Initial Study/Mitigated Negative Declaration

Driscoll Well and Pump Station Project

June 2026

Prepared for:

388 Blohm Avenue
Aromas, California 95004

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Acronyms and Abbreviations

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
District	Aromas Water District
DTSC	California Department of Toxic Substances Control
EIR	environmental impact report
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Authority
GHG	greenhouse gas
IS	initial study
Lmax	maximum sound level
LOS	level of service
MBARD	Monterey Bay Air Resources District
MND	mitigated negative declaration
MT	metric ton
MT CO_2e	metric tons of carbon dioxide equivalent
N_2O	nitrous oxide
ND	negative declaration
NO_x	nitrogen oxides
O_3	ozone
PG&E	Pacific Gas & Electric Company
PM	particulate matter
PM_{10}	particulate matter measuring no more than 10 microns in diameter
$PM_{2.5}$	fine particulate matter measuring no more than 2.5 microns in diameter
project	Driscoll Well and Pump Station Project
PPV	peak particle velocity
SB	Senate Bill

SO_x	sulfur oxides
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	volatile organic compound

Document Overview

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with California Environmental Quality Act (CEQA) and the CEQA Guidelines for the proposed Driscoll Well Project (project). The primary intent of this document is to (1) determine if project implementation would result in potentially significant impacts to the environment, and (2) incorporate mitigation measures into the project design, as necessary, to eliminate or reduce the project's potentially significant impacts to a less than significant level.

In accordance with CEQA, projects that have the potential to result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment must undergo analysis to disclose potential significant effects. The provisions of CEQA apply to California governmental agencies at all levels, including local agencies, regional agencies, state agencies, boards, commissions, and special districts. CEQA requires preparation of an IS for a discretionary project to determine the range of potential environmental impacts of that project and to define the scope of the environment review document. As specified in Section 15064(f) of the CEQA Guidelines, the lead agency may prepare an MND if, in the course of the IS analysis, it is recognized that the project may have a significant impact on the environment, but that implementation of specific mitigation measures would reduce potentially significant impacts to a less than significant level.

As the lead agency for the project, Aromas Water District has the principal responsibility for conducting the CEQA environmental review to analyze the potential environmental effects associated with project implementation. During the review process, it was determined that potential impacts would be reduced to less than significant with the implementation of mitigation measures. The Aromas Water District has incorporated mitigation measures to reduce or eliminate any potentially significant project-related impacts. Therefore, an IS/MND has been prepared for the project.

This IS/MND is organized as follows:

- **Section 1: Project Description.** This section introduces the document and discusses the project description including location, setting, and specifics of the lead agency and contacts.
- **Section 2: Initial Study Checklist.** This section discusses the CEQA environmental topics and checklist questions, identifies the potential for impacts, and proposes mitigation measures to avoid these impacts.
- **Section 3: List of Preparers.** This section lists the organizations and individuals who were consulted and/or prepared this IS/MND.
- **Section 4: References.** This section presents a list of reference materials consulted during preparation of this IS/MND.

Public Review

The IS/MND will be circulated for a 30-day public review period from June 1, 2026, to July 1, 2026.

Comments regarding this IS/MND must be made in writing and submitted to Robert Johnson, Aromas Water District, P.O. Box 388, Aromas, California 95004, or by email to robert@aromaswaterdistrict.org.

Comments should focus on the proposed finding that the project would not have a significant effect on the environment. If the commenter believes that the project may have a significant environmental effect, it would be helpful for the commenter to identify the specific effect and explain why the effect would occur and why it would be significant.

Section 1 Project Description

1.1 Project Overview

The Aromas Water District's (District's) Driscoll Well and Pump Station Project (project) involves the construction and operation of a new municipal water supply well, pump station, and a water treatment system to remove iron and manganese to enhance the water supply reliability for the unincorporated community of Aromas. The project also includes installation of a water pipeline from the well to the existing water distribution system, and a ground-mounted solar photovoltaic system to offset the site's power needs.

1.2 Project Location

The Aromas Water District serves the unincorporated community of Aromas, located approximately 7 miles east of the City of Watsonville in California's Central Coast region (Figure 1, Regional Location). The District's service area is primarily in San Benito County and partially extends into Monterey County (Figure 2, Aromas Water District Service Area). The District provides municipal water treatment and distribution to customers within its service area.

The approximately 1.8-acre project site (Assessor's Parcel Number 0113900110) is located northeast of the Carpenteria Road/Quarry Road intersection and immediately north of the Union Pacific Railroad tracks, in the jurisdiction of San Benito County (Figure 3, Project Site Location). Project development would be on the 0.8-acre southern portion of the project site (hereinafter called the *well pump station site*), and the 1-acre northern portion would remain undeveloped.

The project site consists of active agricultural fields that are regularly disturbed through routine farming operations such as tilling, planting, and harvesting.

Surrounding land uses include agricultural land and the Pajaro River to the north, with additional agricultural land to the west and east. Developed land uses to the south include: Aromas Elementary School, greenhouses, and residential uses.

1.3 Project Purpose

The purpose of the project is to supplement the current potable water system capacity and provide redundancy for the District's production and distribution infrastructure. This will enhance the District's ability to reliably serve existing users. The well is intended to provide system redundancy to meet existing water demands, improve drought resilience, and is not intended to support new growth or expanded service capacity.

1.4 Project Components

The 0.8-acre well pump station site would be enclosed by chain-link fencing and would contain: a new production well and pump station, a water treatment system to remove iron and manganese water housed in a treatment building, and a ground-mounted solar photovoltaic (PV) system, totaling 29,070 square feet of ground disturbance. Refer to Figure 4a, Project Facilities and Site Plan, and Figure 4b, Detailed Site Plan. Site improvements would include paving a new 15-foot-wide driveway and installing an access gate on Carpenteria Road to provide entry to the well pump station site. The project also includes installation of an underground water pipeline located along Carpenteria Road, resulting in an additional disturbance area of approximately 680 linear feet (2,277 square feet). There would be no restrooms or other facilities constructed on the site. In total, the project would disturb approximately 31,347 square feet (including pump station site, production well, treatment building, underground water pipeline, and driveway).

The remaining approximately 1.0 acre (43,560 square feet) of the project site (parcel) would be fenced but would not be developed.

1.4.1 Well, Pump Station, and Treatment System

The new well would be located in the fenced well pump station site and would deliver raw groundwater to the adjacent treatment building. The well is anticipated to produce approximately 500 to 800 gallons per minute, which would be treated prior to distribution. The well discharge head would be mounted on a 4-foot by 4-foot by 18-inch concrete pump pedestal, surrounded by a 6-foot by 6-foot concrete pad that is flush with finished grade. The underground water piping would extend approximately 13 feet above grade from the centerline of the well before transitioning belowground.

A concrete masonry unit treatment building located east of the treatment building, approximately 960 square feet in area and 15 feet in height, would house the water treatment system to remove iron and manganese and a backwash tank. Aboveground piping would connect the well to the treatment system, conveying raw groundwater to the treatment building and routing backwash water to the backwash tank. After being stored in the backwash tank, backwash water would be recovered by the water treatment system and treated prior to being discharged to the potable water distribution system.

The pump station and treatment system would incorporate safety features such as chemical storage containment, emergency shutoff systems, and appropriate monitoring and alarm systems in accordance with relevant regulations.

The well pump station site would be paved to allow for vehicle access around the project components, including the treatment building, production well, and backwash tank. The paved area would be graded to flow into a storm drain catch basin, which would connect to the existing storm drain system within Carpenteria Road to collect site drainage and well pump-to-waste operations. The remainder of the disturbed area would be covered with aggregate base. The area under the solar panels would be covered with decomposed granite for ease of maintenance.

The site would be intermittently occupied by up to two operators for routine operation and maintenance activities.

1.4.2 Solar Photovoltaic System

The project also includes a solar photovoltaic system to offset the required on-site power. Primary power would be provided by a connection to the existing electrical grid operated by Pacific Gas & Electric Company (PG&E). The ground-mounted solar panels or solar array would be constructed north of the treatment building within the 0.8-acre well pump station site and would be constructed in accordance with County Code, Section 21.01.174. The solar array would occupy approximately 8,688 square feet in total, would include approximately 4,725 square feet of solar panels, and would have a maximum height of approximately 6 feet. The system would generate approximately 165.5 megawatt-hours annually and would supply electricity to operate the facility, including the well pump, lighting, instrumentation, and appurtenances. In the event of a power outage, a diesel-fueled backup generator would provide emergency power.

1.4.3 Water Pipeline

A new 8-inch diameter, approximately 730-foot-long water pipeline would be installed underground within the Carpenteria Road right-of-way (crossing under the Union Pacific Railroad tracks) to transfer treated water from the well pump station site to the District's existing water distribution system on Marshall Lane, as shown on Figure 4a.

1.4.4 Lighting

The site would include downward-facing, motion activated pole-mounted lighting for security and any potential emergency event requiring nighttime operations. Lighting would be located near the center of the well pump station site to minimize light spillover beyond the site boundaries. Final lighting design and specifications would be confirmed by the electrical engineer, in compliance with County Code, during design development.

1.4.5 Construction Schedule, Equipment, and Methodology

The planned construction schedule is as follows:

- Production well: September 2026 to November 2026
- Well Pump Station, solar photovoltaic system, and water pipeline: March 2027 to August 2028

Construction hours would typically be between 7:00 a.m. and 5:00 p.m., Monday through Friday, with no construction on Saturdays, Sundays or federal holidays, in accordance with San Benito County Code.

Construction equipment and methodology would include backhoes, excavators, compactors, dozers, motor graders, paddle scrapers, pavers, tire rollers, skid steers, water trucks, cranes, and a well drill rig. This equipment would be used for grading, site preparation, trenching and backfilling, pump installation, and pipeline construction. Construction would not require pile driving.

1.4.6 Compliance with Geotechnical Investigation Recommendations

All earthwork and facility design and construction would be in accordance with the most current California Building Code (CBC) and the applicable recommendations identified in the Geotechnical Investigation, Section V, prepared by Pacific Crest Engineering (Appendix D, Geotechnical Investigation).

1.4.7 Best Management Practices

The following best management practices (BMPs) will be implemented during construction to minimize water quality, air quality, erosion, and public access impacts. The water quality BMPs will be implemented in accordance with the California Stormwater Quality Association Stormwater BMP Handbook and San Benito County requirements to prevent erosion, sedimentation, and pollutant discharge:

- Erosion and sediment control measures, such as silt fencing and fiber rolls installed around the site perimeter, will be implemented to control erosion and prevent sediment from leaving the construction area.
- Concrete washout basins will be established on-site to contain and properly manage wastewater generated from concrete equipment cleaning.
- Stormwater protection measures will be used to prevent runoff from entering nearby agricultural drainage features. Where drainage ditches or channels occur adjacent to the work area, construction equipment and material staging areas will be set back an appropriate distance to avoid encroachment.
- Dust control measures, such as periodic water application, will be implemented to minimize fugitive dust during grading, trenching, and equipment operation.
- Equipment staging and storage will occur within designated areas on the project site to reduce disturbance and maintain safe separation from surrounding agricultural uses.
- Roadway access along Carpenteria Road will be maintained at all times, with no full road closures. Temporary lane shifts or flagging may occur during pipeline installation, but access for local residents, agricultural operations, and emergency vehicles will remain open.
- School access and emergency access will be maintained, and construction traffic will be managed to avoid disruptions during school arrival and dismissal periods.
- Noise-reducing practices, such as limiting construction to daytime hours and minimizing idling, will be implemented to reduce disturbance to nearby residences.
- Properties along Carpenteria Road (where pipeline installation will occur) will be notified in advance of construction activities and anticipated disruption.
- Construction waste will be collected and disposed of in accordance with applicable regulations, and materials will be stored and covered as necessary to prevent wind dispersal.
- Spill prevention and cleanup materials will be kept on-site, and equipment will be inspected regularly for leaks to protect soil and water quality.
- The contractor shall comply with all applicable federal, state, and local laws and regulations related to the use, storage, and disposal of hazardous materials and hazardous waste.

- All hazardous materials shall be stored, handled, and used in accordance with manufacturer recommendations and applicable safety standards.
- Spill prevention and response measures shall be implemented, including immediate containment, cleanup, and proper disposal of any released materials.
- Hazardous materials, wastes, and empty containers shall be properly transported and disposed of at approved facilities and shall not be discharged to storm drains, sanitary sewers, or disposed of in general refuse containers.

1.5 Required Permits and Approvals

The proposed project requires the following permits and approvals:

- **Approval of the Mitigated Negative Declaration.** The Aromas Water District is the CEQA lead agency with authority to determine if the Mitigated Negative Declaration is the appropriate CEQA documentation.
- **Approval of Plans and Issuance of Construction Contracts.** The Aromas Water District will facilitate the preparation and approve the construction plans and specifications for the project, and the District will issue the contracts for its construction.
- **Encroachment Permits.** San Benito County, Monterey County, and Union Pacific Railroad will issue encroachment permits.
- **Well Drilling Permit.** The San Benito County Department of Environmental Health will issue a well drilling permit.
- **Water Supply Permit Amendment.** The State Water Resources Control Board Division of Drinking Water will issue a water supply permit amendment to allow the addition of the new well pump station and water treatment system to the District's water system.
- **Diesel Generator.** The Monterey Bay Air Resources District will issue an Authority to Construct and Permit to Operate for the diesel-powered generator.

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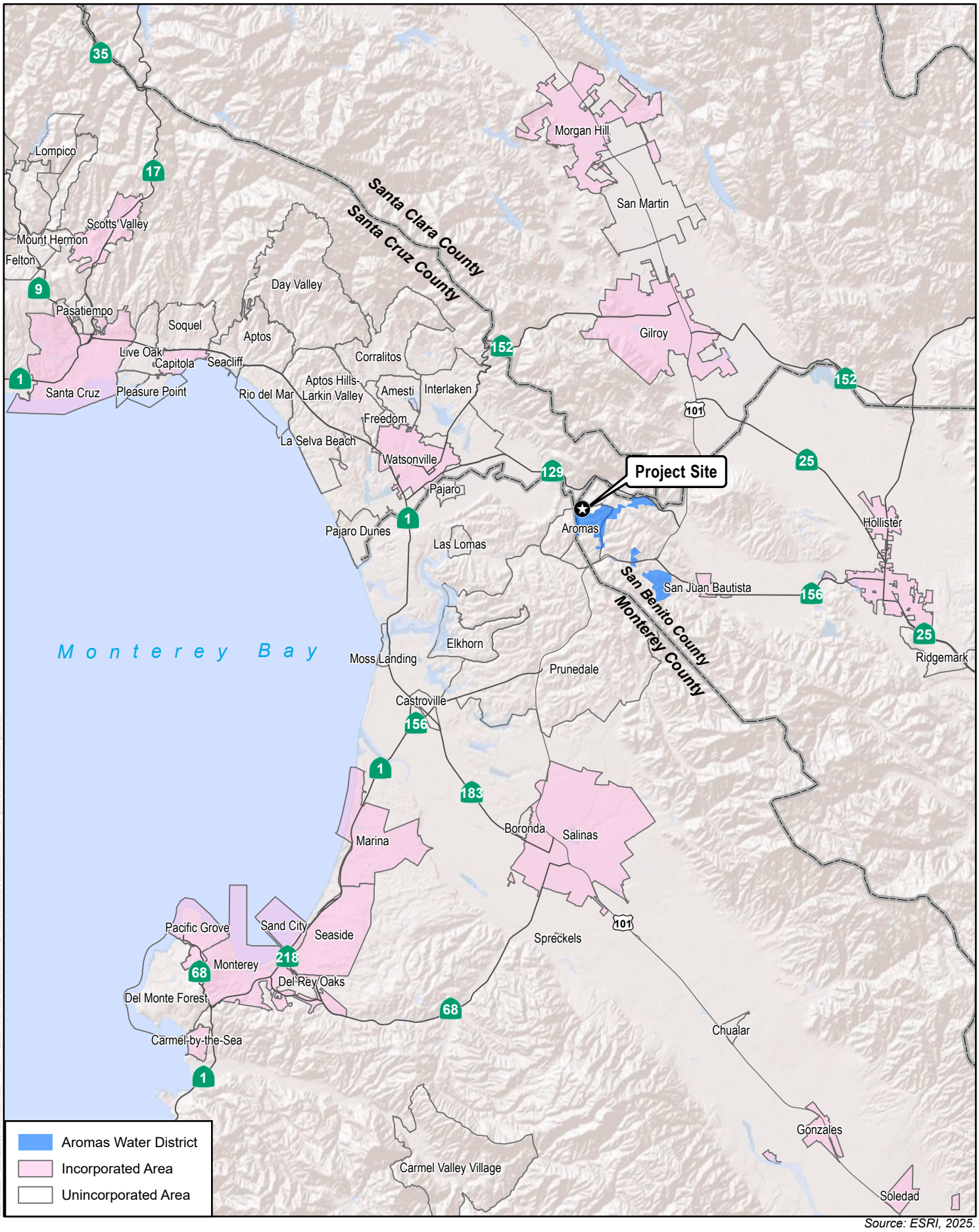

Source: ESRI, 2025.

Harris & Associates

Figure 1
Regional Location
Driscoll Well and Pump Station Project

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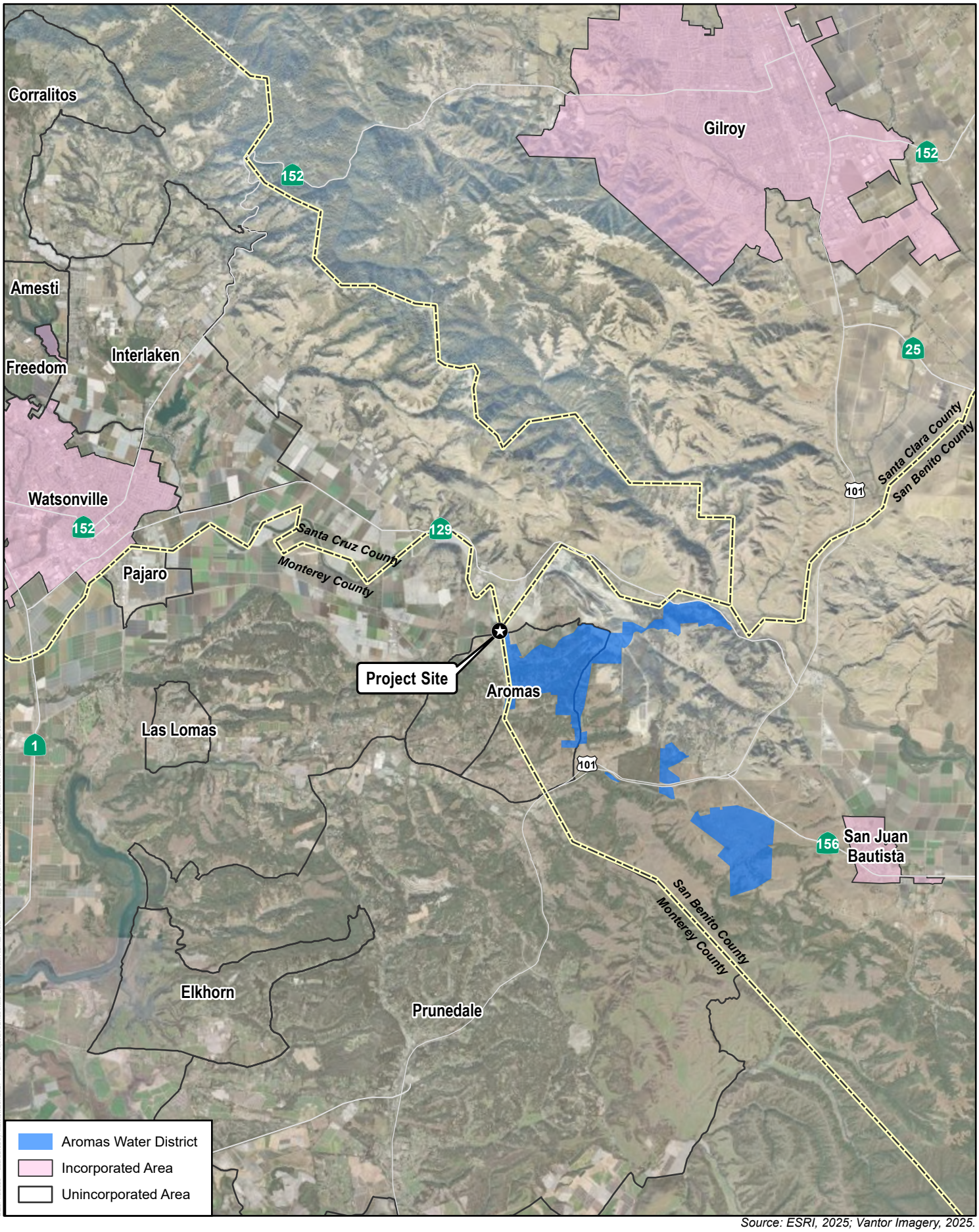

Source: ESRI, 2025; Vantor Imagery, 2025.

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Figure 2

Aromas Water District Service Area

District Driscoll Well and Pump Station Project

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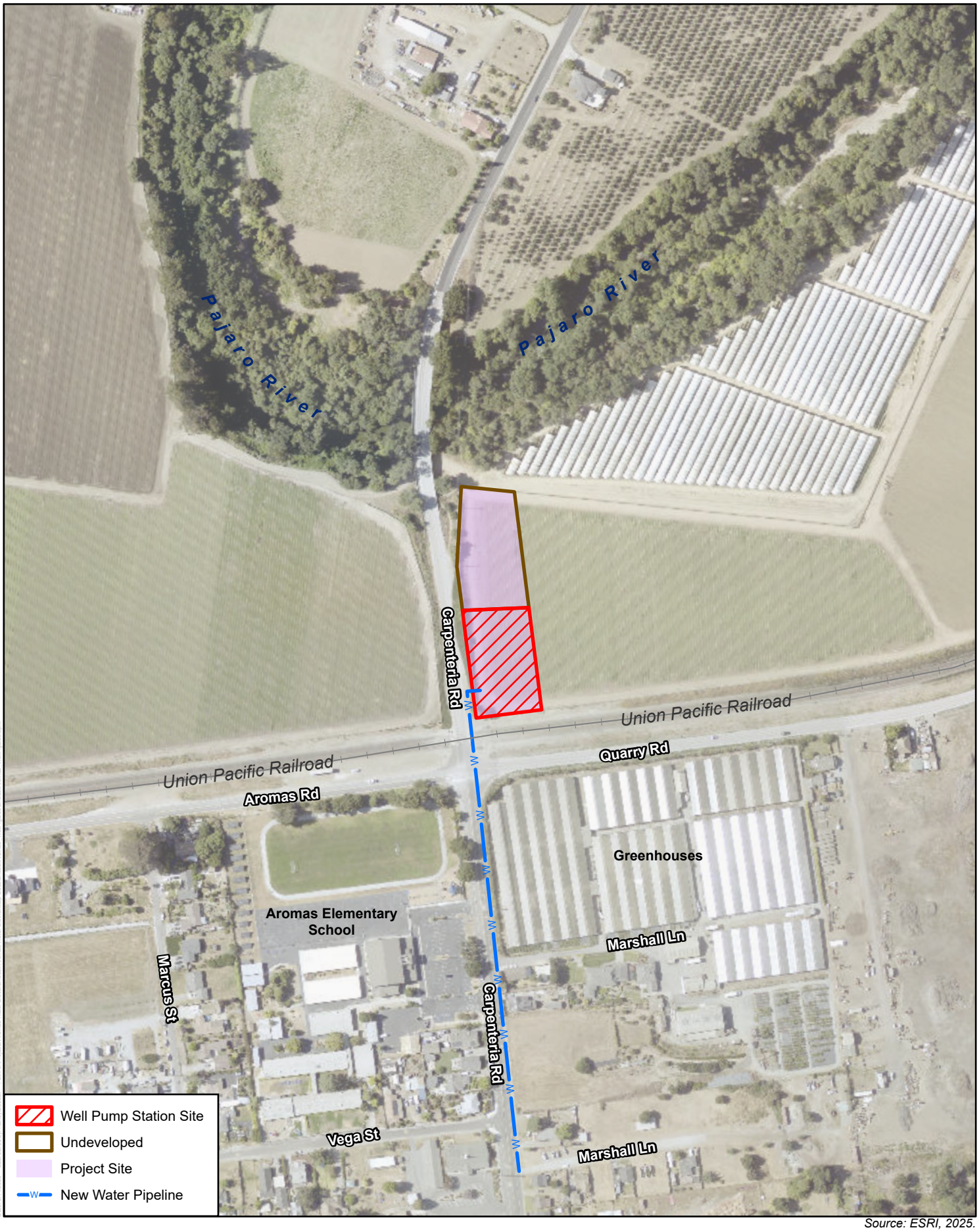

Source: ESRI, 2025.

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Figure 3

Project Site Location

Aromas Water District Driscoll Well and Pump Station Project

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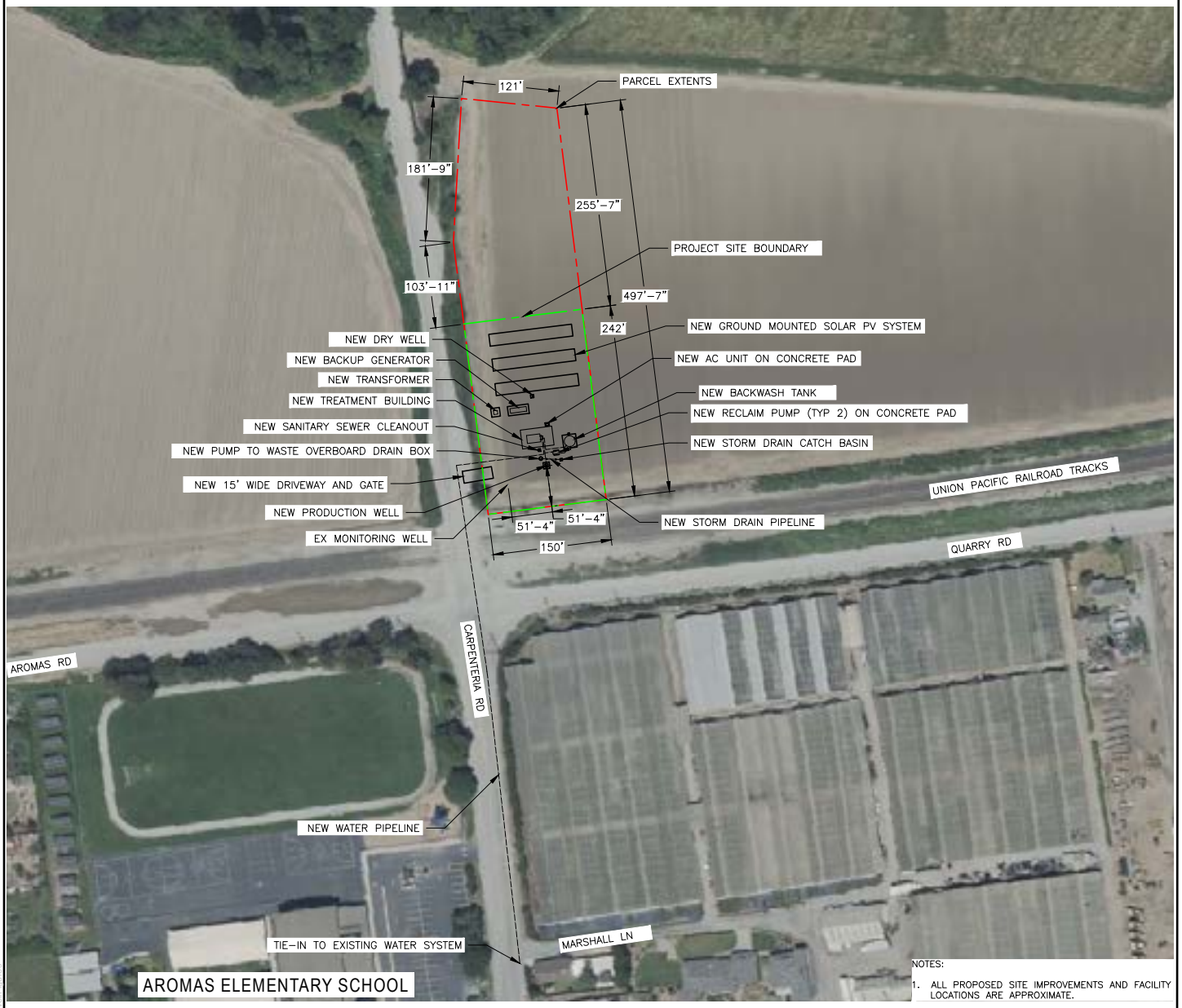

Source: Luhdorff & Scalmanini Consulting Engineers, 2025.

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Figure 4a

Project Facilities and Site Plan

Aromas Water District, Driscoll Well Project

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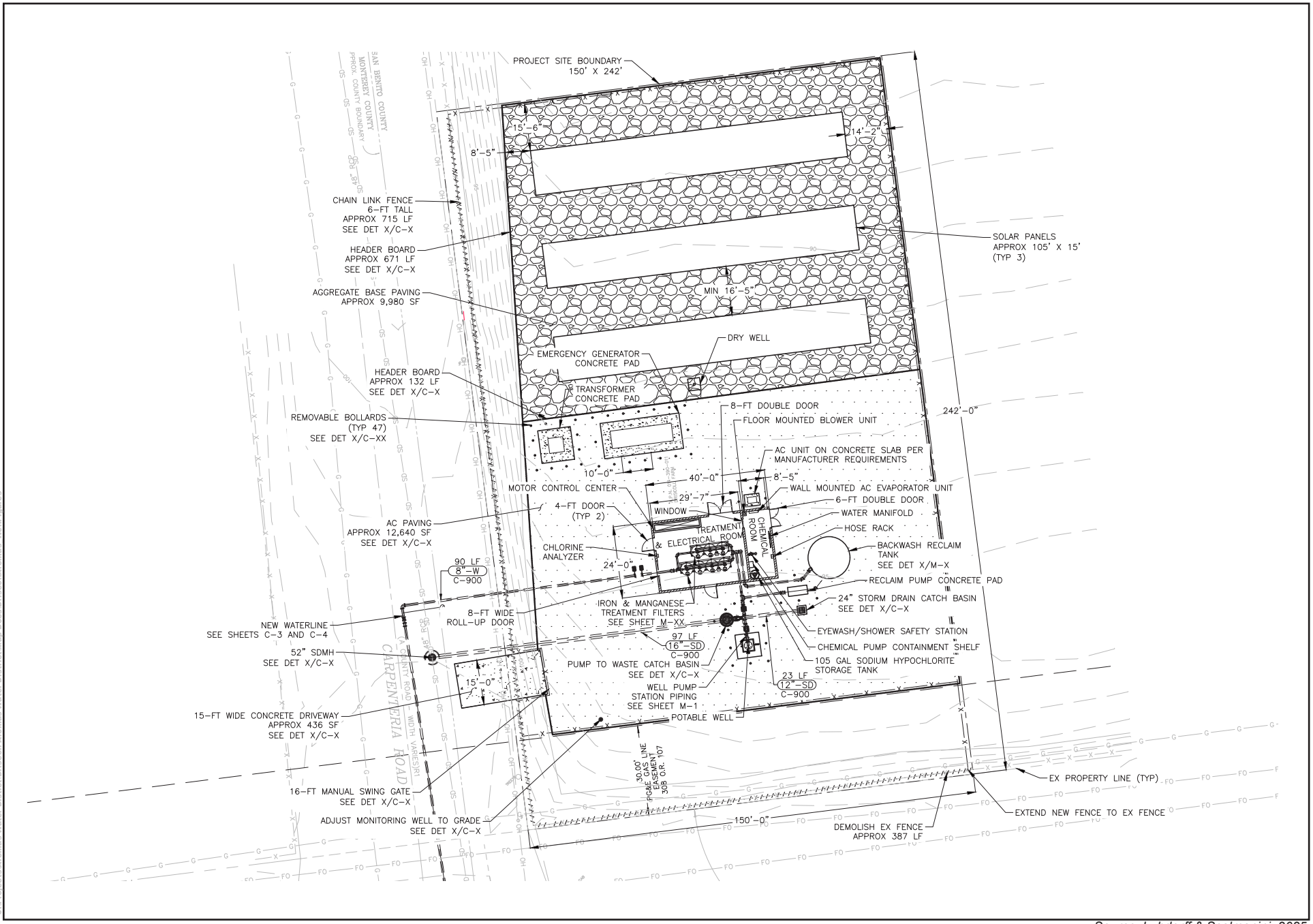

Source: Luhdorff & Scalmanini, 2025.

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Figure 4b

Detailed Site Plan

Driscoll Well and Pump Station Project

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Section 2 Initial Study Checklist

The following discussion of potential environmental effects was completed in accordance with Section 15063 of the CEQA Guidelines to determine if the proposed project may have a significant effect on the environment.

2.1 Project Information

1. Project title:	Driscoll Well Project and Pump Station Project
2. Lead agency name and address:	Aromas Water District 388 Blohm Avenue Aromas, California 95004
3. Contact person name, address, and phone number:	Robert Johnson, General Manager Aromas Water District 388 Blohm Avenue Aromas, California 95004 robert@aromaswaterdistrict.org
4. Project location:	Intersection of Carpenteria Road and Quarry Road, Aromas, California Assessor's Parcel Number 0113900110
5 Project sponsor's name and address:	Aromas Water District 388 Blohm Avenue Aromas, California 95004
6. General plan designation:	IH – Heavy Industrial
7. Zoning:	Rural
8. Description of project:	Refer to Section 1, Project Description, of this IS/MND.
9. Surrounding land uses and setting:	Refer to Section 1, Project Description, of this IS/MND.
10. Other public agencies whose approval is required:	Refer to Section 1.5, Required Permits and Approvals, of this IS/MND.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	No California Native American Tribes traditionally and culturally affiliated with the area have requested consultation pursuant to California Public Resources Code, Section 21080.3.1.

Summary of Required Mitigation Measures

- **AG-1:** Establish Agricultural Conservation Easement
- **BIO-1:** Protect Nesting Birds during Construction
- **CUL-1:** Conduct Worker Awareness Training and Stop Work if Unexpected Discovery of Cultural Resources during Construction
- **GEO-1:** Conduct Worker Awareness Training and Stop Work if Unexpected Discovery of Paleontological Resources
- **NOI-1:** Implement Noise-Reducing Measures for Construction Equipment

2.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the project, involving at least one impact that is a "Potentially Significant Impact" requiring mitigation to reduce to a less than significant level, as indicated by the checklist on the following pages.

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

2.3 Lead Agency 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 (state), including implementation of the mitigation measures identified herein. 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

Robert Johnson, General Manager
Aromas Water District

2.4 Evaluation of Environmental Impacts

This section documents the screening process used to identify and focus on environmental impacts that could result from the project. The checklist portion of the IS begins below and includes explanations of each CEQA issue topic. CEQA requires that an explanation of all answers be provided along with this checklist, including a discussion of ways to mitigate any significant effects identified. The following terminology is used to describe the potential level of significance of impacts:

- **No Impact.** The analysis concludes that the project would not affect the particular resource in any way.
- **Less Than Significant.** The analysis concludes that the project would not cause substantial adverse change to the environment without the incorporation of mitigation.
- **Less Than Significant with Mitigation Incorporated.** The analysis concludes that it would not cause substantial adverse change to the environment with the inclusion of mitigation agreed upon by the applicant.
- **Potentially Significant.** The analysis concludes that the project could result in a substantial adverse effect or significant effect on the environment, even if mitigation is incorporated. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

2.4.1 Aesthetics

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

2.4.1.1 Environmental Setting

The 0.8-acre well pump station site is located northeast of Carpenteria Road/Quarry Road intersection and immediately north of the Union Pacific Railroad tracks, in the unincorporated area of San Benito County. The project site is currently an active agricultural field and is zoned as Rural. The project site and surrounding area are generally flat, with views of hills and undeveloped ridgelines in the distance to the north. Surrounding land uses consist primarily of active agricultural fields to the north, east, and west and development (Aromas Elementary School, greenhouses, residential uses) on parcels immediately south of the project site, across the Union Pacific Railroad tracks.

The 2035 San Benito County General Plan does not designate specific scenic vistas; however, it states that views of mountains, undeveloped rangelands, large agricultural fields and croplands, natural ridgelines along Diablo and Gabilan Ranges, and annual grasslands make up elements of the County's scenic landscape (San Benito County 2015). Additionally, there are five County-designated scenic roadways, the nearest of which to the project site is a segment of State Route 129, Chittenden Pass Road, located approximately 2.6 miles northeast from the project site.

2.4.1.2 Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Scenic vistas are views from a public place that are expansive and considered locally or regionally important. As stated above, the 2035 San Benito County General Plan does not designate specific scenic vistas, but it states that agricultural lands are part of the County's scenic landscape. Implementation of the project would result in a change to the existing agricultural views of the site (San Benito County 2015). However, the change in views would largely only occur for travelers near the intersection of Quarry Road and Carpenteria Road, as the northern portion of the project site (approximately 1 acre) would remain undeveloped, allowing views of surrounding agricultural uses and views of hills farther to the north to remain. While views of the site from the intersection would change, the proposed uses for the site are consistent with the uses permitted in the Rural zone, and the height of the project components (including the treatment building and solar photovoltaic system) meet the height limitations of the site's zoning and would be constructed in accordance with County Code. Therefore, the change in views would not result in a substantial adverse effect on a scenic vista, and the impact would be less than significant.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

No Impact. The nearest highway that is designated or eligible for designation as a state scenic highway is U.S. 101 located approximately 2.5 miles south from the project site (Caltrans 2026). The nearest County-designated scenic roadway is a segment of State Route 129, a two-lane rural roadway known as Chittenden Pass Road that extends from Santa Cruz County into northwestern San Benito County and connects to U.S. 101. Chittenden Pass Road is located approximately 2.6 miles northeast from the project site. The project site is not visible from these roadways due to distance and intervening topography, and the project would have no impact on resources in or along these roadways.

Further, the project components would be relatively low in height, with pump station and production well infrastructure extending approximately 3 to 4 feet above grade, ground-mounted solar photovoltaic panels approximately 6 feet in height, and the treatment building representing the tallest element at approximately 15 feet. The project would not obstruct or alter views associated with State Route 129, U.S. 101, State Route 129 (Chittenden Pass Road), nor State Route 156 farther east due to the distance and intervening land uses between the roadway and project site.

Therefore, the project would not damage scenic resources within a state scenic highway. There would be no impact.

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

Less Than Significant Impact. The project site is located in a rural non-urbanized area of San Benito County, where it borders Monterey County and Santa Cruz County in the unincorporated community of Aromas. The project site and adjacent land uses are characterized by active agricultural uses, nearby industrial development, residential neighborhoods, and a school. The project site is zoned Rural, and the proposed pump station, treatment building, and associated infrastructure are consistent with the allowable uses under this zoning designation.

Public views of the project site are primarily available from adjacent public roadways, including Quarry Road/Aromas Road south of the project site and from Carpenteria Road west of the project site (Figure 3). There are limited views from the school field southwest of the Aromas Road/Carpenteria Road intersection, which are limited due to distance and intervening trees, and roadways.

Implementation of the project would result in a change to the existing visual character of the site from active agricultural land to utility infrastructure. However, this change in visual character would be primarily experienced by travelers near the intersection of Carpenteria Road and Quarry Road/Aromas Road. The northern portion of the project site (approximately 1 acre) would remain undeveloped, allowing views of surrounding agricultural uses and distant hills to remain. From these locations, the proposed facilities would be intermittently visible along public roadways. The majority of project components, including the pump station infrastructure, would be contained in the fenced project site and would remain low in height. The tallest structure is the approximately 15-foot-tall treatment building; however, views would be brief, limited in duration, and would not substantially alter the overall visual character of the area.

The project is consistent with the uses permitted within the Rural zoning designation and would comply with applicable County development standards, including height limitations. While the project would introduce new infrastructure and result in a minor change to views from nearby public roadways, it would not substantially degrade the existing visual character or quality of public views. Further, it would not conflict with applicable zoning or regulations governing scenic quality. Therefore, the impact would be less than significant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The project includes a ground-mounted solar photovoltaic system located north of the proposed treatment building within the 0.8-acre well pump station site. While there is potential for glare to occur due to the proposed solar panels, any glare generated would be temporary based on the location of the sun and would not adversely affect day or nighttime views of the area. The

solar panels would generate similar conditions compared to nearby existing ground-mounted solar panels at Aromas Elementary School, located southwest of the project site. Additionally, in general, solar panels are designed to absorb rather than reflect light, so any glare generated would be minimal. Therefore, the solar photovoltaic system is not expected to result in substantial daytime glare and would not adversely affect day or nighttime views of the area.

