Public Review Draft EIR

Meridian Village Subdivision and Multifamily Development

April 14, 2026

Prepared by

EMC Planning Group

PUBLIC REVIEW DRAFT EIR

MERIDIAN VILLAGE SUBDIVISION AND MULTIFAMILY DEVELOPMENT

PREPARED FOR

City of Hollister
Magda Gonzalez, Contract Senior Planner
339 Fifth Street
Hollister, CA 95023
Tel 925.789.7160
mgonzalez.4leaf@hollister.ca.gov

PREPARED BY

EMC Planning Group Inc.
601 Abrego Street
Monterey, CA 93940
Tel 831.649.1799
Fax 831.649.8399
www.emcplanning.com

April 14, 2026

Table of Contents

Appendices

Tables

Figures

1.0 Introduction

1.1 Purpose for Preparing the EIR

The City of Hollister ("City"), acting as the lead agency, has determined that the Meridian Village Subdivision and Multifamily Development (hereinafter, "proposed project") could result in significant adverse environmental impacts. The City then prepared an initial study to evaluate potential impacts of the project. The initial study concluded that all environmental impacts, except for vehicle miles traveled (VMT), were less than significant or less than significant with mitigation measures incorporated. The VMT impact was found to be significant and unavoidable based on the transportation analysis that was prepared for the proposed project (Appendix H of the initial study). The initial study and transportation analysis are included in Appendix A.

Based on the findings in the initial study, the City has required that an environmental impact report (EIR) be prepared that focuses only on VMT impacts. The purpose of the EIR is to further disclose the project's significant VMT impacts and to identify alternatives to the proposed project that could avoid or substantially lessen the impact.

This EIR has been prepared in compliance with the California Environmental Quality Act (CEQA) of 1970, as amended, to inform public decision makers and their constituents of the VMT impacts associated with the proposed project.

1.2 Methodology

General

This EIR has been prepared by EMC Planning Group in accordance with CEQA and its implementing guidelines, using an interdisciplinary approach. The City of Hollister has the discretionary authority to review and approve the proposed project. This EIR is an informational document that is intended to inform the decision makers and their constituents, as well as responsible and trustee agencies of the environmental impacts of the proposed project and to identify feasible mitigation measures that would avoid or reduce the severity of the impacts. The lead agency is required to consider the information contained in this EIR prior to taking any discretionary action to approve the proposed project.

This EIR has been prepared using available information from private and public sources noted herein, as well as information generated through field investigation by EMC Planning Group and other technical experts.

The purpose of an EIR is to identify a project's significant environmental effects, to indicate the manner in which those significant effects can be mitigated or avoided, and to identify and evaluate alternatives to the proposed project.

An EIR is an objective public disclosure document that takes no position on the merits of the proposed project. Therefore, the findings of this EIR do not advocate a position "for" or "against" the proposed project. Instead, the EIR provides information on which decisions about the proposed project can be based. This EIR has been prepared according to professional standards and in conformance with legal requirements.

Emphasis

This draft EIR focuses on the significant effects on the environment in accordance with CEQA Guidelines section 15143. The significant effects are discussed with emphasis in proportion to their severity and probability of occurrence.

Forecasting

In accordance with CEQA Guidelines section 15144, preparing this draft EIR necessarily involved some degree of forecasting. While foreseeing the unforeseeable is not possible, the report preparers and technical experts used best available efforts to find out and disclose all that it reasonably can.

Speculation

If, after thorough investigation, the report preparers in consultation with the lead agency determined that a particular impact is too speculative for evaluation, the conclusion is noted and the issue is not discussed further (CEQA Guidelines section 15145).

Degree of Specificity

In accordance with CEQA Guidelines section 15146, the degree of specificity in this draft EIR corresponds to the degree of specificity involved in the proposed project. An EIR on a well-defined proposed development project will be more detailed than will be an EIR on policy or regulatory document (e.g., land use plan, specific plan, or zoning ordinance) where the resulting physical environmental changes cannot yet be precisely identified. An EIR on policy or regulatory project would focus on secondary effects from implementing the plan or regulations, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

As described in Section 4.0, Project Description, the applicant for the proposed project has submitted an application to the City of Hollister for a tentative subdivision map.

The level of analysis specificity for the project description is based upon the level of detail available in the project information submitted by the applicant.

Technical Detail

The information contained in this draft EIR includes summarized technical data, maps, plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public, pursuant to CEQA Guidelines section 15147. Placement of highly technical and specialized analysis and data is included as appendices to the main body of the draft EIR.

Citation

In accordance with CEQA Guidelines section 15148, preparation of this draft EIR was dependent upon information from many sources, including engineering reports and scientific documents relating to environmental features. If the document was prepared specifically for the proposed project, the document is included in the technical appendices discussed above. Documents that were not prepared specifically for the proposed project, but contain information relevant to the environmental analysis of the proposed project, are cited but not included in this draft EIR. This draft EIR cites all documents used in its preparation including, where appropriate, the page and section number of any technical reports that were used as the basis for any statements in the draft EIR.

Cumulative Impacts Analysis

CEQA Guidelines section 15130 requires a discussion of cumulative impacts when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3), which states, "The project has possible environmental effects that are individually limited but cumulative considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. A cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR. When the combined cumulative impacts associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting its conclusion that the cumulative impact is less than significant.

A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and therefore, is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the other identified projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

CEQA requires a cumulative development scenario to consist of either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or, a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Cumulative impacts are evaluated within Section 9.0, Cumulative Impacts, of this EIR.

1.3 EIR Process

There are several steps required in an EIR process. The major steps are briefly discussed below.

Notice of Preparation

CEQA Guidelines section 15082 describes the purpose, content and process for preparing, circulating and facilitating early public and public agency input on the scope of an EIR. CEQA Guidelines section 15375 defines a notice of preparation as:

> …a brief notice sent by the Lead Agency to notify the Responsible Agencies, Trustee Agencies, the Office of Planning and Research, and involved federal agencies that the Lead Agency plans to prepare an EIR for the project. The purpose of the notice is to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR.

A notice of preparation was prepared for the proposed project and circulated for 30 days from December 31, 2025 to February 6, 2026, as required by CEQA. Written responses to the NOP were received from the following. The notice of preparation is included as Appendix A and the comments received from agencies, organizations, and private individuals are included in Appendix B.

Native American Heritage Commission

Matthew Lin, Cultural Resource Analyst for the Native American Heritage Commission submitted a comment on the NOP on December 31, 2025. The issues raised are adequately addressed within the initial study included as part of the NOP. No further analysis is required.

California Department of Toxic Substances Control

Tamara Purvis, Associate Environmental Planner with the Department of Toxic Substances Control submitted a comment on the NOP on January 7, 2026. The issues raised are addressed in Section 6.0, DTSC Comment Letter on NOP.

Public Comment

A comment was received from the public, Sarah Moody, dated January 18, 2026. The issues raised are discussed in Section 5.0, Transportation (VMT).

California Department of Transportation, District 5

Ingrid McRoberts, Local Development Review Coordinator for District 5 with the California Department of Transportation submitted a comment on the NOP on February 5, 2026. The issues raised are discussed in Section 5.0, Transportation (VMT).

San Benito High School District

Shawn Tennenbaum, Ed.D., Superintendent of the San Benito High School District submitted a comment on the NOP on February 6, 2026. The issues raised are adequately addressed within the initial study included as part of the NOP. No further analysis is required.

California Department of Fish and Wildlife

Julie Vance, Regional Manager with the California Department of Fish and Wildlife submitted a comment on the NOP on February 9, 2026. The issues raised are adequately addressed within the initial study included as part of the NOP. No further analysis is required.

Draft EIR

Contents

This EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency is required to consider the information in the EIR along with other information which may be presented to the agency. CEQA Guidelines Article 9 requires a draft EIR contain the following information:

- Table of Contents;
- Summary;
- Project Description;

- Environmental Setting;
- Consideration and Discussion of Environmental Impacts;
- Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects;
- Consideration and Discussion of Alternatives to the Proposed Project;
- Effects not found to be Significant;
- Organization and Persons Consulted; and
- Discussion of Cumulative Impacts.

The detailed contents of this draft EIR are outlined in the table of contents.

Public Review

This draft EIR will be circulated for a 45-day public review period. All comments addressing environmental issues received on the draft EIR will be addressed in the final EIR. CEQA Guidelines section 15204(a) states that in reviewing a draft EIR, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

CEQA Guidelines section 15204(c) states that reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to section 15064, an effect shall not be considered significant in the absence of substantial evidence.

Final EIR

Contents

In accordance with CEQA Guidelines section 15132, the final EIR will provide the following:

- List of persons, organizations, and public agencies commenting on the draft EIR;
- Comments received on the draft EIR;
- Responses to significant environmental points raised in comments; and
- Revisions that may be necessary to the draft EIR based upon the comments and responses.

According to CEQA Guidelines section 15204(a), when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. The final EIR and the draft EIR will constitute the entire EIR.

Certification

CEQA Guidelines section 15088 requires the lead agency to provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an EIR.

CEQA Guidelines section 15090 requires lead agencies to certify the final EIR prior to approving a project. The lead agency shall certify that the final EIR has been completed in compliance with CEQA, the final EIR was presented to the decision-making body of the lead agency and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project, and that the final EIR reflects the lead agency's independent judgment and analysis.

1.4 Terminology

Characterization of Impacts

This EIR uses the following terminology to denote the significance of environmental impacts.

No Impact

"No impact" means that no change from existing conditions is expected to occur.

Adverse Impacts

A "less-than-significant impact" is an adverse impact, but would not cause a substantial adverse change in the physical environment, and no mitigation is required.

A "significant impact" or "potentially significant impact" would, or would potentially, cause a substantial adverse change in the physical environment, and mitigation is required.

A "less-than-significant impact with implementation of mitigation measures" means that the impact would cause no substantial adverse change in the physical environment if identified mitigation measures are implemented.

A "significant and unavoidable impact" would cause a substantial change in the physical environment and cannot be avoided if the project is implemented; mitigation may be recommended, but will not reduce the impact to less-than-significant levels.

Beneficial Impact

A "beneficial impact" is an impact that would result in a decrease in existing adverse conditions in the physical environment if the project is implemented.

