed residential and commercial uses as they may affect adjacent noise-sensitive land uses. This section will also analyze potential project-related changes in roadway traffic noise exposure along roadways near or adjacent to the project site as well as quantify noise and/or vibration levels that would likely occur during construction of the project. Noise-sensitive receptors that could be subjected to noise or vibration levels in excess of applicable noise standards or CEQA thresholds during construction will be identified. An acoustical analysis is being prepared, the results of which will be incorporated into this section of the EIR. The EIR analysis will identify significant impacts related to noise and present mitigation measures as appropriate.

Public Services

Law Enforcement and Fire Protection Facilities

The proposed project would increase demand for law enforcement and fire protection services. The EIR will analyze how the proposed project would affect the provision of law enforcement and fire services, and whether new or expanded police and fire protection facilities will be necessary to serve the project. The EIR analysis will identify potential impacts and present mitigation measures as appropriate.

Public School Facilities

The proposed project includes new residential uses that would include school-age children that would attend area schools (Hollister School District and San Benito High School District). The EIR will analyze how the proposed project would affect the provision of school services, and whether new or expanded public school facilities will be necessary to serve the project. The EIR analysis will identify potential impacts and present mitigation measures as appropriate.

Transportation

The proposed project would increase traffic volumes on area roadways through the introduction of new residential and commercial uses. In response to the passage of Senate Bill (SB) 743, changes to the CEQA Guidelines, and recommendations by the Governor's Office of Planning and Research, the use of vehicle miles traveled (VMT) is recommended for the evaluation of impacts on transportation systems due to land use decisions.

Environmental impacts as the result of the proposed project will be identified and analyzed based on VMT.

However, San Benito County currently uses LOS as their adopted methodology for the evaluation of the effects of new development and land use changes on the local transportation network. Therefore, in addition to the evaluation of VMT, the EIR will include a summary of roadway capacity analysis based on the *San Benito County 2035 General Plan* policies related to LOS. However, the determination of project impacts per CEQA requirements will be based solely on the VMT analysis.

A traffic impact analysis (traffic report) is being prepared that will identify baseline and project-generated VMT. Pursuant to SB 743, the Governor's Office of Planning and Research (OPR) published the finalized Updates to the CEQA Guidelines in November 2017. The guidelines stated that Level of Service will no longer be considered an environmental impact under CEQA and considers vehicle-miles-traveled (VMT) the most appropriate measure of transportation impact. Since San Benito County has not formally adopted its own County specific VMT policies, the traffic study will utilize the Governor's Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA*, published in December 2018, for the VMT analysis methodology and impact thresholds.

The roadway capacity analysis will supplement the CEQA VMT analysis by identifying transportation and traffic operational issues that may arise due to project-related increases in traffic volumes on area roadways, including project access to and from Southside Road.

The EIR will evaluate the project's effect on transit service and bicycle and pedestrian circulation in the study area. The EIR will present the findings of the roadway capacity analysis and traffic impact analysis of the project site circulation concept and identify any access or circulation issues that may result in a traffic hazard or conflict with general plan policies. The EIR will incorporate the findings of the traffic impact analysis study. The EIR section will identify potential impacts related to transportation VMT, emergency access, and traffic hazards, and present mitigation measures as appropriate.

The following intersection facilities will be included in the roadway capacity LOS analysis and the traffic safety analysis:

1. South Ridgemark Drive/Best Road and Airline Highway;
2. Fairview Road/Ridgemark Drive and Airline Highway;
3. Enterprise Road and Airline Highway;
4. Airline Highway and Union Road;
5. Airline Highway and Sunset Drive;
6. Highway 25 Bypass/Airline Highway and Sunnyslope Road/Tres Pinos Road;
7. Fairview Road and Hillcrest Road;
8. Fairview Road and Sunnyslope Road;
9. Fairview Road and Union Road (*future intersection*);
10. Southside Road and Union Road;
11. San Benito Street and Union Road;
12. Union Road/Mitchell Road and State Route 156;
13. San Benito Street and Nash Road;
14. State Route 25 and Hillcrest Road;
15. State Route 25 and Meridien Street;
16. State Route 25 and Santa Ana Road;
17. San Felipe Road and State Route 25;
18. Fairview Road and Santa Ana Road; and
19. Southside Road and Promontory at Ridgemark gated access road.

Wastewater Infrastructure

The proposed project will require wastewater infrastructure and wastewater treatment from the Sunnyslope County Water District. This EIR will address the volume of wastewater expected to be generated by the proposed project and the capacity of the Sunnyslope County Water District to adequately serve the project's projected demand. The EIR section will identify potential impacts related to wastewater service and present mitigation measures as appropriate.

Water Supply and Water Supply Infrastructure

The project site is located within the service boundary of the Sunnyslope County Water District. The EIR will address existing and proposed water demand to evaluate the proposed project's impacts on the Sunnyslope County Water District water supply capacity and effects on the groundwater basin. The EIR will identify the existing water supply setting, proposed project's water demand, and evaluate the effects of the proposed project's water demand on groundwater resources. The EIR analysis will identify significant impacts, if any, and present mitigation measures as appropriate.

Effects that May be Less Than Significant

The proposed project is not anticipated to result in potentially significant impacts relating to agricultural resources, hazards and hazardous materials, flooding, water quality, mineral resources, recreation facilities, and solid waste facilities. The environmental effects of the proposed project not anticipated to potentially result in significant impacts will be briefly discussed in this section of the EIR.

Cumulative Impacts

As recommended by CEQA Guidelines section 15130 (b)(1)(B), the EIR will include a summary of projections contained in the *San Benito County 2035 General Plan* to form the cumulative projects scenario. The primary focus of cumulative impacts will be on biological resources, noise, traffic, wastewater service, and water supply. Air quality and GHG emissions cumulative impacts will be assessed, in accordance with air district guidance. The EIR will include an evaluation and determination as to whether the proposed project's impacts are cumulatively considerable.

Significant and Unavoidable Impacts

Any impacts determined to be significant and unavoidable, as discussed in other sections of the EIR, will be summarized in this section of the EIR.

Significant Irreversible Environmental Changes

The proposed project includes a zone change and therefore, the EIR will include a discussion of significant irreversible environmental changes that would be caused by the proposed project should it be implemented.

Growth-Inducing Impacts

As required by the CEQA Guidelines, the EIR will discuss the proposed project's potential for growth-inducing impacts.

Alternatives

In accordance with CEQA Guidelines, the EIR will include analysis of a reasonable range of alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant adverse environmental effects of the project. An evaluation of the comparative merits of the alternatives will be presented in the EIR.

REQUIRED PERMITS AND APPROVALS

The project would need the following discretionary approvals from the County: rezone of the entire Ridgemark property to "Single-family Residential (R-1) as the base district combined with "Planned Unit Development (PUD)" or "Neighborhood Commercial (C-2)" Combined Districts; a vesting tentative subdivision map for 216 lots; conditional use permits for commercial and other non-residential development; and improvement plan, grading, and building permits. The project also may require approvals from other local, state, and federal governmental agencies, including a United States Fish and Wildlife Service (USFWS) Incidental Take Permit, a California Department of Fish and Wildlife (CDFW) Incidental Take Permit and possible Streambed Alteration Agreement. Other agency approvals and permits may include a United States Army Corps of Engineers (USACE) Nationwide Permit, and CDFW and Regional Water Quality Control Board (RWQCB) Water Quality Certification.

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