The project would include downward-facing, motion activated pole-mounted lighting for security and any potential emergency event requiring nighttime operations. Lighting would be located near the center of the site to minimize light spillover beyond the site boundaries. Final lighting design and specifications would be confirmed by the electrical engineer, in compliance with County Code, during design development. All exterior lighting would be required to comply with the 2035 General Plan Policy NCR-9.1 (Light Pollution Reduction), which requires lighting to be unobtrusive, minimize off-site glare, and illuminate only the intended area. Therefore, the project would not result in substantial light or glare that would adversely affect day or nighttime views in the area. The impact would be less than significant.

2.4.1.3 Mitigation Measures

The analysis completed for this section indicates that no potentially significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

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

2.4.2.1 Environmental Setting

As described in Section 1, the 1.8-acre project site currently consists of active agricultural fields that are regularly disturbed through routine farming operations such as tilling, planting, and harvesting. The 0.8-acre well pump station site would be developed, and the 1-acre northern portion of the site would remain undeveloped (Figure 3).

According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the project site is designated as Prime Farmland (Figure 5, Prime Farmland). The project site is zoned Rural and has a land use designation of Heavy Industrial (IH). There is no timberland or forest within or adjacent to the project site, and it is not under a Williamson Act contract (California Department of Conservation 2026).

2.4.2.2 Impact Analysis

a. Would the project 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 Natural Resources Agency, to non-agricultural use?

Less Than Significant Impact with Mitigation Incorporated. The project site is designated as Prime Farmland pursuant to the Farmland Mapping and Monitoring Program of the California Natural Resources Agency. The northern portion of the project site (1 acre) would remain undeveloped and therefore would not be converted to a non-agricultural use. However, the southern portion of the project site (0.8 acres) would be permanently converted from Prime Farmland to non-agricultural use, as it would be developed as a well and pump station with supporting solar array. As the project would result in a loss of Prime Farmland, a potentially significant impact would occur. However, with implementation of Mitigation Measure AG-1, the District would secure a permanent agricultural conservation easement over the northern 1 acre of the project site, resulting in a greater than 1:1 ratio of agricultural land to be preserved for agricultural use. Therefore, the impact would be less than significant with mitigation (AG-1).

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is not under Williamson Act contract. The project site is zoned Rural, which is intended to provide areas for mixtures of housing and small-scale agricultural uses. Therefore, while agricultural use is allowed, the zoning does not require it. The proposed pump station, treatment building, and associated infrastructure are consistent with the allowable uses within the Rural zoning designation. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The project site is zoned Rural. There is no forest land or timberland on the project site. Therefore, the project would not conflict with any zoning for forest land or timberland, and no impact would occur.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site does not contain any forest land and would not result in the loss or conversion of forest land. Therefore, no impact would occur.

e. Would the project 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?

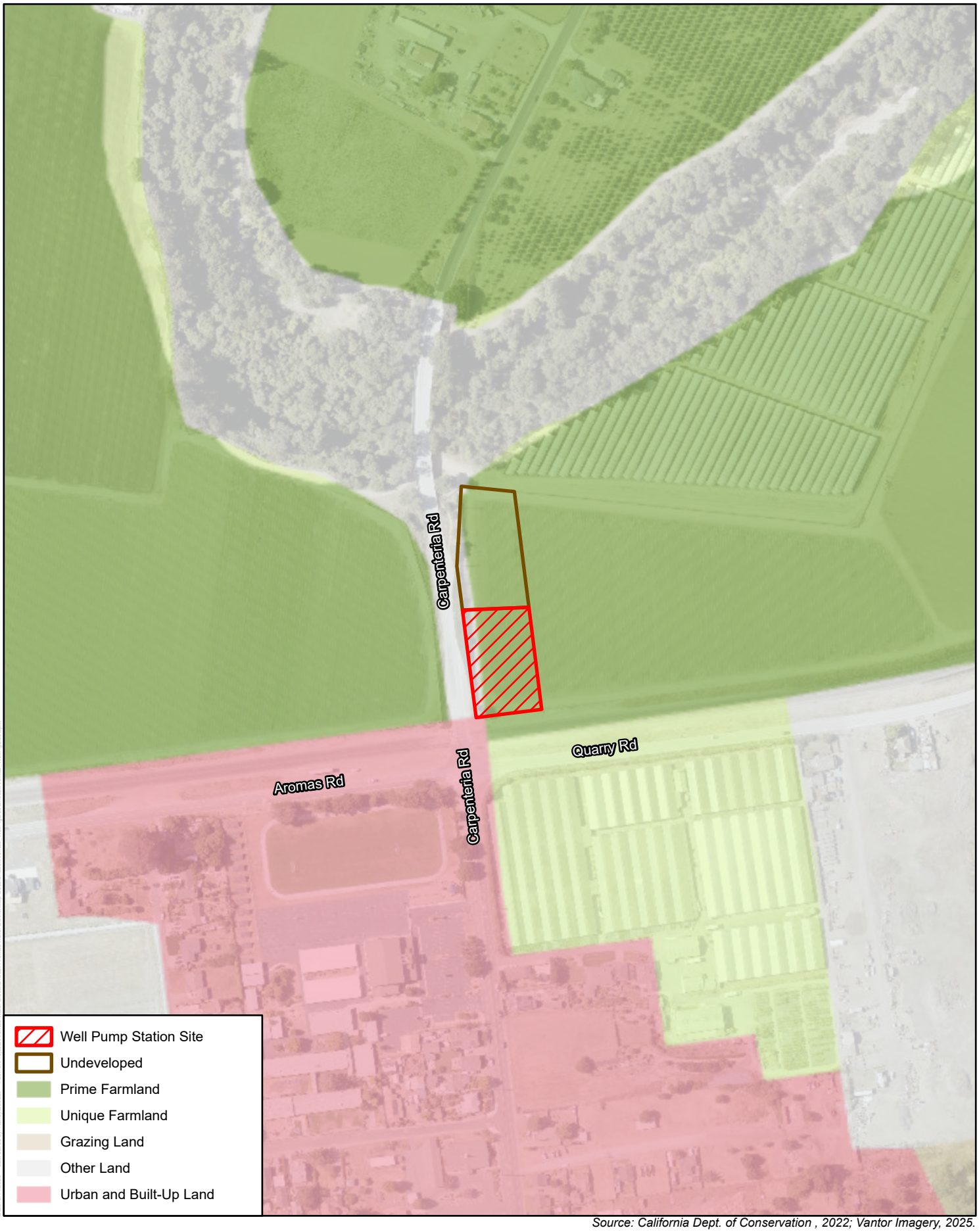
Less Than Significant Impact with Mitigation Incorporated. As discussed under Threshold (a), the project site is designated as Prime Farmland, and implementation of the project would result in the permanent conversion of approximately 0.8 acres of agricultural land to a non-agricultural use for development of the well, pump station, and associated infrastructure, including a solar array. These improvements would introduce a permanent change in land use within the southern portion of the site, resulting in the loss of agricultural productivity on that portion of the property.

Project development would be confined to a limited footprint within the overall parcel, with the northern 1-acre portion remaining undeveloped and available for continued agricultural use. To address the loss of Prime Farmland and ensure that agricultural resources are preserved, Mitigation Measure AG-1 would require the District to secure a permanent agricultural conservation easement. This easement would preserve farmland at a minimum 1:1 ratio in San Benito County, ensuring that land of equal or greater acreage and comparable soil quality is protected in perpetuity. Therefore, with implementation of Mitigation Measure AG-1, the impact related to conversion of farmland to non-agricultural use would be reduced to a less than significant level. The impact would be less than significant with mitigation.

2.4.2.3 Mitigation Measures

The following mitigation is required as part of the project to ensure that potential agriculture impacts are mitigated to levels that are less than significant:

AG-1: **Establish Agricultural Conservation Easement.** Prior to issuance of construction permits, the District shall secure a permanent agricultural conservation easement over the northern 1-acre portion of the project site, which will allow for farmland of equal or greater acreage and comparable soil quality (minimum 1:1 ratio) to be preserved within San Benito County. The easement shall be recorded with the County Recorder and held by a qualified land trust or public agency approved by the County, and shall permanently restrict the preserved land to agricultural use.



Source: California Dept. of Conservation , 2022; Vantor Imagery, 2025.

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Figure 5

Prime Farmland

Aromas Water District Driscoll Well and Pump Station Project

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2.4.3 Air Quality

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

2.4.3.1 Environmental Setting

San Benito County is located in the North Central Coast Air Basin, which includes Monterey County, Santa Cruz County, and San Benito County. The North Central Coast Air Basin encompasses approximately 5,200 square miles along California's central coast. Air quality in the basin is regulated by the Monterey Bay Air Resources District (MBARD), the regional agency responsible for implementing state and federal air quality regulations.

MBARD conducts air quality monitoring, develops regional Air Quality Plans, issues permits for stationary sources, enforces air quality regulations, and provides public education related to air pollution in accordance with the California Air Resources Board, the U.S. Environmental Protection Agency (USEPA), the California Clean Air Act, and the Clean Air Act (MBARD 2026).

2.4.3.2 Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project site is located in San Benito County, which is under the jurisdiction of the MBARD. The applicable Air Quality Plan for the project site is the MBARD Air Quality Management Plan, which establishes strategies and control measures to attain and maintain state and federal air quality standards in the North Central Coast Air Basin.

Construction activities associated with the project would generate temporary emissions from equipment such as dump trucks, bulldozers, compactors, and front-end loaders. These activities may emit ozone precursors, including volatile organic compounds (VOC) and nitrogen oxides (NOx). According to the MBARD CEQA Air Quality Guidelines, emissions from typical construction equipment are accounted for in

the regional emission inventories used in the Air Quality Management Plan. Because the project would use standard construction equipment and typical construction practices consistent with these assumptions, the project would not interfere with implementation of the Air Quality Management Plan or adversely affect the region's ability to attain applicable air quality standards.

The project does not involve land development that would result in a substantial long-term increase in criteria air pollutant emissions. The project's purpose is to supplement the existing potable water system capacity and provide redundancy for aging infrastructure. Construction emissions would be temporary and limited in duration. Operational emissions would be minimal and limited to occasional vehicle trips for routine maintenance and periodic emergency generator testing. As such, the project would not result in emissions that exceed applicable MBARD thresholds or conflict with regional air quality planning assumptions. Therefore, the project would not conflict with or obstruct implementation of the applicable Air Quality Plan. The impact would be less than significant.

b. Would the project 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?

Less Than Significant Impact. Project construction and operation would result in temporary and limited emissions, respectively.

Construction

Construction of the project would result in temporary criteria air pollutant emissions from exhaust from construction equipment, vehicle and truck trips, application of coatings, and fugitive dust from ground disturbance.

The MBARD outlines screening levels for construction activity that could result in a significant impact related to PM_{10} emissions. Projects that require grading and excavation but disturb less than 2.2 acres per day would typically result in emissions below the MBARD threshold of 82 pounds per day of PM_{10}. The project involves construction of a municipal production well, pump station, and associated infrastructure, including approximately 650 feet of pipeline connection to the existing water distribution system. Construction activities would include limited site preparation and grading for the well pad, trenching for pipeline installation along Carpenteria Road, pump installation, and backfilling. Construction equipment would include typical equipment such as excavators, backhoes, compactors, and water trucks. Disturbance associated with these activities would occur within a relatively small construction footprint and would not exceed 2.2 acres of grading per day. Nevertheless, construction emission were modeled for the project using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.37, based on the construction assumptions outlined in Section 1.4, Project Components. Model output is provided in Appendix A, CalEEMod Output. Calculated emissions are summarized in Table 1.

Table 1. Estimated Construction Daily Maximum Air Pollutant Emissions (pounds/day)

Construction Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Site Preparation	0.48	5.02	6.01	0.02	0.75	0.30
Demolition	0.48	4.19	6.02	0.01	0.28	0.15
Grading	1.07	10.24	10.22	0.02	2.81	1.48
Building Construction	0.50	4.84	7.01	0.01	0.21	0.18
Paving	0.65	4.21	5.95	0.01	0.3	0.19
Architectural Coating	1.11	0.81	1.13	0.002	0.02	0.01
Maximum Daily Emissions	1.11	10.24	10.22	0.02	2.81	1.48
MBARD Threshold	—	—	—	—	82	—
Significant Impact?	—	—	—	—	No	—

Source: CalEEMod Version 2022.1.1.37. Refer to Appendix A for model output.

Notes: CO = carbon monoxide; MBARD = Monterey Bay Air Resources District; NO_x = oxides of nitrogen; $PM_{2.5}$ = particulate matter 2.5 microns or less in size; PM_{10} = particulate matter 10 microns or less in size; SO_x = sulfur oxides; VOC = volatile organic compound

As shown in Table 3.3-2, the project would not exceed the MBARD threshold for PM_{10}. The MBARD does not identify quantitative thresholds for other criteria air pollutants during construction and emissions of these pollutants are provided for informational purposes. Construction projects using typical construction equipment, such as dump trucks, scrappers, bulldozers, compactors, and front-end loaders, that temporarily emit precursors of ozone (O_3) (i.e., VOCs or NO_x) are accommodated in the emission inventories of state- and federally required Air Quality Plans and would not have a significant impact on the attainment and maintenance of O_3 Ambient Air Quality Standards (AAQS). However, a project that would use non-typical equipment would have the potential to result in a significant impact related to VOC or NOx emissions. The project would employ typical construction equipment. It would not require non-typical construction equipment or techniques that have not been accounted for in the North Central Coast Air Basin emissions inventories. The project would not exceed maximum daily criteria air pollutant emissions during construction.

Operation

Following construction, operation of the project would generate minimal air pollutant emissions. The facility would consist primarily of a groundwater well, pump equipment, a small treatment system to remove manganese and iron, and associated infrastructure to convey water to the District's existing distribution system.

Operational activities would largely involve automated pumping and periodic maintenance visits by District staff. These activities would generate negligible emissions and would not result in a substantial increase in criteria air pollutant emissions on the project site. No combustion processes, industrial operations, or other emission-generating uses would occur during routine operation other than routine emergency generator testing. Generator testing would occur monthly for approximately 30 minutes and would not be a substantial source of emissions.

Operational activities would be limited to the functioning of the electric-powered well and pump equipment and occasional maintenance, and the project would not generate substantial ongoing emissions of criteria air pollutants.

Therefore, project construction and operation would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The impact would be less than significant.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The MBARD defines sensitive receptors for CEQA purposes as any residence, including single-family homes, condominiums, apartments, and living quarters; education resources, such as preschools and kindergarten through grade 12 (k–12) schools; daycare centers; and healthcare facilities, such as hospitals or retirement and nursing homes. Sensitive receptors also include long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing. Sensitive receptors within the vicinity of the project site include residential uses and a school. The closes portion of the Aromas Elementary School is the field located approximately 230 feet southwest of the project site and classrooms approximately 250 feet east of pipeline installation in Carpenteria Road. The closest residences to the project site are located south and west of the project site along Marcus Street, Vega Street, Marshall Lane, and Carpenteria Road where pipeline installation would occur. The potential for the project to result in emissions of toxic air contaminants (TACs) or result in CO hotpots are addressed separately in the following sections.

Toxic Air Contaminants

As detailed above in Section 2.4.3 b), the project would not generate substantial pollutant concentrations during construction. Emissions from construction activities would be temporary (limited to approximately two years for all project components), would require minimal use of diesel equipment, and would not require a substantial increase in diesel truck trips on roadways with residential receptors. A maximum of 16 truck trips per day is anticipated during site preparation and grading activities (refer to CalEEMod output in Appendix A for calculated vehicle trips).

The closest sensitive receptors to project construction would be residences along Carpenteria Road where the pipeline would be installed. Total project construction is anticipated to occur over an approximately 2-year period, which is less than seven percent of the 30-year risk period recommended for assessing public health risk for residential receptors (CAPCOA 2016). Additionally, pipeline construction would not last for the entire 2-year construction period, and truck trips for all construction activities would not exceed the 100 trucks per day within 1,000 feet of residential uses screening level established by the California Air Resources Board (CARB) for health risks from long-term operation of truck trip-generating facilities. As shown in Table 3.3-2, PM emissions would be below the MBARD threshold for combined exhaust and fugitive dust emissions. As such, diesel particulate matter emissions

during construction would not be sufficient to pose a significant risk to sensitive receptors from construction equipment operations during the project. The impact would be less than significant.

Operation would be ongoing use of well, pump station, and associated facilities. According to the guidance in the Air Quality and Land Use Handbook prepared by the CARB (2005), typical sources of TACs include facilities such as rail yards, distribution centers, and heavy industrial operations. The project does not involve industrial processes, heavy diesel truck traffic, or other activities commonly associated with TAC emissions. As such, following construction, the project would not be a typical source of ongoing TAC emissions. Impacts to nearby sensitive receptors would be less than significant.

Carbon Monoxide Hotspots

Areas with high vehicle density, such as congested intersections and parking garages, have the potential to create high concentrations of CO, known as CO "hotspots," which can expose sensitive receptors to substantial pollutant concentrations. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal AAQS of 35 parts per million or the state AAQS of 20 parts per million. The MBARD's CEQA Guidelines for air quality indicate that the following traffic effects should be assumed to generate a significant CO impact unless CO dispersion modeling demonstrates otherwise:

- Intersections or road segments that operate at level of service (LOS) D or better would operate at LOS E or F with the project's traffic;
- Intersections or road segments that operate at LOS E or F where the volume-to-capacity ratio would increase 0.05 or more with the project's traffic;
- Intersections that operate at LOS E or F where delays would increase by 10 seconds or more with the project's traffic;
- Unsignalized intersections which operate at LOS E or F where the reserve capacity would decrease by 50 or more with the project's traffic; or
- The project would generate substantial heavy-duty truck traffic or generate substantial traffic along urban street canyons or near a major stationary source of CO.

Following construction, the project would generate only occasional vehicle trips for maintenance and would not cause an intersection to operate at LOS E or F, result in a significant increase in congestion at an intersection currently operating and LOS E or F, or generate substantial heavy-duty traffic along urban street canyons or near a major stationary source of CO. Therefore, the project would not result in a significant CO impact. The impact would be less than significant.

In summary, the project would not expose sensitive receptors to substantial pollutant concentrations. The impact would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Construction of the project would result in short-term, temporary odors from vehicle exhaust and construction equipment engines during grading, trenching, and installation activities. Diesel-powered construction equipment would use California ultra-low sulfur diesel fuel, which contains a maximum sulfur content of 15 parts per million and reduces emissions of sulfur-related compounds that can contribute to odors. These odors would be temporary and would cease once construction activities are completed.

Typical land uses that generate objectionable odors include facilities such as sewage treatment plants, landfills, waste transfer stations, petroleum refineries, and certain manufacturing operations (CARB 2005). The project involves construction and operation of a municipal groundwater well and pump station to supplement the existing potable water system. Operation of the well facility would not involve processes or equipment that generate odor-producing emissions. Long-term operation would be limited to water pumping, periodic maintenance visits, and occasional emergency generator testing. Therefore, the project would not create objectionable odors that would affect a substantial number of people. The impact would be less than significant.

2.4.3.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.4 Biological Resources

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

2.4.4.1 Environmental Setting

The project site is highly disturbed and is located in an agricultural field, where regular plowing prevents natural habitats from persisting. The project is bordered on the south and west sides by paved roads, and to the north and east sides the plowed fields continue. No wetlands, riparian habitats, or other sensitive habitats are present on the project site. North of the project site and outside project limits is the Pajaro River, which is host to an intact riparian corridor with mature trees and aquatic habitats.

A database search was performed within a one-mile radius of the project site, including the California Natural Diversity Database (CDFW 2026a), Biogeographic Information Observation system (CDFW 2026b), California Native Plant Society (nine quadrangle) (CNPS 2026), and U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consulting (USFWS 2026). A total of three wildlife species and two plant species historical records were reported from the database search, as shown on Figure 6, Historical Occurrence of Sensitive Species. Of these species, none were identified to have potential to occur on the project site due to the levels of disturbance. A table summarizing the potential for occurrence of the five species is included as Appendix B, Sensitive Species Potential to Occur.

2.4.4.2 Impact Analysis

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

Less Than Significant with Mitigation Incorporated. The project site and surroundings provide nesting opportunities for birds, including open landscapes that may be preferred by some ground-nesting species, and mature trees in the nearby Pajaro River corridor which may be selected by raptors (birds of prey). Because nesting raptors may require large buffers of up to 500 feet, these buffers may overlap with the project site.

Native nesting bird species are protected by California Fish and Game Code, Sections 3503 and 3503.5, and by the federal Migratory Bird Treaty Act (16 USC 703–711). In particular, Section 3503 provides that it is unlawful to take, possess, or needlessly destroy the active nests or eggs of any bird in California, and Section 3503.5 protects all raptors and their eggs and active nests. The Migratory Bird Treaty Act prohibits the take (including killing, capturing, selling, trading, and transport) of native migratory bird species throughout the United States.

Potential direct or indirect impacts may occur to nesting birds due to construction activities if work occurs during the nesting bird season (from February 1 to September 1). However, with implementation of Mitigation Measure BIO-1, pre-construction surveys for nesting birds and raptors within 500 feet of the project site would mitigate any potential impact, such as take of a nest, to a level of less than significant. Therefore, the impact would be less than significant with mitigation (BIO-1).

b. Would the project 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 Game or US Fish and Wildlife Service?

No Impact. No riparian habitat or sensitive natural community occurs on the project site due to regular agricultural disturbance. Therefore, there would be no impact.

c. Would the project 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?

No Impact. The project site is well-drained and does not support any state or federally protected wetland habitats. Therefore, there would be no impact.

d. Would the project 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?

No Impact. The project site does not contain any critical connective habitat or refugia due to regular disturbance from agricultural practices. Therefore, there would be no impact.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The project would not be removing any trees or impacting any sensitive habitat and would not conflict with any local policies or ordinances. Therefore, there would be no impact.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The County of San Benito has a multi-species habitat conservation plan, known as the San Benito County Conservation Plan. This project occurs in San Benito County; however, the project site is located in a regularly disturbed agricultural field with no potential to support covered species or other sensitive species or habitats. Therefore, there would be no conflict with the San Benito County Conservation Plan or any other plans, and there would be no impact.

2.4.4.3 Mitigation Measures

The following mitigation is required as part of the project to ensure that potential biological resources impacts are mitigated to levels that are less than significant:

BIO-1: **Protect Nesting Birds during Construction.** If feasible, construction activities shall take place outside the nesting bird season, which is from February 1 to September 1. If project activities must occur during the nesting bird season, a qualified biologist shall perform a survey for nesting birds prior to the start of work. If no active bird nests are present, work must begin within 14 days, or the area will need to be surveyed again.

If an active bird nest is discovered on the project site or within range of disturbance, the nest will be given a buffer appropriate for the species and site conditions as directed by the qualified biologist. The buffer shall remain in place until the young have fledged from the nest, or the nest is no longer active, as determined by the qualified biologist. Work within the buffer will be avoided until the nest is inactive. The buffer size may be reduced with prior approval from the qualified biologist and in consultation with the California Department of Fish and Wildlife.

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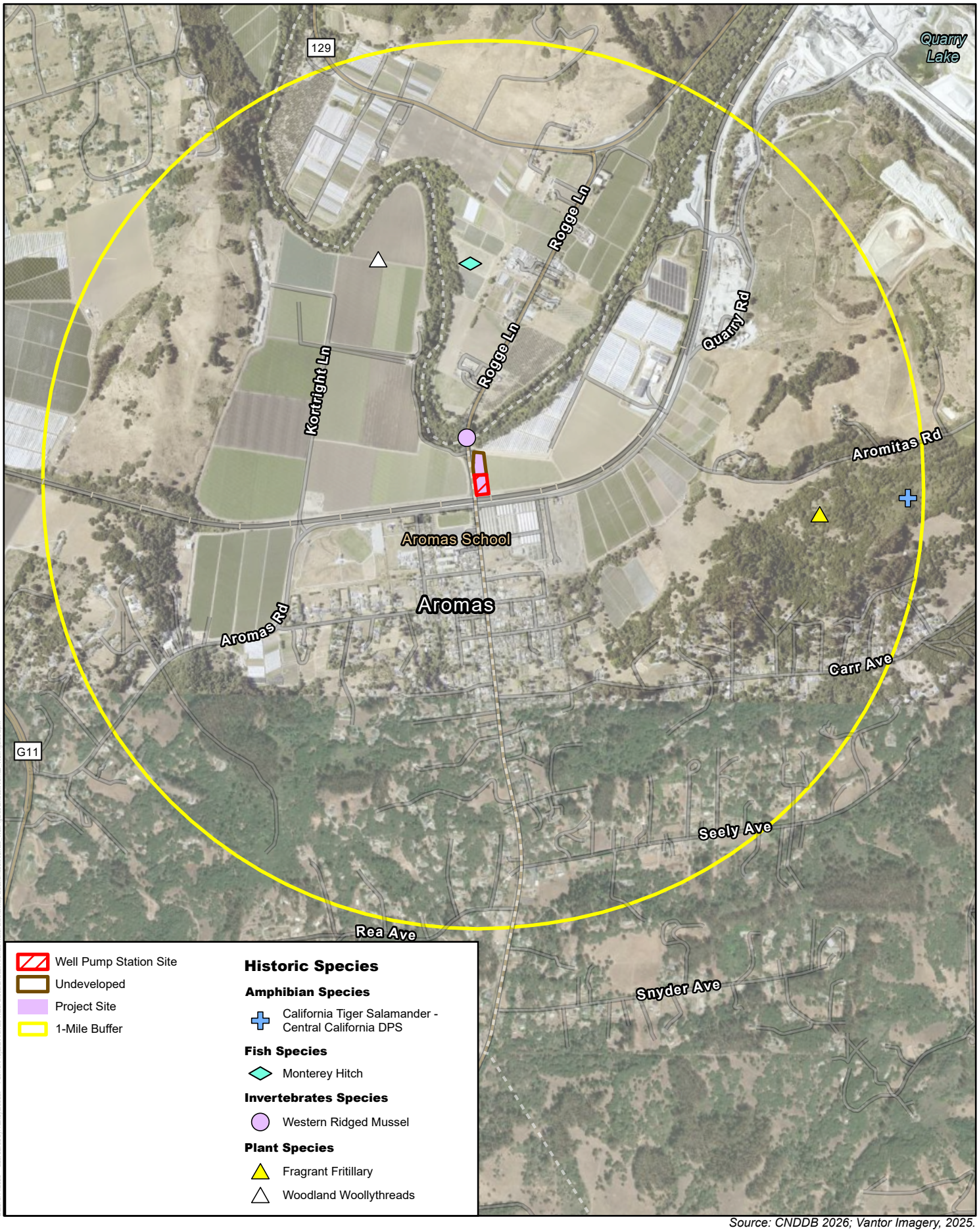

Source: CNDDB 2026; Vantor Imagery, 2025.

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Figure 6

Historic Occurrence of Species

Aromas Water District Driscoll Well and Pump Station Project

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2.4.5 Cultural Resources

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

2.4.5.1 Environmental Setting

The following information is based on the project-specific Cultural Resources Technical Report prepared by Harris & Associates in April 2026 (Appendix C, Cultural Resources Technical Report). The project site is highly disturbed and is located in an agricultural field where plowing occurs on a regular basis. The project site is bordered by paved roads to the south and west, and by agricultural fields to the north and east. Nearby is the Pajaro River that is outside the project site to the north. The presence of a watercourse is an indicator of cultural sensitivity because Native Americans lived near watercourses and used the resources provided.

Efforts to identify cultural resources on the project site included conducting a records search at the Northwest Information Center of the California Historical Resources Information System, reviewing historical maps and aerials, contacting the Native American Heritage Commission and potentially interested Native American representatives and Tribes, and conducting a pedestrian survey of the project site. The methods and results of these efforts are documented in a Cultural Resources Report prepared for this project and submitted to the Northwest Information Center.

The records search identified two previously recorded resources within a 0.25-mile radius of the project site and no resources on the project site. A search of the Native American Heritage Commission's Sacred Lands database was negative. The Native American representatives on the list provided by the Native American Heritage Commission were contacted; and as of April 2, 2026, one response has been received from the Ahman Mutsun Tribal Band. An intensive pedestrian survey conducted on February 3, 2026, did not result in the discovery of any archaeological resources.

The project site is undeveloped, and there are no structures on the site. The area is currently and has historically been in agricultural use.

2.4.5.2 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. There are no built historical resources on the project site. Therefore, there is no potential for the project to cause a substantial adverse change in the significance of a built historical resource. As such, there would be no impact.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. There is no evidence of prehistoric cultural resources on the project site. However, the project site is located adjacent to a perennial watercourse, making it sensitive for precontact cultural resources. There is always a potential that buried resources may be encountered during excavation associated with construction. If those resources were to meet the criteria for significance pursuant to Section 15064.5 and be considered historical resources, any disturbance or destruction of those resources would be a significant impact under CEQA. Implementation of Mitigation Measure CUL-1 to stop work in case of discovery and evaluate and appropriately treat the find would reduce this impact to a less than significant level. The impact would be less than significant with mitigation.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The project site does not include a formal cemetery or any known archaeological resources that might contain interred human remains. However, it is always possible that previously undiscovered human remains may be discovered during excavation associated with construction. Pursuant to California Health and Safety Code, Sections 7050.5–7054, if human remains are discovered at any time during site preparation, excavation, or other ground disturbance associated with the project, the responsible people shall immediately cease any further site excavation and notify the County sheriff, coroner, and the District. If the coroner determines that the remains are not of recent origin and are Native American, the California Native American Heritage Commission shall be notified as required by law. The California Native American Heritage Commission shall designate a most likely descendant who shall be authorized to provide recommendations for the management of the Native American human remains. Pursuant to California Public Resources Code, Section 5097, the most likely descendant shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. Disturbance shall not resume until the significance of the resource is determined and appropriate mitigations to preserve the resource on the site are established. With these required processes in place, the impact would be less than significant.

2.4.5.3 Mitigation Measures

The following mitigation is required as part of the project to ensure that potential cultural resources impacts are mitigated to levels that are less than significant:

CUL-1: Conduct Worker Awareness Training and Stop Work if Unexpected Discovery of Cultural Resources During Construction. Due to the possibility that buried cultural resources might be discovered during construction excavation activities, an environmental professional under the supervision of a qualified archaeologist shall conduct Worker Environmental Awareness Training (WEAP) prior to ground disturbance activities. The WEAP shall identify the types of resources that could be encountered on the project site and the procedures to follow if they are found.

If cultural resources (which may consist of worked stone or bone, concentrations of shell or midden, or historic artifacts) are discovered during ground-disturbing activities, construction crews will stop work within a 100-foot radius of the find and immediately notify the District. Work will stop until the find has been examined and evaluated by a qualified archaeologist. If the archaeologist determines the find to be significant, they will work with the District to establish and implement appropriate treatment, which may include data recovery.

2.4.6 Energy

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

2.4.6.1 Environmental Setting

Electricity service for the project site is currently provided by Central Coast Community Energy, with infrastructure owned and operated by PG&E. Natural gas services are provided by PG&E.

2.4.6.2 Impact Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Construction of the project would result in an incremental increase in the consumption of energy resources during construction due to on-site use of construction equipment and vehicle and truck trips. All project construction equipment would be required to comply with the CARB emissions requirements for construction equipment, which includes measures to reduce fuel-consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered. As a result, the small temporary increase in consumption of fuel during construction would not be wasteful, inefficient, or unnecessary.

Following construction, operation of all equipment would be electric-powered, and the project would include a solar array that would supply electricity to operate the facility, including the well pump, lighting, instrumentation, and appurtenances. As such, the project would not result in a new increase in energy demand from the regional electricity grid. Emergency generators would require consumption of diesel fuel only in an emergency or during necessary maintenance testing. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The impact would be less than significant.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As described above, the project would include a solar array that would supply electricity to operate the facility. The project would not result in net increase in energy demand

and would not interfere with Central Coast Community Energy's ability to provide renewable energy to the region. Therefore, the project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency. The impact would be less than significant.

2.4.6.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

2.4.7.1 Environmental Setting

The following information is based on the project-specific Geotechnical Investigation prepared by Pacific Crest Engineering in March 2026 (Appendix D). The project site is characterized by flat terrain and does not contain steep slopes, bluffs, or other prominent topographic features. The site is generally level and lacks natural landforms that would influence geologic hazards. The site is underlain by alluvial floodplain deposits described as unconsolidated and poorly sorted sediments consisting of sand, gravel, and clay.

These materials are typical of valley floor environments in the region. The report indicates that the on-site soils exhibit the potential for expansive soils.

The project site is located in a seismically active region of California. However, the site is not located in an Alquist-Priolo Earthquake Fault Zone, and no active faults are mapped at or immediately adjacent to the site. The nearest mapped active fault is the San Andreas Fault, located approximately 1.5 miles northeast of the project site. Ground shaking from regional seismic events could occur, as is typical throughout California.

2.4.7.2 Impact Analysis

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Alquist-Priolo Earthquake Fault Zones are established to reduce the risk of surface rupture from known active faults by restricting development directly over such faults. The project site is not located in an Alquist-Priolo Earthquake Fault Zone. Ground surface fault rupture typically occurs along the surficial traces of an active fault during seismic events. Since the nearest mapped active fault is the San Andreas Fault, located approximately 1.5 northeast of the project site, the potential for ground surface fault rupture would be low (Appendix D). Therefore, implementation of the project not expose people or structures to fault rupture hazards, and there would be no impact.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The project site is located in a seismically active region of California, and strong seismic ground shaking is expected to occur during the design life of the project due to the presence of nearby active faults, including the San Andreas Fault which is located 1.5 miles to the northeast. According to the project-specific geotechnical investigation, site conditions may influence the intensity of shaking; however, such conditions are typical of the region.

All proposed structures would be designed and constructed in accordance with the most current CBC and the recommendations identified in the Geotechnical Investigation prepared for the project. These standards are intended to minimize risks to life and property by reducing the potential for structural failure during seismic events. Structures designed in accordance with the CBC are expected to perform adequately, although some degree of non-structural or architectural damage and the need for post-earthquake repairs could occur during a major seismic event.

With adherence to applicable seismic design standards and geotechnical recommendations, the potential for substantial adverse effects related to strong seismic ground shaking would be minimized. Therefore, the impact would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based on the Geotechnical Investigation, the project site is underlain by predominantly fine grain material that is not susceptible to liquefaction. Therefore, the risk of ground failure related to liquefaction is low. The impact would be less than significant.

iv. Landslides?

No Impact. The project site is generally flat to slight sloping and does not contain slopes, bluffs, or hillside features that would be prone to landslides, nor is it situated downslope of terrain that could reasonably generate a landslide affecting the project site. Given the flat topography and absence of nearby landslide-prone features, the project would not be subject to on-site or off-site landslide hazards. Therefore, there would be no impact.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the project would require site preparation activities such as grading, trenching, and excavation, which could result in temporary soil disturbance and limited potential for short-term soil erosion during construction.

The project site is relatively flat, which reduces the potential for substantial erosion or loss of topsoil. Furthermore, as stated in Section 1.4, Project Components, the project includes implementation of erosion and sediment control measures, such as silt fencing and fiber rolls installed around the site perimeter, to control erosion and prevent sediment from leaving the project site during construction. With implementation of these BMPs during construction, the project would not result in substantial soil erosion or the loss of topsoil. Therefore, the impact would be less than significant.

c. Would the project 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?

Less Than Significant Impact. The project site is characterized by relatively flat terrain. As detailed above in Section 2.4.7 a. iv), the project site is not at risk for landslides or slope instability. As detailed in Section 2.4.7 a. iii), the project site is underlain by predominantly fine-grained material that is not susceptible to liquefaction. Liquefaction induced lateral spreading occurs when liquifiable soil mass fails toward an open slope face or fails on an inclined topographic slope. Because the project site has low potential for liquefaction the potential for lateral spreading is also low.

Subsidence occurs when a large land area settles due to oversaturation or extensive withdrawal of groundwater, oil, or natural gas. Areas susceptible to subsidence are typically composed of open textured soils that become saturated. The project site is not susceptible to subsidence.

Therefore, any development on the native, stable soils is unlikely to become unstable and result in geologic hazards. In addition, the project does not have any aspect that could result in a landslide, lateral spreading, subsidence, liquefaction, or collapse. The impact would be less than significant.

d. Would the project 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?

Less Than Significant Impact. The project site is underlain by a relatively thick layer of high expansive clay. These expansive soils are subject to high volume changes during seasonal fluctuations in moisture content, which can cause heaving and cracking of shallow foundations, floor slabs, pavements, and exterior concrete flatwork such as sidewalks. As discussed in Section 1.4.6, Compliance with Geotechnical Investigation Recommendations, all earthwork and facility design and construction would be in accordance with the most current CBC and the applicable recommendations identified in the Geotechnical Investigation, Section V, prepared by Pacific Crest Engineering (Appendix D). Compliance with the recommendations from the Geotechnical Study/Investigation, which would reduce potential impacts associated with expansive soils to a less than significant level.

Therefore, although expansive soils may be present at the project site, adherence to applicable building code requirements and recommendations in the Geotechnical Investigation would reduce potential risks to life or property, and impacts related to expansive soils would be less than significant

e. Would the project 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?

No Impact. The project does not include restrooms or the use of septic tanks or alternative wastewater disposal systems. Therefore, there is no need for the on-site soils to be capable of supporting such facilities. The only wastewater associated with project operations would consist of well backwash water, which would be temporarily stored in an on-site backwash tank, recovered by the water treatment system, and treated prior to being discharged to the potable water distribution system as described in Section 1.4, Project Components. As no septic or alternative wastewater disposal systems are proposed, the project would not result in impacts related to soil suitability for wastewater disposal. Therefore, there would be no impact.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. There are no unique geological features on the project site, which is an agricultural field. According to the County of San Benito General Plan Environmental Impact Report (EIR), paleontological resources, including a range of plant and animal

fossil remains, have been encountered at many locations in San Benito County. The project site is located on Pleistocene alluvial deposits, likely underlain by the earlier Purisima Formation, which is sensitive for paleontological resources. Therefore, very deep excavations may have the potential to affect paleontological resources. The only deep excavation associated with the project would be the construction of the well itself. With implementation of mitigation measure GEO-1, paleontological sensitivity training and a recovery plan, if needed, would reduce this impact to less than significant. Therefore, the impact would be less than significant with mitigation.

2.4.7.3 Mitigation Measures

The following mitigation is required as part of the project to ensure that potential geology and soils impacts are mitigated to levels that are less than significant:

GEO-1: Conduct Worker Awareness Training and Stop Work if Unexpected Discovery of Paleontological Resources. Due to the possibility that buried paleontological resources (such as fossilized bones and teeth) might be discovered during construction excavation activities, an environmental professional under the supervision of a qualified paleontologist shall conduct Worker Environmental Awareness Training (WEAP) prior to ground disturbance activities. The WEAP shall identify the types of resources that could be encountered on the project site and the procedures to follow if they are found.

Additionally, the following "stop work" language shall be included on all construction documents and on any permits issued for the project site, including but not limited to, grading and building permits associated with the project: "If paleontological resources are unexpectedly discovered during construction, work shall be halted immediately within 50 meters (160 feet) of the find, and the County Planning Department notified, until it can be evaluated by a qualified professional paleontologist. If the find is determined to be significant, an appropriate resource recovery shall be formulated, with the concurrence of the San Benito County, and implemented."

2.4.8 Greenhouse Gas Emissions

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

2.4.8.1 Environmental Setting

The primary GHG emitted by human activities is carbon dioxide (CO_2). CO_2 enters the atmosphere through the burning of fossil fuels, solid waste, trees, and wood products and because of other chemical reactions, such as those produced through the manufacturing of cement. Globally, the largest source of CO_2 emissions is the combustion of fossil fuels in power plants, automobiles, industrial facilities, and other similar sources. Methane (CH_4) is emitted from natural and human-related sources, including fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Nitrous oxide (N_2O) is emitted during agricultural and industrial activities and combustion of fossil fuels and solid waste. Hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride are synthetic, powerful GHGs that are emitted from a variety of industrial processes and the production of chlorodifluoromethane. Construction or operation of the project would not include any industrial processes, and chlorodifluoromethane has been mostly phased out of use in the United States, with the exception of feedstock production (USEPA 2024); therefore, these GHGs are not discussed further in this report.