Abbreviations and Acronyms

AMBAG	Association of Monterey Bay Area Governments
APN	Assessor's Parcel Number
CalEEMod	California Emission Estimation Model
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
dB	Decibel
DNL or L_{dn}	Day-Night Average Level
DPM	Diesel Particulate Matter
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
GHG	Greenhouse Gas
MT	Metric Tons
NOP	Notice of Preparation
NO_x	Oxides of Nitrogen
NWI	National Wetlands Inventory
PM_{10}	Suspended Particulate Matter
ROG	Reactive Organic Gases
SLOAPCD	San Luis Obispo County Air Pollution Control District
TAC	Toxic Air Contaminants
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Gases
USFWS	U.S. Fish and Wildlife Service

2.0 Summary

2.1 CEQA Requirements

CEQA Guidelines Section 15123 requires an EIR to contain a brief summary of the proposed project, significant impacts of the proposed project and mitigation measures proposed to lessen or avoid significant impacts, areas of controversy known to the lead agency, and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

2.2 Summary of the Proposed Project

The applicant is requesting approval of a tentative subdivision map to subdivide the project site into five lots, and develop 219 residential units (90 apartments and 129 condominiums), and five parcels for public and private streets. Lot 1 would include 89,104 square feet with five apartment buildings (90 apartment units) and a 16,170 square foot recreation center and private park area, while Lots 2 through 5 would be developed with 3-, 4-, 5-, and 6-unit townhome-style buildings for a total of 129 condominium units.

More detailed project description information is included in Section 4.0, Project Description.

2.3 Summary of Significant Impacts and Mitigation Measures

The proposed project would have several significant impacts. Each of the significant impacts is identified in Table 2-1, Summary of Significant Impacts and Mitigation Measures, located at the end of this Summary section. The table lists each significant impact by topic area, the level of significance of each impact, mitigation measures to avoid or substantially minimize each impact, and the level of significance of each impact after implementation of the mitigation measures.

As noted in Section 1.1 of this EIR, an initial study was prepared to evaluate the potential impacts of the proposed project. The initial study can be found in Appendix A. Table 2-1 identifies the significant impacts and mitigation measures identified in the initial study and reiterates the determination, as evaluated in Section 5.0, Transportation (VMT) in this EIR, that the VMT impact of the project is significant and unavoidable.

2.4 Summary of Alternatives

This EIR evaluates the environmental impacts of the following three alternatives to the proposed project.

1. No project alternative. This alternative addresses impacts from development that could be reasonably expected to occur if the project were not approved, based on the current land use and zoning designations for the site.
2. 100 percent affordable housing. This alternative evaluates potential impacts of developing the site with 219 residential units that would meet the definition of affordable housing for Hollister. This alternative would reduce the significant and unavoidable VMT impact of the proposed project to a less-than-significant level.
3. 25 percent affordable housing. This alternative would increase the number of affordable housing units by ensuring that at least 55 of the proposed apartment units are for low/very low-income levels while the residual 164 units (35 apartment units and 129 condominiums) would remain above moderate-income level units. The total residential development would still be 219 units, same as the proposed project. This alternative would reduce the significant and unavoidable VMT impact of the proposed project to a less-than-significant level.

2.5 Areas of Known Controversy

CEQA Guidelines section 15123, Summary, requires a discussion of areas of controversy known to the lead agency including issues raised by agencies and the public.

No known areas of public controversy have been identified to date. Comment letters received in response to the NOP (included in Appendix B) identify issues the commenters suggested be evaluated in this EIR or revised in the initial study.

2.6 Issues to be Resolved

CEQA Guidelines Section 15123 requires an EIR to discuss issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects. The City of Hollister is not aware of any issues to be resolved; however, the City Council will be required to consider each of the alternatives evaluated in this EIR, and make a decision whether to approve the proposed project or one of the alternatives. See Section 8.0, Alternatives, for the complete alternatives analysis.

Table 2-1 Summary of Significant Impacts and Mitigation Measures

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
Air Quality			
Health risks from exposure of sensitive receptors to toxic air contaminants during construction	Significant	AQ-1 The developer shall prepare a construction management plan to reduce the potential exposure of sensitive receptors to temporary construction toxic air contaminants. The construction management plan language shall be included in all bid documents, grading, and construction plans to be implemented by the project contractor during construction. The following measures shall be included in the Construction Management Plan: a. Heavy-duty diesel vehicles will have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation, and will not be staged within 500 feet of occupied residences; and b. Idling of construction equipment and heavy-duty diesel trucks will be avoided where feasible, and if idling is necessary, it will not exceed three minutes. c. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications and will be checked by a certified visible emissions evaluator. d. All non-road diesel construction equipment will, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112. Further, where feasible, construction equipment will use alternative fuels such as compressed natural gas, propane, electricity or biodiesel. The construction management plan shall be subject to the review and approval of the Community Development Department prior to issuance of a grading permit.	Less than Significant
Biological Resources			
Potential loss of or harm to special-status biological resources, including nesting birds and raptors, should they be present during construction.	Significant	BIO-1 To avoid impacts to nesting birds during the nesting season (January 15 through September 15), construction activities shall be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys.	Less than Significant

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		a. Two surveys for active bird nests will occur within 14 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the USFWS, CDFWS, and the City of Hollister and no further mitigation is required. b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the USFWS, CDFWS, and the City of Hollister.	
Project development and construction activities at the project site could result in the disturbance of roost and/or natal sites occupied by special-status bats on or adjacent to the project site, if present.	Significant	BIO-2 The following measures shall be implemented to avoid loss of or harm to special-status bat species: a. Approximately 14 days prior to construction activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees or buildings within 50 feet of the construction easement. These surveys shall include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the project site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an "Anabat"	Less than Significant

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		unit. Potential roosting features found during the survey shall be flagged or marked. b. If no roosting sites or bats are found, a letter report will be prepared by the biologist and submitted to California Department of Fish and Wildlife and the City of Hollister, and no further measures are required. c. If bats or roosting sites are found, bats shall not be disturbed without specific notice to and consultation with California Department of Fish and Wildlife. d. The bat nursery season is generally considered May 1 to October 1. If bats are found roosting outside of the nursery season, California Department of Fish and Wildlife shall be consulted prior to any eviction or other action. If avoidance or postponement is not feasible, a Bat Eviction Plan will be submitted to California Department of Fish and Wildlife for written approval prior to project implementation. A request to evict bats from a roost includes details for excluding bats from the roost site and monitoring to ensure that all bats have exited the roost prior to the start of activity and are unable to re-enter the roost until activity is completed. Any bat eviction shall be timed to avoid lactation and young-rearing. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.	
Cultural Resources			
Historic archaeological resources and/or unique archaeological resources, if present, could be damaged or destroyed by ground disturbing construction activities	Significant	CUL-1 The following language shall be incorporated into any plans associated with tree removal, grading, and construction, "In the event that archaeological resources are encountered during ground disturbing activities, contractor shall temporarily halt or divert excavations within a 50 meter (165 feet) of the find until it can be evaluated. All potentially significant archaeological deposits shall be evaluated to demonstrate whether the resource is eligible for inclusion on the California Register of Historic Resources, even if discovered during construction. If archaeological deposits are	Less than Significant

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		encountered, they will be evaluated and mitigated simultaneously in the timeliest manner practicable, allowing for recovery of materials and data by standard archaeological procedures. For prehistoric archaeological sites, this data recovery involves the hand-excavated recovery and non-destructive analysis of a small sample of the deposit. Historic resources shall also be sampled through hand excavation, though architectural features may require careful mechanical exposure and hand excavation. Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance by a qualified Archaeologist. Significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites."	
Ground disturbing could damage or destroy previously undiscovered Native American human remains	Significant	CUL-2 The following language shall be incorporated into any plans associated with tree removal, grading, and construction, "In the event that human remains (or remains that may be human) are discovered at the project site, Public Resource Code Section 5097.98 must be followed. All grading or earthmoving activities shall immediately stop within 50 meters (165 feet) of the find. The San Benito County Coroner will be notified immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the project proponent shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (Public Resource Code [PRC] § 5097). The coroner shall contact the Native American Heritage Commission (NAHC) to determine the most likely descendant(s) (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD will determine the most appropriate means of treating the human remains and associated grave artifacts, and shall oversee the disposition of the remains. In the event the NAHC is unable to identify an MLD or the MLD fails to make a recommendation within 48 hours after being granted access to the site, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity within the project area in a location not subject to	Less than Significant

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		further subsurface disturbance if: a) the Native American Heritage Commission is unable to identify the MLD or the MLD failed to make a recommendation within 48 hours after being allowed access to the site; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner."	
Geology and Soils			
Near-surface site soils may exhibit high expansive behavior causing structural damage	Significant	GEO-1 Prior to issuance of a grading permit, the project developer shall prepare a design-level geotechnical report, which involves, but is not limited to, additional soil samples to determine the expansion potential of near-surface soil to develop post-tensioned foundation design criteria. The design-level geotechnical report shall further refine the allowable bearing capacity for the post-tensioned mat system. The design-level geotechnical report shall discuss the topics and update the recommendations presented in the Lowes Hollister Hollister, California Primary Geotechnical Exploration prepared by ENGEO Incorporated in June 2021. After City approval of the design-level geotechnical report, the developer shall implement the recommendations provided within the report and these recommendations shall be incorporated into grading and building plans, as appropriate.	Less than Significant
Paleontological resources could be directly or indirectly destroyed during construction activities	Significant	GEO-2 The following language shall be included on all grading permits: "If paleontological resources are discovered during demolition and earthmoving activities, work shall stop within 100 feet of the find until a qualified paleontologist can assess if the find is unique and, if necessary, develop appropriate treatment measures in consultation with the City of Hollister Planning Division."	Less than Significant
Hazards and Hazardous Materials			
Project construction activities could release hazardous materials into the environment	Significant	HAZ-1 Prior to issuance of a grading permit, the project developer shall ensure that the project site is fully characterized and remediated under the oversight of a self-certified local agency (DTSC or the regional water quality control board). The project developer shall also prepare a cleanup plan, Removal Action Workplan, or a Remedial Action Plan to adequately address all site impacts after complete characterization. The chosen plan shall be reviewed and approved by the City of Hollister Building Division. The plan, once approved by the Building Division, shall be incorporated into the grading and building plans, and implemented, as appropriate.	Less than Significant

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
Noise			
The project's interior noise level may exceed the City's 45 DB L_{dn} standard.	Significant	N-1 Prior to issuance of an occupancy permit, the developer shall provide evidence to the Community Development Department that mechanical ventilation or air conditioning is installed for all project residences.	Less than Significant
Transportation			
Project VMT of 22.76 per capita would exceed the VMT threshold of significance of 18.79 VMT per capita (15% below countywide average)	Significant	No feasible mitigation measures.	Significant and Unavoidable
Utilities and Service Systems			
The City's Water Reclamation Facility may not be able to serve the project's projected demand	Significant	UTIL-1 Prior to project approval, the City's Public Works Director shall make a determination as to whether there is sufficient capacity to serve the project. The project shall not be approved until sufficient capacity exists within the Water Reclamation Facility.	Less than Significant

SOURCE: EMC Planning Group 2026

3.0 Environmental Setting

3.1 Regional Setting

The City of Hollister is located approximately 18 miles northeast of Salinas and 15 miles southeast of Gilroy, in the northern portion of San Benito County. Hollister is surrounded by unincorporated areas of San Benito County, primarily in active agricultural production or rangeland. Land uses in Hollister include residential (approximately 31 percent), industrial (16 percent), and open space (4 percent) (Hollister January 2026). The nearest bodies of water are Santa Ana Creek located approximately 1.27 miles northwest of the project site, and the San Benito River located approximately 1.5 miles southwest of the project site. Figure 3-1, Location Map, identifies the project site's regional location.