Individual GHGs have varying heat-trapping properties and atmospheric lifetimes. The CO_2 equivalent (CO_2e) is a consistent method for comparing GHG emissions because it normalizes various GHG emissions to a consistent measure. Each GHG is compared with CO_2 with respect to its ability to trap infrared radiation, its atmospheric lifetime, and its chemical structure. CH_4 is a GHG that is 25 times more potent than CO_2; therefore, 1 metric ton (MT) of CH4 is equal to 25 metric tons of carbon dioxide equivalent (MT CO_2e). One MT of N_2O is equal to 298 MT of CO_2e.

In September 2006, the California Legislature adopted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing GHG emissions in California. AB 32 identifies a statewide goal of reducing the statewide level of GHG emissions to 1990 levels by 2020. Effective January 1, 2017, Senate Bill (SB) 32 requires California to reduce its statewide GHG emissions by the year 2030 so that emissions are 40 percent below those that occurred in 1990. In 2005, California Governor Arnold Schwarzenegger announced, through Executive Order S-3-05, a statewide GHG emissions reduction target of reducing GHG emissions to 80 percent below 1990 levels by 2050.

Most recently, in 2022, AB 1279 codified a statewide commitment to achieving carbon neutrality as soon as possible, but no later than 2045.

2.4.8.2 Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Implementation of the project would generate GHG emissions by the usage of fossil fuels during construction activities. Construction emissions were calculated using CalEEMod and assumptions consistent with Section 2.4.3, Air Quality. Construction would result in one-time total GHG emissions of 286 MT CO_2e.

Following construction, operation of all equipment would be electric-powered, with power provided by the proposed solar array. One new emergency generator would require testing once per month for approximately 30 minutes. Landscape equipment would occasionally be used for maintenance. A nominal net increase in vehicle emissions is anticipated associated with maintenance of the project, because the project would be incorporated into the existing maintenance routes and schedule for District facilities. As such, new GHG emissions from project operation would be minimal.

Neither Aromas Water District nor MBARD have adopted a threshold related to GHG emissions. The County of San Benito has developed a Climate Roadmap (Roadmap) that aligns with the regional Comprehensive Climate Action Plan. The Roadmap includes a long-term emissions target of net zero CO CO2e by 2045, consistent with AB 1279 (San Benito County 2026). The emissions reductions and carbon sequestration opportunities identified in the Roadmap are not yet enough to meet the 2045 carbon neutrality target, but lay the foundation and result in substantial progress toward this 2045 target. This is consistent with the CARB 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), which outlines a path to achieve carbon neutrality but recognizes that technologies not yet available will be required to achieve the statewide target (CARB 2022). Both the Roadmap and 2022 Scoping Plan focus of reducing fossil fuel use from transportation and transitioning to renewable energy sources to reduce GHG emissions.

As described above, the project would result in minimal short-term and ongoing GHG emissions. The project would include a new solar array to provide renewable energy to meet project demand, and would result in minimal new vehicle trips for maintenance. Therefore, the project would not generate GHG emissions that would have a significant impact on the environment, and the impact would be less than significant.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. As discussed above, the project would result in minimal GHG emissions that would not be anticipated to conflict with the ability of the County of San Benito or the state to meet

emissions reduction goals. Therefore, project would not conflict with the Roadmap or statewide emissions reduction goals, and the impact would be less than significant.

2.4.8.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.9 Hazards and Hazardous Materials

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

2.4.9.1 Environmental Setting

The California Department of Toxic Substance Control's EnviroStor database and the State Water Resources Control Board's GeoTracker database include hazardous release and contamination sites. A search of each database was conducted in April 2026 (DTSC 2026, SWRCB 2026). The searches revealed no hazardous material release sites on the project site or within 1,000 feet of the site. The closest hazardous site in the project vicinity identified was a now-closed cleanup program site approximately 0.5 mile east of the project site, located on Aromas Road.

2.4.9.2 Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project 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?

Less Than Significant Impact. The project involves the construction and operation of a well and pump station with an associated treatment system. The facility would include a designated chemical room, chemical feed systems, and safety features such as an eyewash station, and would require the routine use and storage of limited quantities of treatment chemicals (e.g., sodium hypochlorite) as well as fuels, oils, and lubricants for equipment.

During construction, hazardous materials such as diesel fuel, oil, solvents, and paints would be used. The transport, use, and disposal of these materials would be short-term and temporary. Spills or leakage of petroleum products during construction activities would be immediately contained, the hazardous material identified, and the material remediated in accordance with applicable federal, state, and local regulations, including the California Health and Safety Code, Section 25510, and California Vehicle Code, Section 23112.5. Compliance with these regulations would minimize risks to construction workers, the public, and the environment.

As described in Section 1.4, the project includes implementation of the following BMPs to reduce the potential for hazards associated with hazardous materials:

- The contractor shall comply with all applicable federal, state, and local laws and regulations related to the use, storage, and disposal of hazardous materials and hazardous waste.
- All hazardous materials shall be stored, handled, and used in accordance with manufacturer recommendations and applicable safety standards.
- Spill prevention and response measures shall be implemented, including immediate containment, cleanup, and proper disposal of any released materials.
- Hazardous materials, wastes, and empty containers shall be properly transported and disposed of at approved facilities and shall not be discharged to storm drains, sanitary sewers, or disposed of in general refuse containers.
- The pump station and treatment system shall incorporate safety features such as chemical storage containment, emergency shutoff systems, and appropriate monitoring and alarm systems.

With implementation of these BMPs and compliance with applicable regulations, the potential for routine hazards and reasonably foreseeable upset or accident conditions involving hazardous materials would be minimized. Therefore, the project would not create a significant hazard to the public or the environment, and the impact would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The closest school, Aromas Elementary School, is located directly southwest of the project site along Carpenteria Road, approximately 230 feet away. The project would not emit hazardous emissions or involve the routine handling, use, or disposal of hazardous or acutely hazardous materials. Construction activities would involve the temporary use of common materials such as fuels, lubricants, and disinfectants (e.g., sodium hypochlorite) that are typical for municipal infrastructure projects. As described in Section 2.4.9(a) and (b), compliance with applicable local, state, and federal regulations governing the transport, use, and storage of hazardous materials would ensure that schools within 0.25 mile of the project sites are not exposed to any risks related to hazardous materials during construction activities.

In addition, under normal operating procedures, chemicals would be contained on site. However, unanticipated, accidental release of these hazardous materials into the environment could result. The BMPs identified in Section 1.4 would reduce the potential that schools within 0.25 mile of the project site are not exposed to any risks related to hazardous materials during operation. Therefore, the impact would be less than significant.

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

No Impact. Based The California Department of Toxic Substance Control's EnviroStor database and the State Water Resources Control Board's GeoTracker database search, the project site has not been subject to a release of hazardous substances that would create a significant hazard to the public or environment. In addition, no sites have been identified within 1,000 feet of the project site (DTSC 2026, SWRCB 2026). The closest hazardous site in the project vicinity identified was a now-closed cleanup program site approximately 0.5 mile east of the project site, located on Aromas Road. Therefore, there would be no impact.

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?

No Impact. The project involves construction and operation of a municipal well and pump station and does not include residential uses or other land uses that would place people in areas subject to airport-related hazards. The nearest airport available for public use is Watsonville Municipal Airport, located approximately 9 miles northwest of the project site. Other airports in the region include Monterey Bay Academy Airport, approximately 11 miles west, and Hollister Municipal Airport, approximately 12 miles east of the project site. Due to the distance from these facilities and the absence of residential or

aviation-sensitive uses, the project would not expose people or structures to airport-related hazards. Therefore, there would be no impact.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The San Benito County Multi-Jurisdictional Hazard Mitigation Plan establishes the emergency organization, assigns tasks, specific policies and general procedures, and provides coordination of the planning efforts of the various emergency staff and service elements using the California Standardized Emergency Management System (County of San Benito 2022). The project would not interfere with the implementation of this plan, introduce new hazards or significant population and would not block any emergency routes. Further, as stated in Section 1.4, the project BMPs to be implemented during construction include maintaining emergency access. Therefore, the project would not result in the modification or blockage of any evacuation route, or result in an increased concentration of large numbers of people in an at-risk location. There would be no impact.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The project site is not located in a California Department of Forestry and Fire Protection (CAL FIRE)-designated Fire Hazard Severity Zone. The project would include a single treatment building associated with a municipal well and pump station. The site would be intermittently occupied by up to two operators for routine operation and maintenance activities, and no residential uses would be present on the property. The project does not introduce new housing or other uses that would place people in wildfire-prone areas. Given the limited on-site occupancy, absence of residents, and compliance with applicable fire safety standards, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, there would be no impact.

2.4.9.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.10 Hydrology and Water Quality

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

2.4.10.1 Environmental Setting

The site consists of disturbed agricultural land and is generally flat. No perennial or intermittent waterways occur within the project footprint. The closest waterway to the project site is the Pajaro River, which is located directly north of the project site. The Pajaro River is a 32-mile-long waterway on the Central Coast of California that flows generally east to west, extending from its headwaters near Gilroy, through the Aromas area, and discharging into the Pacific Ocean at Monterey Bay, west of Watsonville.

The District's groundwater is from the Pajaro Valley Groundwater Basin. According to the Geotechnical Investigation (Appendix D), groundwater was encountered at approximately 26 feet below the ground surface. Fluctuations in groundwater levels are subject to seasonal changes in precipitation, temperature, land use changes and pumping. Information in the discussion below as it relates to groundwater supplies is based on the Well Siting Study prepared for the project (Appendix E, Well Siting Study).

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps and as shown on Figure 7, FEMA Flood Zones, the northern portion of the project site is mapped as Zone AE, which represents a high-risk Special Flood Hazard Area subject to inundation by the 1 percent annual chance flood event. Zone AE extends along the Pajaro River corridor. The southern portion of the project site is outside Zone AE and is not located in a mapped Special Flood Hazard Area (FEMA 2026).

2.4.10.2 Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant impact. Construction of the project would involve activities such as site preparation, drilling and installation of the production well, construction of the pump station and treatment building, installation of underground pipeline connections, and installation of a ground-mounted solar photovoltaic system. These activities would require the use of heavy construction equipment and would temporarily disturb soils, which could increase the potential for erosion and sediment-laden runoff during storm events.

As described in Section 1.4, construction would also involve the use of typical construction-related materials and substances, including concrete, cement, fuels, oils, lubricants, and other fluids. If improperly handled or accidentally spilled, these materials could enter stormwater runoff and have the potential to affect surface water quality. To reduce the potential for water quality impacts during construction, the project would be required to implement standard construction BMPs in conformance with the California Stormwater Quality Association Stormwater BMP Handbook, in addition to San Benito County requirements. These BMPs would include, but would not be limited to, erosion and sediment control measures such as fiber rolls and slit fences, stabilization of disturbed soils, proper materials storage and handling, spill prevention and response procedures.

The project is not required to prepare and implement a Stormwater Pollution Prevention Plan, in accordance with the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System Construction General Permit, because the project would disturb less than 1 acre. As described in Section 1.4, the project would disturb approximately 0.72 acre. The 0.8-acre well pump station site (which would include 29,070 square feet of ground disturbance) + 680 linear feet of new water pipeline (2,277 square feet) = 31,347 square feet or 0.72 acre of ground disturbance.

San Benito County Code regulates construction grading, drainage, and erosion control through Chapter 19.17 (Grading, Drainage, and Erosion Control), which requires permits and design measures

to safeguard public health, property, and the environment during site disturbance. Compliance with these local requirements and implementation of construction BMPs would protect water quality (San Benito County 2025).

The well would be constructed to supplement the District's current inventory of groundwater supply wells to ensure it can meet current and future water demands. As documented in the Well Siting Study (Appendix E), the proposed well location was selected based on hydrogeologic conditions, groundwater availability, and water quality considerations. The study includes evaluation of subsurface conditions and available groundwater quality data to ensure the suitability of the site for potable water supply.

A Drinking Water Source Assessment and Protection Program was developed for Driscoll Well, to address all water quality concerns and ensure the drinking water source is protected from potential surface contaminating activities. There were no contaminants detected in the water supply. However, the well is still considered vulnerable to activities located near the drinking water source. Nearby Residential/Municipal and Agricultural/Rural use could potentially cause contamination to the groundwater. To help reduce the chance of introducing contaminants to the aquifer at the wellhead, design specifications for the well include a sanitary seal placed to a depth in excess of the minimum 50-ft. requirement. The annular seal is designed to a depth of 400 feet belowground surface. In addition, the project includes a treatment system designed to remove constituents such as iron and manganese to meet applicable drinking water standards.

Operation of the proposed municipal well and pump station would not introduce residential, commercial, or industrial land uses that typically generate ongoing stormwater pollutants. Operational activities would be limited to routine well operation, treatment of groundwater for iron and manganese removal, and periodic maintenance by two District operators. Routine operation would not result in the discharge of untreated wastewater to surface waters or groundwater nor would it involve activities that would substantially degrade water quality. Backwash water generated from the treatment system would be would be temporarily stored in an on-site backwash tank, recovered by the water treatment system, and treated prior to being discharged to the potable water distribution system as described in Section 1.4. There would not be uncontrolled discharge to surface waters.

The well pump station site would be paved with AC paving around the well facilities and decomposed granite around the solar array, and it would be graded so surface flows are directed to a stormwater catch basin in the south central portion of the site, connecting to the existing storm drainage system in Carpenteria Road. No direct discharges to nearby waterways are proposed.

Based on the findings of the Well Siting Study, implementation of water treatment, and implementation of the construction BMPs, the project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, the impact would be less than significant.

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

Less Than Significant Impact. The project involves construction and operation of a new municipal groundwater well and pump station to support the Aromas Water District's existing water supply system. The District anticipates that the well would produce approximately 500 to 800 gallons per minute, subject to confirmation following final well development and testing. The well is intended to improve system reliability, provide drought resilience, and serve as redundancy for existing infrastructure.

The project site is located in the Pajaro Valley Groundwater Basin, which is managed to support long-term groundwater sustainability. Although the proposed well would result in groundwater extraction, the anticipated production rate is within the range of typical municipal wells in the region and would not represent a substantial increase in basin-wide groundwater pumping.

The proposed well would be operated as part of the District's managed water supply system and is intended to function primarily as a backup and supplemental source of water. The well would not be in constant production and would be operated on an as-needed basis to support system demand, respond to outages, or provide operational flexibility during maintenance or drought conditions. In addition, the project site is located inland and outside coastal areas of the basin that are subject to seawater intrusion; therefore, operation of the well would not contribute to groundwater salinity impacts.

Operation of the proposed well would not substantially increase groundwater extraction beyond levels already required to meet existing system demand. The project would function as part of the District's managed water supply system to provide system redundancy used as a backup water supply. It would not be in constant production and would not represent a new or unmanaged groundwater withdrawal. As such, operation of the well would not substantially decrease groundwater supplies or interfere with sustainable groundwater management of the Pajaro Valley Groundwater Basin.

Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management of the basin. The impact would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

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

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

iv. Impede or redirect flood flows?

Less Than Significant Impact. The project includes construction of a new production well, pump station, a treatment building, and associated facilities on paved and aggregate base operational areas.

The project would introduce a new impervious surface for development of the 0.8 acre well pump station site (29,070 square feet), which would be predominately covered with AC paving around the well facilities and decomposed granite around the solar array. The remaining 1.0 acre of the project site would remain undeveloped, pervious surface. The developed paved portion of the site would be graded to direct surface flows to the 24-inch storm drain catch basin in the south central portion of the site, which connects to the existing storm drain system on Carpenteria Road.

Construction activities, including well drilling and minor grading, could temporarily increase the potential for erosion or sedimentation during storm events. As described under "a" above, to minimize these effects, standard construction BMPs would be implemented in accordance with the California Stormwater Quality Association Stormwater BMP Handbook and San Benito County requirements to reduce the potential for sediment transport and polluted runoff during construction.

Following construction, the limited increase in new impervious surface would not substantially increase runoff volumes, such that it would exceed the capacity of existing drainage features or increase flooding risk on- or off-site. Because project improvements are located outside the flood hazard zone, the project would not expose structures to flood hazards or alter floodplain storage capacity. The project would not impede or redirect flood flows, as no flood control facilities or drainage courses would be modified.

Therefore, the project would not substantially alter drainage patterns, result in erosion or siltation, increase flooding, exceed stormwater system capacity, or impede flood flows. The impact would be less than significant.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As shown on Figure 7 and Figure 8, 100-Year Flood Elevation, a portion of the northern area of the project site is located within a FEMA-designated flood hazard zone associated with the Pajaro River; however, no project improvements are proposed in this area. All permanent project infrastructure, including the well, pump station, and treatment facilities, would be located in the southern portion of the site, which is outside the mapped flood hazard zone. Therefore, the project would not place structures in a flood hazard area or result in the release of pollutants due to inundation.

The project site is located more than nine miles inland from the Pacific Ocean and is outside any mapped tsunami inundation zones. Due to its inland location in the community of Aromas in San Benito County, the project would not be subject to tsunami-related flooding.

In addition, no large enclosed bodies of water are located near the project site that could generate seiche conditions. As a result, the project would not be subject to inundation from seiche events.

In summary, the well pump station site is located outside mapped flood hazard areas, and the site is not subject to tsunami or seiche hazards. Therefore, the potential for inundation and associated pollutant release would be minimal, and the impact would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The project includes construction and operation of a new production well and pump station to support the Aromas Water District's existing water supply system. The project would be subject to applicable water quality regulations administered by the Central Coast Regional Water Quality Control Board, including requirements of the Basin Plan for the Central Coast Region. As described above, BMPs would be implemented during construction in accordance with the California Stormwater Quality Association Stormwater BMP Handbook and San Benito County requirements to prevent erosion, sedimentation, and pollutant discharge.

Operation of the facility would not involve untreated discharges to surface waters or groundwater. As described in Section 1.4, a concrete masonry unit treatment building would house the water treatment system to remove iron and manganese and a backwash tank. Aboveground piping would connect the well to the treatment system, conveying raw groundwater to the treatment building and routing backwash water to the backwash tank. After being stored in the backwash tank, backwash water would be recovered by the water treatment system and treated prior to being discharged to the potable water distribution system as described in Section 1.4. As a result, the project would not conflict with or obstruct implementation of the applicable water quality control plan.

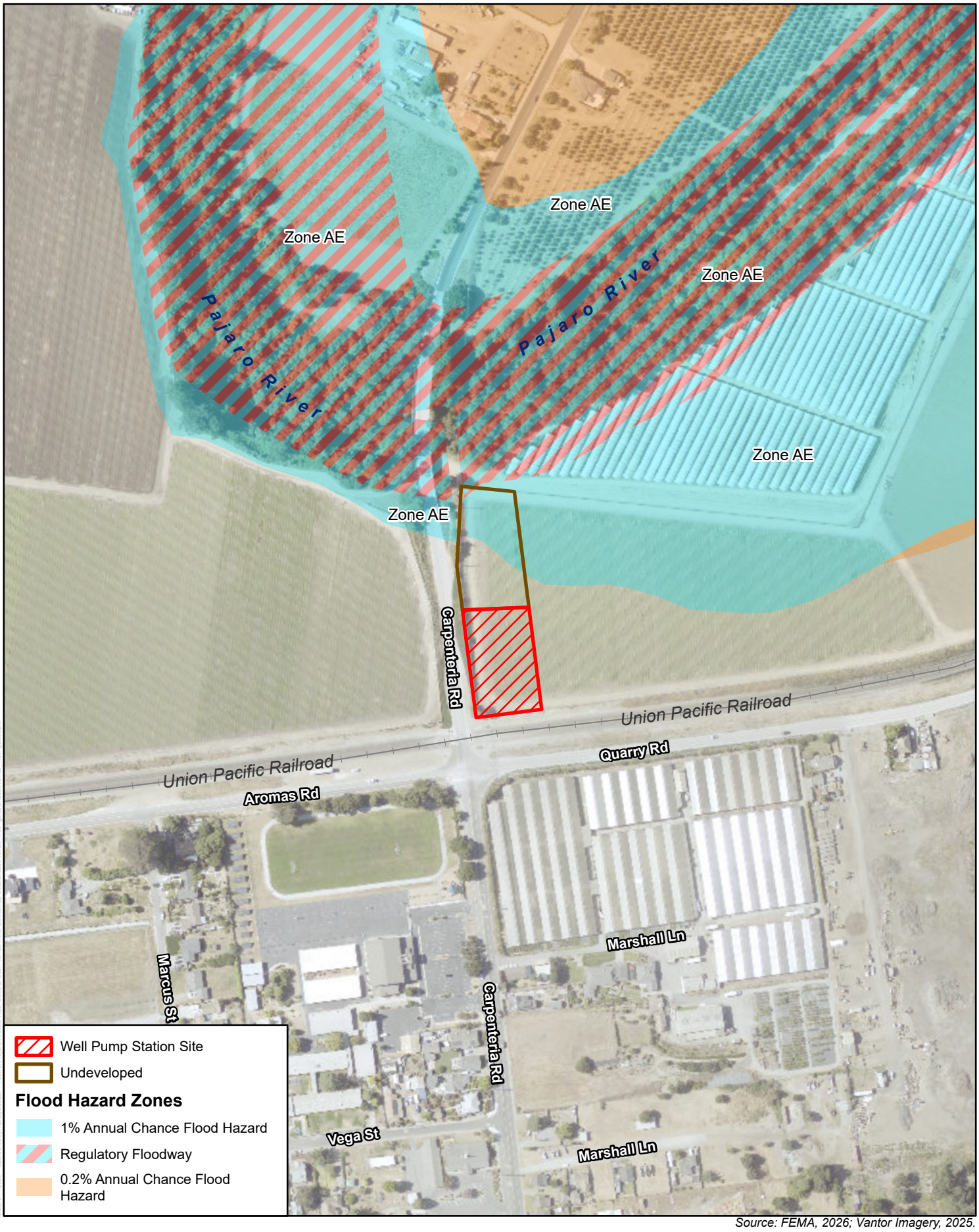
The project site is located in the Pajaro Valley Groundwater Basin, which is subject to groundwater management under the Sustainable Groundwater Management Act. Groundwater in the basin is managed by the Pajaro Valley Groundwater Sustainability Agency through implementation of an adopted Groundwater Sustainability Plan. The proposed well is intended to serve existing water demand, provide system redundancy, and improve drought resilience, rather than to support new growth or increased groundwater extraction. Operation of the well would be consistent with the District's role as a public water supplier and would not substantially increase overall groundwater pumping in the basin.

Because the project would comply with applicable water quality regulations and would not interfere with implementation of the adopted Groundwater Sustainability Plan for the Pajaro Valley Groundwater Basin, the project would not conflict with or obstruct a water quality control plan or sustainable groundwater management plan.

In summary, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impacts would be less than significant.

2.4.10.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.



Source: FEMA, 2026; Vantor Imagery, 2025.

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Feet

Figure 7

FEMA Flood Zones

Aromas Water District Driscoll Well and Pump Station Project

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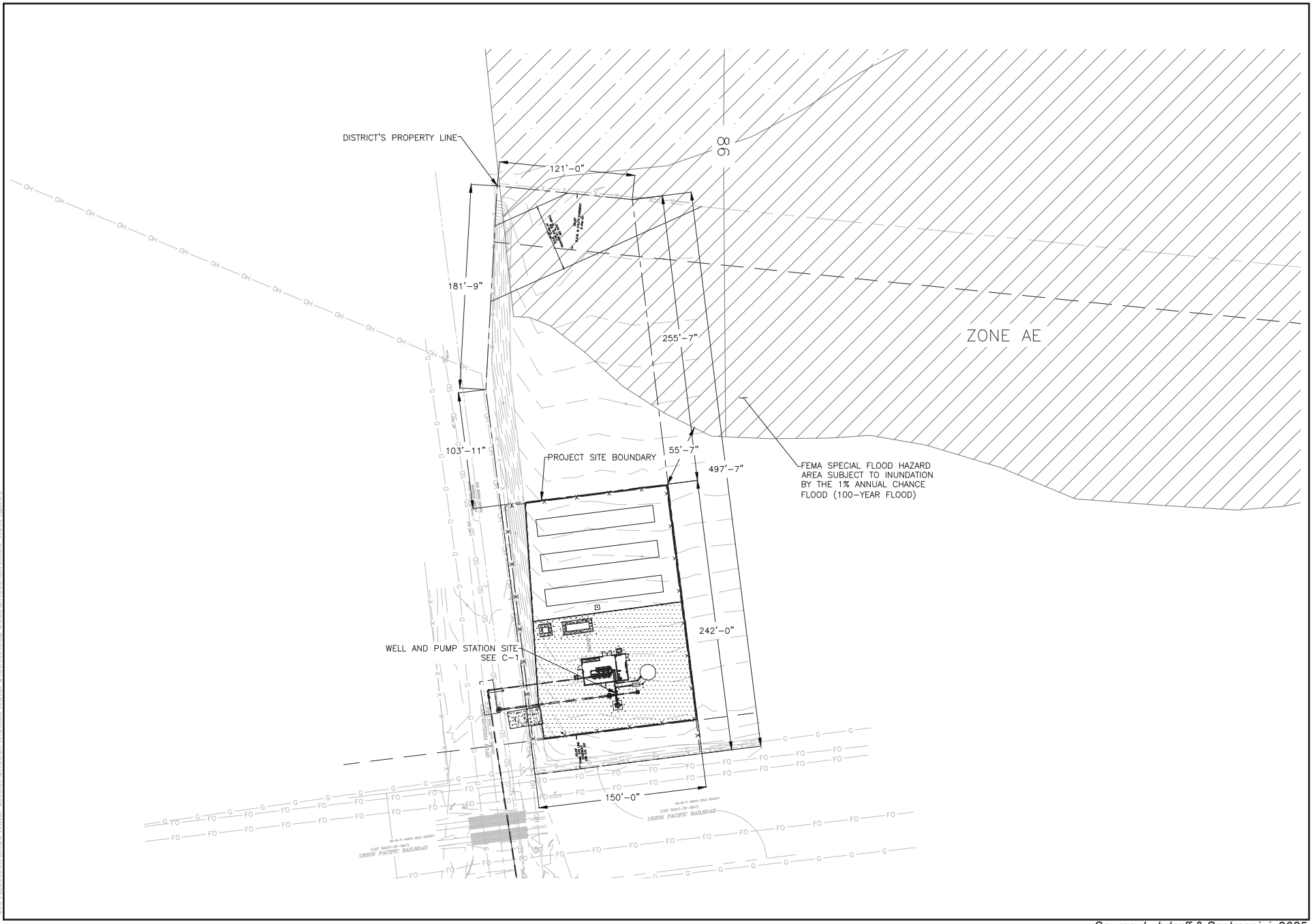

Source: Luhdorff & Scalmanini, 2025.

Harris & Associates

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Feet

Figure 8

100-Year Flood Elevation

Driscoll Well and Pump Station Project

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2.4.11 Land Use and Planning

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

2.4.11.1 Environmental Setting

The project site is located in Aromas, an unincorporated community in San Benito County. The existing general plan designation is Heavy Industrial, and the existing zoning designation is Rural.

The existing land use is agriculture, bordered by Carpenteria Road on the west and Union Pacific Railroad tracks and Quarry Road on the south. The surrounding area is characterized by agricultural and rural land uses. Active agricultural fields are located to the north, east, and west of the site. Development including Aromas Elementary School, residences, and greenhouse uses are located to the south, across the railroad tracks and Quarry Road. The nearest rural residential development is located approximately 750 feet south of the proposed pump station site along Carpenteria Road. Refer to Figure 3.

2.4.11.2 Impact Analysis

a. Would the project physically divide an established community?

No Impact. The proposed municipal well, pump station, and associated pipeline would be contained on the project site and along existing road rights-of-way. The project site is located in a non-residential area and is surrounded by the Union Pacific Railroad, roadways (Carpenteria Road and Quarry Road/Aromas Road) and primarily agricultural uses. The existing Union Pacific Railroad tracks and roadways separate the project site from the developed area to the south. Implementation of the project would not require subdivision of land, removal of access, or the introduction of barriers that would separate existing land uses. The Union Pacific Railroad tracks and roadways already function as an existing physical boundary between the project site and uses to the south. Construction activities for pipeline installation along Carpenteria Road on the south side of Quarry Road/Aromas Road may temporarily disrupt direct access from one side of the road to the other, but this would be temporary and access would not be prevented during construction. Therefore, the project would not physically divide an established community, and there would be no impact.

b. Would the project 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?

No Impact. The proposed municipal well and pump station is consistent with the existing land use designation and zoning for the project site and surrounding area. The project would comply with applicable policies related to project siting, building height, and lighting. The project is intended to support existing water infrastructure and would not induce growth or change surrounding land uses. Implementation of the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental effects. Therefore, there would be no impact.

2.4.11.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.12 Mineral Resources

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

2.4.12.1 Environmental Setting

The project site is located in Mineral Resource Zone 1 (MRZ-1), as designated by the California Geological Survey Mineral Resource Zone Map for Construction Aggregate in the Monterey Bay Production–Consumption Region. MRZ-1 areas are characterized as having no known significant mineral deposits. The project site and surrounding area do not contain active mining operations and are not identified as areas of mineral resource extraction or recovery.

2.4.12.2 Impact Analysis

a. Would the project result in a loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The project site is designated (MRZ-1), indicating that significant mineral resources are not present (California Department of Conservation 2021). While the project would involve ground disturbance associated with construction of the well, pump station, and associated infrastructure, these activities would occur in an area where mineral resources are not known to exist. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource of regional or statewide importance, and there would be no impact.

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

No Impact. The project site is not identified as a locally important mineral resource recovery site in any applicable general plan, specific plan, or other land use plan. Although development of the project would preclude future mineral extraction on the site, no known mineral resources of regional or local importance are present. Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur.

2.4.12.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.13 Noise

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

2.4.13.1 Environmental Setting

Some land uses are generally regarded as being more sensitive to noise than others due to the type of population groups or activities involved. Noise-sensitive land uses typically include uses where people normally sleep and where a quiet environment is essential for use, such as residences and classrooms. The nearest sensitive receptors to the project site are Aromas Elementary School and the residences located south and west of the project site along Marcus Street, Vega Street, Marshall Lane, and Carpenteria Road where pipeline installation would occur. The Aromas Elementary School is located approximately 230 feet southwest of the project site, and the classrooms are located approximately 540 feet southwest of the well and pump station site and approximately 250 feet east of Carpenteria Road. The residences are located approximately 575 feet south of the well and pump station site, and some residences are located along Carpenteria Road. Other land uses in the area include agricultural uses that are not noise sensitive.

The San Benito County General Plan Health and Safety Element (San Benito County 2015) has established acceptable noise levels to be experienced by various land use types. The General Plan states that it is normally acceptable for residential and school uses to experience an ambient noise level of 60 A-weighted decibels (dBA) and conditionally acceptable for them to experience noise levels up to 65 dBA. Additionally, the element establishes hourly average noise level performance standards for new non-transportation noise sources of 55 dBA during daytime hours (7:00 a.m. to 10:00 p.m.) and 45 dBA during nighttime hours (10:00 p.m. to 7:00 a.m.) at affected noise-sensitive receptors.

Regarding construction noise, General Plan Policy HS-8.3 states that the County shall control the operation of construction equipment at specific sound intensities and frequencies during day time hours

between 7:00 a.m. and 6:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays. No construction is allowed on Sundays or federal holidays. However, a numeric limit is not established. Policy HS-8.12 requires implementation of a Construction Noise Control Plan if construction would occur within 500 feet of a sensitive receptor. Policy HS-8.7 requires the use of Federal Transit Administration (FTA) criteria to evaluate vibration impact during construction.

Chapter 19.39 of the County of San Benito County Code outlines Noise Control Regulations. Section 19.39.030 establishes maximum permissible sound pressure levels at various land uses. The standards for receiving residential land uses is 55 dBA during daytime hours (7:00 a.m. to 10:00 p.m.) and 45 dBA during nighttime hours (10:00 p.m. to 7:00 a.m.). For industrial land uses, the standard is 70 dBA during daytime hours (7:00 a.m. to 10:00 p.m.) and 60 dBA during nighttime hours (10:00 p.m. to 7:00 a.m.). Temporary construction is exempt from these standards according to Section 19.39.051, provided construction takes place between the hours of 7:00 a.m. and 7:00 p.m., and does not occur on Sundays or federal holidays. Noise sources associated with a lawful commercial or industrial activity caused by mechanical devices or equipment, including air conditioning or refrigeration systems, are also exempt.

2.4.13.2 Impact Analysis

a. Would the project result in 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?

Less Than Significant Impact with Mitigation Incorporated. The project would generate noise from construction activities and minimal noise from operation after construction.

Construction

Construction of the project would generate temporary noise from operation of heavy construction equipment and truck trips. Although construction activities mostly occur during daytime hours and would be temporary, noise may be audible to nearby sensitive receptors. Construction would only occur during allowable hours under the County's Health and Safety Element and Noise Control Regulations. As described above, these regulations do not include a screening noise level for substantial temporary noise. As such, the project is evaluated against the FTA recommended daytime criteria of 80 dBA for residential receptors (FTA 2018).

Reference noise levels for construction equipment anticipated to be required for the project are listed in Table 2, Typical Noise Levels for Common Construction Equipment (at 50 feet). Noise levels are measured at 50 feet, and typically attenuate 6 decibels (dB) for each doubling of distance. Based on the activities proposed for the project, the equipment with the loudest operating noise level that would be used during most construction phases would be an excavator, concrete mixer, or paver, which would produce noise levels of 85 dBA at a distance of 50 feet (FTA 2018). However, during well drilling, use of a drill rig could produce noise levels of 95 dBA at 50 feet (FTA 2018).

Table 2. Typical Noise Levels for Common Construction Equipment (at 50 feet)

Equipment	Lmax (dBA)
Air Compressor	80
Backhoe	80
Concrete Mixer	85
Concrete Pump	82
Crane	83
Dozer	85
Generator	82
Excavator	85
Loader	80
Paver	85
Pick-up Truck	55
Rock Drill	95
Truck	84

Source: FTA 2018.

Notes: dBA =A-weighted decibels; Lmax = maximum sound level

Due to the size of the project site, it is not anticipated that more than two pieces of construction equipment would be in operation simultaneously in the same location. Assuming two of the noisiest pieces of construction equipment would be in operation simultaneously (drill rig and a dozer or similar equipment), construction equipment would generate noise levels up to 95.4 dBA at 50 feet.

The nearest sensitive receptor to the well and pump station construction area is Aromas Elementary School. The school property is located approximately 230 feet southwest of the project site. At this distance, construction equipment would have the potential to generate noise levels up to 82 dBA during well drilling. However, the nearest sensitive uses are the classrooms located approximately 540 feet from the construction area, where worst-case noise levels from equipment would be expected to be reduced to approximately 75 dBA. As such, construction noise levels at nearby sensitive receptors would not exceed 80 dBA and would not result in a substantial temporary increase in ambient noise levels. However, residences are located along Carpenteria Road where pipeline installation would occur. Use of the drill rig would not be required for pipeline installation; however, typical construction would have the potential to exceed 80 dBA at adjacent residences. Noise levels would potentially exceed 80 dBA up to 90 feet from the construction area. As such, a potentially significant impact would occur during pipeline construction. However, with implementation of Mitigation Measure NOI-1, construction BMPs would be implemented to reduce construction noise exposure. Therefore, the impact would be less than significant with mitigation.

Operation

Following construction, the project would consist of an aboveground well and water treatment system. Operation of the underground pipeline would be passive and would not generate noise. The treatment

system would be enclosed in a concrete masonry unit building. Noise specifications for the proposed equipment are not yet available. However, noise measurements conducted for a similar municipal well project identified a noise level of 86.6 dBA within 1 foot of well operation (MD Acoustics 2023). A similar noise level is assumed for the treatment system. However, the treatment system enclosure would provide at least 5 dBA noise attenuation (Caltrans 2013). As such, combined noise levels from the well pump and treatment system would be approximately 54 dBA at 50 feet, which is the approximate distance from equipment to the project property line. As such, typical operation would not exceed the County Noise Control Regulation noise standards for industrial use of 70 dBA during daytime hours and 60 dBA during nighttime hours. The nearest sensitive receptor is the school property located approximately 230 feet southwest of the project site. At this distance, equipment noise would be reduced to approximately 41 dBA and would not exceed the most sensitive noise standard of 55 dBA during daytime hours and 45 dBA during nighttime hours for residential uses. Because noise levels would not exceed the noise ordinance standards at school property line, noise levels would be further reduced at the classroom buildings and would not exceed noise standards. As such, equipment operation would not result in a substantial permanent increase in ambient noise levels.

Emergency generator enclosure testing would be limited to approximately 30 minutes each month during daytime hours. Operation of the project is not anticipated to generate more than a nominal increase in vehicle trips for maintenance activities. As such, operation of the project would not result in a permanent increase in ambient vehicle noise levels. Therefore, operational noise impacts of the project would not be excessive, unnecessary, or unusually loud; and the impact would be less than significant.

In summary, although the noise impact from operation would be less than significant, the noise impact from construction would be less than significant with mitigation (NOI-1).

b. Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The use of construction and grading equipment would potentially generate periodic vibration on the project site. The equipment required for the project with the potential to generate the highest level of vibration during any phase is a drill rig, which typically generates vibration levels of 0.089 peak particle velocity (PPV) at 25 feet (FTA 2018). Vibration from operation of the drill rig is below the Federal Transit Administration potential damage criteria of 0.2 PPV for non-engineered timber and masonry buildings (FTA 2018). All nearby receptors are set back at least 25 feet from the project site. Therefore, construction would not result in vibration with the potential for building damage.

The FTA also establishes disturbance criteria for vibration. A vibration velocity level of 65 vibration decibel (VdB) is the typical threshold of perception for people and would have the potential to disturb sleep. This level of vibration may also interfere with vibration-sensitive operations. As described above, a drill rig typically generates vibration levels of 0.089 PPV at 25 feet, which is equal to a vibration velocity level of 87 VdB (FTA 2018). Vibration would be reduced to below 65 VdB beyond 135 feet of equipment operation.

There are no vibration-sensitive uses located within 135 feet of the project site. Residences are located along the pipeline construction area; however, construction would occur during daytime hours and would not result in disturbance during typical sleep hours. Therefore, nuisance vibration impacts from construction would be less than significant impact.

Following construction, the proposed well and treatment facilities would not include any components that would generate adverse levels of vibration. Impacts during operation would be less than significant.

In summary, the project would not generate excessive groundborne vibration or groundborne noise levels. The impact would be less than significant.

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 result in exposure of people residing or working in the project area to excessive noise levels?

No Impact. The nearest airport available for public use is Watsonville Municipal Airport, located approximately 9 miles northwest of the project site. Other airports in the region include Monterey Bay Academy Airport, approximately 11 miles west, and Hollister Municipal Airport, approximately 12 miles east of the project site. Noise levels from airport operations do not exceed County General Plan standards at the project site. Therefore, workers at the project site would not be exposed to adverse levels of aircraft noise. The project would have no impact on air traffic during construction or operation. Therefore, there would be no impact.

2.4.13.3 Mitigation Measures

The following mitigation is required as part of the project to ensure that potential construction noise impacts are mitigated to levels that are less than significant:

NOI-1: Implement Noise-Reducing Measures for Construction Equipment. The Aromas Water District shall ensure the construction specifications include the following noise-reducing measures for construction equipment used. These measures shall apply to any construction activities requiring heavy equipment operation within 90 feet of an occupied residence:

- Use acoustical shelters around any air compressors, generators, and any other stationary construction equipment not fitted with baffled enclosures.
- Use baffling around stationary construction equipment to reduce noise and vibration levels.
- Properly muffle and maintain all construction equipment powered by internal combustion engines.
- Prohibit unnecessary idling of internal combustion engines.

Whenever feasible, use electrical power to run air compressors and similar power tools.

2.4.14 Population and Housing

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

2.4.14.1 Environmental Setting

The project site is currently used for agricultural production and is designated for industrial use in unincorporated San Benito County. Surrounding land uses are primarily agricultural, with limited rural residential development located south of the site. The project site does not contain existing housing or population centers.

2.4.14.2 Impact Analysis

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)?

Less Than Significant Impact. The project does not include residential uses and would not generate population growth. The project involves construction of a new municipal well and pump station with associated treatment facilities, a ground-mounted solar photovoltaic system, and approximately 650 feet of new water pipeline. Operation of the facility would require two operators by the Aromas Water District and would not result in new permanent employees or population increases.

While the project would provide a new well and extend water supply infrastructure by installing a new water pipeline from existing water distribution infrastructure, the purpose of the new well is to improve water supply reliability by providing redundancy for the District's existing production and distribution infrastructure. The purpose is not intended to support new growth or expand service capacity. The project would not extend infrastructure beyond the existing service area or facilitate new development. Therefore, the project would not induce substantial unplanned population growth, either directly or indirectly. The impact would be less than significant.