3.2 Project Site Location and Setting

Project Location and Existing Site Conditions

The approximately 12.75-acre project site is located south of Meridian Street and west of State Route 25 within the City of Hollister, County of San Benito on Assessor Parcel Number (APN) 054-600-005. The property is located approximately seven miles from the San Andreas Fault, and approximately 0.40 miles northeast of the Calaveras Fault. The Hollister Municipal Airport is located 2.33 miles northwest of the project site. According to the Hollister Municipal Airport Land Use Compatibility Plan (2012), the project site is located within the Airport Influence Area and the Airspace Protection Zone.

The site is undeveloped and operating as agricultural cropland with wheat crops and contains two trees. Figure 3-2, Aerial Photograph, illustrates the uses on, and surrounding, the project site. Figure3-3, Site Photographs, provides a visual of the project site from a pedestrian's viewpoint.

Surrounding Land Use and Vicinity Setting

The site is surrounded by commercial and residential uses to the west; an undeveloped agricultural parcel cultivated with wheat crops, Meridian Street, and residential uses to the north; an undeveloped agricultural parcel cultivated with wheat crops, State Route 25, and residential uses to the east; and an undeveloped agricultural parcel cultivated with wheat crops, and industrial and commercial uses to the south. Residential neighborhoods and commercial uses surround the project site and the adjacent undeveloped agricultural parcels, as shown in Figure 3-2, Aerial Photograph.

3.3 General Plan and Zoning Designations

The project site is designated Mixed-Use in the *City of Hollister General Plan* ("General Plan") and has a Neighborhood Mixed-Use (NMU) zoning designation.

General Plan Land Use Designation

Mixed Use

The General Plan land use map (dated 2020) identifies the project site as "Mixed Use." The General Plan does not include a "Mixed Use" designation definition. Refer to the zoning district definition below.

Zoning District

The current Zoning Map (dated 2021) identifies the project site as "Neighborhood Mixed Use (NMU)." The Neighborhood Mixed Use zoning district:

> "Mixed-Use Districts are intended to provide both commercial and residential uses on one property or development to support the needs of the city and ensure that housing is constructed to meet the city's regional housing needs assessment and provide a mix of house types for the community. All mixed-use projects are required to provide residential."

General Plan Housing Element

The City of Hollister is currently updating their 6th Cycle housing element. Therefore, the current housing element is the *City of Hollister Housing Element of the General Plan,* which is the 5th Cycle housing element for the 2015-2023 planning period and was adopted on April 4, 2016.

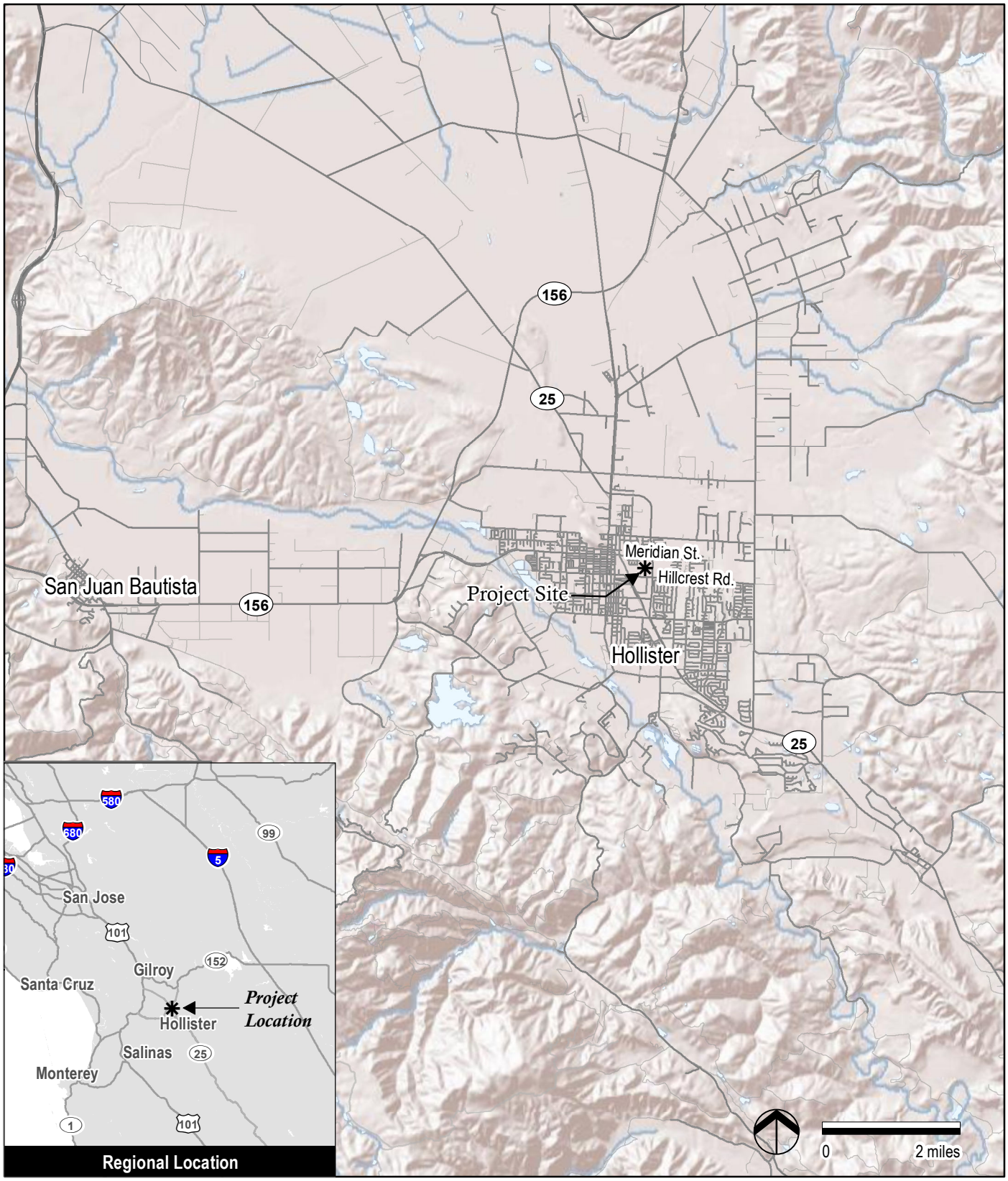
The *City of Hollister 2023-2031 Housing Element HCD Resubmittal February 2026* (public review draft) includes the project site with 206 above-moderate income units (134 single-family dwellings and 72 multi-family units) and as a pipeline project (Table F-10).

Hollister 2040 General Plan (Public Review Draft)

In January 2026, the City of Hollister published the revised draft 2040 General Plan to reflect City Council direction provided at an April 2025 meeting. The draft 2040 General Plan is out for review and feedback from the public. The Planning Commission will meet in March 2026 to review and consider recommending adoption of the 2040 General Plan and the City Council will consider adoption of the document in April 2026.

3.4 Plan Consistency

Consistent with CEQA Guidelines section 15125(d), this EIR discusses any inconsistencies between the proposed project and General Plan polices and implementing actions which directly or indirectly have the potential to reduce VMT. This discussion is included in Section 5.0, Transportation – Vehicle Miles Traveled. The City has not adopted a VMT reduction plan or associated regulations against which project consistency can be evaluated.



Source: ESRI 2024

Figure 3-1

Location Map

Meridian Village Subdivision and Multifamily Development Draft EIR

This side intentionally left blank.

Source: San Benito County 2025, Google Earth 2025

Figure 3-2

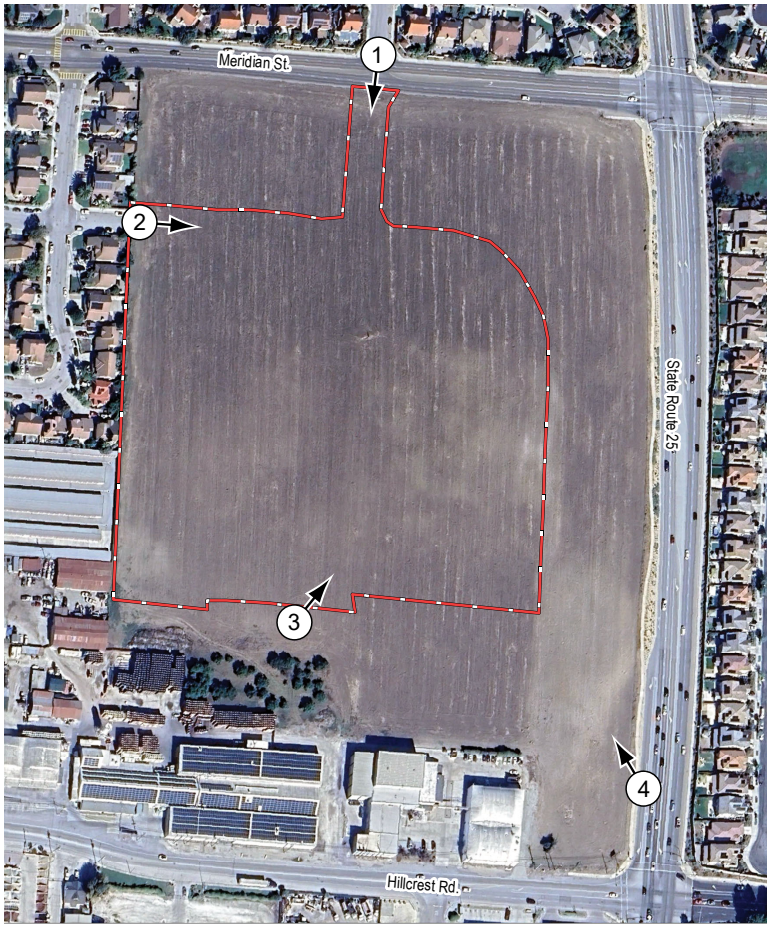
Aerial Photograph

Meridian Village Subdivision and Multifamily Development Draft EIR

This side intentionally left blank.