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

No Impact. The project site is vacant and does not contain any existing housing. Implementation of the project would not result in the displacement of people or housing and would not require the construction of replacement housing elsewhere. Therefore, there would be no impact.

2.4.14.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.15 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

2.4.15.1 Environmental Setting

Police protection is provided by the San Benito County Sheriff's Office, and fire protection services are provided by the Aromas Tri-County Fire Protection District. The nearest fire station is located approximately 0.9 mile south of the project site.

School services in the area are provided by the Aromas-San Juan Unified School District. The nearest school is Aromas Elementary School, located approximately 230 feet southwest of the project site (Figure 3). Classrooms are also located approximately 250 feet east of the proposed pipeline alignment along Carpenteria Road.

Parks and recreational services are provided by local and regional agencies serving the surrounding community. The nearest park is Aromas Community Park, located approximately 0.2 mile west of the project site on the south side of Aromas Road.

2.4.15.2 Impact Analysis

No Impact. The project consists of construction of a municipal well, pump station, and associated infrastructure to support the existing Aromas Water District system. The project would not introduce residential uses or increase population, and therefore would not increase demand for public services including police/fire protection, schools, parks, or other community facilities. As discussed in Section 2.4.14, Population and Housing, the project is intended to provide redundancy for the District's existing water supply and distribution infrastructure and is not intended to support new growth or expand service capacity. The project site is already within the service areas for police and fire protection, and

the proposed facilities would not substantially increase the need for these services. Construction activities would be temporary, and emergency access would be maintained during construction. The project would not result in the need for long-term demand for public services nor the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services. Therefore, there would be no impact.

2.4.15.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.16 Recreation

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

2.4.16.1 Environmental Setting

The project site is located in a rural area characterized primarily by agricultural uses, with limited nearby commercial, residential, and agricultural-related development (e.g., greenhouses). Parks and recreational services in the Aromas area are provided by San Benito County and local community facilities. Recreational facilities within approximately 0.25 mile of the project site include Aromas Community Park, located approximately 0.2 mile west of the project site on the south side of Aromas Road. Aromas Community Park provides a variety of recreational amenities for the surrounding community, including open space areas and the Aromas Dog Park. No other parks or recreational facilities are located within the immediate vicinity of the project site.

2.4.16.2 Impact Analysis

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?

No Impact. The project consists of construction of a municipal well, pump station, and associated infrastructure. The project does not include residential or commercial uses and would not result in increased population either directly or indirectly. As discussed in Section 2.4.14, project is intended to provide redundancy for the District's existing water supply and distribution infrastructure and is not intended to support new growth or expand service capacity. Because the project would not induce population growth, it would not increase the use of existing neighborhood or regional parks or other recreational facilities, including Aromas Community Park and the Aromas Dog Park. Therefore, no substantial physical deterioration of recreational facilities would occur.

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?

No Impact. The project does not include recreational facilities and would not require the construction or expansion of recreational facilities that could result in adverse physical effects on the environment. Therefore, there would be no impact.

2.4.16.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.17 Transportation

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

2.4.17.1 Environmental Setting

The project site is located adjacent to Carpenteria Road in the unincorporated community of Aromas in San Benito County. Carpenteria Road is a two-lane rural roadway that provides access to surrounding agricultural uses, residential properties, and Aromas Elementary School. Aromas Road/Quarry Road intersects with Carpenteria Road south of the project site, and the Union Pacific Railroad tracks run immediately south of the site. Vehicle access to the site would be provided from Carpenteria Road via a new driveway (Figure 3). Traffic in the area is primarily local and consists of residents, agricultural operations, and school-related trips.

There are no sidewalks or bicycle facilities adjacent to the project site. Sidewalks are present farther south along Carpenteria Road, approximately 700 feet south of the project site and within the vicinity of Aromas Elementary School. There are no designated or labeled bicycle lanes along Carpenteria Road or surrounding roadways on the immediate project site.

2.4.17.2 Impact Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The proposed consists of construction of a new municipal well, pump station, ground-mounted solar photovoltaic system, and associated infrastructure. During construction activities, traffic would be generated from truck trips to and from the project site and commute trips for the construction workers; and there would be disruption to Carpenteria Road during installation of the water pipeline. Construction-generated traffic and work in Carpenteria Road would be temporary and would not result in long-term degradation in operating conditions on area roadways or at area intersections. Traffic within the vicinity of the project site is minimal, and construction traffic is not

expected to affect LOS. Although there would be lane closures and delays on Carpenteria Road during pipeline installation, adjacent uses would be accessible through traffic controls and detours, and would receive advanced notice of construction work. Project-generated truck trips are minimal and would be spread over the course of the workday.

The project site is located along a rural roadway with no adjacent sidewalks, bicycle facilities, or transit stops on the immediate project site. Therefore, construction and operation of the project would not interfere with or disrupt existing pedestrian, bicycle, or transit facilities. Access to the site would be provided via a new driveway from Carpenteria Road to the well pump station site, and roadway access for local residents, agricultural operations, and emergency services would be maintained during construction.

Once operational, the project would generate minimal vehicle trips associated with routine operation and maintenance activities and would not result in long-term impacts to the local roadway network. The project would be incorporated into the District's existing operation and maintenance activities.

The project would not conflict with applicable San Benito County General Plan policies related to circulation, including roadway, bicycle, pedestrian, and transit systems. Therefore, the impact would be less than significant.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. In 2013, Governor Brown signed SB 743, which created a process to change the way that transportation impacts are analyzed under California CEQA. Specifically, SB 743 amended the CEQA Guidelines to state that automobile delay metrics (i.e., level of service, or LOS) will no longer be considered a significant impact under CEQA. Instead, increases in vehicle miles traveled (VMT) will be used.

The County has not established a VMT standard nor significance criteria for VMT evaluations in San Benito County. As a result, state guidance is used with regard to analysis and significance criteria. The California Governor's Office of Land Use and Climate Innovation (previously the Office of Planning and Research or OPR) established screening criteria that could be used to screen a project out of the requirement for a VMT study. Among those criteria is the Small Project Size criterion, which states that projects generating less than 110 trips per day may be considered to have an insignificant impact to VMT. Operation of the project would be limited to occasional vehicle trips for routine maintenance and periodic emergency generator testing. The project would not result in 110 trips per day and therefore is considered to have a less than significant impact related to VMT. Thus, the project would not conflict with or be inconsistent with CEQA Guidelines, Section 15064.3(b). The impact would be less than significant.

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

Less Than Significant Impact. The new well and associated facilities would not alter the physical configuration of the existing roadway network serving the project site and would not introduce unsafe

design features, such as sharp curves or dangerous intersections. Project access would be via a new 15-foot-wide driveway from Carpenteria Road into the well pump station site. The driveway would be configured at a right angle to the roadway and located approximately 230 feet from the intersection of Carpenteria Road and Quarry Road, providing ample sight distance. In addition, the project would not introduce incompatible uses, such as farm equipment. Therefore, there would be no increase in hazards due to design features or incompatible uses. The impact would be less than significant.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The well pump station site would be accessed via a new 15-foot-wide driveway from Carpenteria Road. During construction, staging area would be on the well pump station site. Construction of the project, including installation of the underground water pipeline within Carpenteria Road, would require temporary lane shifts or flagging, which could temporarily slow traffic along Carpenteria Road. As described in Section 1.4.7, Best Management Practices, the following measures would be implemented to ensure emergency access:

- Roadway access along Carpenteria Road will be maintained at all times, with no full road closures. Temporary lane shifts or flagging may occur during pipeline installation, but access for local residents, agricultural operations, and emergency vehicles will remain open.
- School access and emergency access will be maintained, and construction traffic will be managed to avoid disruptions during school arrival and dismissal periods.

With implementation of these measures, emergency access to the project site and surrounding area would be maintained throughout construction.

Once construction is complete, operation of the project facilities would be contained on the project site. The new well would be incorporated into the District's existing operation and maintenance activities, and there would be no substantial increase in traffic that would result in inadequate emergency access on roadways near the project site (Carpenteria Road and Aromas Road/Quarry Road). The new driveway would provide emergency access to the project site. Therefore, the impact would be less than significant.

2.4.17.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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 section 5020.1(k), or	☐	☒	☐	☐
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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

2.4.18.1 Environmental Setting

California Public Resources Code, Section 21080.3.1(b) (Assembly Bill 52), requires a lead agency to formally notify a California Native American Tribe that is traditionally and culturally affiliated within the geographic area of the discretionary project when formally requested. As of this writing, no California Native American Tribes traditionally and culturally affiliated with the County region have formally requested consultation with the District (as lead agency under CEQA) regarding Tribal Cultural Resources. No Tribal Cultural Resources are known to occur in or near the project site.

Although no Tribes have requested AB 52 consultation, Tribal outreach was conducted with culturally affiliated Tribes as identified by the Native American Heritage Commission. Letters were sent to each representative or Tribe on the Native American Heritage Commission contact list on January 26, 2026. As of this writing, one Tribe (Amah Mutsun Tribal Band) responded. The Tribe requested consultation and identified that they are “not aware of any specific previously recorded Indigenous archaeological sites within the APE.” They are concerned that the area has been under-surveyed and request that a cultural survey be conducted. In addition, they identify that there is “potential for previously unrecorded

Tribal Cultural Resources to be encountered, especially in proximity to historic waterways such as the Pajaro River." Furthermore, they have requested "information or analysis for impacts on groundwater resources within the surrounding area."

As discussed in Section 2.4.5, Cultural Resources, no resources that would meet the criteria for listing in state or local registers are known to be located on the project site.

2.4.18.2 Impact Analysis

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

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 section 5020.1(k), or

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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact with Mitigation Incorporated. As stated above, outreach and coordination with culturally affiliated Tribes was conducted. No Tribal Cultural Resources were identified through outreach and coordination; however, there is potential for unidentified resources to be present.

As discussed in Section 2.4.5, no archaeological resources that meet the criteria for significance have been identified on the project site. However, the area is sensitive for buried archaeological resources, because the project is located adjacent to a perennial watercourse (Pajaro River), making it sensitive for precontact cultural resources. Due to this sensitivity, there is an increased risk of encountering buried Native American archaeological resources during construction activities. If buried resources are inadvertently discovered during construction, that meet the criteria for listing in the California Register of Historical Resources or a local register or are determined by a lead agency to be significant, destruction or disturbance of the resource(s) would be a potentially significant impact.

Implementation of Mitigation Measure CUL-1 would require a worker environmental awareness program and a stop work order if an unexpected discovery of cultural resources is made to allow for an evaluation of the find. Therefore, the impact would be less than significant with mitigation (CUL-1). Refer to Section 2.4.5 for the full mitigation measure.

2.4.18.3 Mitigation Measures

The following mitigation is required as part of the project to ensure that potential Tribal Cultural Resources impacts are mitigated to levels that are less than significant:

CUL-1: Conduct Worker Awareness Training and Stop Work if Unexpected Discovery of Cultural Resources During Construction. The complete mitigation measure is in Section 2.4.5.

2.4.19 Utilities and Service Systems

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

2.4.19.1 Environmental Setting

Utility services on the project site include water, wastewater, stormwater drainage, solid waste, electricity, natural gas, and telecommunications.

Water service in the area is provided by the Aromas Water District, which operates and maintains the local potable water system serving the unincorporated community of Aromas. The project site is located in the District's service area and would connect to the existing system.

Wastewater service is not provided by a public agency in unincorporated San Benito County. The unincorporated community of Aromas is not served by a municipal sewer system, and existing development in the area relies on individual septic systems for wastewater disposal.

Stormwater collection in unincorporated community of Aromas is generally handled in roadside ditches, swales and natural drainage paths, and culverts under roads/driveway. At the project site, there is an underground storm drain pipe in Carpenteria Road that collects stormwater and carries it to the Pajaro River.

Electricity service for the project site is provided through Central Coast Community Energy, with infrastructure owned and operated by PG&E. Natural gas services are provided by PG&E. Telecommunication services are provided by several private companies, such as AT&T, Charter Communications, Earthlink, HugesNet, T-Mobile, Verizon, and Viasat. Solid waste services for Aromas are provided by Recology San Benito County, the exclusive franchise hauler for unincorporated San Benito County. Recology takes trash to the John Smith Road Landfill near Hollister, as it is the primary permitted landfill for San Benito County, and recycles to material recovery facilities operated by Recology.

2.4.19.2 Impact Analysis

a. Would the project 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?

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

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The purpose of the project (drilling of a new water well) is to provide system redundancy for the Aromas Water District's water supply services and ensure the District has sufficient water supplies during normal, dry, and multiple dry years. The new production well would be intended to supplement existing system capacity and improve water supply reliability in the District's existing service area. The project is not intended to provide additional water supply to support new growth or expanded service capacity. The Well Site Study prepared for the project demonstrates there is sufficient groundwater to serve the new well (Appendix D).

The project would include the installation of a new 8-inch diameter, approximately 730-foot-long water pipeline underground within Carpenteria Road to transfer treated water from the well pump station site to the District's existing water distribution system on Marshall Lane. The pipeline connection would tie into existing infrastructure and would not require expansion, relocation, or modification of new water infrastructure.

The project would include necessary utility connections to support operation of the proposed facilities. Electrical power would be provided through a combination of an on-site solar photovoltaic system and a connection to the existing electrical grid operated by PG&E. A diesel-fueled emergency backup generator would be installed on-site to ensure continued operation during power outages. While new on-site and short-distance utility connections would be required, these connections would tie into existing infrastructure and would not require expansion, relocation, or modification of off-site electrical facilities.

Stormwater would be conveyed to the existing storm drainage system in Carpenteria Road by grading the site so surface water flows into a storm drain catch basin and pipeline connecting to the pipeline in Carpenteria Road.

The project would not generate wastewater requiring connection to a wastewater treatment system, as no restrooms or habitable facilities are proposed as part of the project. The only wastewater associated with project operations would consist of well backwash water generated by the treatment system. Backwash water would be conveyed through aboveground piping to an on-site backwash tank, where it would be temporarily stored and then reclaimed by the treatment system and treated prior to being discharged to the potable water distribution system as described in Section 1.4. Any such discharge would not require expansion of existing wastewater treatment facilities or exceed the provider's existing capacity commitments. Therefore, the project would not result in a determination by a wastewater treatment provider that it lacks adequate capacity to serve the project. Overall, the project would include only localized, project-level utility connections and would not result in conditions requiring expansion or construction of new off-site utility infrastructure, the construction or relocation of which could cause significant environmental effects. The Well Site Study prepared for the project demonstrates there is sufficient groundwater to serve the new well (Appendix D). Therefore, the impact would be less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The project would generate a limited amount of solid waste during construction, consisting primarily of packaging materials, scrap materials, and excess soils associated with site preparation and installation of project components. The construction contractor would be responsible for properly disposing solid waste in accordance with applicable state and local regulations, including requirements for waste reduction, recycling, and proper disposal. Operational activities associated with the project would generate minimal to no solid waste, and Recology would provide solid waste collection and disposal services. Construction and operational solid waste would not exceed state or local standards, would not require expansion of landfill or recycling facilities, and would not impair the attainment of applicable solid waste reduction goals. Therefore, the impact would be less than significant.

2.4.19.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.20 Wildfire

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

2.4.20.1 Environmental Setting

The project site is not located in a CAL FIRE-designated State Responsibility Area or a Very High Fire Hazard Severity Zone (CAL FIRE 2023). The site consists of relatively flat, actively cultivated agricultural land located adjacent to Carpenteria Road, north of Quarry Road and the Union Pacific Railroad tracks. The surrounding area does not contain steep slopes or dense vegetation that would contribute to wildfire spread.

2.4.20.2 Impact Analysis

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

No Impact. The project would be accessed via Carpenteria Road, which provides adequate access for emergency vehicles. Construction activities would be temporary and localized and would not result in long-term road closures or access restrictions. The project would not interfere with implementation of the San Benito County Emergency Operations Plan. Construction of the project, including installation of the underground water pipeline within Carpenteria Road, would require temporary lane shifts or flagging, which could temporarily slow traffic along Carpenteria Road. As described in Section 1.4.7, measures would be implemented to ensure emergency access. Finally, operation of the well and pump station would not restrict emergency access or evacuation routes. Therefore, there would be no impact.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The project site is not located in a State Responsibility Area or a Very High Fire Hazard Severity Zone. The site is relatively flat and consists of agricultural land with minimal vegetation, which would not contribute to wildfire spread or intensity. The project would not introduce conditions that would exacerbate wildfire risks or expose occupants to wildfire-related pollutant concentrations. Therefore, there would be no impact.

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?

No Impact. The project would not require the installation or maintenance of infrastructure that would exacerbate wildfire risk. Improvements would be limited to a municipal well, pump station, and associated pipeline connection within the well pump station site and the existing Carpenteria Road right-of-way. The project would not include fuel breaks, new roadways, or other infrastructure that could increase fire risk. Therefore, there would be no impact**.**

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The project site is relatively flat and does not contain steep slopes or nearby water bodies that would increase the potential for post-fire flooding, landslides, or debris flows. Due to the absence of wildfire hazard conditions and the site's topography, the project would not expose people or structures to significant risks associated with post-fire conditions. Therefore, there would be no impact.

2.4.20.3 Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.21 Mandatory Findings of Significance

Does the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have the potential to 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?	☐	☒	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

2.4.21.1 Impact Analysis

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 wildlife or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated. The project would have potentially significant impacts to nesting birds due to construction activities if work occurs during the nesting bird season (from February 1 to September 1). However, with implementation of Mitigation Measure BIO-1 (Protect Nesting Birds during Construction), pre-construction surveys for nesting birds and raptors would be conducted

within 500 feet of the project site, and necessary protection measures would be implemented as necessary to mitigate any potential impact, such as take of a nest, to a less than significant level.

In addition, the project could result in unanticipated discovery of and potential impact to unknown buried cultural, Tribal Cultural Resources, or paleontological resources, during excavation associated with construction. If those resources were to meet the criteria for significance pursuant to Section 15064.5 and be considered historical resources, any disturbance or destruction of those resources would be a significant impact under CEQA. Implementation of Mitigation Measures CUL-1 and GEO-1 requires worker awareness training and stop work order in case of discovery, as well as evaluation and appropriate treatment of the find. This would reduce this impact to a less than significant level.

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)?

Less Than Significant Impact with Mitigation Incorporated. Implementation of the project would not result in individually limited or cumulatively considerable significant impacts. All resource topics have been analyzed in accordance with CEQA and the CEQA Guidelines, and it was determined that the project would not result in any potentially significant impacts. In addition, when the limited (less than significant) impacts of the project are considered in sum or together with the impacts of other projects in the area, it would not result in a considerable or substantial contribution to significant cumulative impacts identified in the San Benito County General Plan EIR (traffic, air quality, agricultural conversion), with implementation of the mitigation measures identified in this Initial Study, including Mitigation Measure AG-1: Establish Agricultural Conservation Easement. Therefore, the impact would be less than significant with mitigation.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation Incorporated. The only potentially adverse effects on human beings would be related to excessive noise during pipeline construction. However, the impact would be less than significant with implementation of Mitigation Measure NOI-1 (Implement Noise-Reducing Measures for Construction Equipment) and construction BMPs (Section 1.4.7).

2.4.21.2 Mitigation Measures

The following mitigation is required as part of the project to ensure that potential impacts are mitigated to levels that are less than significant:

- **AG-1:** Establish Agricultural Conservation Easement
- **BIO-1:** Protect Nesting Birds during Construction

- **CUL-1:** Conduct Worker Awareness Training and Stop Work if Unexpected Discovery of Cultural Resources during Construction
- **GEO-1:** Conduct Worker Awareness Training and Stop Work if Unexpected Discovery of Paleontological Resources
- **NOI-1:** Implement Noise-Reducing Measures for Construction Equipment

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Section 3 List of Preparers

3.1 Lead Agency

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Robert Johnson, General Manager

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Appendix A. CalEEMod Output

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Aromas Well Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Aromas Well
Construction Start Date	4/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	1.80000
Precipitation (days)	39.2000
Location	36.892543533076235, -121.64336843623536
County	San Benito
City	Unincorporated
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3101
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.37

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	5.68500	1000sqft	0.13051	5,685.00	0.00000	0.00000	—	Treatment/Solar panels
Parking Lot	32.6480	1000sqft	0.74949	0.00000	0.00000	0.00000	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.07319	10.2408	10.2183	0.02184	0.43618	2.37342	2.80960	0.40266	1.08167	1.48433	—	2,650.51	2,650.51	0.07172	0.17568	2.37921	2,699.64
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.11489	4.84458	7.01250	0.01223	0.18906	0.13354	0.30148	0.17396	0.03130	0.18581	—	1,344.73	1,344.73	0.05375	0.01479	0.01138	1,350.49
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.34949	3.27305	4.97829	0.00866	0.11961	0.08238	0.18416	0.11006	0.03040	0.12410	—	953.733	953.733	0.03794	0.01328	0.07128	957.819
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.06378	0.59733	0.90854	0.00158	0.02183	0.01503	0.03361	0.02009	0.00555	0.02265	—	157.901	157.901	0.00628	0.00220	0.01180	158.578

2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.07319	10.2408	10.2183	0.02184	0.43618	2.37342	2.80960	0.40266	1.08167	1.48433	—	2,650.51	2,650.51	0.07172	0.17568	2.37921	2,699.64

2027	0.48625	4.58915	7.00345	0.01221	0.16744	0.02439	0.19183	0.15407	0.00598	0.16005	—	1,344.96	1,344.96	0.05337	0.01456	0.11491	1,350.74
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.50429	4.84458	7.01250	0.01223	0.18906	0.02439	0.21345	0.17396	0.00598	0.17994	—	1,344.73	1,344.73	0.05375	0.01479	0.00328	1,350.49
2027	0.64510	4.59232	6.99797	0.01223	0.16795	0.13354	0.30148	0.15451	0.03130	0.18581	—	1,343.77	1,343.77	0.05353	0.01461	0.01138	1,349.47
2028	1.11489	4.09907	5.90267	0.00857	0.15446	0.13354	0.28800	0.14211	0.03130	0.17341	—	946.278	946.278	0.03724	0.01239	0.01019	950.911
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.28173	2.66443	3.72707	0.00651	0.10178	0.08238	0.18416	0.09370	0.03040	0.12410	—	722.028	722.028	0.02733	0.01328	0.07128	726.739
2027	0.34949	3.27305	4.97829	0.00866	0.11961	0.01867	0.13828	0.11006	0.00455	0.11461	—	953.733	953.733	0.03794	0.01040	0.03756	957.819
2028	0.08545	0.20455	0.29193	0.00043	0.00689	0.00529	0.01218	0.00634	0.00124	0.00757	—	44.5694	44.5694	0.00174	0.00055	0.00690	44.7846
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.05142	0.48626	0.68019	0.00119	0.01857	0.01503	0.03361	0.01710	0.00555	0.02265	—	119.540	119.540	0.00452	0.00220	0.01180	120.320
2027	0.06378	0.59733	0.90854	0.00158	0.02183	0.00341	0.02524	0.02009	0.00083	0.02092	—	157.901	157.901	0.00628	0.00172	0.00622	158.578
2028	0.01560	0.03733	0.05328	0.00008	0.00126	0.00097	0.00222	0.00116	0.00023	0.00138	—	7.37897	7.37897	0.00029	0.00009	0.00114	7.41461

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44081	4.09093	5.57793	0.00877	0.13431	—	0.13431	0.12356	—	0.12356	—	851.928	851.928	0.03456	0.00691	—	854.851
Demolition	—	—	—	—	—	0.04754	0.04754	—	0.00720	0.00720	—	—	—	—	—	—	—

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04831	0.44832	0.61128	0.00096	0.01472	—	0.01472	0.01354	—	0.01354	—	93.3619	93.3619	0.00379	0.00076	—	93.6823
Demolition	—	—	—	—	—	0.00521	0.00521	—	0.00079	0.00079	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00882	0.08182	0.11156	0.00018	0.00269	—	0.00269	0.00247	—	0.00247	—	15.4571	15.4571	0.00063	0.00013	—	15.5102
Demolition	—	—	—	—	—	0.00095	0.00095	—	0.00014	0.00014	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04158	0.02654	0.42567	0.00000	0.00000	0.07631	0.07631	0.00000	0.01789	0.01789	—	78.5110	78.5110	0.00176	0.00304	0.27920	79.7409
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00121	0.07133	0.01444	0.00042	0.00119	0.01669	0.01788	0.00119	0.00457	0.00576	—	60.7411	60.7411	0.00006	0.00940	0.12598	63.6712
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00432	0.00327	0.04154	0.00000	0.00000	0.00815	0.00815	0.00000	0.00191	0.00191	—	8.08807	8.08807	0.00024	0.00036	0.01321	8.21388
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Hauling	0.00013	0.00808	0.00160	0.00005	0.00013	0.00179	0.00192	0.00013	0.00049	0.00062	—	6.65893	6.65893	0.00001	0.00103	0.00596	6.97219
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00079	0.00060	0.00758	0.00000	0.00000	0.00149	0.00149	0.00000	0.00035	0.00035	—	1.33907	1.33907	0.00004	0.00006	0.00219	1.35990
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00002	0.00148	0.00029	0.00001	0.00002	0.00033	0.00035	0.00002	0.00009	0.00011	—	1.10246	1.10246	< 0.000005	0.00017	0.00099	1.15433

3.3. Site Preparation (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43578	3.73818	5.54403	0.00793	0.18506	—	0.18506	0.17026	—	0.17026	—	858.447	858.447	0.03482	0.00696	—	861.393
Dust From Material Movement	—	—	—	—	—	0.20851	0.20851	—	0.02259	0.02259	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00478	0.04097	0.06076	0.00009	0.00203	—	0.00203	0.00187	—	0.00187	—	9.40764	9.40764	0.00038	0.00008	—	9.43993
Dust From Material Movement	—	—	—	—	—	0.00229	0.00229	—	0.00025	0.00025	—	—	—	—	—	—	—

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00087	0.00748	0.01109	0.00002	0.00037	—	0.00037	0.00034	—	0.00034	—	1.55754	1.55754	0.00006	0.00001	—	1.56289
Dust From Material Movement	—	—	—	—	—	0.00042	0.00042	—	0.00005	0.00005	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02079	0.01327	0.21283	0.00000	0.00000	0.03815	0.03815	0.00000	0.00894	0.00894	—	39.2555	39.2555	0.00088	0.00152	0.13960	39.8704
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.02152	1.26810	0.25679	0.00741	0.02116	0.29664	0.31780	0.02116	0.08121	0.10238	—	1,079.84	1,079.84	0.00106	0.16720	2.23961	1,131.93
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00022	0.00016	0.00208	0.00000	0.00000	0.00041	0.00041	0.00000	0.00010	0.00010	—	0.40440	0.40440	0.00001	0.00002	0.00066	0.41069
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00023	0.01437	0.00285	0.00008	0.00023	0.00319	0.00342	0.00023	0.00087	0.00111	—	11.8381	11.8381	0.00001	0.00183	0.01059	12.3950
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00004	0.00003	0.00038	0.00000	0.00000	0.00007	0.00007	0.00000	0.00002	0.00002	—	0.06695	0.06695	< 0.000005	< 0.000005	0.00011	0.06800
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00004	0.00262	0.00052	0.00001	0.00004	0.00058	0.00062	0.00004	0.00016	0.00020	—	1.95993	1.95993	< 0.000005	0.00030	0.00175	2.05213

3.5. Grading (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02452	9.19052	9.69044	0.01582	0.41898	—	0.41898	0.38547	—	0.38547	—	1,714.25	1,714.25	0.06954	0.01391	—	1,720.14
Dust From Material Movement	—	—	—	—	—	2.07517	2.07517	—	1.00227	1.00227	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02246	0.20144	0.21239	0.00035	0.00918	—	0.00918	0.00845	—	0.00845	—	37.5727	37.5727	0.00152	0.00030	—	37.7016
Dust From Material Movement	—	—	—	—	—	0.04548	0.04548	—	0.02197	0.02197	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00410	0.03676	0.03876	0.00006	0.00168	—	0.00168	0.00154	—	0.00154	—	6.22058	6.22058	0.00025	0.00005	—	6.24193
Dust From Material Movement	—	—	—	—	—	0.00830	0.00830	—	0.00401	0.00401	—	—	—	—	—	—	—

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03118	0.01991	0.31925	0.00000	0.00000	0.05723	0.05723	0.00000	0.01341	0.01341	—	58.8832	58.8832	0.00132	0.00228	0.20940	59.8057
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.01748	1.03033	0.20865	0.00602	0.01720	0.24102	0.25822	0.01720	0.06599	0.08318	—	877.371	877.371	0.00086	0.13585	1.81969	919.695
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00065	0.00049	0.00623	0.00000	0.00000	0.00122	0.00122	0.00000	0.00029	0.00029	—	1.21321	1.21321	0.00004	0.00005	0.00198	1.23208
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00037	0.02336	0.00462	0.00013	0.00038	0.00518	0.00556	0.00038	0.00142	0.00180	—	19.2369	19.2369	0.00002	0.00298	0.01721	20.1419
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00012	0.00009	0.00114	0.00000	0.00000	0.00022	0.00022	0.00000	0.00005	0.00005	—	0.20086	0.20086	0.00001	0.00001	0.00033	0.20399
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00007	0.00426	0.00084	0.00002	0.00007	0.00095	0.00101	0.00007	0.00026	0.00033	—	3.18489	3.18489	< 0.000005	0.00049	0.00285	3.33472

3.7. Building Construction (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49393	4.80600	6.90565	0.01205	0.18874	—	0.18874	0.17364	—	0.17364	—	1,304.47	1,304.47	0.05291	0.01058	—	1,308.94

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49393	4.80600	6.90565	0.01205	0.18874	—	0.18874	0.17364	—	0.17364	—	1,304.47	1,304.47	0.05291	0.01058	—	1,308.94
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19622	1.90923	2.74334	0.00479	0.07498	—	0.07498	0.06898	—	0.06898	—	518.213	518.213	0.02102	0.00420	—	519.991
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03581	0.34843	0.50066	0.00087	0.01368	—	0.01368	0.01259	—	0.01259	—	85.7960	85.7960	0.00348	0.00070	—	86.0904
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00993	0.00634	0.10164	0.00000	0.00000	0.01822	0.01822	0.00000	0.00427	0.00427	—	18.7461	18.7461	0.00042	0.00073	0.06666	19.0397
Vendor	0.00088	0.02893	0.01097	0.00016	0.00032	0.00617	0.00650	0.00032	0.00171	0.00203	—	22.7266	22.7266	0.00020	0.00341	0.05964	23.8075
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00956	0.00790	0.09557	0.00000	0.00000	0.01822	0.01822	0.00000	0.00427	0.00427	—	17.5079	17.5079	0.00063	0.00078	0.00173	17.7576
Vendor	0.00080	0.03068	0.01128	0.00018	0.00032	0.00617	0.00650	0.00032	0.00171	0.00203	—	22.7557	22.7557	0.00020	0.00343	0.00155	23.7846
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00373	0.00283	0.03595	0.00000	0.00000	0.00706	0.00706	0.00000	0.00165	0.00165	—	7.00056	7.00056	0.00021	0.00031	0.01143	7.10945
Vendor	0.00033	0.01191	0.00444	0.00007	0.00013	0.00240	0.00253	0.00013	0.00066	0.00079	—	9.03321	9.03321	0.00008	0.00135	0.01023	9.44915
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00068	0.00052	0.00656	0.00000	0.00000	0.00129	0.00129	0.00000	0.00030	0.00030	—	1.15902	1.15902	0.00003	0.00005	0.00189	1.17705
Vendor	0.00006	0.00217	0.00081	0.00001	0.00002	0.00044	0.00046	0.00002	0.00012	0.00014	—	1.49555	1.49555	0.00001	0.00022	0.00169	1.56441
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.9. Building Construction (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.47604	4.55564	6.89930	0.01205	0.16712	—	0.16712	0.15375	—	0.15375	—	1,304.35	1,304.35	0.05291	0.01058	—	1,308.83
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.47604	4.55564	6.89930	0.01205	0.16712	—	0.16712	0.15375	—	0.15375	—	1,304.35	1,304.35	0.05291	0.01058	—	1,308.83
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33258	3.18270	4.82006	0.00842	0.11675	—	0.11675	0.10741	—	0.10741	—	911.259	911.259	0.03696	0.00739	—	914.387

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06070	0.58084	0.87966	0.00154	0.02131	—	0.02131	0.01960	—	0.01960	—	150.869	150.869	0.00612	0.00122	—	151.387
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00935	0.00566	0.09391	0.00000	0.00000	0.01822	0.01822	0.00000	0.00427	0.00427	—	18.3594	18.3594	0.00042	0.00073	0.05992	18.6463
Vendor	0.00086	0.02785	0.01023	0.00016	0.00032	0.00617	0.00650	0.00032	0.00171	0.00203	—	22.2452	22.2452	0.00004	0.00325	0.05500	23.2690
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00903	0.00722	0.08798	0.00000	0.00000	0.01822	0.01822	0.00000	0.00427	0.00427	—	17.1485	17.1485	0.00058	0.00078	0.00155	17.3967
Vendor	0.00080	0.02946	0.01069	0.00018	0.00032	0.00617	0.00650	0.00032	0.00171	0.00203	—	22.2745	22.2745	0.00004	0.00325	0.00143	23.2448
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00624	0.00450	0.05825	0.00000	0.00000	0.01241	0.01241	0.00000	0.00290	0.00290	—	12.0588	12.0588	0.00037	0.00054	0.01806	12.2483
Vendor	0.00059	0.02010	0.00729	0.00011	0.00023	0.00422	0.00445	0.00023	0.00117	0.00140	—	15.5498	15.5498	0.00003	0.00227	0.01654	16.2432
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00114	0.00082	0.01063	0.00000	0.00000	0.00226	0.00226	0.00000	0.00053	0.00053	—	1.99647	1.99647	0.00006	0.00009	0.00299	2.02784
Vendor	0.00011	0.00367	0.00133	0.00002	0.00004	0.00077	0.00081	0.00004	0.00021	0.00025	—	2.57445	2.57445	< 0.000005	0.00038	0.00274	2.68925
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.11. Paving (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48071	4.15212	5.30895	0.00857	0.16795	—	0.16795	0.15451	—	0.15451	—	823.016	823.016	0.03339	0.00668	—	825.840
Paving	0.09818	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00753	0.06500	0.08311	0.00013	0.00263	—	0.00263	0.00242	—	0.00242	—	12.8848	12.8848	0.00052	0.00010	—	12.9290
Paving	0.00154	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00137	0.01186	0.01517	0.00002	0.00048	—	0.00048	0.00044	—	0.00044	—	2.13322	2.13322	0.00009	0.00002	—	2.14054
Paving	0.00028	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06620	0.05293	0.64484	0.00000	0.00000	0.13354	0.13354	0.00000	0.03130	0.03130	—	125.685	125.685	0.00424	0.00571	0.01138	127.504
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00102	0.00074	0.00957	0.00000	0.00000	0.00204	0.00204	0.00000	0.00048	0.00048	—	1.98054	1.98054	0.00006	0.00009	0.00297	2.01166
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00019	0.00013	0.00175	0.00000	0.00000	0.00037	0.00037	0.00000	0.00009	0.00009	—	0.32790	0.32790	0.00001	0.00001	0.00049	0.33305
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.13. Paving (2028) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.46577	4.05108	5.30698	0.00857	0.15446	—	0.15446	0.14211	—	0.14211	—	823.039	823.039	0.03339	0.00668	—	825.864
Paving	0.09818	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01823	0.15855	0.20771	0.00034	0.00605	—	0.00605	0.00556	—	0.00556	—	32.2129	32.2129	0.00131	0.00026	—	32.3234
Paving	0.00384	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00333	0.02894	0.03791	0.00006	0.00110	—	0.00110	0.00102	—	0.00102	—	5.33321	5.33321	0.00022	0.00004	—	5.35151
Paving	0.00070	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05972	0.04799	0.59569	0.00000	0.00000	0.13354	0.13354	0.00000	0.03130	0.03130	—	123.239	123.239	0.00386	0.00571	0.01019	125.048
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00229	0.00165	0.02210	0.00000	0.00000	0.00509	0.00509	0.00000	0.00119	0.00119	—	4.85504	4.85504	0.00014	0.00022	0.00665	4.93169
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00042	0.00030	0.00403	0.00000	0.00000	0.00093	0.00093	0.00000	0.00022	0.00022	—	0.80381	0.80381	0.00002	0.00004	0.00110	0.81650
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.15. Architectural Coating (2028) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10731	0.80814	1.11833	0.00173	0.01536	—	0.01536	0.01413	—	0.01413	—	133.517	133.517	0.00542	0.00108	—	133.975
Architectural Coatings	1.00595	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00588	0.04428	0.06128	0.00009	0.00084	—	0.00084	0.00077	—	0.00077	—	7.31600	7.31600	0.00030	0.00006	—	7.34111
Architectural Coatings	0.05512	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00107	0.00808	0.01118	0.00002	0.00015	—	0.00015	0.00014	—	0.00014	—	1.21125	1.21125	0.00005	0.00001	—	1.21540
Architectural Coatings	0.01006	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00163	0.00131	0.01626	0.00000	0.00000	0.00364	0.00364	0.00000	0.00085	0.00085	—	3.36296	3.36296	0.00011	0.00016	0.00028	3.41230
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00009	0.00006	0.00084	0.00000	0.00000	0.00019	0.00019	0.00000	0.00005	0.00005	—	0.18548	0.18548	0.00001	0.00001	0.00025	0.18841
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00002	0.00001	0.00015	0.00000	0.00000	0.00004	0.00004	0.00000	0.00001	0.00001	—	0.03071	0.03071	< 0.000005	< 0.000005	0.00004	0.03119
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	4/1/2026	5/26/2026	5.00000	40.0000	—
Site Preparation	Site Preparation	5/27/2026	6/1/2026	5.00000	4.00000	—
Grading	Grading	6/2/2026	6/11/2026	5.00000	8.00000	—
Building Construction	Building Construction	6/12/2026	12/23/2027	5.00000	400.000	—
Paving	Paving	12/24/2027	1/20/2028	5.00000	20.0000	—
Architectural Coating	Architectural Coating	1/21/2028	2/17/2028	5.00000	20.0000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00000	6.00000	84.0000	0.37000
Demolition	Rubber Tired Dozers	Diesel	Average	1.000000	1.000000	367.000	0.40000
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Site Preparation	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Grading	Graders	Diesel	Average	1.000000	6.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	6.00000	367.000	0.40000
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	4.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	2.00000	6.00000	82.0000	0.20000
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00000	8.00000	84.0000	0.37000

Paving	Tractors/Loaders/Back	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Paving	Cement and Mortar Mixers	Diesel	Average	4.00000	6.00000	10.00000	0.56000
Paving	Pavers	Diesel	Average	1.000000	7.00000	81.0000	0.42000
Paving	Rollers	Diesel	Average	1.000000	7.00000	36.0000	0.38000
Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	10.00000	10.8000	LDA,LDT1,LDT2
Demolition	Vendor	—	7.90000	HHDT,MHDT
Demolition	Hauling	0.90000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	5.00000	10.8000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.90000	HHDT,MHDT
Site Preparation	Hauling	16.0000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	7.50000	10.8000	LDA,LDT1,LDT2
Grading	Vendor	—	7.90000	HHDT,MHDT
Grading	Hauling	13.0000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	2.38770	10.8000	LDA,LDT1,LDT2
Building Construction	Vendor	0.93177	7.90000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	17.5000	10.8000	LDA,LDT1,LDT2
Paving	Vendor	—	7.90000	HHDT,MHDT

Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	0.47754	10.8000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.90000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00000	0.00000	960.000	960.000	1,958.88

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00000	0.00000	0.00000	3,055.00	0.00000
Site Preparation	252.000	260.000	2.00000	0.00000	0.00000
Grading	1,047.20	0.00000	6.00000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.74949

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction

Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Unrefrigerated Warehouse-No Rail	0.00000	0%
Paving	Parking Lot	0.74949	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00000	203.983	0.03300	0.00400
2027	0.00000	203.983	0.03300	0.00400
2028	0.00000	203.983	0.03300	0.00400

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	8.66000	annual days of extreme heat
Extreme Precipitation	6.05000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	27.8600	annual hectares burned

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

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A

Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

6.3. Adjusted Climate Risk Scores

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	17.6478
AQ-PM	1.38146
AQ-DPM	36.4530
Drinking Water	69.9388
Lead Risk Housing	58.3617
Pesticides	82.3103
Toxic Releases	8.96474
Traffic	59.4500
Effect Indicators	—
CleanUp Sites	11.8328
Groundwater	83.2143
Haz Waste Facilities/Generators	99.2720
Impaired Water Bodies	98.0680
Solid Waste	63.6655
Sensitive Population	—
Asthma	35.0075
Cardio-vascular	34.4840
Low Birth Weights	53.4642
Socioeconomic Factor Indicators	—
Education	56.7325
Housing	46.4639
Linguistic	50.0068
Poverty	35.3518
Unemployment	11.8688

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	42.48684717
Employed	6.544334659
Median HI	47.69665084
Education	—
Bachelor's or higher	52.02104453
High school enrollment	100
Preschool enrollment	39.48415244
Transportation	—
Auto Access	54.54895419
Active commuting	65.99512383
Social	—
2-parent households	56.17862184
Voting	61.19594508
Neighborhood	—
Alcohol availability	67.58629539
Park access	15.35993841
Retail density	8.635955345
Supermarket access	39.22751187
Tree canopy	88.46400616
Housing	—
Homeownership	53.13743103
Housing habitability	45.18157321
Low-inc homeowner severe housing cost burden	27.16540485
Low-inc renter severe housing cost burden	38.89387912

Uncrowded housing	36.04516874
Health Outcomes	—
Insured adults	57.69280123
Arthritis	0.0
Asthma ER Admissions	63.2
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	41.9
Cognitively Disabled	43.0
Physically Disabled	43.7
Heart Attack ER Admissions	58.7
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	20.6
SLR Inundation Area	0.0

Children	39.2
Elderly	23.9
English Speaking	65.8
Foreign-born	25.6
Outdoor Workers	23.4
Climate Change Adaptive Capacity	—
Impervious Surface Cover	92.6
Traffic Density	39.0
Traffic Access	0.0
Other Indices	—
Hardship	73.1
Other Decision Support	—
2016 Voting	76.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	52.0000
Healthy Places Index Score for Project Location (b)	43.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Construction: Construction Phases	Adjusted working days to applicant provided schedule of April 2026 to Feb. 2028
Construction: On-Road Fugitive Dust	Project site is served and accessible by paved roads
Construction: Architectural Coatings	Painting only required for treatment buildings not solar panels

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Demolition	Demolition	End Date	4/15/2026	5/26/2026
Demolition	Demolition	Work Days per Phase	10.00000	40.0000
Site Preparation	Site Preparation	Start Date	4/16/2026	5/27/2026
Site Preparation	Site Preparation	End Date	4/17/2026	6/1/2026
Site Preparation	Site Preparation	Work Days per Phase	1.000000	4.00000
Grading	Grading	Start Date	4/18/2026	6/2/2026
Grading	Grading	End Date	4/20/2026	6/11/2026
Grading	Grading	Work Days per Phase	2.00000	8.00000
Building Construction	Building Construction	Start Date	4/21/2026	6/12/2026
Building Construction	Building Construction	End Date	9/8/2026	12/23/2027
Building Construction	Building Construction	Work Days per Phase	100.0000	400.000
Paving	Paving	Start Date	9/9/2026	12/24/2027
Paving	Paving	End Date	9/16/2026	1/20/2028

Paving	Paving	Work Days per Phase	5.00000	20.0000
Architectural Coating	Architectural Coating	Start Date	9/17/2026	1/21/2028
Architectural Coating	Architectural Coating	End Date	9/24/2026	2/17/2028
Architectural Coating	Architectural Coating	Work Days per Phase	5.00000	20.0000

8.4.7. On-Road Fugitive Dust

Phase Name	Model Parameter	Units	Default Value	New Value
Demolition	Worker Trip Paved	%	52.0000	100.0000
Demolition	Vendor Trip Paved	%	52.0000	100.0000
Demolition	Hauling Trip Paved	%	52.0000	100.0000
Site Preparation	Worker Trip Paved	%	52.0000	100.0000
Site Preparation	Vendor Trip Paved	%	52.0000	100.0000
Site Preparation	Hauling Trip Paved	%	52.0000	100.0000
Grading	Worker Trip Paved	%	52.0000	100.0000
Grading	Vendor Trip Paved	%	52.0000	100.0000
Grading	Hauling Trip Paved	%	52.0000	100.0000
Building Construction	Worker Trip Paved	%	52.0000	100.0000
Building Construction	Vendor Trip Paved	%	52.0000	100.0000
Building Construction	Hauling Trip Paved	%	52.0000	100.0000
Paving	Worker Trip Paved	%	52.0000	100.0000
Paving	Vendor Trip Paved	%	52.0000	100.0000
Paving	Hauling Trip Paved	%	52.0000	100.0000
Architectural Coating	Worker Trip Paved	%	52.0000	100.0000
Architectural Coating	Vendor Trip Paved	%	52.0000	100.0000
Architectural Coating	Hauling Trip Paved	%	52.0000	100.0000

8.4.8. Architectural Coatings

Phase Name	Model Parameter	Units	Default Value	New Value

Architectural Coating	Non-Residential Interior Area	sq ft	8,527.50	960.000
Architectural Coating	Non-Residential Exterior Area	sq ft	2,842.50	960.000

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Appendix B. Sensitive Species Potential to Occur

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Sensitive Wildlife Species Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR	Habitat	Potential to Occur
WILDLIFE				
INVERTEBRATES				
Gonidea angulata	western ridged mussel	None/none/-	Occurs in freshwater streams and rivers in the western united states and Canada west coast. Prefers turbid, well oxygenated waters.	**Not expected**. Recent (<20 years) records indicate presence within one mile, within the Pajaro river. However no suitable habitat is present in the project area; no aquatic features are present.
AMPHIBIANS				
Ambystoma californiense population 1	California tiger salamander – Central California DPS	FT/ST/-	Occurs in grassland, oak savanna, and mixed woodlands edges or lower elevation coniferous forest edges. Adults aestivate in mammal burrows or similar refugia for the length of the dry season. Migrates at nighttime from November through May to seek breeding ponds and pools.	**Not Expected**. Habitat in project area is not suitable due to lack of aquatic features for breeding and lack of aestivating locations due to development. Historical records (>20 years) indicate presence within one mile. IPaC database review indicated no critical habitat within the project area.
FISH				
Lavinia exilicauda harengus	Monterey hitch	None/None/-	Inhabits freshwater or brackish pools, ponds, and lagoons within the Pajaro and Salinas river systems. May also inhabit low gradient areas of rivers where pools are available into the late summer. Spawning occurs during the warmer months from May to August.	**Not Expected.** No suitable habitat onsite. This species has been historically documented in the nearby Pajaro river, however no aquatic features are present in the work area.
PLANTS				
Monolopia gracilens	woodland woollythreads	1B.2	California Endemic. Can occur in a variety of canopy types including woodland, chaparral, and grassland; often associated with serpentine soils.	**Not Expected.** Project area is regularly disturbed. CNDDB records indicate historical (>50 years) occurrence within 1 mile, however location data is approximate.
Fritillaria liliacea	fragrant fritillary	1B.2	Calilfornia endemic. Occurs near sea level in grassy slopes or coastal prairie; prefers heavier soils with high clay content.	**Not Expected.** Project area is regularly disturbed. CNDDB records indicate historical (>50 years) occurrence within 1 mile, however exact location data is not available.

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Appendix C. Cultural Resources Technical Report

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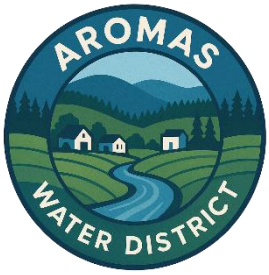
Cultural Resources Technical Report

Driscoll Well and Pump Station Project

April 2026

Prepared for:



388 Blohm Avenue
Aromas, California 95004

Prepared by:

Harris & Associates

60 West Alisal Street, Suite 200
Salinas, California 93901

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National Archaeological Database Information

Authors:	Shahira Ashkar and Donna Beddow
Firm:	Harris & Associates 60 West Alisal Street, Suite 200 Salinas, California 93901
Project Proponent:	Aromas Water District Robert Johnson, General Manager 388 Blohm Avenue Aromas, California 95004
Report Date:	April 2026
Report Title:	Cultural Resources Technical Report – Driscoll Well and Pump Station Project
Type of Study:	Intensive Pedestrian/Phase I
New Sites:	None
Updated Sites:	None
USGS Quad:	Watsonville East
Acreage:	1.8 acres
Key Words:	Negative Survey, CEQA, Ohlone/Costanoan Traditional Use Area

Abstract

This report represents the results of a cultural resource survey for the Driscoll Well and Pump Station Project. The purpose of the survey is primarily for the purpose of CEQA evaluation. The survey was conducted to identify any impacts to cultural resources that could result from the construction and operation of a new well and pump station in Aromas, California. No previously recorded archaeological sites are mapped on the project site. Under the current development plan, cultural resources will not be impacted.

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Confidential Appendices (Bound Separately – Not for Public Review)

Acronyms and Abbreviations

AB	Assembly Bill
CEQA	California Environmental Quality Act
CHRIS	California Historic Resources Inventory System
CRHR	California Register of Historical Resources
MLD	most likely descendant
NAHC	Native American Heritage Commission
project	Driscoll Well and Pump Station Project
USGS	U.S. Geological Survey

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Executive Summary

The Driscoll Well and Pump Station Project (project) would include the construction and operation of a new municipal water supply well, pump station, and iron and manganese removal treatment system to enhance the water supply reliability for the unincorporated community of Aromas. The project also includes installation of a water pipeline from the well to the existing water distribution system, and a ground-mounted solar photovoltaic system to provide power.

The project site is at the northeastern corner of Carpenteria Road and Quarry Road in the community of Aromas, approximately 7 miles east of Watsonville in San Benito County. While the community of Aromas is in both Santa Cruz and San Benito Counties, the project site itself is in San Benito County. The project is in an unsectioned portion of Township 12S, Range 03E, on the Watsonville East U.S. Geological Survey (USGS) quadrangle. The project site is currently undeveloped and in agricultural use. There are no structures on the parcel.

This study consists of an archaeological field survey of the project site, which was negative for the presence of resources. Harris & Associates archaeologist Shahira Ashkar served as the principal investigator and conducted the fieldwork. Archaeology manager Donna Beddow provided oversight and review and conducted Native American outreach. Both Ms. Ashkar and Ms. Beddow meet the Secretary of Interior Professional Standards for Archaeology (Appendix A, Resumes). No resources were identified.

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Section 1 Introduction

1.1 Project Location and Description

The Aromas Water District serves the unincorporated community of Aromas, located in California's Central Coast region within both Monterey and San Benito Counties, south of Santa Cruz County. The community lies approximately 7 miles east of the City of Watsonville (Figure 1, USGS Topographic Map; Figure 2, Regional Location). The Aromas Water District provides municipal water treatment and distribution, as well as wastewater collection and treatment services, to customers within its service area.

The approximately 1.8-acre project site is on the western corner of a 29.04-acre parcel, adjacent to Carpenteria Road and north of Quarry Road and the Union Pacific Railroad tracks, within the jurisdiction of San Benito County. The site consists of active agricultural fields that are currently under cultivation. The land is regularly disturbed through routine farming operations such as tilling, planting, and harvesting. The existing conditions were photographed and are included in Appendix B, Photographs. Surrounding land uses include agricultural land to the north, west, and east. Developed land uses to the south include Aromas Elementary School, greenhouses, and residential uses.

The Driscoll Well and Pump Station Project (project) would be constructed on a 1.8-acre parcel, approximately 0.8 acre (35,278 square feet) of which would be developed as the well pump station site. The well pump station site, enclosed by chain-link fencing, would contain a new production well and pump station, an iron and manganese water treatment system housed within a treatment building, and a ground-mounted solar photovoltaic system (Figure 3, Project Facilities and Site Plan). Site improvements would include paving a new 15-foot-wide driveway and installing an access gate on Carpenteria Road to provide entry to the well pump station site. The project also includes installation of an underground water pipeline along Carpenteria Road resulting in an additional disturbance area of approximately 680 linear feet and 3,175 square feet. There would be no restrooms or other facilities constructed on the site. In total, the project would disturb approximately 34,166 square feet (including pump station site, production well, treatment building, underground water pipeline, and driveway). The remaining approximately 1 acre (43,560 square feet) of the parcel would be fenced but would not be developed.

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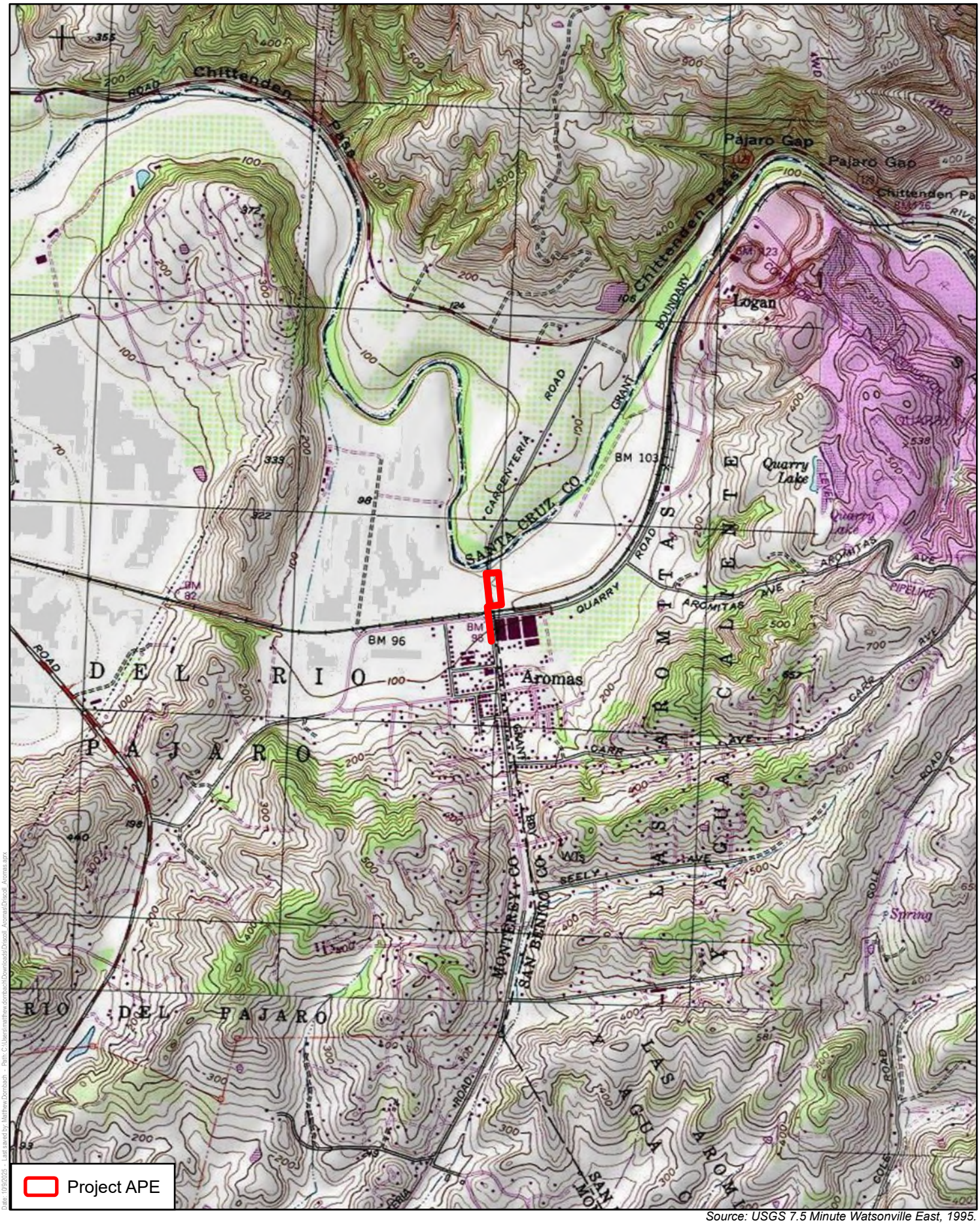

Source: USGS 7.5 Minute Watsonville East, 1995.

Harris & Associates

N

0 1,000 2,000

Feet

Figure 1

USGS Topographic Map

Driscoll Well and Pump Station Project

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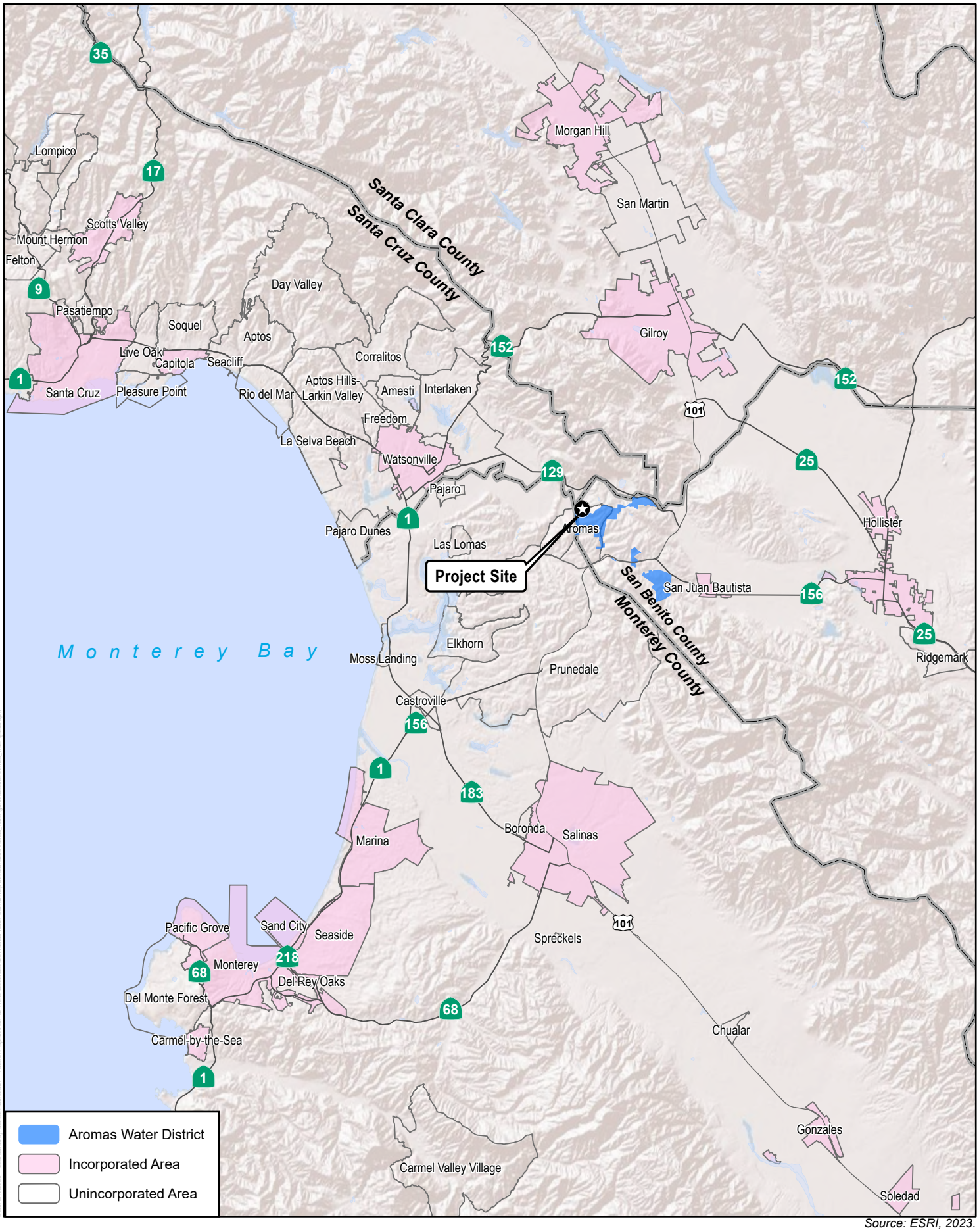

Source: ESRI, 2023.

Harris & Associates

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Miles

Figure 2

Regional Location

Driscoll Well and Pump Station Project

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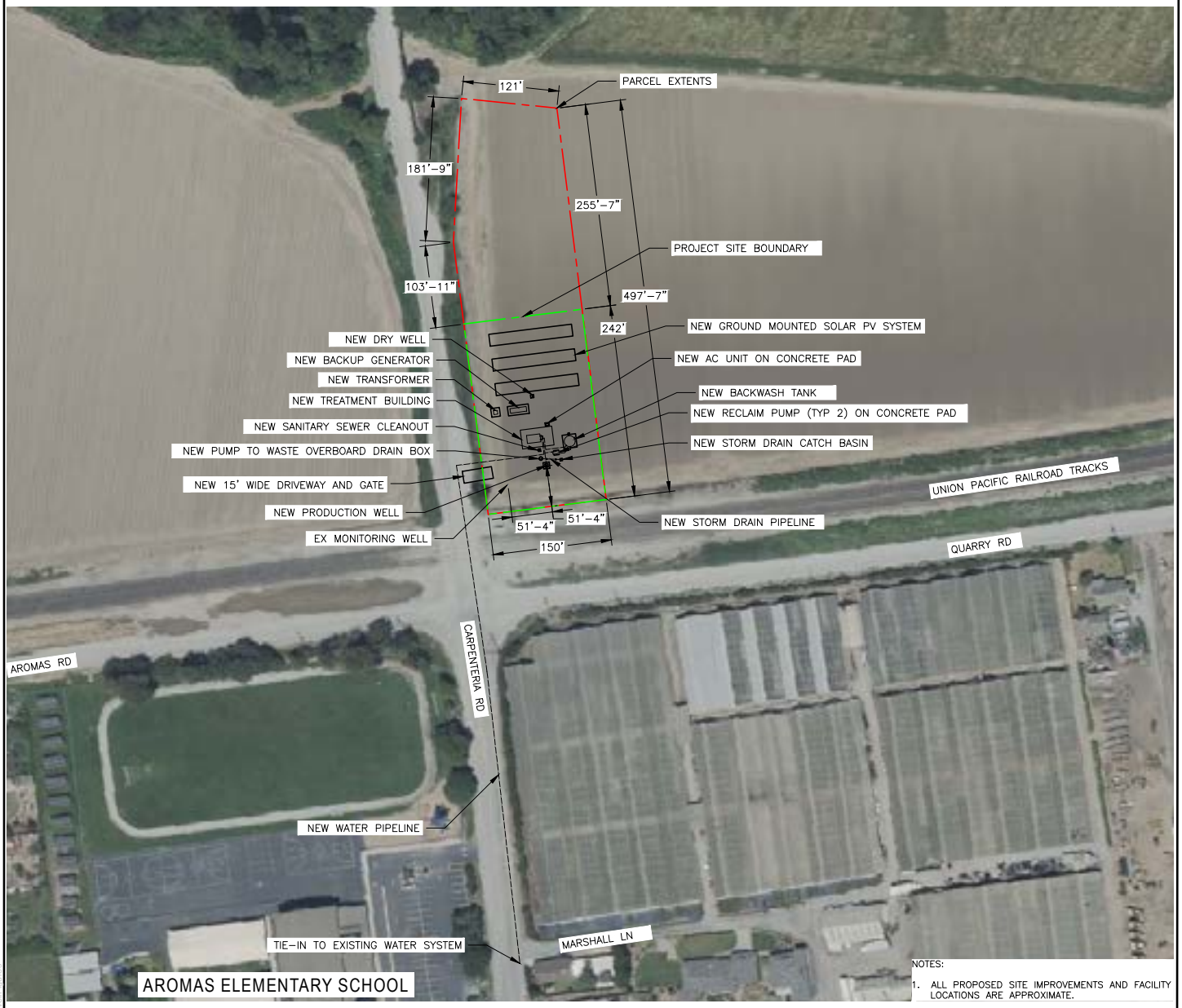

Source: Luhdorff & Scalmanini Consulting Engineers, 2025.

Harris & Associates

N

0 90 180

Feet

Figure 3

Project Facilities and Site Plan

Driscoll Well and Pump Station Project

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Section 2 Project Setting

2.1 Environmental Setting

2.1.1 Natural Environment

The project vicinity has a mild Mediterranean climate, which is characterized by wet winters and dry summers. The area is influenced by proximity to the coast, where a semi-permanent high-pressure zone sits over the Pacific Ocean during much of the year and forms a fog belt (marine layer). The project site is just south of the Pajaro River, where the river cuts through the Pajaro Gap at the south end of the Santa Cruz Mountains.

2.1.2 Cultural Setting

Cultural resources are found throughout the region and are reminders of the historical record. Cultural resources are the tangible or intangible remains or traces left by pre-contact or historical people who inhabited the region. They encompass both the built (post-1769) and the archaeological environments, as well as Traditional Cultural Properties. They are typically in protected areas near water sources and multiple ecoregions, and can include Traditional Cultural Properties, such as gathering areas, landmarks, and ethnographic locations.

2.1.2.1 Prehistoric

The following provides a brief cultural background for the Santa Cruz and Monterey County area, and is based on work by Dennison and Heideman (2015) and Ross (2018).

2.1.2.2 Millingstone Period

Millingstone period deposits of the Early Holocene are characterized by the initial appearance of handstones and milling slabs (“milling stones”), which are associated with seed processing. Flaked tools are also in these assemblages, including large side-notched points and cobble-core tools. Faunal remains suggest that Millingstone subsistence featured a wide range of animals such as shellfish, fish, birds, and land mammals, including deer and rabbits, but in terms of volume, Millingstone diets consisted of 70 to 84 percent marine-derived food, particularly shellfish. At least 42 Central Coast sites feature a Millingstone period occupation. Although these are found over a wide range of geographical settings (open rocky coasts, sloughs, bays, and the interior valleys of the California Coast Ranges), most known Millingstone occupations in the region occur on the coast (Jones et al. 2007:136).

2.1.2.3 Early Period

The Early period of the Middle Holocene reflects new settlements that began approximately (ca.) 3500 to 3000 cal B.C. Breschini and Haversat (2004) have suggested that the Early period begins in 4000 cal B.C. and should be divided into two subphases. Phase I features the retention of Millingstone characteristics, while Phase II (2000–600 cal B.C.) features a pronounced increase in stemmed points

and the introduction of mortars and pestles and Class L beads (rectangular Olivella beads). This split is supported by the assemblages of at least four Monterey County sites and may be supported as more post-2000 cal B.C. deposits are discovered.

The Early period is characterized by a great frequency of large projectile points and other bifaces, including relatively narrow contracting-stemmed points, wider Rossi square-stemmed points, and side-notched points of the type found in Millingstone deposits. The use of cobble-core tools continues through this period but in lower frequencies. Portable mortar and pestles appear in Early period assemblages but are infrequent. Burials from site CA-MNT-391 show a preference for flexed (bent) position and contained Rossi square-stemmed projectile points, fish gorges, and Class L beads. Bi-pointed bone gorges associated with line fishing appear during the Early period, and fish remains are more apparent in Early period assemblages than in Millingstone assemblages (Jones et al. 2007:138). Most Early period faunal assemblages feature deer, although a site at Morro Bay (CA-SLO-165), approximately 145 miles south, contains a large number of rabbit bones, and site CA-MNT-391, approximately 10 miles to the south, has a preponderance of sea otters. These site assemblages demonstrate that the environment was one well suited to a hunting-gathering economy with a variety of water birds, small and large mammals, fish, reptiles and amphibians, and edible plant species.

2.1.2.4 Middle Period

The Middle period of the Early Holocene manifestation of the Hunting Culture features the continuation of the contracting-stemmed points and the disappearance of the square-stemmed and large-notched types. The Olivella bead type G2 (a saucer type) outnumbers the L type during this period. Ground stone features both handstones and milling slabs, and mortar and pestles. Bone gorges are still present, and circular shell fishhooks appear for the first time. Fish remains are markedly more prevalent in Middle period assemblages than in Early period ones. Mammal remains from Middle period sites vary from site to site and include northern fur seals and sea otters. In some Middle period sites, rabbit remains predominate, while in others, deer remains prevail. Grooved stone net weights are extant in Middle period assemblages. Burials continue to be flexed position and are sometimes accompanied by bone flutes. Bone tubes and large quantities of G2 type beads are present in burials of this period. G1 type Olivella saucer beads also appear. Shell bead types can be chronological indicators when types are compared within a region. At the end of this period, small leaf-shaped projectile points appear, indicating the advent of bow and arrow use (Bennyhoff and Hughes 1987).

2.1.2.5 Middle-Late Transition Period

Marked changes in Central Coast assemblage and settlement patterns occur after ca. A.D. 1000, at the beginning of the Late Holocene. Assemblages feature a large number of the arrow points that appear at the end of the Middle period, as well as a new bead type, the Class K cupped Olivella bead. These developments help identify assemblages from this period. Fewer stemmed points are present but Class G1 and G2 beads are still found in assemblages of this period. Overall, the Hunting Culture that includes the Early, Middle, and Middle-Late Transition periods experiences an increase in the exploitation of fish.

The exploitation of shellfish is evident at all coastal sites but seems to decrease, while the hunting of vertebrates increases. Radiocarbon dates indicate that the exploitation of acorns may have occurred during the Hunting Culture (Jones et al. 2007:138).

2.1.2.6 Late Period

Late period assemblages are distinct from those of previous periods because of a preponderance of Desert side-notched and Cottonwood projectile points, small bifacial bead drills, bedrock mortars, hopper mortars, Class E lipped Olivella beads and Class K beads, and steatite disc beads. However, Breschini and Haversat (2004) put forth that Desert side-notched points appeared after contact in the Monterey Peninsula area. Sites in the Santa Cruz area and the Monterey Peninsula feature thin, rectangular Class M beads and small, serrated arrow points. Circular shell fishhooks persist through the Late period (Breschini and Haversat 2004; Jones et al. 2007:140).

Inland Late period sites are more prevalent in the archaeological record than coastal Late period sites. Many Late period sites that have been recorded feature bedrock mortars and associated middens, which may indicate a greater reliance on plant-based foods. Prehistoric inhabitants of California processed plant-based foods such as seeds (including acorns) in bedrock mortars. However, sites on the Monterey Peninsula from this period feature dense deposits of whole abalone shells that have been interpreted as abalone collecting and processing sites used by inland inhabitants (Jones et al. 2007:140). Residential features (circular house floors approximately 10 to 14 feet in diameter) have been recorded on the coast and inland.

2.1.2.7 Ethnohistoric Period

The project site is within the historically known territory of the Ohlone, or Tribes from the Costanoan language family. Speakers of the various Costanoan languages occupied an area extending from the northern San Francisco Bay Area to the southern Monterey Bay and lower Salinas River areas. Ethnographic information for Costanoan speakers comes from early Spanish explorers and mission documents, as well as the works of modern ethnographers and linguists and Ohlone descendants.

The numerous Costanoan social groups in this region were organized by tribelets, each of which could have several villages or a main village with a number of camps (Levy 1978:487). Tribelets were also political units that were structured by similarities in language and ethnicity, each holding claim to a designated portion of territory. Topographic features, such as rivers, watersheds, and ridgelines, defined tribelet territories and the boundaries were strictly respected.

Costanoan territory extended between the Carquinez Strait and San Pablo Bay on the north, southward along the coast beyond Monterey Bay to Carmel Valley, and inland to the coast range (Levy 1978:485). Neighboring groups included the Coast Miwok north across the Carquinez Strait, the Miwok and Northern Valley Yokuts to the east, and the Salinan and Esselen to the south.

Each tribelet's territory contained a main village and smaller satellite villages. The villages were typically situated along a river or stream for easy access to water (Levy 1978:487). Coastal people did not build right on the shoreline, but usually on an overlooking bluff. Dwellings were domed structures consisting of a tule- or grass-covered framework of poles, with a rectangular doorway and central hearth (Levy 1978:492). The forest-dwelling Rumsen group also constructed conical houses of split redwood and redwood bark. Villages often contained specific enclosures for dancing. Assembly halls in the center of the settlement were common; some halls were large enough to contain the entire village population of 200 people. Each community had a sweat lodge, placed near a stream. The Costanoans either buried or cremated the deceased, sometimes depending on firewood availability. There is no mention of cemeteries associated with villages (Levy 1978:490–491).

The rich resources of the ocean, bays, valleys, and mountains provided Ohlone-speaking people with food and all their material needs (Levy 1978:491–492). The primary food staple was the acorn, supplemented by a great variety of wildlife and plant resources. Depending on species availability and desirability, Costanoans used four oak species, including coast live, valley, tanbark, and black. Collected nuts included buckeye, laurel, pine nuts, and hazelnuts. Seeds from dock, chia and other salvias, tarweed, and hollyleaf cherry were collected and ground into meal. Vegetal resources also included several berry-producing plants, wild onions, carrots, tule roots, and greens of clover and other annuals. Large and small game including deer, elk, antelope, bear, mountain lion, raccoon, ground squirrel, woodrat, mouse, mole, dog, rabbit, and jackrabbit, plus seal and stranded whale were part of their diet. Migrating waterfowl were an important resource, and included geese, ducks, and coots. Pigeons, quails, and hawks were also consumed, but not eagles, owls, ravens, or turkey vultures. Rivers and streams provided freshwater fish, including steelhead, salmon, and sturgeon, while the ocean provided shark, sardine, and lamprey. The Costanoan diet also included a variety of insects and reptiles, but not amphibians.

The Native American population in this region came into contact with European cultures at the beginning of Spain's land exploration and settlement in A.D. 1769. Traditional lifeways were altered drastically during the late 1700s to early 1800s when the Spanish placed their capital at Monterey, built forts at Monterey and San Francisco, and established seven Franciscan missions to convert native people to Christianity and the European way of life. Large-scale epidemics soon swept through the mission population and the remaining villages (Milliken 1995). Subsequent Spanish colonial towns at Santa Cruz and Yerba Buena (San Francisco), followed by large Mexican land grants, separated Costanoans from their harvesting grounds and hunting parks. Many surviving Native Americans were pulled away from their own villages to the new Euro-American settlements. It is estimated that the combined Costanoan population fell from a pre-contact total of 10,000 down to 2,000 by the end of the mission period in 1834 (Levy 1978:486). During the mission period, the dwindling Costanoan population also intermarried with other interior Tribes at the missions, mixing their cultural identities.

During the late 1800s, several Native American communities of mixed heritage remained in rural areas, with Pleasanton, Monterey, and San Juan Bautista being the best known (Levy 1978:487). Even these groups continued to shrink as young people married into other groups and moved away.

Estimates of the total remaining population of people with recognizable Costanoan descent were fewer than 300 in 1973 (Levy 1978:487).

2.1.2.8 Historic Period

The Historic period can be divided into three phases (Spanish, Mexican, and American). Each phase is identified with a change in political power. Common goals in each phase included land gain, assimilation of the native population, and the attainment of wealth. However, these periods were dissimilar in the rationale behind these goals. Rationale included defense (Spain), independence and secularization (Mexico), and expansion and economics (United States). Assimilation of Native Californians was a desire of each government that came to power; however, the greatest misfortune of this period was the large decline in Native American populations (Phillips 1981).

2.1.2.9 Spanish Period

Sebastian Vizcaino's landing at present day Monterey in 1602 is one of the earliest documented contacts with Native Americans in the area. Following Vizcaino's landing, other Spanish ships may have stopped at Monterey, but contact was minimal until the initial overland exploration of the area by Gaspar de Portolá in 1769 (Hoover et al. 1990). Subsequent exploration of the region included Pedro Fages in 1770 and 1772, Fernando Javier de Rivera in 1774, and Juan Bautista de Anza in 1776 (Beck and Haase 1974).

Portolá's expedition, although at the time producing little lasting and substantive contact, was a forerunner of later developments. As a direct result of the expedition, the Spanish established a system of fully functioning Franciscan missions over the length of Alta California, from San Diego to the northern San Francisco Bay. Missions in the area included Mission San Antonio de Padua (1771), Mission Soledad (1791), Mission Santa Cruz (1791), Mission San Juan Bautista (1797), and Mission San Miguel (1797).

2.1.2.10 Mexican Period

In 1821, Mexico achieved independence from Spain, and word of this event reached Alta California the following year. In California history, this era is known as the Mexican Period (ca. 1821–1848). The colonial policies of the republic were to be quite different from those of the Spanish monarchy. Not only were Californians allowed to trade with foreigners, but foreigners could also now hold land in the province once they had been naturalized and converted to Catholicism. Under Spain, land grants to individuals were few in number, and title to these lands remained in the hands of the crown. Under Mexican rule, however, governors were encouraged to make more grants for individual ranchos, and these grants were to be outright. Most importantly, the new Mexican republic was determined to move to "secularize" the missions, to remove the natives and the mission property from the control of the Franciscan missionaries.

Secularization was set in motion by the Mexican Governor Echeandia in 1826, but was not carried out in earnest until 1834 when Governor José Figueroa issued an official proclamation ordering the secularization of the California missions. His proclamation turned the mission properties over to Mexican civil authorities, allowed for the dispersing of mission property, opened mission land for

settlement by petitioners, and created a series of pueblos. Native American neophytes were freed from their role as personal servants to the padres; however, in reality, the effects of secularization throughout California were to deprive a large percentage of the remaining mission Native Americans of their property. This resulted in the creation of a relatively large population of landless Native American tenants, many of whom sought work in the newly created rancherias.

The new ranchos that sprang up as a result of secularization created a wholly new culture in California, one that was centered on the raising and maintaining of vast herds of cattle. These ranchos were usually owned by individual families who supervised a significant number of Native American laborers and vaqueros. The ranch owners owed their livelihood to the sale and trade of the products, primarily hide and tallow, derived from their cattle. A flourishing trade with foreign merchants, mostly Americans, kept the Mexican ranchos afloat; hides and tallow were traded to American merchants for everything from food staples and clothing to furniture and luxury goods.

The community of Aromas is on a small portion of the Rancho Las Aromitas y Agua Caliente Mexican Land Grant, given by Governor Jose Castro to Juan Miquel Anzar in 1835. The land grant derives from nearby sulfur springs, meaning “little aromas and hot spring.”

2.1.2.11 American Period

The end of the Mexican-American War and the signing of the Treaty of Guadalupe Hidalgo in 1848 marked the beginning of the American Period (ca. 1848–present) in California history. The onset of this period, however, did nothing to change the economic condition of the Native American populations working on the ranchos.

The community of Aromas, straddling the Monterey-San Benito County Line, was originally settled in the early 1870s after the construction of the Southern Pacific Railroad. Originally known as “Sand Cut” referencing a nearby railroad tunnel, it was renamed Aromas in 1895. As farmers settled in the area, the Aromas School District was formed in 1889, and a small school was constructed. It was replaced by the Aromas School (P-27-002244) in 1895, which was designed by noted architect William Weeks. The Aromas Community Baptist Church (P-27-002243) was constructed in 1899 and stood until approximately 1970. The community maintains its rural character and as of 2020 had a population of just over 2,700.

2.1.3 Previous Investigations

Staff conducted a records search of the project site and surrounding area using the California Historic Resources Inventory System (CHRIS) (Confidential Appendix C, CHRIS Background Data). Twenty studies have been conducted within a 0.25-mile radius, of which 15 overlap with the current project footprint (Table 1, Previous Studies Within a 0.25-Mile Radius). The 15 previously conducted studies on the project site include multiple studies prepared for four linear projects, the San Felipe Division of the Central Valley Project, the Gilroy/Morgan Hill Wastewater Plant and Outfall Project, the Pajaro Valley Water Management Agency Import Pipeline and Water Recycling Facilities Project, and the Qwest Network Construction Project.