1 On Meridian Street facing south at the project site.

2 On west side of the project site facing east.



Project Site

Source: Google Earth 2025
Photographs: EMC Planning Group 2024

3 On south side of the project site facing northeast.

4 On State Route 25 facing northwest across the project site.

Figure 3-3
Site Photographs

This side intentionally left blank.

4.0
Project Description

4.1 Project Objectives

In accordance with CEQA Guidelines Section 15124(b), the description of the project shall contain a statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.

The project applicant (Colette Fahmy) has provided the following list of objectives for the proposed project:

1. Provide an infill residential project on an underutilized site.
2. Develop residential uses on a site that does not currently contain any housing, which will help meet the City's Regional Housing Needs Assessment obligations.
3. Develop a high-quality multi-family residential community.
4. Contribute to meeting the growing housing needs of the City and the region by providing ownership multi-family residential units and for rent apartment housing units to accommodate a spectrum of demographics.
5. Develop the project site in an environmentally sensitive manner, including through implementation of current codes and building standards that require water efficiency and energy efficiency as well as water quality best management practices and drought tolerant landscaping.

Project Background

An initial study and mitigated negative declaration were previously prepared in 2006 for the Guerra Pre-zoning, Zone Change, and C-District Review project on the project site. The previous project proposed mixed uses, including up to 250,000 square feet of commercial uses and 120 multi-family (condominium) residential units. This previous project involved a larger area than the currently proposed project site. Since preparation of the 2006 initial study, development proposed for the property was significantly revised and is now known as the Meridian Village project. The parcel has since been annexed.

An initial study was prepared in December 2025 for the currently proposed project, which concluded that the project would result in a significant and unavoidable impact associated with vehicle miles traveled (VMT) with no mitigation measures found to reduce impacts to less than significant. This EIR document will evaluate and discuss the VMT impacts of the proposed project. The initial study, which evaluated all of the remaining topics, can be found in Appendix A.

4.2 Project Characteristics

The full tentative map, dated January 2024, is included in Appendix A of the initial study, included in this EIR as Appendix C. The site plan can be found in Figure 4-1, Site Plan.

Subdivision and Development

The proposed project includes subdividing the 12.75-acre parcel into five lots, with a total of 219 residential units (90 apartments and 129 condominiums), and five parcels for public and private streets.

Proposed Lots

The proposed acreage and use on each lot are provided below:

Lot 1

Lot 1 will cover 2.22 acres and would be developed with five apartment buildings, each building consisting of 18 units for a total of 90 apartment units. Lot 1 will also include a private storm drain easement, as well as Parcel F consisting of a 19,840 square foot recreation center and private park area.

Lot 2

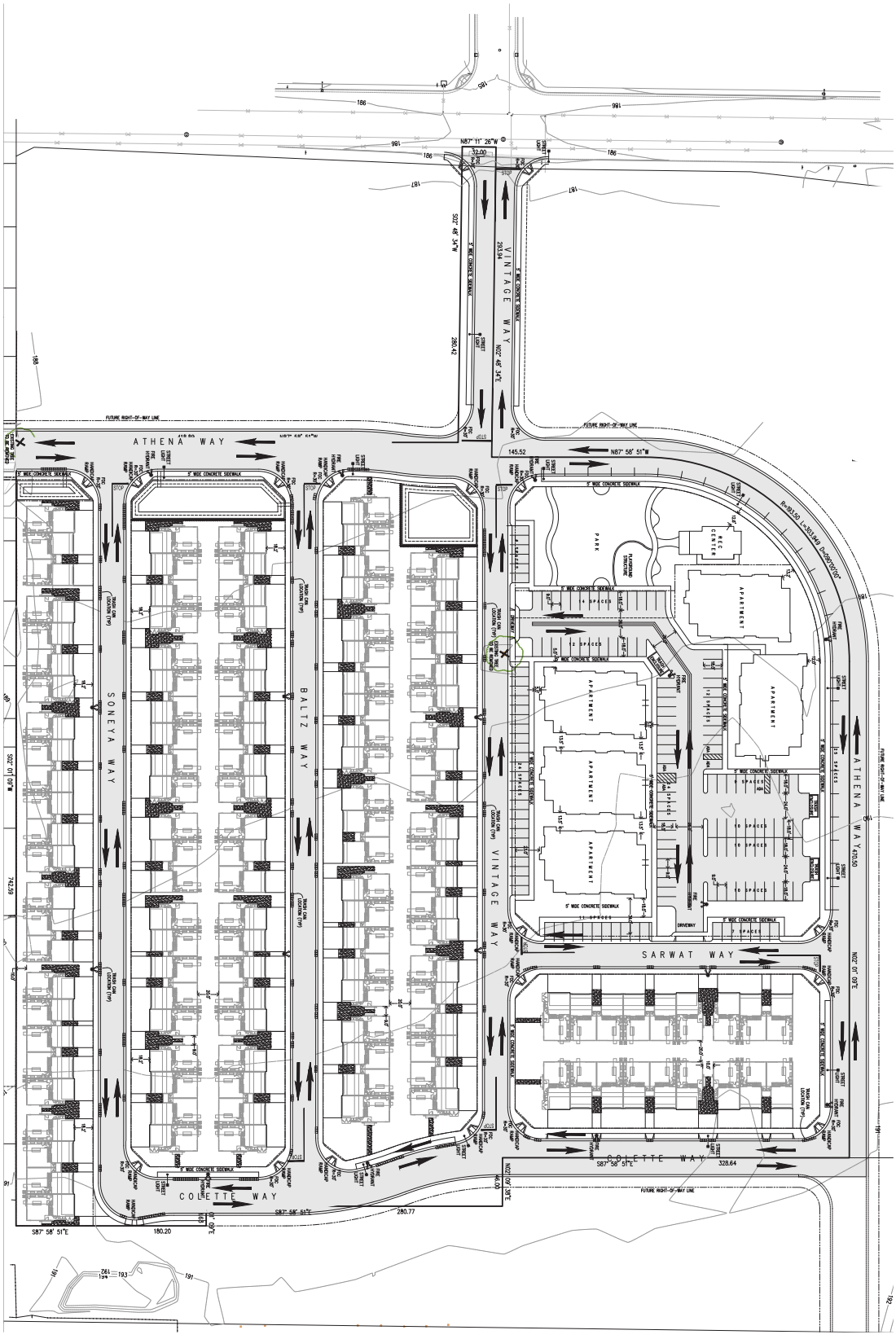
Lot 2 will cover 0.95 acres and would be developed with 3-, 4-, 5-, and 6-unit townhome-style buildings.

Lot 3

Lot 3 will cover 2.00 acres and would be developed with 3-, 4-, 5-, and 6-unit townhome-style buildings. Additionally, Lot 3 will include Parcel G consisting of a 5,228 square foot bioretention area.

Lot 4

Lot 4 will cover 2.05 acres and would be developed with 3-, 4-, 5-, and 6-unit townhome-style buildings. Additionally, Lot 4 will include Parcel H consisting of a 3,979 square foot bioretention area.



0 150 feet

Source: Hanna Brunetti Engineers 2024

Figure 4-1

Site Plan

This side intentionally left blank.

Lot 5

Lot 5 will cover 1.15 acres and would be developed with 3-, 4-, 5-, and 6-unit townhome-style buildings. Additionally, Lot 5 will include Parcel I consisting of a 1,260 square foot bioretention area.

Proposed Parcels A, B, C, D, and E

Parcels A through E will consist of public and private streets.

Parcel A

Parcel A will be 50,056 square feet and will be a public portion of Vintage Way between existing Meridian Street and proposed Athena Way, as well as Athena Way.

Parcel B

Parcel B will be 33,822 square feet and will be private street Sarwat Way and private portion of Vintage Way located between Athena Way and Colette Way.

Parcel C

Parcel C will be 24,207 square feet and will be private street Baltz Way.

Parcel D

Parcel D will be 24,013 square feet and will be private street Soneya Way.

Parcel E

Parcel E will be 27,687 square feet and will be public street Colette Way.

Recreation Center and Open Space

Parcel F would develop a 19,840 square foot recreation center and private park area. The private park area would include a park and playground structure.

Access and Parking

The project site will involve two access points. The primary access point (proposed Vintage Way) will be from Meridian Street to the north, and the secondary access point will be an extension of the existing Athena Way from the west. The proposed Vintage Way will be a public street for the first 40 feet and a private street the remaining 26 feet. The proposed extension of Athena Way will be public along with the proposed Colette Way. The following proposed internal streets will be private: Sarwat Way, Baltz Way, and Soneya Way.

The public street portion of the proposed Vintage Way will consist of a 30-foot emergency vehicle access easement, which will also be used as an ingress/egress and public utilities easement.

The proposed project will provide a total of 665 parking spaces (149 spaces for the apartments and 516 spaces for the condominiums) and 16 bicycle parking spaces.

Building Layout and Elevations, Landscape Plan, and Photometric Plan

Proposed building layout and elevations, as well as landscape and photometric plans, are included in Appendix D.

Tree Removal

There are two existing trees on the project site that will be removed.

Utilities

The proposed project will connect into the existing water, sanitary sewer system, and storm drain system located on Meridian Street. Street lighting will also be placed throughout the project site. Stormwater will be treated within the four drainage management areas and direct stormwater towards each management area's stormwater control measure located along the western side of the project site.

Grading

The project site consists of relatively flat to gently sloping topography. Construction activities would occur across the 12.75-acre project site and may require grading and earthmoving.

Population

The proposed project involves the development of 219 multi-family residential units, which would result in the addition of approximately 723 people to the City of Hollister (219 multi-family homes x 3.30 persons per household) (California Department of Finance 2025).

4.3 Intended Uses of the EIR

In accordance with CEQA Guidelines section 15124(d), the following is a list of agencies that are expected to use this EIR in their decision-making, and a list of the approvals for which this EIR may be used. These lists include information that is known to the City of Hollister.

City of Hollister

Community Development Department

- Certification of the EIR;
- Meridian Village Subdivision and Multifamily Development project;
- Major subdivision application; and
- Tentative subdivision map.

Public Works Department

- Grading permits;
- Building permits;
- Tree removal;
- Occupancy permits; and
- Encroachment permits.

Other Agencies

San Benito County Airport Land Use Commission

- Application for Determination of Consistency.

Regional Water Quality Control Board

- Subject to requirements of the Phase II Small MS4 permit (Order No. 2013-0001-DWQ).

This side intentionally left blank.

5.0
Transportation – Vehicle Miles Traveled

As described in Section 1.0, Introduction, this EIR has been prepared to address the significant and unavoidable vehicle miles traveled (VMT) impact of the project as defined in the initial study and *Meridian Village Residential Development Transportation Analysis* ("transportation analysis") (Hexagon Transportation Consultants, Inc. 2024) found in Appendix H of the initial study, in Appendix A. The evaluation of VMT impacts is based on this transportation analysis.

Responses to the Notice of Preparation

Sarah Moody expressed concerns associated with traffic. She requests that additional turning lanes into and onto Meridian Street be considered and that sidewalks and bike infrastructure are thoughtfully included in the project.

Ingrid McRoberts of the California Department of Transportation (Caltrans) commented on the NOP to suggest considering mitigation measures that include alternative modes of transport and a pathway towards quality transit services to job centers like Gilroy and San Jose.

The topics raised by Sarah Moody are not discussed in this EIR as they are not related to VMT. The discussion under checklist question "a" within Section 17.0, Transportation, of the initial study (Appendix A) discusses sidewalks and bike infrastructure associated with the proposed project. Additional information about pedestrian and bicycle facilities, as well as turning lanes to and from Meridian Street into the project site can be found in the transportation analysis, which is Appendix H of the initial study. The initial study reports that the transportation analysis evaluated several intersections within the vicinity of the project site, including Meridian Street. All study intersections are projected to operate at acceptable levels of service during both the AM and PM peak hours under both Background Plus Project Conditions and the Year 2045 Plus Project Conditions scenarios (p. ii and iii). However, under both scenarios, the San Benito Street/Fourth Street intersection would have peak-hour traffic volumes that exceed the thresholds that warrant signalization.

Caltrans requested a copy of the transportation analysis, which City staff sent on February 6, 2026. The transportation analysis addressed alternative modes of transport (Appendix H of the initial study).

5.1 Environmental Setting

VMT is the total number of miles of travel by personal vehicles a project is expected to generate in a day. Existing VMT conditions within a local jurisdiction can commonly be determined through use of a regional travel demand model. For the City of Hollister, Hexagon Transportation Consultants, Inc. conducted the VMT assessment of the transportation analysis using the TREDLite VMT application, as the City uses the TREDLite VMT tool to complete VMT analyses for proposed development projects (Hexagon Transportation Consultants, Inc. 2024, p. 1). The reported VMT for residential uses such as the proposed project utilizes average VMT per capita (resident). The use of the average VMT per capita metric is consistent with guidance of the *Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA*.

The VMT tool identifies the existing average VMT per capita and VMT per employee for the project area based on the Assessor's parcel number (APN) of a project. Based on the project location, type of development, project description, and proposed trip reduction measures, the evaluation tool calculates the project VMT (p. 10).

For residential uses, the baseline (2019) VMT against which the change in VMT created by the project is compared to assess impact significance, is calculated as VMT per capita (per person) per day. The TREDLite VMT evaluation tool indicates that the average county-wide home-based VMT per capita is 22.11 (Hexagon Transportation Consultants, Inc. 2024, p. 11).

The project site is vacant and therefore, does not currently generate VMT.

5.2 Regulatory Setting

State

California Senate Bill 743

California recognized the limitations of measuring and mitigating only vehicle delay at intersections and, therefore, in 2013 passed Senate Bill (SB) 743, which requires jurisdictions to end the practice of using congestion and delay metrics, such as level of service, as the metric for evaluating impacts of new development in Transit Priority Areas.

SB 743 also directed the California Governor's Office of Land Use and Climate Innovation (formerly called the Office of Planning and Research) to establish new criteria for determining the significance of transportation impacts that "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses." The Office of Land Use and Climate Innovation updated the CEQA Guidelines in July 2020 for this purpose by adding a new section 15064.3 to the Guidelines. The provisions of SB 743 apply statewide to all projects, even those outside of Transit Priority Areas. Vehicle miles traveled (VMT) is generally defined as the total miles of travel by personal motorized vehicles a project is expected to generate in a day.

In response to revising the CEQA Guidelines pursuant to SB 743, the California Governor's Office of Planning and Research (now the Office of Land Use and Climate Innovation) issued the *Technical Advisory on Evaluating Transportation Impacts in CEQA* ("technical advisory") in 2018, which provides guidance on how agencies can evaluate VMT in CEQA documents. While the advisory provides guidance on evaluating operational VMT impacts and recommends thresholds of significance, it is silent on thresholds for construction impacts, as SB 743 does not address construction VMT impacts.

Pursuant to the technical advisory, home-based VMT per resident (capita) is the recommended metric to evaluate CEQA-related transportation impacts for residential land uses. The technical advisory recommends an impact threshold of 15 percent below the existing VMT/capita (regional or citywide) levels for residential land uses.

Local

City of Hollister

City of Hollister VMT Policy

The City of Hollister has not yet adopted analysis procedures, standards, or guidelines for VMT consistent with SB 743. In the absence of an adopted VMT policy with impact thresholds, the assessment used for this project relies on guidelines published by the Governor's Office of Land Use and Climate Innovation *Technical Advisory on Evaluating Transportation Impacts in CEQA*, as discussed in Section 5.4, below.

Municipal Code Chapter 17.18, Pedestrian, Bicycle, Parking, and Loading Standards

City Municipal Code Chapter 17.18, Pedestrian, Bicycle, Parking, and Loading Standards, provides standards and requirements associated with the provision of sufficient transportation facilities and encouraging the use of alternative modes of transportation.

2005 General Plan

The following General Plan policies are germane to the proposed project:

> **C 2.3 Pedestrian Connections**. Work with local businesses, private developers, and public agencies to ensure provision of safe pedestrian pathways to major public facilities, schools and employment centers. Require new developments to provide internal pedestrian connections and linkages to adjacent neighborhoods and community facilities.
>
> **C 3.1 Regional Transportation Measures**. Continue to collect traffic impact fees and require other site related transportation improvements from private developers to ensure implementation of transportation system improvements to local and regional facilities attributable to proposed development.

5.3 Thresholds of Significance

CEQA Guidelines Appendix G is a sample initial study checklist that includes a number of factual inquiries related to the subject of VMT, as it does on a whole series of additional environmental topics. Lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of VMT impacts, or indeed on any subject addressed in the checklist. Rather, with few exceptions, CEQA grants agencies discretion to develop their own thresholds of significance. Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Therefore, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

VMT Threshold of Significance Approach

The significance of project VMT impacts is assessed here based on the guidance and methodology provided by the California Governor's Office of Land Use and Climate Innovation as described in Section 5.2, Regulatory Setting. That guidance recommends an impact threshold of 15 percent below the existing VMT/capita (regional or citywide) levels for residential projects.

5.4 Analysis, Impacts, and Mitigation Measures

Vehicle Miles Traveled

IMPACT 5-1	Conflict with CEQA Guidelines Section 15064.3 by Exceeding the Applicable Threshold for VMT, which is 18.79 VMT per Capita (15% Below County Average)	Significant and Unavoidable

VMT Modeling and Analysis

The transportation analysis prepared for the proposed project, found in Appendix H of the initial study (Appendix A), assessed the VMT impacts of the proposed project. The information presented below is derived from that analysis.

VMT Modeling and Results

The City of Hollister has not adopted VMT-specific methodologies or thresholds. Therefore, Hexagon Transportation Consultants, Inc. relied on statewide guidance published by the Governor's Office of Planning and Research in *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Governor's Office of Planning and Research 2018). The transportation analysis results were extracted at the project level based on VMT per capita and total VMT. San Benito County was utilized as the regional basis for calculating average VMT per capita and determining if the project would contribute to a VMT impact. Accordingly, the analysis applied a significance threshold of 15 percent below the existing countywide VMT per capita, consistent with state-recommended screening criteria (Hexagon Transportation Consultants, Inc. 2024, p. 11).

Table 5-1, Vehicle Miles Traveled Analysis Summary, reports VMT per capita for San Benito County during 2019 (base year), the project conditions, and the VMT per capita threshold.

Table 5-1 Vehicle Miles Traveled Analysis Summary

Project	County Average VMT per Capita (2019)	VMT per Capita Threshold (15 percent below County Average)	Project VMT per Capita	Exceeds Threshold? (Significant VMT Impact)
Meridian Village Residential Development	22.11	18.79	22.76	Yes

SOURCE: Hexagon Transportation Consultants, Inc. 2024
NOTE: VMT results are based on the Big Data Blockgroup where a Project is located.

The countywide average VMT per capita is 22.11. A project would have a significant impact if it generates more than 18.79 VMT per capita, which is 15 percent below the existing countywide average. The results of the transportation analysis indicate that the proposed project would generate 22.76 VMT per capita before the implementation of mitigation measures, which is above the 18.79 VMT per capita threshold. Accordingly, in the absence of mitigation that would reduce VMT, the proposed project would result in a significant VMT impact.

VMT Reduction Features/Measures

State guidance establishes the 15 percent below existing VMT per capita threshold to encourage development in transit-rich, mixed-use areas where multimodal transportation options can reduce trip generation and trip lengths. Projects that incorporate design features and trip-reduction measures within such contexts are better positioned to achieve meaningful VMT reductions. In contrast, the proposed project is located in a suburban area characterized by limited transit service, a discontinuous bicycle network, limited supporting employment land uses, and predominantly single-family residential, commercial, and industrial land uses. This locational and land use context constrains opportunities for alternative travel modes, making it difficult for the project to achieve a 15 percent reduction in average VMT per capita. In other words, implementation of a transportation demand management plan, which targets a reduction in residential vehicle trips to and from the project site, would be unlikely to fully mitigate the identified VMT impact to below the threshold.