Table 1. Previous Studies Within a 0.25-Mile Radius

Report ID	Title	Author	Year
S-003287	Preliminary Archaeological Reconnaissance for Timberline Sawmill, North of Aromas, San Benito County, California	Gary S. Breschini and Trudy Haversat	1980
S-005222	**Archaeological Impact Evaluation: San Felipe Division, Central Valley Project, Part I; The Southern Santa Clara Valley, California: A General Plan for Archaeology**	**Thomas F. King and Patricia P. Hickman**	**1973**
S-005222a	**Archaeological Impact Evaluation: San Felipe Division, Central Valley Project, Part II: The Direct Impact of San Felipe Division Facilities on Archaeological Resources**	**Thomas F. King**	**1973**
S-005222b	**A Preliminary Archaeological Surface Reconnaissance of the San Felipe Division, Central Valley Project, Santa Clara and San Benito Counties, California**	**Gary S. Breschini and Trudy Haversat**	**1978**
S-005222c	**Archaeological and Historical Investigations in Portions of the Central Valley Project, San Felipe Division**	**David M. Van Horn**	**1980**
S-006949	**Archival Study of the Cultural Resources Evaluation of the Gilroy/Morgan Hill Wastewater Plant and Outfall in the Counties of Santa Clara and Santa Cruzz**	**Robert Cartier**	**1985**
S-006949a	**Cultural Resource Evaluation of the Gilroy/Morgan Hill Long Term Wastewater Management Plan in the Counties of Santa Clara, Santa Cruz, and San Benito**	**Robert Cartier**	**1985**
S-006949b	**Addendum to the Cultural Resource Evaluation of the Gilroy/Morgan Hill Long Term Wastewater Management Plan in the Counties of Santa Clara, Santa Cruz, and San Benito**	**Robert Cartier**	**1985**
S-006949c	**Addendum 2, Cultural Resource Evaluation of the Gilroy/Morgan Hill Long Term Wastewater Management Plan in the Counties of Santa Clara, Santa Cruz, and San Benito**	**Robert Cartier**	**1985**
S-007210	An Archaeological Investigation of Assessor's Parcels Numbered 261-11-07, and 261-11-06 on Blohm Avenue, Aromas, Monterey County, CA.	Robert Stillinger and Jane Stillinger	1985
S-010935	Preliminary Cultural Resources Reconnaissance for a Parcel at Aromas Road and Blohm Avenue, Aromas, Monterey County, California	Gary S. Breschini and Trudy Haversat	1989
S-022860	Results of Phase I Archaeological Investigations with Recommendations for Cultural Resource Management APN 267-102-001, -014, -017, -025, and -026, 263 Carpenteria Road, Aromas, Monterey County, California	Larry F. Bourdeau	2000
S-027938	**Cultural Resource Survey for the Pajaro Valley Water Management Agency, Import Pipeline and Water Recycling Facilities: Final Report**	**Pacific Legacy, Inc.**	**2003**
S-027938a	**PVWA Import Pipeline, Additional Archaeological Survey, San Benito County (letter report)**	**John Holson**	**2004**
S-027938b	**PVWMA Import Pipeline Additional Archaeological Survey, Pajaro Valley (letter report)**	**John Holson**	**2004**

Table 1. Previous Studies Within a 0.25-Mile Radius

Report ID	Title	Author	Year
S-027938c	**PVWMA Import Pipeline Additional Archaeological Survey, Pajaro Valley (letter report)**	**Michelle C. St. Clair**	**2004**
S-032937	Preliminary Archaeological Reconnaissance of Assessor's Parcel 267-102-066, in Aromas, Monterey County, California	Mary Doane and Gary S. Breschini	2006
S-033061	**Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project, State of California**	**Nancy Sikes, Cindy Arrington, Bryon Bass, Chris Corey, Kevin Hunt, Steve O'Neil, Catherine Pruett, Tony Sawyer, Michael Tuma, Leslie Wagner, and Alex Wesson**	**2006**
S-033061a	**Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project, State of California**	**SWCA Environmental Consultants**	**2006**
S-033061b	**Final Report of Monitoring and Findings for the Qwest Network Construction Project (letter report)**	**Nancy E Sikes**	**2007**

Note: Bold = Study intersects with project site.

Two resources were previously recorded within the records search area (Table 2, Previously Recorded Cultural Resources Within a 0.25-Mile Radius). These resources consist of the locations of two historical structures in the community of Aromas—the Aromas Community Baptist Church and the Aromas School. The Aromas Community Baptist Church was demolished in 1970, and the Aromas School has been moved; no archaeological resources were identified in the search area. There are no known resources on the project site.

Table 2. Previously Recorded Cultural Resources Within a 0.25-Mile Radius

Primary Number	Trinomial	Chronological Placement	Site Type	Size
P-27-002243	N/A	Historic	Site of Historic Structure – Aromas Community Baptist Church	N/A
P-27-002244	N/A	Historic	Site of Historic Structure – Aromas School	N/A

Note: Bold = Study intersects with project site.
N/A = Not Applicable

2.1.4 Applicable Regulations

The project is subject to state and local laws and regulations as discussed below.

2.1.4.1 State Level Regulations

California Environmental Quality Act

According to the California Environmental Quality Act (CEQA), a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Public Resources Code (CRHR Section 5024.1; 14 CCR 4852), including the following:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to California Public Resources Code, Section 5020.1[k]), or not identified in a historical resources survey (meeting the criteria in Section 5024.1[g] of the CEQA Guidelines) does not preclude a lead agency from determining that the resource may be a historical resource as defined in California Public Resources Code, Section 5020.1(j) or 5024.1.

California Register of Historical Resources (California Public Resources Code, Section 5020 et seq.)

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code, Section 5020.1[j]). In 1992, the California Legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code, Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places criteria (California Public Resources Code, Section 5024.1[c]):

1. Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Resources less than 50 years old are not generally considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resources (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historical resources. The CRHR criteria are nearly identical to those for the National Register of Historic Places, and properties listed or formally designated as eligible for listing in the National Register of Historic Places are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The State Historic Preservation Officer maintains the CRHR.

California Health and Safety Code, Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code, Section 7050.5, requires that, if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County Coroner has examined the remains (California Health and Safe Code, Section 7050.5b). If the County Coroner determines or has reason to believe the remains are those of a Native American, they must contact the Native American Heritage Commission (NAHC) within 24 hours (California Health and Safe Code, Section 7050.5c). The NAHC will notify the most likely descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 24 hours of notification of the MLD by the NAHC. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

California Native American Graves Protection and Repatriation Act

In 2001, the California Legislature passed Assembly Bill (AB) 978, the California Native American Graves Protection and Repatriation Act of 2001, requiring all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items to provide a process for the identification and repatriation of these items to the appropriate Tribes. The bill also created a Repatriation Oversight Commission with oversight authority. The legislation intended to cover gaps in the federal Native American Graves Protection and Repatriation Act specific to California. After the Repatriation Oversight Commission remained unfunded for over a decade, the NAHC was granted oversight authority. The NAHC was given more responsibilities in 2018 under AB 2836 and in 2021 under AB 275. AB 2836 requires the NAHC to provide technical assistance to the University of California in implementing policies and procedures adopted to expedite repatriation of remaining items in its possession. AB 275 requires the NAHC to maintain a list of California Native American Tribes and their state aboriginal territories, adopt mediation procedures, and publish notices of completion of preliminary inventories and summaries on the NAHC website. Pursuant to California Health and Safety Code, Section 8013(a), the NAHC maintains a list of California Native American Tribes and their respective state aboriginal territories for the repatriation of Native American human remains and cultural items.

Native American Historic Resource Protection Act

California Public Resources Code, Section 5097 et seq., codifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. Section 5097.9 states that no public agency or private party on public property shall “interfere with the free expression or exercise of Native American Religion.” The code further states that:

> No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine . . . except

on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres.

2.1.4.2 County of San Benito

2035 County of San Benito General Plan

The Natural and Cultural Resources Element of the 2035 County of San Benito General Plan includes the following cultural resources goals (County of San Benito 2015).

- **Goal NCR-7.** To protect, preserve, and enhance the unique cultural and historic resources in the County
  - **NCR-7.9.** Tribal Consultation
    - The County shall consult with Native American tribes regarding proposed development projects and land use policy changes consistent with the State's Local and Tribal Intergovernmental Consultation requirements.
  - **NCR-7.11.** Prohibit Unauthorized Grading
    - The County shall prohibit unauthorized grading, collection, or degradation of Native American, tribal, archaeological, or paleontological resources, or unique geological formations.
  - **NCR-7.12.** Archaeological Artifacts
    - The County shall require an archaeological report prior to the issuance of any project permit or approval in areas determined to contain significant historic or prehistoric archaeological artifacts and when the development of the project may result in disturbance of a site. The report shall be written by a qualified cultural resources specialist and shall include information as set forth in the County's archaeological report guidelines available at the County Planning Department.

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Section 3 Methods

3.1 Survey Methods

The goal of this survey was to identify any archaeological resources that may be present. Shahira Ashkar, Harris & Associates archaeologist, conducted the survey on February 3, 2026. A records search was conducted for the project site, including a 0.25-mile buffer. In addition, the NAHC was contacted for a Sacred Lands File search.

The field survey was conducted using standard archaeological procedures and techniques. The survey area included the project site outlined on Figure 3, which included the entire 1.8-acre parcel and water pipeline alignment. North–south transects approximately 7 to 10 meters apart were walked throughout the main portion of the project site, which is in agriculture. The area was tilled but not planted, and visibility was excellent with 100 percent visibility. The water pipeline alignment is fully paved and was not surveyed. Construction crews were active along the alignment at the time of the survey.

The survey began at the southeast corner of the project site and proceeded in north–south transects to the west. One fragment of modern metal farm equipment measuring approximately a foot long was in the northwestern portion of the 1.8-acre parcel. Several river rocks were also noted, but none culturally modified (worked or battered). No cultural resources were identified during the survey.

The survey area was photographed (Appendix B) to document the environmental setting. A copy of the study will be submitted to the Northwest Information Center.

3.2 Historical Maps and Aerials

Historic aerial maps from 1952 through 2022 were reviewed on Historic Aerials (NETR Online 2026) and aerial photography between 1949 and 2025 were reviewed on Google Earth. The project site appears to have been planted in orchards between 1949 and 1981. Since 1982, the project has been planted in row crops, and remains so today. The nursery across the railroad and Quarry Road appears on aerials in the early 1970s. The Aromas Community Park appears on historical aerials in the early 1990s and was established in 1994.

3.3 Laboratory and Cataloging Procedures

No diagnostic artifacts were identified during the survey; therefore, artifact evaluation and documentation is not required.

3.4 Artifact Conveyance

Artifact conveyance is not required because no artifacts were identified during the survey.

3.5 Native American Outreach

The NAHC was contacted on October 9, 2025, for a Sacred Lands File check to determine if Sacred Lands are present on site. The NAHC response was negative for resources and recommended that the list of Tribes provided be contacted for more information. All Tribal bands on the list provided by the NAHC were contacted by email on January 26, 2026 (and letters followed in regular mail), for any information they may have regarding Sacred Sites that may be present on site (Confidential Appendix D, Sacred Lands File Search and Tribal Outreach). To date, one response has been received from the Amah Mutsun Tribal Band. In their response, they requested consultation due to the sensitivity of the area. They identified that they are not aware of any recorded Indigenous archaeological sites within the project area of potential effect, and requested that the project site be surveyed and a copy of the archaeological report provided when it is available. In addition, they asked for any information or analysis pertaining to the potential impact of the project on groundwater resources within the surrounding area.

Section 4 Report of Findings

The field survey of the project site was negative for the presence of archaeological resources.

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Section 5 Interpretation of Resource Importance and Impact Identification

5.1 Resource Importance

5.1.1 Archaeological Resources

No archaeological resources were identified during the field survey, nor are they expected to be present based on the disturbed nature of the project site and surrounding area.

5.1.2 Historical Resources

No historical resources are present within the project site.

5.1.3 Native American Heritage Resources/Traditional Cultural Properties

No information has been obtained from Native American outreach that any resources are present that would be considered culturally or spiritually significant. No Traditional Cultural Properties that currently serve religious or other community practices are known to exist on the project site. During the current archaeological evaluation, no resources were identified.

5.2 Impact Identification

No archaeological resources were identified during the field survey and the two previously recorded resources in the vicinity of the project site are sites where historical resources once stood. As such, no impacts would occur, and mitigation is not required. No further evaluation is recommended.

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Section 6 Management Considerations – Mitigation Measures and Design Considerations

Implementation of the project would result in no impacts to cultural resources. No mitigation measures or design considerations are recommended.

While there is no evidence of archaeological resources on the surface, it is always possible that buried resources are present on the project site. If any cultural materials or human remains are discovered during project construction, work will stop within 50 feet of the find until it can be evaluated by a qualified archaeologist. If human remains are discovered, work will stop and the coroner will be contacted in compliance with California Health and Safety Code 7050.5.

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Section 8 List of Preparers and Persons and Organizations Contacted

The following persons participated in the preparation of this report:

8.1 Harris & Associates

- Shahira Ashkar, Principal Investigator
- Donna Beddow, Archaeology Manager
- Janelle Firoozi, CEQA Project Manager

8.2 The following persons and and organizations were contacted:

- Ed Ketchum, Amah Mutsun Tribal Band
- Valentin Lopez, Amah Mutsun Tribal Band
- Delia Dominguez, Kitanemuk & Yowlumne Tejon Indians
- Katherine Perez, Northern Valley Yolut/Ohlone Tribe
- Timothy Perez, Northern Valley Yokut.Ohlone Tribe
- Bob Pennell, Table Mountain Rancheria
- Michelle Heredia-Cordova, Table Mountain Rancheria
- Felix Christman, Tule River Indian Tribe
- Kerri Vera, Tule River Indian Tribe
- Kenneth Woodrow, Wuksachi Indian Tribe/Eshom Valley Band

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Appendix A. Resumes

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Donna Beddow, RPA

ARCHAEOLOGY MANAGER

Donna Beddow is a Senior Archaeologist with over 25 years of practical experience managing or part of multi-disciplinary teams. She specializes in cultural and tribal cultural resources, and has extensive experience with Native American consultation including AB-52, SB-18, AB-130, and Sacred Lands. The majority of her career has been for the County of San Diego as a Senior Staff Archaeologist and Environmental Coordinator. She served as the County of San Diego Historic Site Board liaison and managed the County's cultural program. Her Master's thesis was used as the model for the development of the County's Significance Guidelines for Cultural Resources. These guidelines have been used by other lead agencies and environmental organizations, and are still used by the County of San Diego.

Her 25 plus years of experience include the review and preparation of CEQA documents. She has managed highly complex projects involving sensitive or difficult environmental issues; resolved major project issues and public controversies though applicant engagement and coordination with the general public and tribes. Ms. Beddow has reviewed and prepared cultural resource studies and CEQA documents for both private and public development projects.

EDUCATION

MA, Anthropology, San Diego State University, 2004

BA, History, San Diego State University, 1997

QUALIFICATIONS

Register of Professional Archaeologists

Meets Secretary of Interior's Professional Qualifications in Archaeology and History

RELEVANT EXPERIENCE

- **Port of San Diego,** *Harbor Park,* April 2025 to Present. Harris assisted the Port of San Diego with a Section 106 consultation for grant funding to assist with the redevelopment of Harbor Park. As Principal Investigator, responsibilities included conducting a background search that relied on the CHRIS system, sacred lands files, inventories, historic maps, and historic registers. In addition, tribal outreach, a site survey to identify previously recorded and new sites, and preparation of a cultural resources technical report and Section 106 documents (Area of Potential Effect, Findings of No Effect) were completed. The evaluation relied in part on the Chula Vista Bayfront Master Plan Final EIR (2010).
- **County of Monterey**, *General Plan Housing Element Sixth Cycle (2023-2031) Update,* August 2024 to Present. Harris assisted with the preparation of the cultural technical study and Program EIR for the Sixth Cycle Housing Element. As Principal Investigator, responsibilities included the management of the cultural and tribal cultural resources requirements for the project. Duties included the preparation of the cultural technical study including sensitivity maps, and the cultural and tribal cultural resources sections of the EIR which required the identification of impacts and appropriate mitigations.
- **San Diego Unified School District,** *Central Elementary,* March 2025 to Present. Harris assisted San Diego Unified School District with the cultural evaluation for the redevelopment of the existing school site with residential and community-serving facilities. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **Watsonville Headworks,** October 2024 to Present. Harris assisted the City of Watsonville with the cultural evaluation for improvements to the Watsonville Wastewater Treatment Facility. Federal funding for the project was being sought; therefore, a Historic Properties Identification Report (HPIR) was required for compliance with the National Historic Preservation Act. Responsibilities included conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, because the project site had been previously developed and historically disturbed, a desktop survey was conducted and the HPIR was prepared.
- **Liekweg Residence,** July 2024 to December 2025. Harris provided cultural monitoring for the excavation of two planters as required by the City of San Diego due the high sensitivity of the project site. Archaeological and tribal monitoring was

provided during construction that required tribal coordination. During monitoring resources were identified, and through coordination with the tribe and City staff, wet screening of soils was conducted to identify any artifacts and/or ecofacts. Identified resources were further evaluated at the Harris lab for artifact class, material type, artifact type, use wear/modification, and measurements. Tribal coordination was required to determine the final conveyance of artifacts. A monitoring report was prepared that included a description of the significance of the find.

- **San Diego Unified School District,** *Chesterton Elementary,* November 2023 to February 2025. Harris assisted the San Diego Unified School District (District) with a Section 106 consultation for the redevelopment of the Chesterton Elementary School. As Principal Investigator, responsibilities included conducting a background search that relied on the CHRIS system, sacred lands files, inventories, historic maps, and historic registers. The project also required tribal outreach, a site survey to identify resources, and preparation of a cultural resources technical report and Section 106 documents (Area of Potential Effect, Findings of No Effect).
- **City of Los Alamitos***, 4665 Lampson,* November 2023 to Present. Harris assisted the City of Los Alamitos with the review of the draft Project EIR, technical studies, and mitigation monitoring and reporting program (MMRP). Responsibilities include peer reviewing and revising the cultural and tribal cultural sections of the draft EIR, and cultural and historic studies for adequacy under CEQA and other applicable federal, state, and local requirements, and determine if the documents provide substantial evidence for impact determinations.
- **City of San Marcos,** *CEQA On-Call Consultant Services* (*Woodward 46 Specific Plan, Pico Avenue),* October 2023 to Present. Harris assisted the City of San Marcos with the review of environmental documents and technical studies. In addition, Harris has provided survey and report preparation for various projects. Responsibilities include peer reviewing and revising the cultural and tribal cultural sections of draft environmental documents and cultural studies for adequacy under CEQA and other applicable federal, state, and local requirements, and for consistency and compliance with project plans. In addition, as Principal Investigator, responsibilities include conducting background searches that relied on the CHRIS system, sacred lands file checks and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. Furthermore, a site survey to identify previously recorded and new sites was conducted, coordination with Native American monitors, and preparation of cultural resources technical reports.
- **University of California at San Diego (UCSD)**, *Rancho Bernardo Healthcare Center Medical Office Building*, September 2023 to Present. Harris assisted UCSD with the preparation of a Mitigated Negative Declaration (MND) for the development of a healthcare campus on a 9.81-acre site. As Principal Investigator, responsibilities consisted of a desk top evaluation of the project which included conducting a background search that relied on the CHRIS system, review of historic maps, and historic registers including the National, California, and local registers, a sacred lands file check and tribal outreach, and preparation of the cultural and tribal cultural resources section of the MND. Harris also assisted UCSD with the preparation of AB 52 tribal outreach letters and assisted with consultation tasks such as coordinating meetings and responding to tribes.
- **County of San Bernardino,** *CEQA On-Call Consultant Services,* September 2023 to Present. Harris assisted the County of San Bernardino with the review of environmental documents (EIR, MND, ND) and technical studies. Responsibilities include peer reviewing and revising the environmental documents and technical studies for adequacy under CEQA and other applicable federal, state, and local requirements, and for consistency with the County's General Plan. In addition, Harris assisted the County with AB-52 consultation. Specifically, Harris, prepared and tribal outreach information letters, responded to tribal comments received, and coordinated with the County on government-to-government consultation.
- **County of Santa Cruz,** *Buena Vista Drive Repairs,* August 2023 to Present**.** Harris assisted the County of Santa Cruz with the cultural evaluation for improvements to Buena Vista Drive. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **City of Gilroy,** *StorQuest,* July 2023 to October 2023**.** Harris assisted the City of Gilroy with the cultural evaluation for the development of a self-storage facility. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **City of Coronado,** *Housing Element Update,* May 2023 to Present*.* Harris assisted the City of Coronado with the preparation of the Housing Element Update and a Programmatic Environmental Impact Report (PEIR). As Principal Investigator, responsibilities include a desk top evaluation of the project which included conducting a background

search that relied on the CHRIS system, review of historic maps, and historic registers including the National, California, and Coronado registers. Harris also assisted Coronado with the preparation of AB 52 tribal outreach letters.

- **City of Napa,** *The Grange Campground,* March 2023 to Present**.** Harris assisted the City of Napa with the cultural evaluation for the development of a campground complex. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **City of San Diego,** *Coastal Resiliency Master Plan & PEIR,* February 2023 to Present. Harris is assisting the City in the development of the Coastal Resilience Master Plan and PEIR to implement Climate Resilient San Diego. The team evaluated nine locations for nature-based solutions and narrowed the scope down to the six most suitable locations. As Principal Investigator, responsibilities include conducting a background search that relies on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National, California, and City of San Diego Registers. In addition, site surveys to identify previously recorded and new sites, and preparation of a cultural resources technical report was prepared. The Plan and PEIR will implement Climate Resilient San Diego to inform development of nature-based coastal resilience projects to build resilience to the impacts of sea level rise and enhance and protect the biological diversity of the City's coastline.
- **City of Chula Vista,** *Otay Ranch Town Center,* December 2022. Harris assisted the City of Chula Vista with the review of the CEQA Addendum and technical studies. Responsibilities include peer reviewing and revising the cultural section of the CEQA Addendum and the cultural and paleontological studies for adequacy under CEQA and other applicable federal, state, and local requirements, and for consistency with project plans, and the City's General Plan, and for technical accuracy.
- **City of Pacific Grove,** *Capital Improvement Project for Wastewater Collection System Phase 9,* October 2022 to Present**.** Harris assisted the City of Pacific Grove with the cultural evaluation for improvements to the wastewater collection system. Responsibilities included conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **Port of San Diego,** *Sweetwater Park,* July 2022 to Present. Harris assisted the Port of San Diego with a Section 106 consultation for grant funding to assist with the development of Sweetwater Park. In addition, Harris also provided monitoring services during construction. As Principal Investigator, responsibilities included conducting a background search that relied on the CHRIS system, sacred lands files, inventories, historic maps, and historic registers. In addition, tribal outreach, a site survey to identify previously recorded and new sites, and preparation of a cultural resources technical report and Section 106 documents (Area of Potential Effect, Findings of No Effect) were completed. The evaluation relied in part on the Chula Vista Bayfront Master Plan Final EIR (2010). Furthermore, archaeological and tribal monitoring was provided during construction that required tribal coordination, and included data recovery for identified resources. Consultation and coordination with tribes was conducted for the conveyance of artifacts that resulted in the reburial of artifacts onsite.
- **CH Realty,** Perris Valley Industrial Project – City of Perris*,* March 2022 to Present**.** Harris conducted the cultural evaluation for the development of an industrial building. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **County of San Diego, HUD Cultural Evaluations,** February 2022 to Present. Harris assisted the County of San Diego with the cultural evaluation of development sites that are applying for federal funding. Development sites include individual mobile homes, park acquisition sites, sidewalk and ADA access improvements, and vacant land. As Principal Investigator, responsibilities included conducting a background search that relies on the CHRIS system, historic maps, and historic registers including the National, California, and County of San Diego Registers. In addition, cultural surveys were conducted and preparation of required documentation for Section 106 consultation.
- **City of Watsonville,** *Climate Action and Adaptation Plan,* September - December 2021. Harris assisted the City of Watsonville with the preparation of the Climate Action and Adaptation Plan including a Negative Declaration. As part of the project, tribal consultation pursuant to SB 18 was required. Harris prepared the SB 18 tribal outreach letters, and assisted with consultation tasks such as coordinating meetings and responding to tribes.

- **City of Victorville, *General Plan Update,*** March 2020 – January 2022. Harris assisted the City of Victorville with the preparation of the General Plan Update which included updates to the Housing and Land Use Elements, as well as the Programmatic EIR. Harris prepared AB 52 and SB 18 tribal outreach letters and assisted with consultation tasks such as coordinating meetings and responding to tribes.
- **County of San Diego,** *Live Oak Springs Water System Improvements Project,* April 2021 to May 2024. Harris assisted the County with the biological and cultural evaluations for improvements to the potable water system on approximately 74 acres in the community of Live Oak Springs. In addition, Harris provided archaeological and tribal monitoring during project construction. As Principal Investigator, responsibilities included conducting a background search that relied on the CHRIS system, sacred lands files, inventories, and historic maps. In addition, tribal outreach, a site survey to identify previously recorded and new sites, preparation of a cultural resources technical report, and coordination with the Native American monitor was completed. Furthermore, archaeological and tribal monitors were provided during construction that required tribal coordination, and data recovery was conducted for identified resources.
- **County of San Diego Planning & Development Services,** *Project Staff Support Services,* March 2021 to Present**.** Harris' support services cover technical expertise of CEQA resource areas including, but not limited to, CEQA documentation, biological resources, cultural resources, and noise. Services include reviewing EIRs, MNDs, NDs, 15183 checklists, addendums, categorical exemptions, and other CEQA documentation. The Harris team also conducts research and prepares reports and environmental documentation, project mitigation measures, conditions of approval, and project alternatives. As Principal Investigator, responsibilities consist of providing support services for the cultural resources subject area. Duties include cultural resource evaluations, review and preparation of cultural reports, conducting cultural surveys, and engaging in tribal consultations (Sacred Lands, AB-52, and SB-18). In addition, consulting with tribes post-project approval has been conducted to determine appropriate mitigations when projects are not in compliance with permit requirements.
- **County of San Diego Department of Public Works,** *Environmental Staff Support Services,* March 2021 to Present**.** Harris assisted the County of San Diego with cultural evaluations for public projects. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **City of Escondido,** *Program EIR for Sixth Cycle Housing Element and Land Use/Zoning***.** Harris assisted the City of Escondido with the preparation of the Program EIR for the Sixth Cycle Housing Element. As Principal Investigator, responsibilities included the management of the cultural and tribal cultural resources requirements for the project. Duties included the preparation of the cultural and tribal cultural resources sections of the EIR which required the identification of impacts and appropriate mitigations. In addition, tribal outreach letters pursuant to AB 52 and SB 18 were prepared for the City, and Harris coordinated with the City on deliverables.

Shahira Ashkar, RPA

ENVIRONMENTAL PROJECT MANAGER/ARCHAEOLOGIST

Shahira is a senior project manager and director, and archaeologist with nearly 30 years of experience in environmental consulting in California. Shahira has extensive experience conducting historic research, conducting pedestrian inventories and evaluating cultural resources for eligibility in state and local registers. She has conducted test and data recovery excavations and has experience with the California Environmental Quality Act (CEQA) and Section 106 of the National Historic Preservation Act (NHPA). Shahira also manages projects and has experience working with federal, state, and local agencies and applicants to support CEQA and NEPA compliance for development, planning, and infrastructure projects.

RELEVANT EXPERIENCE

- **Western Area Power Administration,** *Cottonwood-Roseville Line Archaeological Services.* Shahira served as project manager for the cultural resources survey and monitoring of powerline pole replacement and rewiring on a 140-mile alignment between Roseville and Cottonwood, California. She prepared site record update and evaluated prehistoric site, supervised and facilitated survey of approximately 70 helicopter landing zones, flagging of more than 40 sites, and survey of construction of towers and stringing of wire.
- **City of Rohnert Park,** *University District Specific Plan EIR*. Shahira served as lead archaeologist for this EIR to analyze impacts of the development of the parcel. She conducted pre-field research and field surveys and created mitigation measures to reduce impacts on prehistoric archaeological resources to a less-than-significant level. The project was completed on schedule and within budget.
- **Oak Canyon Ranch LLC, Copperopolis,** *Regulatory Compliance for Calaveras 3,250-Acre Development for Oak Canyon Ranch*. Shahira led the Section 106 compliance for this development project. She updated inadequate recordation for CEQA completed by another consultant. She also conducted presence absence testing and completed resources evaluations.
- **City of Roseville,** *Longmeadow Park Project*. Shahira served as lead cultural resources manager for this park development project in Roseville. She conducted research and survey. She also prepared technical study and section for environmental document.
- **City of Roseville,** *Foothills Business Park Bike Trail IS/MND*. Shahira served as lead archaeologist for this proposed bike trail extension along a drainage in Roseville. She conducted pedestrian inventory and met with Native American representatives in compliance with Section 106 triggered by need for a Section 404 permit. Cultural material was located outside project APE and avoidance and minimization measures were negotiated between the City and the Native American representatives.
- **El Dorado Irrigation District**, *Natoma Ditch NRHP and CRHR Archival Research*. Shahira managed the project to evaluate potential impacts to a segment of the Natoma Ditch around Folsom Lake. She coordinated and peer reviewed archival research to evaluate the resource for eligibility for listing in state and federal registers. She also worked closely with EID to

EDUCATION

MA, Anthropology (Archaeology emphasis)

BA, Anthropology (Archaeology emphasis)

CERTIFICATION

Register of Professional Archaeologists (RPA), No. 12243

AFFILIATIONS

Member, Association of Environmental Planners (AEP)

Member, WTS International (WTS)

evaluate significance of the resource and assess impacts of project to improve a water line.

- **Los Angeles Department of Water and Power, Inyo County,** *Owens Lake Phase IV and V Surveys*. Shahira managed the cultural resources survey of approximately 2000 acres of the Phase IV and Phase V project area of the dust mitigation project at Owens Lake. She evaluated significance of several historic resources including the Swansea Pier. Shahira assessed impact to the Natural Soda Products Company Historic District and suggested mitigation measures. She also coordinated efforts with client and interested Native American groups. These projects were completed on schedule and within budget.
- **Three Rivers Levee Improvement Authority, Marysville,** *Bear River Levee and Western Pacific Interceptor Canal Levee Improvement Project*. Shahira managed the cultural resources surveys and evaluations along the levees. She served as lead archaeologist and field director for archaeological testing and evaluation of prehistoric archaeological sites and within the levee footprint. Shahira worked with Native American representative and most likely descendants, including presentation to the Butte Tribal Council, due to the presence of human remains. She also coordinated efforts of subconsultants, Native American monitors, USACE, and landowners to complete test excavations and evaluations within project schedule.
- **City of Clovis,** *Sewage Treatment/Water Reuse Facility Program*. Shahira managed the archaeological inventory and programmatic analysis of a proposed water reuse facility and distribution lines for the City of Clovis. She prepared technical report and EIR section.
- **City of Lincoln,** *Lincoln Wastewater Treatment Plan EIR*. Shahira served as lead cultural resources specialist for this compliance effort involving expansion of the existing WWTP and construction of a new WWTP between 1998 and 2002. Resources recorded and/or evaluated included farmsteads, historic buildings, and remains of a World War II debarkation facility for Japanese-Americans being transported to internment camps.
- **US Air Force, San Bernardino and Kern Counties,** *Evaluation of 62 Historic Period Sites at Edwards Air Force Base*. Shahira performed an evaluation of 62 historic period sites located near the Air Force Research Laboratory. She conducted relocation of sites, mapping, testing, and archival research; and evaluated the resources.
- **US Air Force, San Bernardino and Kern Counties,** *Evaluation of Edwards Air Force Base, South Base (EAFB 291)*. Shahira performed mapping, test excavation, and evaluation of the World War II-era Muroc Army Air Base. She conducted mapping using a mated laser technology incorporated impulse laser rangefinder and MapStar digital compass. Shahira used GPS units to plot site data points.
- **Forest Service, Mt. Hough District, Plumas National Forest**, *Cultural Resources Inventory, Watersheds 23 and 24*. Shahira conducted a cultural resources survey of 1,600 acres on the Plumas National Forest. She recorded numerous historic period sites associated with mining and timber harvesting.

Appendix B. Photographs

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Photograph 1: Southwest corner of project. View to the east.

Photograph 2: Southwest corner of project site. View to the northeast.

Photograph 3: Southeast corner of project. View to the north.

Photograph 4: East side of project. View to the northwest.

Photograph 5: Farm equipment.

Photograph 6: West side of project. View to the northeast.

Photograph 7: West side of project. View to the east.

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Confidential Appendix C. CHRIS Background Data

Under Separate Cover – Refer to Confidential Appendices

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Confidential Appendix D. Sacred Lands File Search and Tribal Outreach

Under Separate Cover – Refer to Confidential Appendices

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Appendix D. Geotechnical Investigation

GEOTECHNICAL INVESTIGATION

AROMAS WATER DISTRICT
DRISCOLL WELL AND PUMP STATION
MONTEREY COUNTY, CALIFORNIA

FOR
LUHDORFF & SCALMANINI CONSULTING ENGINEERS
WOODLAND, CALIFORNIA

Pacific Crest
ENGINEERING INC

CONSULTING GEOTECHNICAL ENGINEERS

25113-M85-B62
MARCH 2026
www.4pacific-crest.com

Appendix E. Well Siting Study

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Luhdorff & Scalmanini
Consulting Engineers

January 15, 2026
File No. 24-5-207

Shaminder Kler
State Water Resources Control Board
Division of Drinking Water
1 Lower Ragsdale
Building 1, Suite 120
Monterey, CA 93940

SUBJECT: REQUEST FOR WELL SITING AND DESIGN CONCURRENCE FOR THE AROMAS WATER DISTRICT DRISCOLL WELL – AROMAS, CALIFORNIA

Dear Mr. Shaminder

On behalf of the Aromas Water District (District), Luhdorff & Scalmanini Consulting Engineers (LSCE) is seeking concurrence from your office regarding the location and design elements of the planned Aromas Water District Driscoll Well to be constructed as a community supply well for the District. The well site and the production well design details are described below. Attachments to this letter include a well location map, monitoring well as-built profile, monitoring well water quality summary, proposed production well profile, proposed well site map, preliminary DWSAP, and FEMA Flood Hazard Map.

Separate permit applications for the construction of the pump station and use of the well, in addition to any CEQA documentation required, will be submitted at a later date.

Aromas Water District Driscoll Well

The Aromas Water District Driscoll Well is a proposed community supply well to be constructed in Aromas, CA (**Sheet 1**) by the District. The well will be constructed to supplement the District's current inventory of groundwater supply wells to ensure it can meet current and future water demands. LSCE is assisting the District with the investigation, design, permitting, construction, and commissioning of the new well and pump station. The new well and pump station will be incorporated into the District's existing water distribution system, and as such, the District is actively participating in the design of the well station.

Site Investigation

A test hole was drilled at the proposed well site to a depth of 1,000 feet in January of 2025 to gather lithologic and geophysical data to be used to characterize subsurface materials. LSCE identified intervals of coarse-grained materials that could be targeted for completion in a production well between approximately 780 and 840-feet below ground surface (bgs). LSCE also identified multiple fine grained (clay) intervals between the coarse-grained intervals from 0-760 feet bgs that isolate the coarse-grained intervals (**Sheet 2**).

The test hole was reamed to accommodate the installation of three, 2-inch diameter, PVC piezometers (**Sheet 2**) that allowed for monitoring of water levels and collection of water quality samples in discrete zones. The screen depths of each piezometer are as follows:

Piezometer	Total Depth (ft bgs)	Screen Intervals (ft bgs)
MW-385	385	370-380
MW-835	835	820-830
MW-925	925	910-920

Water samples were collected for analysis from the piezometers in March of 2025. A summary table (**Table 1**) of the water quality analysis of samples collected from the piezometers is attached. In MW-385 and MW-835, specific conductance and total dissolved solids (TDS) were above the recommended concentration limit, but below and their respective maximum contaminate levels (MCL). In MW-925, chloride and total dissolved solids (TDS) were above the recommended concentration limit, but below and their respective MCL**.** Odor and specific conductance exceeded the MCL in MW-925. Manganese concentrations were above the MCL is all three piezometers. Well head treatment will be utilized to reduce the concentration constituents exceeding Title 22 Water Quality limits.

Well Location

The proposed well site (**Sheet 3**) is currently a field for growing strawberries bounded by Southern Pacific Railroad tracks and Quarry Road on the south and Rogge Lane/Carpenteria Road on the west. The proposed well location is approximately 110-feet northeast of a storm drain line located in Carpenteria Road. The nearest storm drain inlet is located approximately 260-feet southwest of the proposed well location located on the southwest corner of the intersection Aromas and Carpenteria Road (**Sheet 3**). No other sanitary features requiring minimum septation distances from the well were identified.

The minimum control zone radius around the well per Division of Drinking Water requirements is 50 feet to protect against vandalism, tampering, or other threats due to system ownership, easement, or zoning. The layout of the proposed well location maintains a 50-foot control zone around the well. The proposed well station components will be housed in a CMU block building and the well site will be encircled by a lockable security fencing which will provide effective protection from vandalism and tampering. In the event that changes to land use were proposed to the areas surrounding the well site, the District would have input on and the ability to restrict development activities that could pose a threat to the well.

Based on the Federal Emergency Management Administration (FEMA) flood hazards map, the proposed well site is not within a mapped flood hazard zone (**Attachment 1**).

New Production Well Design

Based on the site-specific investigation, LSCE prepared a preliminary well design (**Sheet 4**). The proposed 16-inch diameter, stainless steel well will be constructed to a depth of 850 feet and will be screened between 780 and 840 feet bgs. The well will be constructed with a conductor casing and sanitary seal to a depth of 70 feet bgs. An annular seal will be placed from ground surface to a depth of 400 feet bgs where it will terminate 20 feet into a clay zone that extends from 380 to 440 feet bgs.

Preliminary DWSAP

A preliminary Drinking Water Source Assessment Protection (DWSAP) Program was prepared for the Driscoll Well (**Attachment 2**). A maximum flow rate of 700 gallons per minute (gpm) was used to determine the maximum potential capture zone as required in the DWSAP. The Physical Barrier Effectiveness score for the proposed Driscoll Well was 80 (High).

On behalf of the Aromas Water District, LSCE requests concurrence from your office with regards to well siting and concurrence on the design of the new Aromas Water District Driscoll Well. We will be happy to respond if you have questions or require further information regarding the well project.