General Plan policies listed above in Section 5.2, Regulatory Setting, would apply to the proposed project. The proposed project would be required to provide internal pedestrian connections and linkages to adjacent neighborhoods and community facilities (C 2.3 Pedestrian Connections) and pay traffic impact fees and implement other site-related transportation improvements to pay for "fair share" impacts attributable to the project (C 3.1 Regional Transportation Measures). Compliance with the policies described above would contribute to a feasible reduction of VMT; however, the project-related VMT per capita would still exceed the threshold.

The proposed project would need to implement further VMT reduction measures as mitigations to achieve a 17.4 percent reduction in VMT per capita to reduce its impacts to less than significant levels. According to the transportation analysis, the maximum reduction possible is 20 percent, resulting in 18.21 VMT per capita (Hexagon Transportation Consultants, Inc. 2024, p. 11). The transportation analysis further states that achieving the identified maximum VMT reduction is not feasible for the residential uses of the proposed project due to the limited alternative modes of transportation and supporting employment land uses within Hollister (p. 11 and p. 44). Therefore, the project's impact to VMT would be significant and unavoidable.

Conclusion

The project will generate a VMT per capita that exceeds the threshold of significance. This is a significant impact. VMT reduction measures have been investigated, but their implementation is deemed to be unachievable due to Hollister's suburban-type location. Therefore, the VMT impact is significant and unavoidable.

6.0
California Department of Toxic Substances Control Comment Letter on NOP

The topic of hazardous materials and its potential impacts associated with the proposed project were addressed in Section 9.0, Hazards and Hazardous Materials, of the initial study. The California Department of Toxic Substances Control (DTSC) commented on the proposed project during the public review period for the notice of preparation. The initial study can be found in Appendix A and this comment letter can be found in Appendix B. The DTSC comment letter is summarized here.

DTSC states that all imported soil/fill material should be tested to assess that any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. Documentation of the origins of the soil/fill material and sampling, if applicable, should be conducted to ensure that the imported soil/fill material are suitable for the intended land use and to minimize the possibility of introducing contaminated soil/fill material. DTSC states that the soil sampling should include analysis based on the source of the fill and knowledge of prior land use.

DTSC also recommends that any potential contamination at the project site be fully characterized and then remediated under the oversight of a self-certified local agency (i.e., DTSC or the regional water quality control board). DTSC states that the initial study's Mitigation Measure HAZ-1, which requires the preparation of a Site (or Soil) Management Plan, does not sufficiently identify and document the potential contaminants that may pose a threat to human health and the environment. DTSC recommends that a cleanup plan, a Removal Action Workplan, or a Remedial Action Plan be prepared to adequately address all site impacts after complete characterization.

Based upon this recommendation from DTSC, Mitigation Measure HAZ-1 has been revised as shown below:

Mitigation Measure

HAZ-1 Prior to issuance of a grading permit, the project developer shall ensure that the project site is fully characterized and remediated under the oversight of a self-certified local agency (DTSC or the regional water quality control board). The project developer shall also prepare a cleanup plan, Removal Action Workplan, or a Remedial Action Plan to

adequately address all site impacts after complete characterization. The chosen plan shall be reviewed and approved by the City of Hollister Building Division. The plan, once approved by the Building Division, shall be incorporated into the grading and building plans, and implemented, as appropriate.

7.0 Significant and Unavoidable Impacts

7.1 CEQA Requirements

A significant adverse unavoidable environmental impact is a significant adverse impact that cannot be reduced to a less-than-significant level by implementing mitigation measures. CEQA Guidelines section 15093 requires that a lead agency make findings of overriding considerations for unavoidable significant adverse environmental impacts before approving a project.

CEQA Guidelines section 15093(a) requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." CEQA Guidelines section 15093(b) states that when the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

7.2 Significant and Unavoidable Impacts

Vehicle Miles Traveled

Project-Level

As described in Section 5.0, Transportation (VMT), the proposed project would exceed the VMT per capita threshold of significance. The impact cannot be reduced to less than significant through implementation of uniformly applied polices or regulations, nor through implementation of mitigation measures. Therefore, the impact at the project-level is significant and unavoidable. The City Council will be required to adopt a statement of overriding considerations for this impact.

Cumulative-Level

As described in Section 5.0, Transportation (VMT), the *Technical Advisory on Evaluating Transportation Impacts in CEQA* states that a project whose VMT falls below an efficiency-based threshold of significance metric, such as VMT per capita, and that is aligned with long-term environmental goals

and relevant plans would have no cumulative impact distinct from the project impact. Therefore, because the project's VMT impact is significant and unavoidable, the cumulative VMT impact is significant and unavoidable. The City will need to make a statement of overriding consideration for the cumulative VMT impact.

8.0 Growth Inducing Impacts

8.1 CEQA Requirements

CEQA Guidelines section 15126.2 states that an EIR shall discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Population increases may tax community service facilities, requiring construction of new facilities that could cause significant environmental effects. An EIR shall also discuss characteristic of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

8.2 Impact Analysis

Development of the project site has been envisioned by the City of Hollister since the General Plan was adopted in 2005. This is reflected in the fact that the General Plan shows the project site planned for residential and commercial uses. The proposed project is consistent with the General Plan land use vision for the project site. The project potential to be growth-inducing arises from its new resident generation. The environmental impacts of physical development and population growth that would occur with buildout under the General Plan, including development of the project site, have already been evaluated as part of the General Plan EIR and mitigated to less than significant where feasible.

The project would not indirectly induce population or other forms of growth through removing infrastructure or other barriers to such growth. The project is planned on an infill site that already has access to utility infrastructure and to the existing road network.

This side intentionally left blank.

9.0 Cumulative Impacts

9.1 CEQA Requirements

CEQA Guidelines section 15130 requires a discussion of cumulative impacts when the project's incremental effect is "cumulatively considerable," as defined in section 15065(a)(3), which states, "The project has possible environmental effects that are individually limited but cumulative considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. A cumulative impact consists of an impact that is created as a result of the combination of the proposed project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR. When the combined cumulative impacts associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting its conclusion that the cumulative impact is less than significant.

A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and, therefore, is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the other identified projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact (CEQA Guidelines, Section 15130).

CEQA requires a cumulative development scenario to consist of either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

9.2 Cumulative Development Scenario

CEQA requires a cumulative development scenario to consist of either 1) a "list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency" or 2) a "summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for reducing GHGs. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Projections may be supplemented with additional information such as a regional modeling program.

The cumulative development scenario in this EIR is the summary of projections contained in the adopted *City Hollister 2005 General Plan* ("General Plan") and evaluated in the *Final Environmental Impact Report City of Hollister General Plan (March 2005 Public Review Draft)* ("General Plan EIR").

Geographic Scope

The geographic scope of the area affected by cumulative impacts can vary with the specific environmental topic being evaluated. Therefore, the cumulative development scenario can vary with the environmental topic being considered. The geographic scope of the area affected by cumulative impacts is typically larger than the boundary of the project site itself. According to CEQA Guidelines section 15130(b)(1)(3), the lead agency should define the geographic scope of the area affected by the cumulative effect. For the proposed project, the geographic scope for cumulative impacts ranges from development within the site and City of Hollister to much broader areas such as San Benito County, the air basin or the state. The geographic scope is included in each cumulative impact discussion, and summarized in Table 9-1, Geographic Scope for Cumulative Impact Analyses. Where an impact has not been identified for an environmental topic, no cumulative impact analysis is provided and, therefore, no cumulative impact geographic boundary is identified.

Table 9-1 Geographic Scope for Cumulative Impact Analyses

Topic	Geographic Area
Air Quality (Criteria Air Emissions)	North Central Coast Air Basin
Air Quality (Toxic Air Contaminants)	Project Vicinity
Biological Resources	City of Hollister General Plan Planning Area
Cultural Resources	City of Hollister General Plan Planning Area
Geology and Soils	Project Vicinity
Hazards and Hazardous Materials	City of Hollister General Plan Planning Area
Noise	Project Vicinity
Transportation	San Benito County
Wastewater	City of Hollister General Plan Planning Area and the City of San Juan Bautista

SOURCE: EMC Planning Group 2026

General Plan Projections Contributing to Cumulative Development Conditions

As noted above, for a number of environmental topics, the geographic scope of the area affected by a cumulative effect is the City's planning area as described in the General Plan. The cumulative development scenario for the City consists of buildout projections contained in the General Plan, which include 15,769 dwelling units, 22,204 jobs, and a population of 55,192 people through 2023 (City of Hollister December 2025, p. 2.4). The proposed project accounts for approximately 1.39 percent of the projected cumulative residential units and 1.31 percent of the population under cumulative development conditions.

9.3 Cumulative Analysis

The methodology for addressing each cumulative impact topic is to: 1) identify the geographic boundary or scope for the environmental topic; 2) determine whether past projects, other current projects, and probable future projects (including the proposed project), have or will likely combine to create a significant cumulative environmental impact based on information contained in the general plan EIR, or based on other pertinent information for the geographic scope of the cumulative effect; and, if so, 3) evaluate the contribution of the project to the cumulative effect and determine whether that contribution is considerable.

Air Quality

Proposed Project Impact Summary

The air quality impacts of the project are discussed in the initial study found in Appendix A of this EIR. Although the air basin is currently in attainment with national mandated thresholds for suspended particulate matter (PM_{10}), the air basin is in non-attainment with state mandated thresholds for PM_{10}. The air district is in attainment for all other state criteria pollutant emissions.

Operational PM_{10}. As presented in Table 1 of the initial study, the proposed project would result in 10.3 pounds per day of unmitigated operational PM_{10}, well below the threshold of 82 pounds per day. Therefore, the proposed project would not result in significant operational PM_{10} impacts and the project's contribution to regional air quality would be less than significant.

Construction PM_{10}. As presented in Table 2 of the initial study, the proposed project would result in 9.40 pound per day of construction PM_{10}, well below the threshold of 82 pounds per day. Therefore, the proposed project would not result in significant construction PM_{10} impacts and the project's contribution to regional air quality would be less than significant.

Toxic Air Contaminants. The project would result in less than significant impacts with mitigation incorporated (AQ-1) associated with exposing sensitive receptors to toxic air contaminants during construction (initial study, p. 26-27).

Geographic Scope

Criteria Air Pollutants (PM_{10})

The geographic scope for cumulative air quality impacts varies based on the particular potential impact being considered. For criteria air emissions impacts, the boundary is the North Central Coast Air Basin (air basin) which encompasses all of Monterey, Santa Cruz, and San Benito counties. As noted in the Monterey Bay Air Resource District's (MBARD) *Air Monitoring 2025 Annual Report*, the air district is in attainment status for state and federal ozone emissions (MBARD 2026). The 2017 air quality management plan was designed to bring the air district into attainment for this pollutant. Consequently, the air district is no longer required to prepare an air quality management plan for ozone emissions.

Toxic Air Contaminants

For health risks associated with construction source and stationary source Toxic Air Contaminant (TAC) emissions from future development within the site, the geographic scope is the location of existing sensitive receptors within and adjacent to the site. Operational residential neighborhoods are not sources of toxic air contaminants that would increase health risks and therefore, cumulative impacts of operational toxic air contaminants are not addressed.

Cumulative Impacts

Criteria Air Pollutants (PM_{10})

According to MBARD's *Air Monitoring 2025 Annual Report,* this status is mainly a result of exceedances at the King City monitoring station due to dust particles associated with natural meteorological conditions and agricultural operations (tilling fields) throughout the Salinas Valley (MBARD 2026, p. 10). Nonetheless, past and present development earth-moving activities, in combination with natural conditions and tilling agricultural fields, have generated emissions to the extent that their concentration within the air basin exceeds applicable standards. Therefore, this impact is cumulatively significant.

Toxic Air Contaminants

Construction TACs can adversely affect sensitive receptors, but due to their temporary nature and localized effects, it is unlikely that they would combine in a cumulative context to adversely affect the same population of sensitive receptors. Construction activities associated with other development in the immediate vicinity is not anticipated in this location of Hollister, which is already fully urbanized. Therefore, the impact is less than cumulatively significant. Additionally, as discussed earlier, the project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (CEQA Guidelines section 15130(a)(3)).

Project Contribution to Cumulative Impacts

Criteria Air Pollutants (PM_{10})

Consistent with air district guidance, consistency with the air quality plan serves as the analysis of cumulative impacts from generation of criteria air pollutant emissions. Given that the proposed project would not exceed any construction or operational air quality significance thresholds, the project is consistent with associated air quality control measures in the air quality plan. Therefore, the proposed project's contribution to cumulative impacts for criteria air pollutant emissions would be less than cumulatively considerable.

Toxic Air Contaminants - Health Risks During Construction

Sensitive receptors are located immediately west of the project site and, therefore, could be exposed to localized health risks associated with TAC emissions from construction equipment exhaust. Implementation of the mitigation measure AQ-1, identified in Appendix A of this EIR, is required to ensure that the potential health risks from the construction equipment exhaust would be less than significant by preparing a construction management plan and requiring that best management practices be implemented. As a result, the proposed project contribution to this effect would be less than cumulatively considerable.

Health Risks During Operation

The initial study found in Appendix A of this EIR concludes that operations of residential uses are not sources of TACs that would increase health risks. As a result, the proposed project contribution to this effect would be less than cumulatively considerable.

Biological Resources

Proposed Project Impact Summary

The biological impacts of the project are discussed in the initial study found in Appendix A of this EIR. The proposed project would have less than significant impacts with mitigation measures BIO-1 and BIO-2 incorporated for its effect on nesting birds and special-status wildlife species (protected bat species), respectively.

Geographic Scope

The cumulative impact scenario for biological resources is variable, depending on the specific resource being considered. For the purposes of cumulative analysis for nesting birds and protected bat species, the geographic boundary for cumulative impacts is the General Plan planning area.

Cumulative Impacts

Past, present, and future development in the General Plan planning area will impact habitat for nesting birds and protected bat species. Development and construction activities could result in the disturbance of nesting birds and protected bat species; loss or harm to nesting birds and protected bat species in the General Plan planning area is cumulatively significant impact. Compliance with applicable federal, state, and local regulations relating to preservation of sensitive species in the project area and the mitigation measures BIO-1 and BIO- would further reduce the project's contribution to cumulative biological impacts. Additionally, as discussed earlier, the project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (CEQA Guidelines section 15130(a)(3)).

Project Contribution to Cumulative Impacts

The proposed project is located on land that is developed for agricultural uses. Generally, developed land does not provide valuable habitat for most special-status species due to its regular disturbance and absence of cover for wildlife. Given the relatively low quality of the habitat that would be affected by the proposed project, as well as the anticipated effectiveness of mitigation measures (i.e., BIO-1 and BIO-2), the impacts of the proposed project on biological resources are considered to be less than cumulatively considerable.

Cultural Resources

Proposed Project Impact Summary

The cultural impacts of the project are discussed in the initial study found in Appendix A of this EIR. The proposed project would result in a less than significant impact with mitigation measures incorporated for potential impacts to historic and/or unique archaeological resources and the disturbance of Native American human remains (i.e., CUL-1 and CUL-2, respectively).

Geographic Scope

The geographic scope for cumulative cultural resources impacts is the General Plan planning area.

Cumulative Impacts

Impacts on cultural resources (historic and unique archaeological resources) may have occurred throughout Hollister, and the areas immediately adjacent, over time given the richness of these resources in other areas of Hollister and due to a range of development activities that have disturbed surface and subsurface resources. Cumulative impacts on these resources are assumed to be significant.

Project Contribution to Cumulative Impacts

The initial study (Appendix A of this EIR) determined that the proposed project would be required to implement mitigation measures CUL-1 and CUL-2 to reduce its contribution to cumulative cultural resources impacts during construction. With implementation of these mitigation measures, the project contribution to cultural resources impacts during construction would be less than cumulatively considerable.

Geology and Soils

Proposed Project Impact Summary

The geology and soils impacts of the proposed project are discussed in the initial study found in Appendix A of this EIR. The proposed project was determined to result in less than significant impacts with incorporation of mitigation measures GEO-1 and GEO-2 associated with expansive soils and potential impacts to paleontological resources, respectively.

Geographic Scope

The geographic scope for cumulative geology and soils impacts is generally site specific because each project site has a different set of geologic considerations and the development of specific sites would be subject to uniform site development and construction standards as a means to address site-specific hazards. The geographic scope for cumulative expansive soils impacts and potential impacts to paleontological resources impacts is the immediate project vicinity.

Cumulative Impacts

Past, present, and foreseeable future cumulative development in Hollister have increased the number of people and structures that could be exposed to expansive soils hazards as well as potential cumulative impacts to paleontological resources. Cumulative development will increase exposure to expansive soils hazards by introducing significant new development and population and will increase the potential to directly or indirectly destroying an unknown, unique paleontological site. Therefore, the cumulative impact related to geologic resources and soils is considered to be significant.

Project Contribution to Cumulative Impacts

The proposed project is construction of residences on expansive soils, which could create a substantial direct or indirect risk to life or property. Additionally, development of the proposed project could directly or indirectly destroy a unique paleontological resource. Therefore, implementation of mitigation measures GEO-1 and GEO-2 identified in the initial study (Appendix A) are required to ensure that the potential risks associated with expansive soils and potential impacts to paleontological resources during construction activities would be less than significant. Further, new development must comply with a range of General Plan policies and uniformly applied state and local regulations, such as the California Building Code, designed to reduce exposure of structures and people to geologic hazards. Given these considerations, the proposed project would not have cumulatively considerable geologic or soils impacts.

Hazards and Hazardous Materials

Proposed Project Impact Summary

The hazards and hazardous materials impact of the project are discussed in the initial study found in Appendix A of this EIR. The initial study concluded that the proposed project would result in a less than significant impact with implementation of mitigation associated with elevated levels of arsenic related to historically cultivated row crops and orchards. Mitigation Measure HAZ-1, presented in the initial study, has been revised pursuant to a comment letter received during the Notice of Preparation public review period. The revised mitigation that will be implemented to reduce impacts to a less-than-significant level can be found in Section 6.0, California Department of Toxic Substances Control Comment Letter on NOP.

Geographic Scope

The geographic scope for this impact is the Hollister General Plan planning area, as the conversion of existing or historical farmland could result in similar hazardous materials impacts.

Cumulative Impacts

Elevated Levels of Arsenic

Past use of the project site has contributed to increased risks to public health and safety associated with elevated levels of arsenic related to historically cultivated row crops and orchards. Potential cumulative impacts associated with exposure to elevated levels of arsenic could result from the design and development of projects throughout the planning area on farmland, without adequate site management planning. Therefore, this impact is considered to be cumulatively significant.

Airport Land Use Compatibility

Past, present, and foreseeable future cumulative development in Hollister have increased the number of people and structures that could be exposed to safety hazards or excessive noise associated with Hollister Municipal Airport. Therefore, this impact is cumulatively significant. Compliance with applicable federal, state, and local regulations relating to airspace protection would reduce cumulative impacts associated with the Hollister Municipal Airport to a less-than-significant level.

Project Contribution to Cumulative Impacts

Elevated Levels of Arsenic

The public or the environment in the immediate project site could be exposed to elevated levels of arsenic related to historically cultivated row crops and orchards. Impacts associated with the potential to release of arsenic into the environment would be less-than-cumulatively considerable with the implementation of mitigation measure HAZ-1, identified in Appendix A of this EIR, to prepare a Site Management Plan to manage health and safety risks during construction. As discussed earlier, the project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (CEQA Guidelines section 15130(a)(3)).

Airport Land Use Compatibility

As discussed in Section 9.0, Hazards and Hazardous Materials, and in Section 13.0, Noise, in the initial study found in Appendix A of this EIR, the project site is not located within any of the airport noise contours and the project would not result in excessive noise for people residing or working in the project area. The project is within the airport influence area and will require approval from the airport land use commission prior to issuance of a grading permit. Given these considerations, the proposed project would not have cumulatively considerable impacts associated with airport-related safety hazards or excessive noise.

Noise

Proposed Project Impact Summary

The noise impacts of the project are discussed in the initial study found in Appendix A of this EIR. The initial study concluded that the proposed project would result in less than significant noise impacts with implementation of mitigation measure N-1, which is associated with interior noise exposure.

Construction Noise

As discussed in the initial study, construction noise could result in a short-term, significant increase in ambient noise levels at nearby noise sensitive land uses. However, construction noise is not generally considered to be a significant impact if construction is limited to the daytime hours. Compliance with General Plan Policy HS3.3 will ensure that temporary construction noise levels are less than significant.