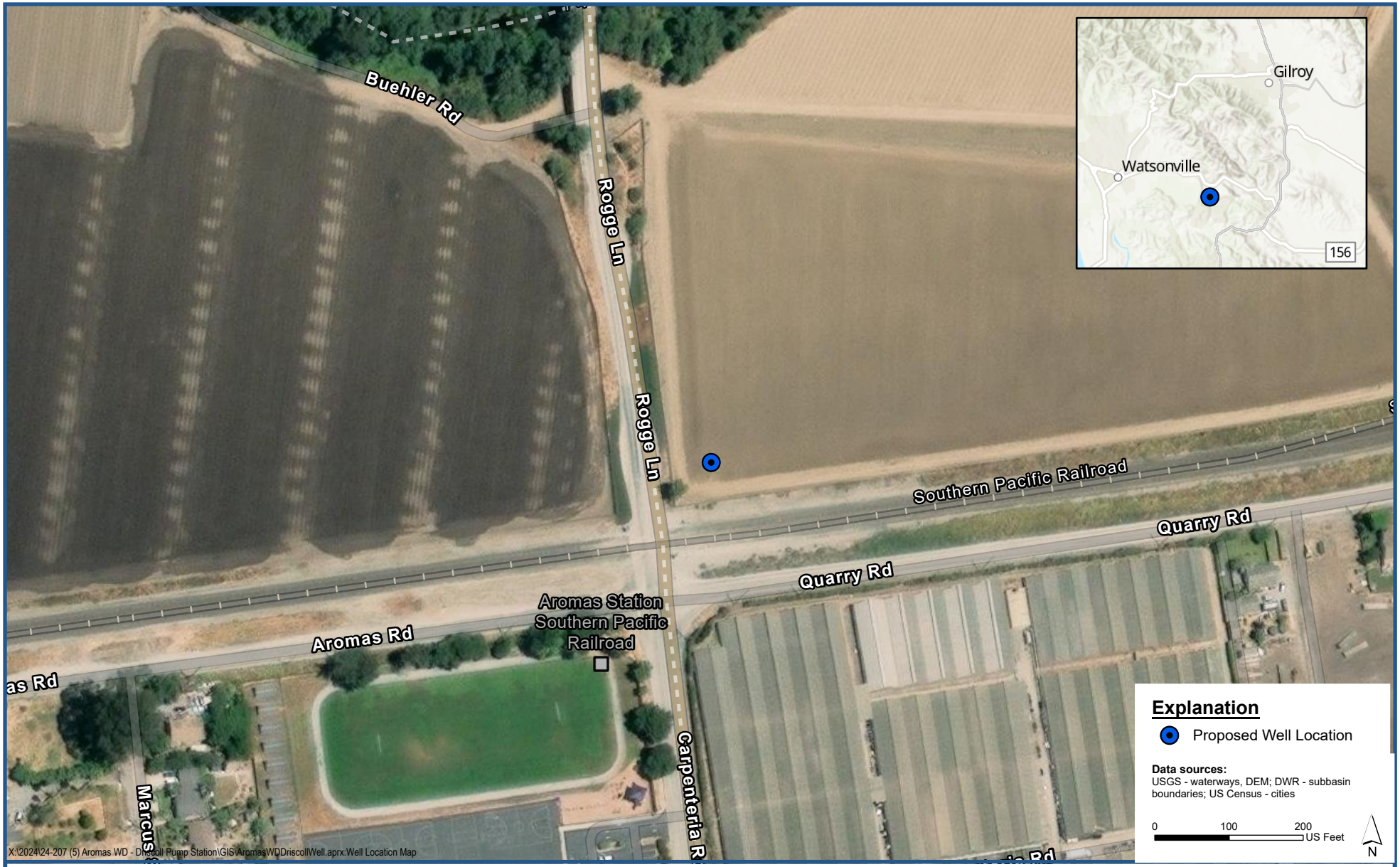
Sincerely,

LUHDORFF AND SCALMANINI
CONSULTING ENGINEERS

Scott Lewis, P.G.
Senior Principal Geologist

CC: Robert Johnson, CSMD
General Manager
Aromas Water District

Attachments: Sheet 1 – Location Map
Sheet 2 – Lithologic Log and Monitoring Well As-Built Profile
Sheet 3 – Driscoll Well Site Map
Sheet 4 – Proposed Driscoll Production Well Design
Table 1 – Monitoring Well Water Quality Summary Table
Attachment 1 – FEMA Flood Map
Attachment 2 - Preliminary DWSAP



Luhdorff & Scalmanini
Consulting Engineers

Well Location Map

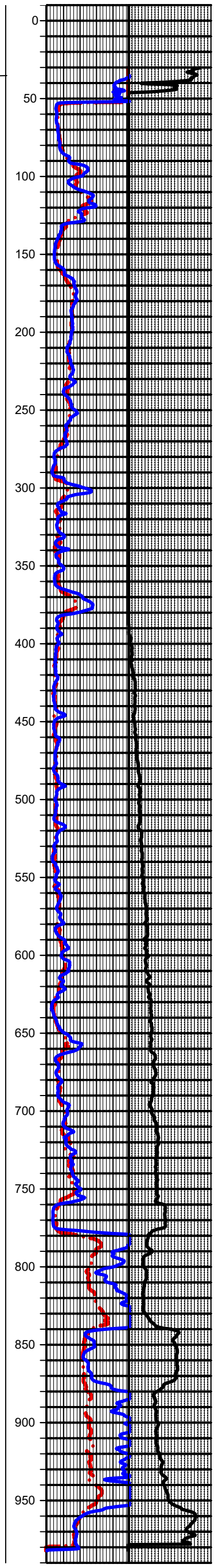
Driscoll Well
Aromas Water District, Aromas, CA

Figure X-X

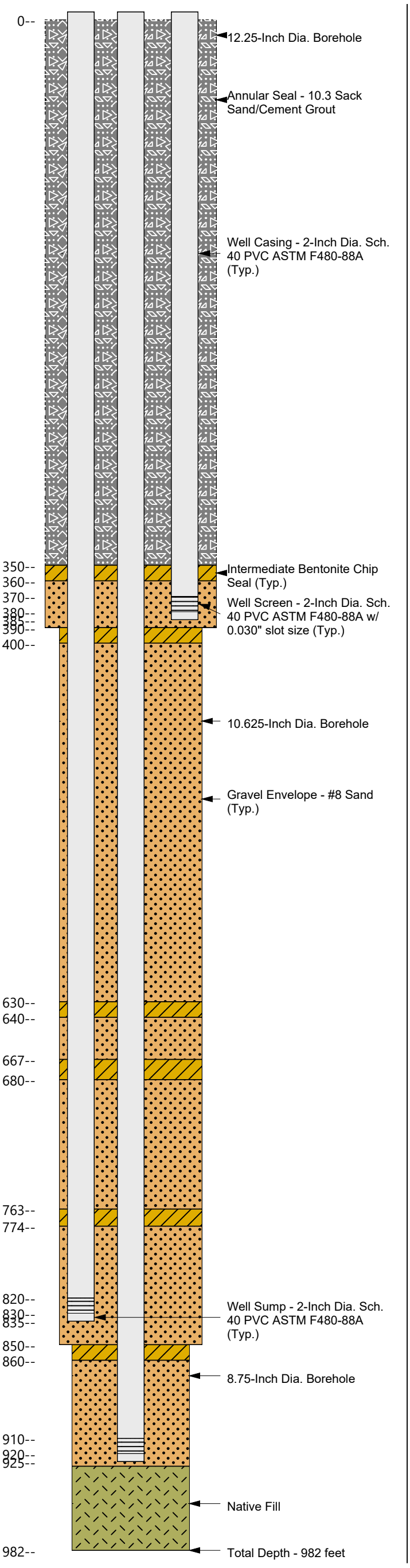
Client: Aromas Water District	**Lat/Long:** 36.8923736 / -121.6434722
Project Name: Driscoll MW	**GSE (ft-msl)** 5±
LSCE #: 21-2-141	**Drill Date:** 1/27/2025 - 2/4/2025
Location: Aromas, CA	**Drilling Method:** Direct Rotary
Geologist: NP	**Driller:** Bradley and Sons

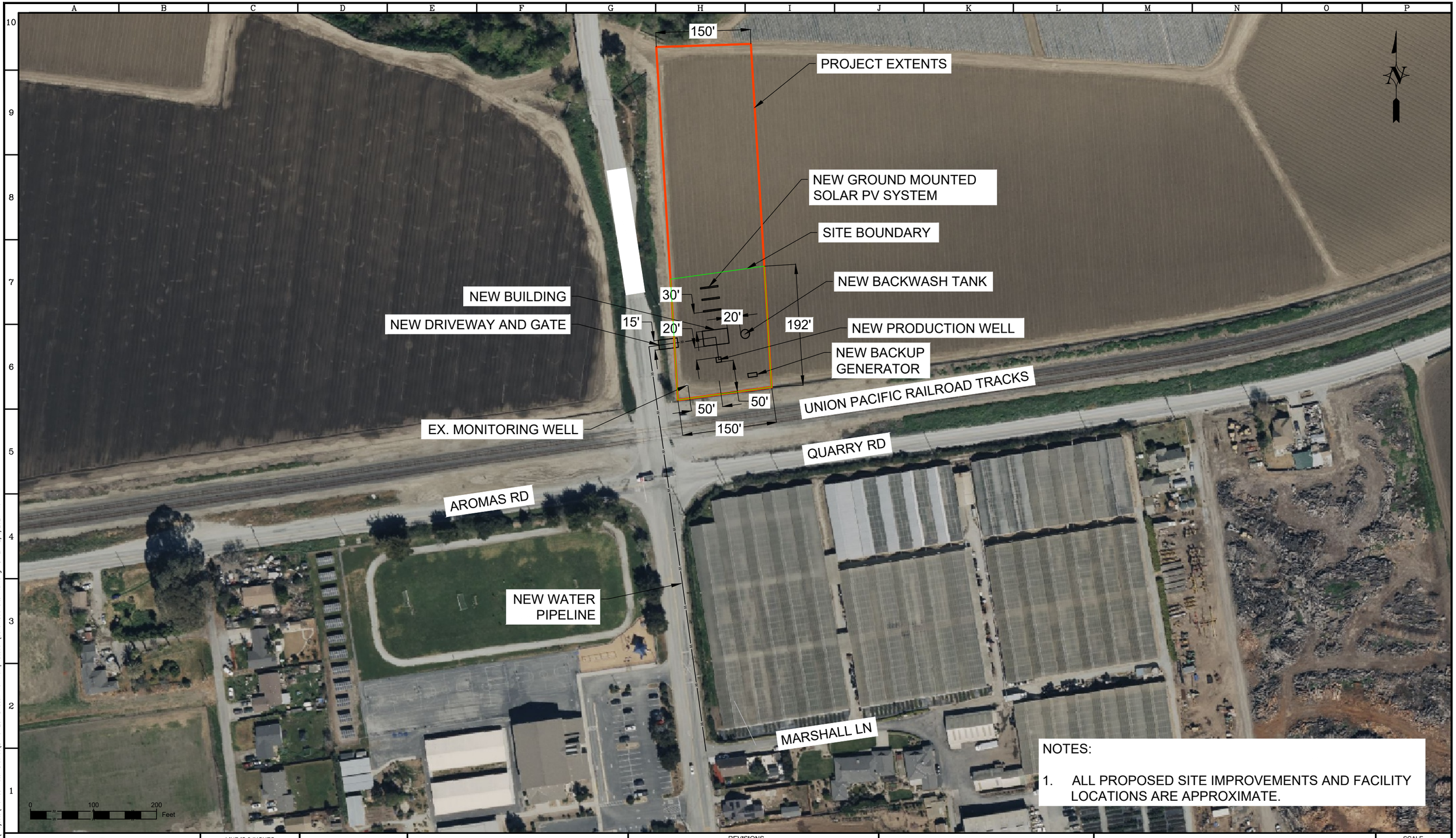
Luhdorff & Scalmanini
Consulting Engineers

Depth (ft bgs)	Lithologic Description	Strat-Column
0		
	Clay - Medium-high plasticity, brown	
50		
100	Sand - Fine-coarse, subrounded	
	Sandy Gravel - Rounded to subrounded, moderately sorted, up to 1/4" gravel, poorly sorted, fine-medium sand	
	Clay - Low plasticity, brown clay	
150		
	Sand - Fine, well sorted, black/brown	
	Clayey Sand - Fine, well sorted sand, low plasticity, light brown clay	
200		
250		
	Clay - Medium plasticity, white	
300	Clayey Sand - Medium sand, low plastic, blue clay	
	Clay - Medium plasticity, blue/white	
350		
	Clay w/sand - Low plasticity, sticky, tan clay, fine sand	
	Clay - Medium plasticity, tan	
400		
450	Clay w/sand - Medium plasticity, tan clay, medium-fine sand	
500		
550		
	Clay - Low-medium plasticity, blue	
600	Sandy Clay - Medium plasticity, blue clay with medium-fine sand	
650		
	Sand w/clay - Fine sand w/ low plasticity, blue clay streaks	
	Clay w/sand - Low plasticity, blue clay, fine sand	
700		
	Clay w/sand - Medium plasticity, black/blue clay, fine sand	
750		
	Clay - Medium plasticity, black clay	
	Sand, Mudstone, Clay - Medium-coarse, moderately sorted sand w/shells, poorly indurated orange mudstone, medium plasticity brown clay	
800		
850	Clay, Sand, Mudstone - Medium plasticity, brown clay, medium-coarse moderately sorted sand, poorly indurated orange mudstone	
	Mudstone, clay, sand, siltstone - Poorly indurated orange mudstone, medium plasticity clay, poorly indurated green siltstone	
900		
950		
	Mudstone, Siltstone, Clay - Poorly indurated orange mudstone, poorly indurated green siltstone, medium plasticity brown clay	



As-Built Well Profile





NOTES:

1. ALL PROPOSED SITE IMPROVEMENTS AND FACILITY LOCATIONS ARE APPROXIMATE.

C:\D FILE: Z:\S -C-D Dropbox\Projects\-romas Water District\24-5-207 Driscoll Well Pump Station\Schematic Site Plan.dwg D-TE: 12/6/2024 1:04 PM

LINE IS 2 INCHES AT FULL SIZE (IF NOT 2"-SCALE ACCORDINGLY)

FILE Schematic Site Plan.dwg
DRAWN RM
DESIGNED AK
CHECKED OS
DATE AUGUST 2025

THIS DRAWING IS NOT VALID FOR CONSTRUCTION PURPOSES UNLESS IT BEARS THE SEAL & SIGNATURE OF A DULY REGISTERED PROFESSIONAL

Luhdorff & Scalmanini
Consulting Engineers

REVISIONS

ZONE	REV.	DESCRIPTION	BY	DATE	APP.

AROMAS WATER DISTRICT
DRISCOLL WELL PUMP STATION
SAN BENITO COUNTY, CA

SUBMITTED: _____ DATE: _____

SUBMITTAL APPROVED: _____ DATE: _____

SCHEMATIC SITE PLAN & PROJECT EXTENTS

SCALE
1" = 70'

DRAWING NUMBER

SHEET NUMBER
_____ OF _____

Client: Aromas Water District	**Lat/Long:** 36.8923736 / -121.6434722
Project Name: Driscoll Site	**GSE (ft-msl)** 5±
LSCE #: 21-2-141	**Drill Date:** TBD
Location: Aromas, CA	**Drilling Method:** Reverse Rotary
Geologist: NP	**Driller:** TBD

Luhdorff & Scalmanini
Consulting Engineers

Depth (ft bgs)	Lithologic Description	Strat-Column
0		
50	Clay - Medium-high plasticity, brown	
100	Sand - Fine-coarse, subrounded	
150	Sandy Gravel - Rounded to subrounded, moderately sorted, up to 1/4" gravel, poorly sorted, fine-medium sand	
	Clay - Low plasticity, brown clay	
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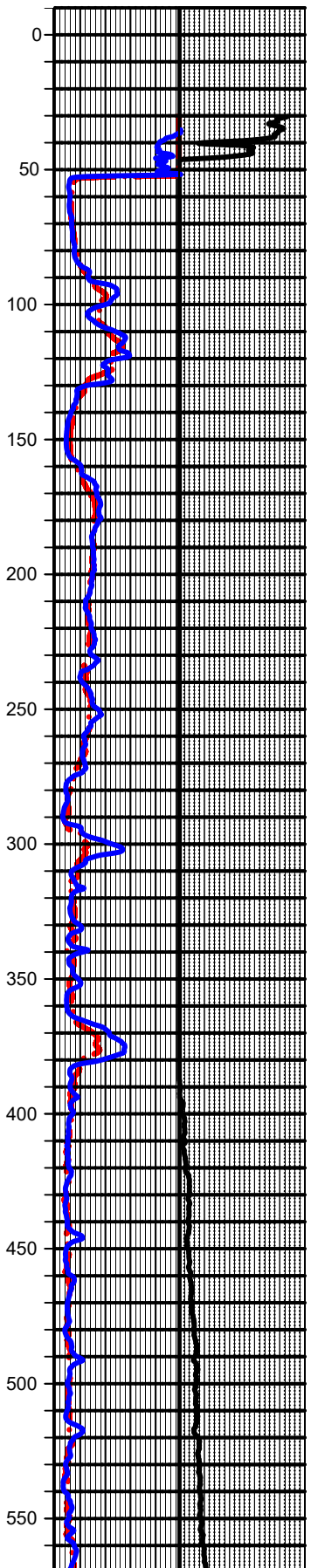
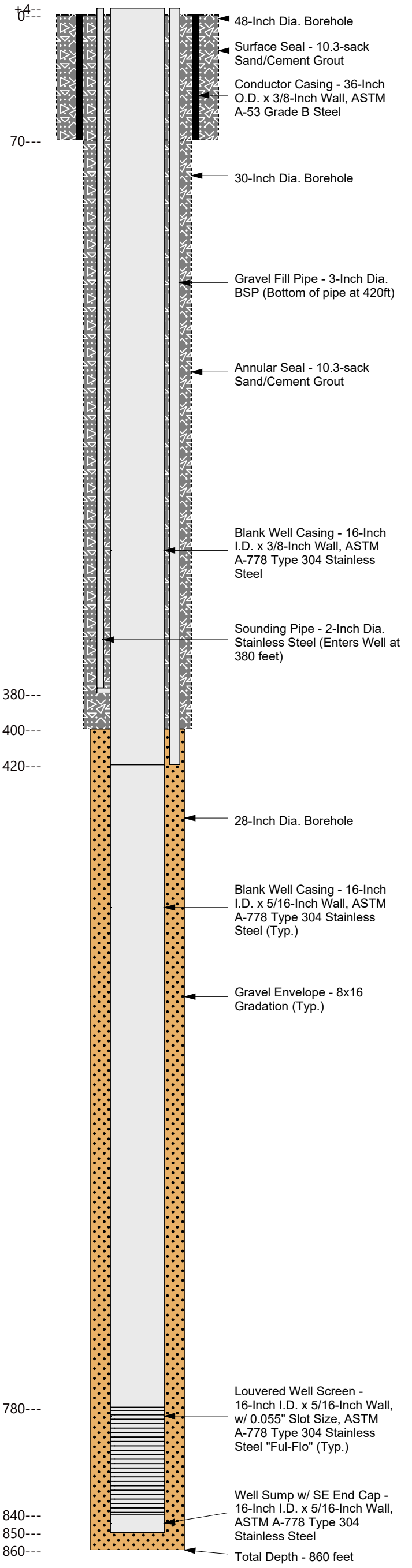
400	Clay w/sand - Low plasticity, sticky, tan clay, fine sand	
	Clay - Medium plasticity, tan	
450	Clay w/sand - Medium plasticity, tan clay, medium-fine sand	
500		
550	Clay - Low-medium plasticity, blue	
600	Sandy Clay - Medium plasticity, blue clay with medium-fine sand	
650	Sand w/clay - Fine sand w/ low plasticity, blue clay streaks	
	Clay w/sand - Low plasticity, blue clay, fine sand	
700	Clay w/sand - Medium plasticity, black/blue clay, fine sand	
750	Clay - Medium plasticity, black clay	
800	Sand, Mudstone, Clay - Medium-coarse, moderately sorted sand w/shells, poorly indurated orange mudstone, medium plasticity brown clay	
850	Clay, Sand, Mudstone - Medium plasticity, brown clay, medium-coarse moderately sorted sand, poorly indurated orange mudstone	



Preliminary Production Well Design



Aromas Water District
Driscoll Monitoring Well
Water Quality Summary

ANALYTE	UNITS	REPORTING LIMIT	METHOD	MCL	MW-385 (3/12/25)	MW-835 (3/20/25)	MW-925 (3/12/25)
CATIONS							
Calcium	mg/L	0.6	200.7		96	71	81
Magnesium	mg/L	0.1	200.7		41	26	28
Potassium	mg/L	0.5	200.7		2.8	4.5	4.8
Sodium	mg/L	0.5	200.7		98	180	220
Hardness as $CaCO_3$	mg/L	3.3	SM 2340B		410	280	320
ANIONS							
Bicarbonate Alkalinity	mg/L	5	SM 2320B		350	330	290
Carbonate Alkalinity	mg/L	6.0	SM 2320B		ND	ND	ND
Chloride (Cl)	mg/L	1	300.0	250/500[2]	120	230	**310**
Cyanide	µg/L	100	SM4500-CNE	150	ND	ND	ND
Fluoride	mg/L	0.20	300.0	2	ND	0.31	0.3
Hydroxide Alkalinity	mg/L	5	SM 2320B		ND	ND	ND
Sulfate (as SO4)	mg/L	*	300.0	250/500[2]	96	69	68
Sulfide	mg/L	0.1	SM4500-S2-D		ND	1	0.5
Total Alkalinity as $CaCO_3$	mg/L	5	SM 2320B		280	270	240
Perchlorate	µg/L	1.0	314.0	6	ND	ND	ND
PHYSICAL PARAMETERS							
Color (A.P.H.A)	Color Units	5	SM 2120B	15[2]	5	ND	5
pH	SU		SM 4500-H B	6.5/8.5[4]	7.66	7.26	7.72
Specific Conductance	µmhos/cm	1.0	SM 2510 B-1997	900/1,600[2]	**1160**	**1450**	**1670**
Temperature	Deg C	1.00	SM 4500-H B		17.4	16.80	18.10
Surfactants (MBAS)	mg/L	0.040	SM5540C	500[2]	ND	ND	0.048
Total Dissolved Solids (TDS)	mg/L	20	SM 2540C	500/1,000[2]	**690**	**820**	**940**
Odor	TON	1	140.1	3	2	**3**	**17**
Turbidity	NTU	0.10	180.1	5[2]	0.24	17	2.8
INORGANICS							
Aluminum	mg/L	0.050	200.7	1000[1]/200[3]	ND	ND	ND
Aluminum, Dissolved	mg/L	0.0050	200.7		ND		ND
Antimony	mg/L	0.030	200.7	0.006	ND	ND	ND
Arsenic	mg/L	0.010	200.7	0.010	ND	ND	ND
Arsenic, Dissolved	mg/L	0.010	200.7		ND		ND
Barium	mg/L	0.010	200.7	1	0.089	0.11	0.14
Beryllium	mg/L	0.0050	200.7	0.004	ND	ND	ND
Boron	mg/L	0.050	200.7	1[3]	0.93	0.68	0.72
Cadmium	mg/L	0.0050	200.7	0.005	ND	ND	ND
Chromium	mg/L	.010	200.7	.050	ND	ND	ND
Cobalt	mg/L	0.0050	200.7		ND	ND	ND
Hexavalent Chromium	µg/L	1.0	218.6	10	ND	ND	ND
Copper	mg/L	0.010	200.7	1.3[2]	ND	ND	ND
Iron	mg/L	0.041	200.7	0.3[2]	ND	0.18	0.15
Lead	mg/L	0.010	200.7	0.015[3]	ND	ND	ND
Manganese	mg/L	0.010	200.7	0.05[2]	**0.13**	**0.28**	**0.44**
Mercury	µg/L	0.40	245.1	2	ND	ND	ND
Molybdenum	mg/L	0.010	200.7		ND	ND	ND
Nickel	mg/L	0.010	200.7	0.1	ND	ND	ND
Selenium	mg/L	0.030	200.7	0.05	ND	ND	ND
Silver	mg/L	0.0050	200.7	0.1[2]	ND	ND	ND
Thallium	mg/L	0.030	200.7	0.002	ND	ND	ND
Vanadium	mg/L	0.010	200.7	0.05[3]	ND	ND	ND
Zinc	mg/L	0.050	200.7	5[2]	ND	ND	ND
OTHER ANALYSES							
1,2,3-Trichloropropane	ng/L	5.0	SRL 524M-TCP	0.005	ND	ND	ND

[1] - Primary MCL
[2] - Secondary MCL (recommended/upper range)
[3] - Notification Level
[4] - Suggested lower/upper acceptable range
[5] - Various MCLs

Luhdorff & Scalmanini
Consulting Engineers

National Flood Hazard Layer FIRMette

FEMA

121°38'55"W 36°53'47"N

0 250 500 1,000 1,500 2,000 Feet

1:6,000

121°38'17"W 36°53'18"N

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 / 17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

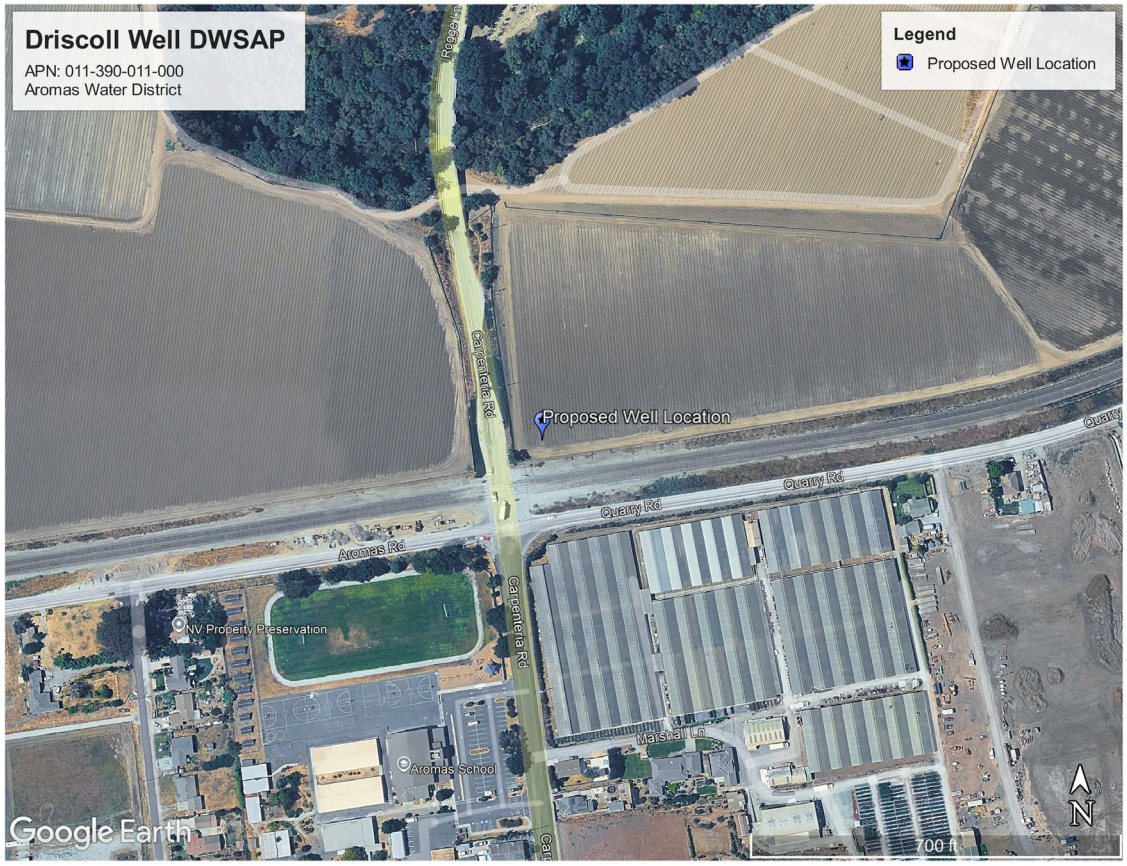
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 12/5/2025 at 11:11 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Driscoll Production Well
APN: 011-390-011-000

Monterey Water District – Aromas Water District Water System
Aromas, CA – San Benito County



DRINKING WATER SOURCE ASSESSMENT AND PROTECTION PROGRAM

PREPARED BY
LUHDORFF AND SCALMANINI
CONSULTING ENGINEERS, INC.

December 2025

EXECUTIVE SUMMARY

The Drinking Water Source Assessment and Protection (DWSAP) Program is a federal and state mandated program to assess the vulnerability of the drinking water supply to contamination. California's DWSAP was approved by the United States Environmental Protection Agency (EPA) in November 1999 as satisfying source protection under a 1996 amendment to the federal Safe Drinking Water Act. California's program is regulated by the Division of Drinking Water and Environmental Management, Department of Public Health (DPH).

The DWSAP program for groundwater sources (wells) requires California drinking water purveyors to assess local hydrogeologic conditions, well construction and production, and land use in the vicinity of water supply wells. These factors are used to delineate Groundwater Protection Zones for each well, which represent geographic areas from which groundwater may be extracted by the well in two, five and ten years of pumping. Within the protection zones, Possible Contaminating Activities (PCAs) are identified and ranked according to the potential to contaminate the water supply well. PCAs include known contaminant plumes, leaking underground storage tanks, dry cleaners, gas stations, etc. The well construction features and hydrogeology are considered in determining the Physical Barrier Effectiveness (PBE), which indicates how effective the well design may be in preventing potential contamination in groundwater from entering the well.

The DWSAP results can be used as a planning tool for land use in the vicinity of water sources. The DWSAP should be updated every five years, or whenever existing water supply wells are modified or rehabilitated, or when new wells are put into service.

WATER SYSTEM NAME

The Aromas Water District (District) provides water to the city of Aromas, CA (City). The District is responsible for supplying water to 2,988 customers with a total of 958 service connections. The District operates three (3) active wells that provide 100% of the City's potable water supply.

PROPOSED NEW WELL SOURCE

This DWSAP report analyzes the proposed subject Driscoll Production Well. The subject well will be constructed in 2026 as a municipal supply well. The District oversees production and monitoring wells throughout the City. The proposed well is preliminarily designed based on the lithologic and geophysical data from surrounding wells and the Driscoll monitoring well drilled and constructed in January and February of 2025.

DWSAP METHODOLOGY

To prepare this DWSAP on behalf of the Aromas Water District, Luhdorff and Scalmanini, Consulting Engineers Inc. (LSCE) reviewed local well construction details, pump/discharge records, and local hydrogeologic data and reports, and constructed a monitoring well to identify potential water-bearing zones and analyze water quality for the proposed water supply well. LSCE also reviewed local, state, and federal agency database files along with an Environmental Data Resources (EDR) report concerning potential existing contamination sites. Based on these sources, the Groundwater Protection Zones, Physical Barrier Effectiveness, Possible Contaminating Activities, and Vulnerability Rankings were determined according to the following methodologies:

Groundwater Protection Zones

Groundwater Protection Zones are concentric zones that represent the overlying areas where groundwater may be drawn into the well during two, five, and ten years of pumping. The size of each protection zone is determined from the estimated annual extraction rate of the well, the effective porosity of the formation within which the well is completed, the period of pumping (two, five and ten years), and the screened interval of the well.

For the subject Driscoll Well, the pumping rate of the well for calculating the protection zones was based on the planned operation of the well as contemplated by the District. The Calculated Fixed Radius Delineation method was used to determine the Groundwater Protection Zones. Each Groundwater Protection Zone is assigned a point value for the purpose of vulnerability ranking: the two-year zone (Zone A) is assigned five points, the five-year zone (Zone B5) is assigned three points, and the ten-year zone (Zone B10) is assigned one point. DPH requires a minimum radius for each protection zone: 600 feet for Zone A, 1,000 feet for Zone B5, and 1,500 feet for Zone B10. If the calculated radii of the protection zones are less than the DPH minimums, the minimum values are used instead.

Physical Barrier Effectiveness

After the Groundwater Protection Zones are established, the local hydrogeology and construction features of the well are evaluated to determine how effective the well completion may be in preventing potential contamination in groundwater from entering the well. The factors evaluated include aquifer confinement, sanitary seal depth, proximity to improperly abandoned or destroyed wells, and static water level conditions. Each component of this Physical Barrier Effectiveness (PBE) survey is given a point value, with more points associated with factors that more effectively protect the well from contamination. The PBE of the well is then characterized according to the resultant point score: *Low* (0 to 35 points), *Moderate* (36-69 points), or *High* (70-100 points). Wells in **unconfined** aquifers can score a maximum of 70 PBE points, and wells completed in **confined** aquifers can score a maximum of 100 PBE points.

Possible Contaminating Activities Inventory and Vulnerability Ranking

Within each Groundwater Protection Zone, Possible Contaminating Activities (PCAs) are identified. The DPH provides a PCA Inventory and assigns each PCA a risk ranking to represent the potential for that PCA to contaminate groundwater: VH (Very High) = 7 points, H (High) = 5 points, M (Medium) = 3 points, or L (Low) = 1 point. For instance, the DPH ranks gas stations as VH and schools as L. Some PCAs have different risk rankings depending on which Groundwater Protection Zone they are located in. For example, sewer collection systems are ranked H in Zone A but only L in Zones B5 and B10.

A Vulnerability Score, ranging from 3 to 17, is calculated for each Possible Contaminating Activity:

	Possible Contaminating Activity Points (7, 5, 3, or 1)
	Groundwater Protection Zone Points (5, 3, or 1)
+	Physical Barrier Effectiveness Points (5, 3, or 1)
=	Vulnerability Score

All of the PCAs within the Groundwater Protection Zones are ranked by Vulnerability Score from highest to lowest, i.e., from the most likely to contaminate groundwater to the least likely. For example, for a well with a PBE of M, a gas station (VH) located in Zone B5 would have a Vulnerability Score of 13:

	PCA of VH	7 points
	Zone B5	3 points
+	PBE of M	3 points
=	Vulnerability Score	13 points

Only those PCAs with Vulnerability Scores of nine and higher (> 9) are included in the Vulnerability Ranking. Water supply wells are considered by DPH to be vulnerable to those PCAs with a score of nine or higher, and most vulnerable to those PCAs associated with groundwater contamination.

DWSAP RESULTS

Groundwater Protection Zones

As described above, Groundwater Protection Zones are calculated for a supply well based on estimated pumping capacity, well screen interval, assumed porosity of the aquifer, and the approximate direction of groundwater flow. The DWSAP methodology requires that Groundwater Protection Zones be delineated at distances that approximate the two-, five-, and ten-year travel times for groundwater to reach the well. The Driscoll Well was assigned larger radii than the DPH minimum values for groundwater protection zone radius based on a maximum flow rate of 700 gpm pumped continuously to supplement the District's water supply.

Well	Estimated Pumping Capacity (ft^3/yr)	Well Screen Interval (ft)	Default Porosity (Fraction)
Driscoll Well	49,186,900	780-840	0.2

Well	Zone A (2-Year TT) Radius (ft)	Zone B5 (5-Year TT) Radius (ft)	Zone B10 (10-year TT) Radius (ft)
Driscoll Well	1,615	2,554	3,612

Note: TT = Travel Time

Physical Barrier Effectiveness

Based on the hydrogeologic setting, the well is constructed within a confined aquifer, which results in the well potentially receiving up to 100 PBE points. Points can be deducted from this maximum for various reasons, including the lack of a surface seal or site security. The PBE points for the proposed well are listed below:

Well	Seal Depth (ft)	Total PBE points	PBE Ranking
Driscoll Well	400	80	High

A profile of the well showing seal depth and other construction features is included with this DWSAP, for reference.

Possible Contaminating Activities Inventory and Vulnerability Ranking

There has not been groundwater contamination or evidence of saltwater intrusion detected in groundwater near the proposed source. The PCAs for which the well has the greatest vulnerability are listed below:

Well	Zone	Activity	Vulnerability Score
Driscoll Well	A	Sewer Collection System – Residential	11
	A	Housing – High Density	11
	A	Parks	11
	A	Schools	11
	A	Wells – Agricultural/Irrigation	11
	A	Crops – Irrigated	11
	A	Fertilizer, Pesticide/Herbicide Application	11
	A	Crops – Non-irrigated	11
	A	UST – Upgraded and/or Registered	11
	A	Wells – Water Supply	11
	A	Transportation Corridors – Railroads	11
	A	Transportation Corridors – Roads/Streets	11
	A	Surface Water – Streams/Lakes/Rivers	11
	A	Wells – Monitoring/Test Holes	11
	B5	Sewer Collection System – Residential	9
	B5	Housing – High Density	9
	B5	Parks	9
	B5	Wells – Agricultural/Irrigation	9
	B5	Crops – Irrigated	9
	B5	Fertilizer, Pesticide/Herbicide Application	9
	B5	Crops – Non-irrigated	9
	B5	Transportation Corridors – Railroads	9
	B5	Transportation Corridors – Roads/Streets	9
	B5	Surface Water – Streams/Lakes/Rivers	9
	B5	Wells – Monitoring/Test Holes	9

CONCLUSIONS

Results of the DWSAP indicate that the subject Driscoll Well would be most vulnerable to activities that are not known to have contaminated soil or groundwater but have the potential to do so. The groundwater pumped from the Driscoll Well is not considered vulnerable to any existing contaminant plumes. The known and potential contaminating activities are as follows:

Known Soil or Groundwater Contamination

- None

Potential Soil or Groundwater Contaminating Activities

- Sewer Collection Systems – Residential
- Housing – High Density
- Parks
- Schools
- Wells – Agricultural/Irrigation
- Crops – Irrigated
- Fertilizer, Pesticide/Herbicide Application
- Crops – Non-irrigated
- UST – Upgraded and/or Registered
- Wells – Water Supply
- Transportation Corridors – Railroads
- Transportation Corridors – Roads/Streets
- Surface Water – Streams/Lakes/Rivers
- Wells – Monitoring/Test Holes

The vulnerability rankings calculated for the Aromas Water District's Driscoll Well are reflective of the Possible Contaminating Activities typically found in Residential/Municipal and Agricultural/Rural settings. The Physical Barrier Effectiveness ranking for the well is H, or "High".

REFERENCES

Aromas Water District Water System Details, CA Drinking Water Watch, sdwis.waterboards.ca.gov, Accessed December 2025.

Pajaro Valley Water Management Agency, www.pvwater.org, Geology, Basin Monitoring, Accessed December 2025.

California Department of Water Resources. 2006. Pajaro Valley Groundwater Basin, Basin Description, Bulletin 118.

California Department of Water Resources. 2016. Corralitos-Pajaro Valley Groundwater Basin, Basin Description, Bulletin 118.

Martin B. Freeny, July 11, 2016, Technical Memorandum: Aromas Water District – Marshall Well Site Assessment.

Environmental Data Resources, EDR Radius Map Report with GeoCheck, December 2025.

Drinking Water Source Assessment

Water System

Aromas Water District

San Benito County

Water Source

Driscoll Well

Assessment Date

December, 2025

California State Water Resources Control Board
Division of Drinking Water

District No.	05
System No.	CA3510004
Source No.	
PS Code	GW

Checklist for Drinking Water Source Assessment - Ground Water Source

District Name: Monterey District No.: 05 County: San Benito
System Name: Aromas Water District System No. CA3510004
Source Name: Driscoll Well Source No.: _____ PS Code: GW

Completed by: Luhdorff & Scalmanini Consulting Engineers Date: December 2025

The following information should be contained in the drinking water source assessment submittal.

___X___ Cover Page

___X___ Checklist *(this form)*

___X___ Assessment Summary

___X___ Vulnerability Summary

___X___ Source Location Form *(not currently available, contact DHS for information)*

___X___ Delineation of groundwater protection zones

___X___ Source Data Sheet (select appropriate form)

- ___X___ Well Data Sheet
- _____ Spring Data Sheet
- _____ Horizontal Well Data Sheet

___X___ Physical Barrier Effectiveness Checklist

___X___ Possible Contaminating Activities (PCA) inventory form

___X___ Vulnerability Ranking

___X___ Assessment map with source location and protection zone

_____ Additional maps (optional) (e.g. local maps of zones and PCAs, recharge area maps, or maps indicating direction of ground water flow)

___X___ Means of Public Availability of Report (indicate those that will be used)

- ___X___ Notice in the Consumer Confidence Report* (minimum)
- ___X___ Copy in regulatory agency (DHS or LPA) office (minimum)
- _____ Copy in public water system office (recommended)
- _____ Copy in public library/libraries
- _____ Internet (indicate Internet address: _____)
- _____ Other (describe)

*The CCR should indicate where customers can review the assessments.

Assessment Summary

District Name: Monterey District No.: 05 County: San Benito
System Name: Aromas Water District System No. CA3510004
Source Name: Driscoll Well Source No.: PS Code: GW

Completed by: Luhdorff & Scalmanini Consulting Engineers Date: December 2025

Description of System and Source

The Aromas Water District water system is located in San Benito County and serves the community of Aromas, CA. There are approximately 958 service connections serving a population of 2,988 people.

The drinking water source for the Aromas Water District water system is the Corralitos-Pajaro Valley groundwater subbasin located along the Central Coast of California. The northern boundary of the subbasin is the northern boundary of the Pajaro Valley Water Management Agency. The eastern boundary of the subbasin is the San Andreas Fault, adjacent pre-Quaternary formations, and the Santa Cruz Mountains. The southern boundary of the subbasin is comprised of the pre-Quaternary formations and the southern boundary of the Pajaro Valley Water Management Agency. The subbasin is bounded on the west by Monterey Bay.

The Aromas area is underlain by a thick sequence of sedimentary materials. From the surface to depth, these materials include surficial Pleistocene and Holocene alluvial deposits, underlain by Pleistocene terrace deposits (locally described as Aromas Formation), underlain by the Purisima Formation. The Purisima Formation is a thick sequence of clay/siltstone units interbedded with fine-grained sandstone units. When perforated in the sandstone units the formation can yield significant water to wells. At depth, the Purisima Formation is believed to overlie granitic bedrock. Recharge to the aquifer is through direct percolation of rainfall and streamflow seepage from the Pajaro River and its tributaries and percolation of irrigation water.

The subbasin for the source includes approximately 117 square miles/75,000 acres. General land use is agricultural, residential, and undeveloped.

Assessment Procedures

The assessment of the source Driscoll Well was conducted by Luhdorff and Scalmanini Consulting Engineers (LSCE) in December 2025. The following sources of information were used in the assessment: CA State Water Board files, DWR files, Environmental Data Resources (EDR) report, previous hydrogeological studies, LSCE files and records, site plans/drawings, and aerial photos.

Procedures used to conduct the assessment include: file review, calculations, field review, map review, use of GIS, and review of state well and water records.

Contents of this Assessment

Yes	**X**	**No**	☐	**Assessment Summary**
Yes	**X**	**No**	☐	**Vulnerability Summary**
Yes	**X**	**No**	☐	**Source Location Form**
Yes	**X**	**No**	☐	**Delineation of Protection Zones**
Yes	**X**	**No**	☐	**Physical Barrier Effectiveness Checklist**

Yes	**X**	**No**	☐	**Source Data Sheet**
Yes	**X**	**No**	☐	**Inventory of Possible Contaminating Activities**
Yes	**X**	**No**	☐	**Vulnerability Ranking**
Yes	**X**	**No**	☐	**Assessment Map**

Vulnerability Summary

District Name: Monterey District No.: 05 County: San Benito
System Name: Aromas Water District System No. CA3510004
Source Name: Driscoll Well Source No.: PS Code: GW

Completed by: Luhdorff & Scalmanini Consulting Engineers Date: December 2025

THE FOLLOWING INFORMATION MUST BE INCLUDED IN THE SYSTEM CONSUMER CONFIDENCE REPORT

A source water assessment was conducted for the Driscoll Well of the Aromas Water District water system in December 2025.

The source is considered most vulnerable to the following activities associated with contaminants detected in the water supply:

None

The source is considered most vulnerable to the following activities not associated with any detected contaminants:

Sewer Collection Systems – Residential
Housing – High Density
Parks
Schools
Wells – Agricultural/Irrigation
Crops – Irrigated
Fertilizer, Pesticide/Herbicide Application
Crops – Non-irrigated
USTs – Upgraded and/or Registered
Wells – Water Supply
Transportation Corridors – Railroads
Transportation Corridors – Roads/Streets
Surface Water – Streams/Lakes/Rivers
Wells – Monitoring/Test Holes

Discussion of Vulnerability

There have been no contaminants detected in the water supply. However, the well is still considered vulnerable to activities located near the drinking water source. Nearby Residential/Municipal and Agricultural/Rural use could potentially cause contamination to the groundwater. To help reduce the chance of introducing contaminants to the aquifer at the wellhead, design specifications for the well include a sanitary seal placed to a depth in excess of the minimum 50-ft. requirement. The annular seal is designed to a depth of 400 feet below ground surface.

In addition, the deeper coarse grained water bearing strata in the formation are overlain by thick sequences of fine-grained sediments. These fine-grained clay layers act as aquitards to help confine the aquifer, naturally slowing transport of surface waters down to the stratigraphic intervals screened with well casing.

Appendix H

Drinking Water Source Location – Ground Water

Public Water System: Aromas Water District Water System No.: CA3510004__

Water District: Monterey_____ Source Name: Driscoll Well

Location date: January 2025 _ Source located by (name of person): _S. Lewis__

Method of determining location:

_____ USGS quad map (7.5 minute series, 1:24,000 scale), hand calculated

_____ USGS quad map (7.5 minute series, 1:24,000 scale), computer calculated

_____ Global Positioning System (GPS)

Unit (manufacturer/model):

Accuracy of GPS unit (+/- ____ ft.)

__X__ Other Method: Mapping Software

Accuracy of GPS unit (+/- 120 feet)

Location of well (decimal degrees): Latitude: N º 38.8923460

Longitude: W º -121.6434110

Physical description of location [Pertinent landmarks, address, or approximate address (cross streets, etc.)]: APN: 011-390-011-000

Approximately 190 ft northeast from the intersection of Quarry Road and Carpenteria Road in Aromas, CA. Located on the southwest corner of an existing strawberry field.

General description of recharge area, if known:

Recharge to the aquifer is through direct percolation of rainfall and streamflow seepage from the Pajaro River and its tributaries and percolation of irrigation water.

WELL DATA SHEET

Complete as much information as possible. Leave blank if information is not available, use N.A. if not applicable.		
** Indicates items required for Source Water Assessment*		
*** Indicates additional items required for assessments and Ground Water Rule*		
	(separate multiple entries in field with semi-colon)	Actual, Estimated, Design, or Default?
DATA SHEET GENERAL INFORMATION		
System Name	Aromas Water District	*from DHS database*
System Number	CA3510004	*from DHS database*
Source of Information *(well log, DHS/County files, system, etc)*	CSWRCB Files	*Actual*
Organization Collecting Information *(DHS, County, System, other)*	LSCE	*Actual*
Date Information Collected/Updated	Dec-25	*Actual*
WELL IDENTIFICATION		
* Well Number or Name	Driscoll Well	*Design*
* DHS Source Identification Number (**FRDS ID No.**)	TBD	*Actual*
DWR Well Log on File? ("YES" or "NO")	TBD	*Actual*
State Well Number (from DWR)	TBD	*Actual*
Well Status (Active, Standby, Inactive)	Planned	*Actual*
WELL LOCATION		
Latitude	36.892346	*Estimated*
Longitude	-121.643411	*Estimated*
Ground Surface Elevation (ft above Mean Sea Level)	96	*Estimated*
Street Address	0 Quarry Road	*Actual*
Nearest Cross Street	Carpenteria Road	*Actual*
City	Aromas Water District	*Actual*
County	San Benito	*Actual*
* Neighborhood/Surrounding Area *(see Note 1)*	A, Re, Mu	*Actual*
Site plan on file? ("YES" or "NO")	TBD	*Actual*
DWR Ground Water Basin	Corralitos-Pajaro Valley	*from DWR*
DWR Ground Water Sub-basin	Corralitos-Pajaro Valley	*from DWR*
SANITARY CONDITIONS		
** Distance to closest Sewer Line, Sewage Disposal, Septic Tank (ft)	> 50ft	*Design*
Distance to Active Wells (ft)	> 2,000 ft	*Design*
Distance to Abandoned Wells (ft)	> 50 ft	*Design*
Distance to Surface Water (ft)	> 600 ft	*Design*
** Size of controlled area around well (square feet)	> 50 ft	*Design*
* Type of access control to well site *(fencing, building, etc)*	Fencing	*Design*
* Surface Seal? (Concrete slab)("YES", "NO" or "UNKNOWN")	YES	*Design*
* Dimensions of concrete slab: Length(ft)/ Width(ft)/ Thick(in)	TBD	*Design*
* Within 100 year flood plain? ("YES", "NO" or "UNKNOWN")	NO	*Actual*
* Drainage away from well? ("YES" or "NO")	YES	*Design*
ENCLOSURE/HOUSING		
Enclosure Type *(building, vault, none, etc.)*	Fencing	*Design*
Floor material	TBD	*Design*
Located in Pit? ("YES" or "NO")	NO	*Actual*
Pit depth (feet) (if applicable)		
WELL CONSTRUCTION		
Date drilled	TBD	*Actual*
Drilling Method	Reverse Rotary	*Actual*
Depth of Bore Hole (feet below ground surface)	860	*Design*
Casing Beginning Depth/Ending Depth(ft below surface); 2nd Casing Beginning Depth/Ending Depth; 3rd Casing, etc.	0/420; 420/780; 840/850	*Design*
Casing Diameter (inches); 2nd Casing Diameter; 3rd Casing, etc.	16	*Design*
Casing Material; 2nd Casing Material; 3rd Casing, etc.	Stainless Steel	*Design*

WELL DATA SHEET

Complete as much information as possible. Leave blank if information is not available, use N.A. if not applicable.		
** Indicates items required for Source Water Assessment*		
*** Indicates additional items required for assessments and Ground Water Rule*		
	(separate multiple entries in field with semi-colon)	Actual, Estimated or Default?
WELL CONSTRUCTION (continued)		
Conductor casing used? ("YES", "NO" or "UNKNOWN") *(See Note 2)*	YES	*Design*
Conductor casing removed? ("YES", "NO" or "UNKNOWN")	NO	*Design*
* Depth to highest perforations/screens (ft below surface) (or "UNKNOWN")	780	*Design*
Screened Interval Beginning Depth/Ending Depth (ft below surface); 2nd Screened Interval Beg. Depth/Ending Depth; 3rd Screened Interval, etc.	780/840	*Design*
* Total length of screened interval (ft) *(default = 10% pump capacity in gpm)* (or "UNKNOWN")	60	*Design*
* Annular Seal?("YES", "NO" or "UNKNOWN") *(See Note 3)*	YES	*Design*
* Depth of Annular Seal (ft)	400	*Design*
Material of Annular Seal *(cement grout, bentonite, etc.)*	Cement Grout	*Design*
Gravel pack, Depth to top (ft below ground surface)	400	*Design*
Total length of gravel pack (ft)	460	*Design*
AQUIFER		
* Aquifer Materials *(list all that apply: sand, silt, clay, gravel, rock, fractured rock)*	Clay, Rock, Sand, Silt	*Actual*
* Effective porosity (decimal percent) *(default = 0.2)* (or "UNKNOWN")	0.2	*Default*
* Confining layer (Impervious Strata) above aquifer? ("YES", "NO" or "UNKNOWN")	YES	*Actual*
Thickness of confining layer, if known (ft)	90	*Actual*
Depth to confining layer, if known (ft below ground)	0	*Actual*
* Static water level (ft below ground surface)	90.07	*Actual*
Static water level measurement: Date/Method	3-20-2025/Electric Sounder	*Actual*
Pumping water level (ft below ground surface)	TBD	*Actual*
Pumping water level measurement: Date/Method	TBD	*Actual*
WELL PRODUCTION		
Well Yield (gpm)	700	Design
Well Yield Based On (i.e., pump test, etc.)	Geophysical Surveys/WCR	Actual
Date measured	TBD	Actual
Is the well metered? ("YES" or "NO")	YES	Design
Production (gallons per year)	84,672,000	Estimated
Frequency of Use (hours/year)	2,190	Estimated
Typical pumping duration (hours/day)	6	Estimated
PUMP		
Make	TBD	Design
Type	TBD	Design
Size (hp)	TBD	Design
* Capacity (gpm)	TBD	Design
Depth to suction intake (ft below ground surface)	TBD	Design
Lubrication Type	N/A	Actual
Type of Power: *(i.e., electric, diesel, etc.)*	Electric	Design
Auxiliary power available? ("YES" or "NO")	YES	Design
Operation controlled by: *(i.e., level in tank, pressure, etc.)*	Pressure	Design
Pump to Waste capability? ("YES" or "NO")	NO	Design
Discharges to: *(i.e., distribution system, storage, etc.)*	Treatment, Distribution	Design
REMARKS AND DEFECTS (use additional sheets as necessary)		

WELL DATA SHEET

Complete as much information as possible. Leave blank if information is not available, use N.A. if not applicable.		
** Indicates items required for Source Water Assessment*		
*** Indicates additional items required for assessments and Ground Water Rule*		
NOTES		
1. Neighborhood/Surrounding Area (list all that apply): A= Agricultural, Ru = Rural, Re = Residential, Co = Commercial, I = Industrial, Mu = Municipal, P = Pristine, O = Other		
2. Conductor Casing - Oversized casing used to stabilize bore hole during well construction. Should be removed during installation of annular seal.		
3. Annular Seal - Seal of grout in the space between the well casing and the wall of the drilled hole. Sometimes called "sanitary seal".		
Please Note:		
The information on this Well Data Sheet is considered confidential. To allow the information to be included		
in the permit report, or made available subject to a public information act request, the waiver clause below has		
to to be signed and dated by the owner (public water system). In lieu of this signature, the WDS has to be		
retained in a confidential file, or the information shown in the shaded rows has to be "blacked out."		
I/We, *(Name)*_____, ***certify that I/We am/are the present owners of the well described on this well data sheet. I/We have reviewed the information presented on this well data sheet and I/We take no exception to having the information inlcuded in the Department of Health Services' Engineering Report. I/We understand that by including the well data sheet in the Engineering Report, it will be part of a public document that can be reviewed and copied subject to the public information act request.***		
	,	
_____ _____		
(Signature) (Date)		

Delineation of Ground Water Protection Zones

District Name: Monterey District No.: 05 County: San Benito
System Name: Aromas Water District System No. CA3510004
Source Name: Driscoll Well Source No.: PS Code: GW

Completed by: Luhdorff & Scalmanini Consulting Engineers Date: December 2025

Indicate the method used to delineate the zones:

(For more information refer to the Drinking Water Source Assessment and Protection document)

__X__ Calculated Fixed Radius (Default) (Show calculations below)

_____ Modified Calculated Fixed Radius (Show calculations below and attach documentation for direction of ground water flow)

_____ More detailed methods
Type used (i.e., analytical methods, hydrogeologic mapping, modeling):

_____ Arbitrary Fixed Radius (For use only by or with permission of DHS—use minimum distances shown below)

Calculated Fixed Radius Equation

The equation for the calculated fixed radius (R) is $R_t = \sqrt{Q\,t / \pi\,\eta\,H}$

R_t = R_2, R_5, or R_{10} corresponding to t (Calculate R for each travel time)
Q = maximum pumping capacity of well
(ft^3/year = gpm * 70,267): 49,186,900
t = time of travel (years), 2, 5 and 10 years
π = 3.1416
η = effective porosity (decimal percent) (If unknown, assume 0.2):
0.2
H = screened interval of well (feet) (If unknown, assume 10% of Q gpm, 10 ft minimum):
60

Specific methods follow on next page

Calculated Fixed Radius Delineation Method (Default)

Using the equation presented above, calculate the size of zones for the appropriate aquifer setting of the source.

Porous Media Aquifer

Zone A (2 year TOT) R_2 = 1,615 ft, minimum = 600 ft —use larger: _____ft
Zone B5 (5 year TOT) R_5 = 2,554 ft, minimum = 1,000 ft—use larger: _____ft
Zone B10 (10 year TOT) R_{10} = 3,612 ft, minimum = 1,500 ft—use larger: _____ft

Fractured Rock Aquifer

(Increase size of zones by 50%)

Zone A (2 year TOT) $1.5R_2$ = _____ft, minimum = 900 ft—use larger: _____ft
Zone B5 (5 year TOT) $1.5R_5$ = _____ft, minimum = 1,500 ft—use larger: _____ft
Zone B10 (10 year TOT) $1.5R_{10}$ = _____ft, minimum = 2,250 ft—use larger: _____ft

Modified Calculated Fixed Radius Delineation Method

In porous media aquifers, if the direction of ground water flow is known (see Section 6.2.3), the default zone circle may be shifted upgradient by $0.5R_t$. The upgradient and downgradient limits of the zone are determined below.

Zone A (2-year TOT)

upgradient distance = $1.5R_2$ = _____ft, minimum = 900 ft, use larger: _____ft
downgradient distance = $0.5R_2$ = _____ft, minimum = 300 ft, use larger: _____ft

Zone B5 (5-year TOT)

upgradient distance = $1.5R_5$ = _____ft, minimum = 1,500 ft, use larger: _____ft
downgradient distance = $0.5R_5$ = _____ft, minimum = 500 ft, use larger: _____ft

Zone B10 (10-year TOT)

upgradient distance = $1.5R_{10}$ = _____ft, minimum = 2,250 ft, use larger: _____ft
downgradient distance = $0.5R_{10}$ = _____ft, minimum = 750 ft, use larger: _____ft

Physical Barrier Effectiveness Checklist - Ground Water Source

District Name: Monterey District No.: 05 County: San Benito
System Name: Aromas Water District System No. CA3510004
Source Name: Driscoll Well Source No.: PS Code: GW

Completed by: Luhdorff & Scalmanini Consulting Engineers Date: December 2025

Use the DHS Well Data Sheet (separate document) to complete the following form.

Directions:

1. Read through the form and collect the information needed to complete the form. (Hydrogeology, Soils, Presence of abandoned or improperly destroyed wells, Well construction and operation.)

2. Determine Parameter A, Type of Aquifer.
   - If the aquifer is confined, use the right-hand column, and evaluate only the parameters indicated for confined aquifers.
   - If the aquifer is unconfined, semi-confined, or the degree of confinement is unknown, or if the aquifer is fractured rock, use the left-hand column and evaluate only the parameters for unconfined aquifers.

3. For each parameter appropriate for the source, place a check in the box for the answer that most closely applies to that source. If more than one answer is possible, select the more conservative (i.e. lower points) answer. *[For example, if the depth to static water (Parameter D) has varied between 45 and 55 feet, choose answer 2 (20 to 50 feet).]*

4. Add the points in the column appropriate for the source and interpret the score as shown on the bottom of the last page.
   - Determine whether the source has a High, Moderate or Low Physical Barrier Effectiveness. Use this in the Vulnerability analysis. The higher the points, generally the more effective the source and site are to retarding the movement of contaminants to the water supply.

NOTE: If the source is located in fractured rock the source is considered to have a Low Physical Barrier Effectiveness, regardless of the point total. So, if Parameter B, Aquifer Material is 3, the remainder of the form does not need to be completed.

Physical Barrier Effectiveness (PBE) – Ground Water, page 1 of 2
Source Name: Driscoll Well Source No.: TBD

PARAMETER	*POINTS*			
	Unconfined		Confined	
A. TYPE OF AQUIFER Confinement *(up to **50** points maximum)* choose one				
a. Unconfined, Semi-confined, Fractured Rock, Unknown	0			
b. Confined			50	X
B. AQUIFER MATERIAL (Unconfined Aquifer) Type of materials within the aquifer *(up to **20** points maximum)* choose one				
1. Porous Media (Interbedded sands, silts, clays, gravels) with continuous clay layer minimum 25' thick above water table within Zone A	20			
2. Porous Media (Interbedded sands, silts, clays, and gravels)	10			
3. Fractured rock * (* Low Physical Barrier Effectiveness - no further questions required)	0			
C. PATHWAYS OF CONTAMINATION (All Aquifers) Presence of Abandoned or Improperly Destroyed Wells *(up to **10** points maximum)*				
1. Are they present within Zone A (2-year time of travel (TOT) distance)?				
a. Yes or unknown	0		0	
b. No	5		5	X
2. Are they present within Zone B5 (2- to 5-year TOT distance)?				
a. Yes or unknown	0		0	
b. No	3		3	X
3. Are they present within Zone B10 (5- to 10-year TOT distance)?				
a. Yes or unknown	0		0	
b. No	2		2	X
D. STATIC WATER CONDITIONS (Unconfined Aquifer) Depth to static Water (DTW) = _____ feet *(up to **10** points maximum)* choose one				
1. 0 to 20 feet	0			
2. 20 to 50 feet	2			
3. 50 to 100 feet	6			
4. > 100 feet	10			
E. WELL OPERATION (Unconfined Aquifer) Depth to Uppermost Perforations (DUP) DUP = _____ feet Maximum Pumping Rate of Well (Q) Q = _____ gallons/minute Length of screened interval (H) H = _____ feet [(DUP – DTW) / (Q/H)] = *(up to **10** points maximum*) choose one				
1. < 5	0			
2. 5 to 10	5			
3. > 10	10			

Physical Barrier Effectiveness – Ground Water, page 2 of 2
Source Name: Driscoll Well Source No. TBD

PARAMETER	*POINTS*			
	Unconfined		Confined	
F. HYDRAULIC HEAD (Confined Aquifer) What is the relationship in hydraulic head between the confined aquifer and the overlying unconfined aquifer? (i.e. does the well flow under artesian conditions?) *(up to **20** points maximum)* choose one				
1. head in confined aquifer is higher than head in unconfined aquifer under all conditions			20	
2. head in confined aquifer is higher than head in unconfined aquifer under static conditions			10	
3. head in confined aquifer is lower than or same as head in unconfined aquifer			0	
4. unknown			0	X
G. WELL CONSTRUCTION (All Aquifers) 1. Sanitary Seal (Annular Seal) Depth = 400 feet *(up to **10** points maximum)* choose one				
a. None or less than 20 feet deep	0		0	
b. 20 to 50 ft deep	6		10	
c. 50 ft or greater	10		10	X
2. Surface seal (concrete cap) *(up to **4** points maximum)* choose one				
a. Not present or improperly constructed	0		0	
b. Watertight, slopes away from well, at least 2' laterally in all directions	4		4	X
3. Flooding potential at well site *(up to **1** point maximum)* choose one				
a. Subject to localized flooding (i.e. in low area or unsealed pit or vault) or Within 100 year flood plain	0		0	
b. Not subject to flooding	1		1	X
4. Security at well site *(up to **5** points maximum)* choose one				
a. Not secure	0		0	
b. Secure (i.e. housing, fencing, etc.)	5		5	X
Maximum Points Possible	70		100	
POINT TOTAL FOR THIS SOURCE			**80**	

Physical Barrier Effectiveness SCORE INTERPRETATION

Point Total		Effectiveness	
0 to 35	**=**	**Low**	(includes all sources in Fractured Rock)
36 to 69	**=**	**Moderate**	
X 70 to 100	**=**	**High**	

Possible Contaminating Activities (PCA) Inventory Form - Ground Water

District Name: Monterey District No.: 05 County: San Benito
System Name: Aromas Water District System No. CA3510004
Source Name: Driscoll Well Source No.: PS Code: GW

Completed by: Luhdorff & Scalmanini Consulting Engineers Date: December 2025

Check the PCA tables that will be used for this drinking water source (assessment must include the "Other" checklist and at least one of the remaining three checklists):

Commercial/Industrial _____

Residential/Municipal X

Agricultural/Rural X

Other (required for all) X

Proceed to appropriate checklist or checklists. Indicate whether the PCA is located in the zone by placing a Y (yes), N (no), or U (unknown) in the appropriate boxes.
Example:

Zone A	Zone B5	Zone B10
Y	N	N
N	**Y**	**U**
U	N	N

Risk Ranking of PCAs, where VH = Very High Risk, H = High Risk, M = Moderate Risk, L = Low Risk

PCA Checklist COMMERCIAL/INDUSTRIAL

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Automobile- Body shops (H)				
Automobile- Car washes (M)				
Automobile- Gas stations (VH)				
Automobile- Repair shops (H)				
Boat services/repair/ refinishing (H)				
Chemical/petroleum pipelines (H)				
Chemical/petroleum processing/storage (VH)				
Dry cleaners (VH)				
Electrical/electronic manufacturing (H)				
Fleet/truck/bus terminals (H)				
Furniture repair/ manufacturing (H)				
Home manufacturing (H)				
Junk/scrap/salvage yards (H)				
Machine shops (H)				
Metal plating/ finishing/fabricating (VH)				
Photo processing/printing (H)				
Plastics/synthetics producers (VH)				
Research laboratories (H)				
Wood preserving/treating (H)				
Wood/pulp/paper processing and mills (H)				
Lumber processing and manufacturing (H)				
Sewer collection systems (H, if in Zone A, otherwise L)				
Parking lots/malls (>50 spaces) (M)				
Cement/concrete plants (M)				
Food processing (M)				
Funeral services/graveyards (M)				
Hardware/lumber/parts stores (M)				
Appliance/Electronic Repair (L)				
Office buildings/complexes (L)				
Rental Yards (L)				
RV/mini storage (L)				

PCA Checklist RESIDENTIAL/MUNICIPAL

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Airports - Maintenance/ fueling areas (VH)	N	N	N	
Landfills/dumps (VH)	N	N	N	
Railroad yards/ maintenance/ fueling areas (H)	N	N	N	
Septic systems - high density (>1/acre) (VH if in Zone A, otherwise M)	U	U	U	
Sewer collection systems - Residential (H, if in Zone A, otherwise L)	Y	Y	Y	
Utility stations - maintenance areas (H)	N	N	N	
Wastewater treatment plants (VH in Zone A, otherwise H)	N	N	N	
Drinking water treatment plants (M)	N	N	N	
Golf courses (M)	N	N	N	
Housing - high density (>1 house/0.5 acres) (M)	Y	Y	Y	
Motor pools (M)	N	N	N	
Parks (M)	Y	Y	N	
Waste transfer/recycling stations (M)	N	N	N	
Apartments and condominiums (L)	N	N	N	
Campgrounds/ Recreational areas (L)	N	N	N	
Fire stations (L)	N	N	N	
RV Parks (L)	N	N	N	
Schools (L)	Y	N	N	
Hotels, Motels (L)	N	N	N	

PCA Checklist AGRICULTURAL/RURAL

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Grazing (> 5 large animals or equivalent per acre) (H in Zone A, otherwise M)	**N**	**N**	**N**	
Concentrated Animal Feeding Operations (CAFOs) as defined in federal regulation1 (VH in Zone A, otherwise H)	**N**	**N**	**N**	
Animal Feeding Operations as defined in federal regulation2 (VH in Zone A, otherwise H)	**N**	**N**	**N**	
Other Animal operations (H in Zone A, otherwise M)	**N**	**N**	**N**	
Farm chemical distributor/ application service (H)	**U**	**U**	**U**	
Farm machinery repair (H)	**N**	**N**	**N**	
Septic systems - low density (<1/acre) (H in Zone A, otherwise L)	**U**	**U**	**U**	
Lagoons / liquid wastes (H)	**N**	**N**	**N**	
Machine shops (H)	**N**	**N**	**N**	
Pesticide/fertilizer/ petroleum storage & transfer areas (H)	**U**	**U**	**U**	
Agricultural Drainage (H in Zone A, otherwise M)	**U**	**U**	**U**	
Wells - Agricultural/ Irrigation (H)	**Y**	**Y**	**Y**	
Managed Forests (M)	**N**	**N**	**N**	
Crops, irrigated (Berries, hops, mint, orchards, sod, greenhouses, vineyards, nurseries, vegetable) (M)	**Y**	**Y**	**Y**	
Fertilizer, Pesticide/ Herbicide Application (M)	**Y**	**Y**	**Y**	
Sewage sludge/biosolids application (M)	**U**	**U**	**U**	
Crops, nonirrigated (e.g., Christmas trees, grains, grass seeds, hay, pasture) (L) (includes drip-irrigated crops)	**Y**	**Y**	**Y**	

PCA Checklist OTHER ACTIVITIES

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
NPDES/WDR permitted discharges (H)	N	N	N	
Underground Injection of Commercial/Industrial Discharges (VH)	N	N	N	
Historic gas stations (VH)	U	U	U	
Historic waste dumps/ landfills (VH)	U	U	U	
Illegal activities/ unauthorized dumping (H)	N	N	N	
Injection wells/ dry wells/ sumps (VH)	N	N	N	
Known Contaminant Plumes (VH)	N	N	N	
Military installations (VH)	N	N	N	
Mining operations - Historic (VH)	N	N	N	
Mining operations - Active (VH)	N	N	N	
Mining - Sand/Gravel (H)	N	N	Y	
Wells - Oil, Gas, Geothermal (H)	N	N	N	
Salt Water Intrusion (H)	N	N	N	
Recreational area - surface water source (H)	N	N	N	
Underground storage tanks - Confirmed leaking tanks (VH)	N	N	N	
Underground storage tanks - Decommissioned - inactive tanks (L)	N	N	N	
Underground storage tanks - Non-regulated tanks (tanks smaller than regulatory limit) (H)	N	N	N	
Underground storage tanks - Not yet upgraded or registered tanks (H)	N	N	N	
Underground storage tanks - Upgraded and/or registered - active tanks (L)	Y	N	N	
Above ground storage tanks (M)	U	U	U	
Wells - Water supply (M)	Y	N	N	
Construction/demolition staging areas (M)	N	N	N	
Contractor or government agency equipment storage yards (M)	N	N	N	
Dredging (M)	N	N	N	
Transportation corridors - Freeways/state highways (M)	N	N	N	
Transportation corridors - Railroads (M)	Y	Y	Y	
Transportation corridors - Historic railroad right-of-ways (M)	U	U	U	
Transportation corridors - Road Right-of-ways (herbicide use areas) (M)	U	U	U	
Transportation corridors - Roads/ Streets (L)	Y	Y	Y	
Hospitals (M)	N	N	N	
Storm Drain Discharge Points (M)	U	U	U	
Storm Water Detention Facilities (M)	U	U	U	

PCA Checklist OTHER ACTIVITIES (continued)

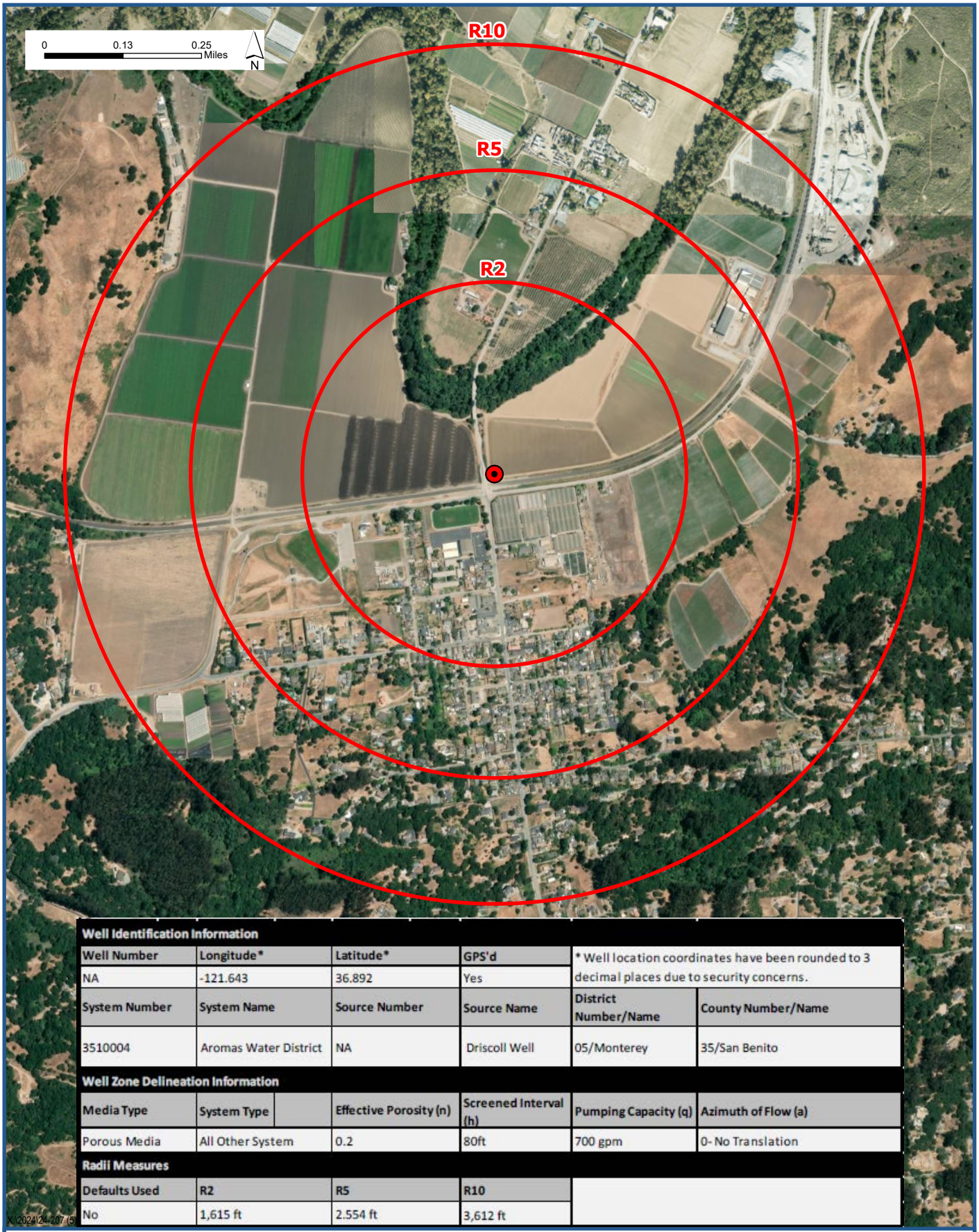
PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Artificial Recharge Projects - Injection wells (potable water) (L)	**N**	**N**	**N**	
Artificial Recharge Projects - Injection wells (non-potable water) (M)	**N**	**N**	**N**	
Artificial Recharge Projects - Spreading Basins (potable water) (L)	**N**	**N**	**N**	
Artificial Recharge Projects - Spreading Basins (non-potable water) (M)	**N**	**N**	**N**	
Medical/dental offices/clinics (L)	**N**	**N**	**N**	
Veterinary offices/clinics (L)	**N**	**N**	**N**	
Surface water - streams/ lakes/rivers (L)	**Y**	**Y**	**Y**	
Wells - monitoring, test holes (L)	**Y**	**Y**	**Y**	

VULNERABILITY RANKING MASTER LIST - Ground Water

District Name: Monterey		District No.: 05		County: San Benito	
System Name: Aromas Water District		System No.: CA3510004			
Source Name: Driscoll Well		Source No.:		PS Code: GW	
		PCA Risk Points	Zone Points	PBE Points	Vulnerability Score
		VH = 7	A = 5	L = 5	
		H = 5	B5 = 3	M = 3	Risk + Zone + PBE points
		M = 3	B10 = 1	H = 1	
Zone	PCA (Risk)	L = 1	Unknown = 0	VH = 0	
A	Sewer collection systems- Residential (H, if in Zone A, otherwise L)	5	5	1	11
A	Housing - high density (>1 house/0.5 acres) (M)	3	5	3	11
A	Parks (M)	3	5	3	11
A	Schools (L)	1	5	5	11
A	Wells - Agricultural/ Irrigation (H)	5	5	1	11
A	Crops, irrigated (M)	3	5	3	11
A	Fertilizer, Pesticide/ Herbicide Application (M)	3	5	3	11
A	Crops, nonirrigated (L) (includes drip-irrigated crops)	1	5	5	11
A	USTs- Upgraded and/or registered - active tanks (L)	1	5	5	11
A	Wells – Water supply (M)	3	5	3	11
A	Transportation Corridors- Railroads (M)	3	5	3	11
A	Transportation Corridors- Roads/ Streets (L)	1	5	5	11
A	Surface water - streams/ lakes/rivers (L)	1	5	5	11
A	Wells – monitoring, test holes (L)	1	5	5	11
B5	Sewer collection systems- Residential (H, if in Zone A, otherwise L)	1	3	5	9
B5	Housing - high density (>1 house/0.5 acres) (M)	3	3	3	9
B5	Parks (M)	3	3	3	9
B5	Wells - Agricultural/ Irrigation (H)	5	3	1	9
B5	Crops, irrigated (M)	3	3	3	9
B5	Fertilizer, Pesticide/ Herbicide Application (M)	3	3	3	9
B5	Crops, nonirrigated (L) (includes drip-irrigated crops)	1	3	5	9
B5	Transportation Corridors- Railroads (M)	3	3	3	9
B5	Transportation Corridors- Roads/ Streets (L)	1	3	5	9
B5	Surface water - streams/ lakes/rivers (L)	1	3	5	9
B5	Wells – monitoring, test holes (L)	1	3	5	9
B10	Sewer collection systems- Residential (H, if in Zone A, otherwise L)	1	1	5	7
B10	Housing - high density (>1 house/0.5 acres) (M)	3	1	3	7
B10	Wells - Agricultural/ Irrigation (H)	5	1	1	7
B10	Crops, irrigated (M)	3	1	3	7
B10	Fertilizer, Pesticide/ Herbicide Application (M)	3	1	3	7
B10	Crops, nonirrigated (L) (includes drip-irrigated crops)	1	1	5	7
B10	Mining - Sand/Gravel (H)	5	1	1	7
B10	Transportation Corridors- Railroads (M)	3	1	3	7
B10	Transportation Corridors- Roads/ Streets (L)	1	1	5	7
B10	Surface water - streams/ lakes/rivers (L)	1	1	5	7
B10	Wells – monitoring, test holes (L)	1	1	5	7
Unknown	Historic gas stations (VH)	7	0	0	7
Unknown	Historic waste dumps/ landfills (VH)	7	0	0	7
Unknown	Farm chemical distributor/ application service (H)	5	0	1	6
Unknown	Pesticide/fertilizer/ petroleum storage & transfer areas (H)	5	0	1	6
Unknown	Sewage sludge/biosolids application (M)	3	0	3	6
Unknown	Above ground storage tanks (M)	3	0	3	6

VULNERABILITY RANKING MASTER LIST - Ground Water

District Name: Monterey		District No.: 05		County: San Benito	
System Name: Aromas Water District		System No.: CA3510004			
Source Name: Driscoll Well		Source No.:		PS Code: GW	
		PCA Risk Points	Zone Points	PBE Points	Vulnerability Score
		VH = 7	A = 5	L = 5	Risk + Zone + PBE points
		H = 5	B5 = 3	M = 3	
		M = 3	B10 = 1	H = 1	
Zone	PCA (Risk)	L = 1	Unknown = 0	VH = 0	
Unknown	Transportation Corridors- Historic railroad right-of-ways (M)	3	0	3	6
Unknown	Transportation Corridors- Road Right-of-ways (herbicide use) (M)	3	0	3	6
Unknown	Storm Drain Discharge Points (M)	3	0	3	6
Unknown	Storm Water Detention Facilities (M)	3	0	3	6
Unknown	Agricultural Drainage (H in Zone A, otherwise M)	3	0	1	4
Unknown	Septic systems - high density (>1/acre) (VH if in Zone A, otherwise M)	3	0	0	3
Unknown	Septic systems – low density (<1/acre) (H in Zone A, otherwise L)	1	0	1	2



Well Identification Information					
Well Number	Longitude*	Latitude*	GPS'd	* Well location coordinates have been rounded to 3 decimal places due to security concerns.	
NA	-121.643	36.892	Yes		
System Number	System Name	Source Number	Source Name	District Number/Name	County Number/Name
3510004	Aromas Water District	NA	Driscoll Well	05/Monterey	35/San Benito
Well Zone Delineation Information					
Media Type	System Type	Effective Porosity (n)	Screened Interval (h)	Pumping Capacity (q)	Azimuth of Flow (a)
Porous Media	All Other System	0.2	80ft	700 gpm	0- No Translation
Radii Measures					
Defaults Used	R2	R5	R10		
No	1,615 ft	2.554 ft	3,612 ft		

X:\2024\24-207 (5)

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DWSAP Groundwater Zone Interference

Drinking Water Source Assessment Protection Program
Aromas Water District - Driscoll Well

Figure X-X

Client: Aromas Water District	**Lat/Long:** 36.8923736 / -121.6434722
Project Name: Driscoll Site	**GSE (ft-msl)** 5±
LSCE #: 21-2-141	**Drill Date:** TBD
Location: Aromas, CA	**Drilling Method:** Reverse Rotary
Geologist: NP	**Driller:** TBD

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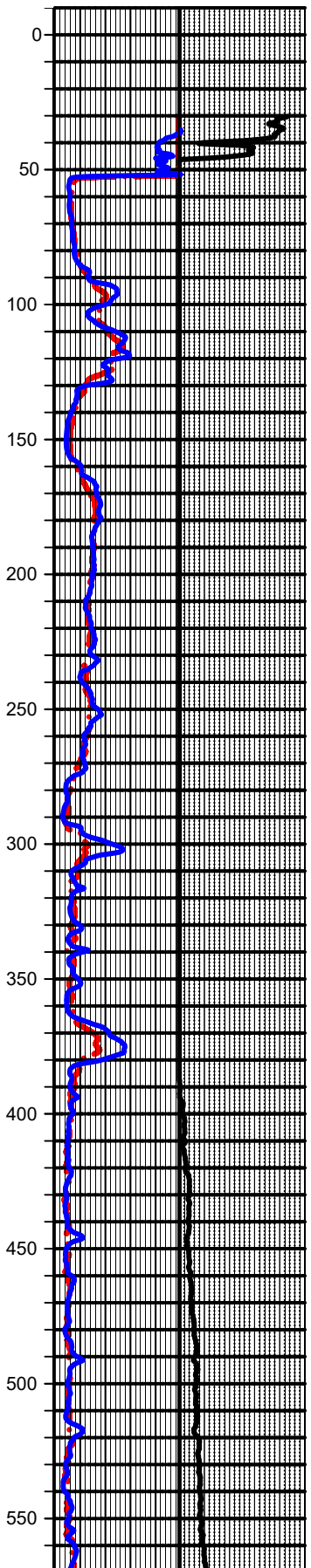
Depth (ft bgs)	Lithologic Description	Strat-Column
0		
50	Clay - Medium-high plasticity, brown	
100	Sand - Fine-coarse, subrounded	
150	Sandy Gravel - Rounded to subrounded, moderately sorted, up to 1/4" gravel, poorly sorted, fine-medium sand	
	Clay - Low plasticity, brown clay	
200	Sand - Fine, well sorted, black/brown	
250	Clayey Sand - Fine, well sorted sand, low plasticity, light brown clay	
300	Clay - Medium plasticity, white	
	Clayey Sand - Medium sand, low plastic, blue clay	
350	Clay - Medium plasticity, blue/white	
400	Clay w/sand - Low plasticity, sticky, tan clay, fine sand	
	Clay - Medium plasticity, tan	
450	Clay w/sand - Medium plasticity, tan clay, medium-fine sand	
500		
550	Clay - Low-medium plasticity, blue	
600	Sandy Clay - Medium plasticity, blue clay with medium-fine sand	
650	Sand w/clay - Fine sand w/ low plasticity, blue clay streaks	
	Clay w/sand - Low plasticity, blue clay, fine sand	
700	Clay w/sand - Medium plasticity, black/blue clay, fine sand	
750	Clay - Medium plasticity, black clay	
800	Sand, Mudstone, Clay - Medium-coarse, moderately sorted sand w/shells, poorly indurated orange mudstone, medium plasticity brown clay	
850	Clay, Sand, Mudstone - Medium plasticity, brown clay, medium-coarse moderately sorted sand, poorly indurated orange mudstone	



Preliminary Production Well Design