Operational Noise

The noise assessment prepared for the proposed project (Appendix G of the initial study, which can be found in Appendix A of this EIR) concluded that the project's contribution to existing and cumulative traffic noise exposure levels would not result in traffic noise exposure levels exceeding the City's exterior threshold of 60 dB L_{dn} in residential areas, and the project would not result in an increase of 3 dB or more at any location where traffic noise exposure would already be expected to exceed 60 dB L_{dn} without the project. A traffic noise level increase of 3 dB at sensitive receptor locations where noise levels already exceed the City's applicable noise level standards without the project was used as threshold of significance for a traffic noise exposure impact. Therefore, the impact would be less than significant.

Geographic Scope

The geographic boundary for cumulative noise impacts associated with construction and operation of the proposed project is the project vicinity.

Cumulative Impacts

Construction Noise

Past, present, and foreseeable future development would introduce new sources of construction noise in the project vicinity. Construction activities of multiple projects in the project vicinity occurring simultaneously, should that occur, would increase noise levels and would be cumulatively considerable. Construction activities occurring outside of daytime hours would be considered a significant impact, and therefore cumulatively considerable.

Operational Noise

Past and present development in Hollister have contributed to increased ambient traffic noise levels. A traffic noise level increase of 3 dB at sensitive receptor locations where noise levels already exceed the City's applicable noise level standards is a significant cumulative impact.

Project Contribution to Cumulative Impacts

Construction Noise

The proposed project would introduce construction noise in the project vicinity. Compliance with General Plan Policy HS3.3 will ensure that temporary construction noise levels are less than significant and would not be cumulatively considerable.

Operational Noise

The noise assessment prepared for the proposed project serves as the cumulative impact analysis for noise impacts. The noise assessment evaluated "Cumulative No Project" and "Cumulative Plus Project" traffic scenarios to assess noise impacts and concluded that the cumulative traffic noise would not be significant at noise-sensitive land uses off-site. Given this consideration, the operational traffic noise impact of the proposed project would not be cumulatively considerable.

Transportation

Proposed Project Impact Summary

The transportation impacts of the project are discussed in Section 5.0, Transportation – Vehicle Miles Traveled, of this EIR. The proposed project would result in a significant and unavoidable impact associated with exceeding the applicable VMT threshold.

Geographic Scope

The geographic scope for cumulative VMT impacts associated with the proposed project is San Benito County.

Cumulative Impacts

According to the Governor's Office of Land Use and Climate Innovation's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, a project whose VMT falls below an efficiency-based threshold of significance metric, such as VMT per capita, and that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Thus, a finding of a less than significant project impact would imply a less than significant cumulative impact. The threshold being used to assess project VMT impacts is VMT per capita.

Project Contribution to Cumulative Impacts

The VMT impact for the proposed project is significant and unavoidable. Therefore, the cumulative VMT impact is also significant and unavoidable. VMT reduction measures have been investigated, but their implementation is deemed to be unachievable due to Hollister's suburban-type location. Therefore, the project contribution to the cumulative impact is considerable. The City will need to adopt a statement of overriding consideration for the cumulative VMT impact.

Wastewater

Proposed Project Impact Summary

The wastewater impacts of the project are discussed in the initial study found in Appendix A of this EIR. The initial study concluded that the proposed project would be required to implement mitigation measure UTIL-1 to ensure a less than significant impact associated with wastewater treatment facility capacity.

Geographic Scope

The geographic scope for cumulative wastewater impacts is the General Plan planning area and the City of San Juan Bautista.

Cumulative Impacts

Past, present, and foreseeable future cumulative development within Hollister would require adequate wastewater treatment facilities to support the increase in land use and development. Should cumulative wastewater generation exceed the capacity of existing facilities, construction of new or expanded facilities would be required. Construction of expanded facilities could have the potential to cause short-term, significant air quality, biological resources, cultural resources, greenhouse gas emissions, noise, and possibly other environmental impacts. However, it is unlikely that such construction activities would occur simultaneously with construction activities for other development in the immediate vicinity of wastewater facilities improvement locations such that considerable, short-term cumulative impacts would occur.

Project Contribution to Cumulative Impacts

The proposed project would generate approximately 30,660 gallons of wastewater per day (219 dwelling units x 40 gallons per day per dwelling unit), or 0.009 million gallons per day. This total makes up less than one percent of the daily capacity of the City's Water Reclamation Facility. The City's Public Works Director states that the City is working on a study to determine the available capacity of the facility and any required upgrades to increase it pursuant to requests from the regional water board. The proposed project would be required to implement mitigation measure UTIL-1 to determine whether there is adequate capacity at the City's Water Reclamation Facility to serve the project.

10.0 Alternatives

10.1 CEQA Requirements

CEQA Guidelines section 15126.6(a) requires a description of a range of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

CEQA Guidelines section 15126.6(b) further requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The EIR must present enough information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

10.2 Project Objectives and Significant Impacts

As discussed above, alternatives must be able to meet most of the basic objectives of the project. Therefore, the proposed project objectives are summarized here.

Objectives

As outlined in Section 4.1, Project Objectives, the project objectives are reiterated here as follows:

1. Provide an infill residential project on an underutilized site.
2. Develop residential uses on a site that does not currently contain any housing, which will help meet the City's Regional Housing Needs Assessment obligations.
3. Develop a high-quality multi-family residential community.
4. Contribute to meeting the growing housing needs of the City and the region by providing ownership multi-family residential units and for-rent apartment housing units to accommodate a spectrum of demographics.

5. Develop the project site in an environmentally sensitive manner, including through implementation of current codes and building standards that require water efficiency and energy efficiency as well as water quality best management practices and drought tolerant landscaping.

Significant Impacts

The project would have several significant impacts. These are summarized below.

Unavoidable Significant Impacts

The project would have one significant impact that cannot be reduced to less than significant – generation of residential vehicle miles traveled (VMT) per capita that exceeds the threshold of significance, at both the project level and cumulative level. This impact is discussed in Section 5.0, Transportation (VMT).

The approach for defining and evaluating project alternatives takes into consideration the extent to which an alternative reduces one or more significant unavoidable impacts of the project to less than significant, versus lessening the significance of an impact that is already reduced to less than significant by implementation of mitigation measures. This "priority" on avoiding significant unavoidable impacts is based on CEQA Guidelines section 15126.6(a), which states in part:

> "Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation."

"Significant impacts" here are impacts that have been identified as unavoidable. The degree to which an alternative avoids or lessens significant impacts that are already reduced to less than significant through implementation of mitigation measures is a secondary consideration in identifying alternatives to evaluate in detail and in evaluating the environmentally superior alternative.

Significant Impacts Reduced to Less than Significant with Mitigation Measures

The project would have several significant impacts that are mitigated to less than significant with implementation of mitigation measures. These impacts, identified in the initial study in Appendix A, include:

1. Health risks from exposure of sensitive receptors to toxic air contaminants during construction activities;
2. Potential loss of or harm to special-status biological resources, including nesting birds and raptors;

3. Potential loss of or harm to special-status biological resources, including bat species;
4. Potential loss of or damage to unknown buried archaeological resources and/or Native American human remains;
5. Potential damage caused by volume changes associated with expansive soils;
6. Potential loss of or damage to paleontological resources;
7. Potential to risk the release of hazardous materials into the environment (also addressed in Section 6.0 of this EIR);
8. Potential for interior noise levels to exceed the City's 45 DB L_{dn}; and
9. City's Water Reclamation Facility may not be able to serve the project's projected demand.

10.3 Alternatives Considered but Rejected

Alternative Project Location

CEQA Guidelines section 15126.6(f)(2) identifies considerations for evaluating an alternative project location. Among these are whether any of the significant effects of the project would be avoided or substantially lessened and whether feasible alternative locations exist. Feasibility is described in section 15126.6(f)(1) and includes factors such as site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

As noted above, the priority for selecting project alternatives is to substantially lessen or avoid the significant unavoidable VMT impact of the project. As discussed in Section 5.0, Transportation (VMT), the 15 percent below existing countywide average VMT per capita impact threshold of significance is designed to encourage developments in transit-rich, mixed-use areas to implement that include design features and trip reduction measures to take advantage of existing multi-model infrastructure and land use mixes to reducing trip making and/or trip lengths. However, Hollister is located in a rural setting with a limited transit network, and lacks diverse commercial services and employment centers typical of more urbanized areas. This context would make it challenging for any purely residential project in Hollister to achieve a 15 percent reduction in average VMT per capita. Further, it is likely that the same or similar significant, but mitigable impacts of the project would occur on any other vacant site within the City of Hollister because these impacts are not inherently site specific. For these reasons, a specific alternative project location was not evaluated further.

10.4 Alternatives Considered

The following alternatives to the project are considered:

1. Alternative 1: No Project;
2. Alternative 2: 100 Percent Affordable Housing; and
3. Alternative 3: 61 Percent Increased Affordable Housing.

Per CEQA Guidelines section 15130, a no project alternative must be evaluated. Alternatives 2 and 3 were selected based on their ability to reduce the significant and unavoidable VMT impact to a less than significant level.

The alternatives are described below, along with analysis of how each has potential to substantially lessen or avoid the significant and unavoidable VMT impact and substantially lessen or avoid the significant, mitigable impacts of the project.

Alternative 1: No Project

CEQA Guidelines section 15126.6 (e) requires the "No Project" alternative be evaluated along with its impacts. The "No Project" alternative analysis must discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

No Project Alternative Description

The project as currently proposed is consistent with the General Plan. Therefore, if the proposed project were not approved, a similar project could be proposed and approved at the site.

For this reason, the "No Project" alternative evaluates a no project, no development scenario.

Attainment of Project Objectives

This alternative would not meet any of the project objectives.

Alternative Impacts Comparison

This analysis identifies the potential impacts associated with the proposed project not being developed at the site and compares them with the significant and unavoidable and significant, mitigatable impacts of the proposed project.

Vehicle Miles Traveled (VMT)

Under this alternative, there would be no VMT impacts as there would be no development at the site.

Air Quality

There would be no air quality impacts as there would be no development at the site.

Biological Resources

There would be no biological resources impacts as there would be no development at the site.

Cultural Resources

There would be no cultural resources impacts as there would be no development at the site.

Geology and Soils

There would be no geology and soils impacts as there would be no development at the site.

Hazards and Hazardous Materials

There would be no hazards and hazardous materials impacts as there would be no development at the site.

Noise

There would be no noise impacts as there would be no development at the site.

Wastewater

There would be no wastewater impacts as there would be no development at the site.

Alternative 2: 100 Percent Affordable Housing

Alternative Description

The California Governor's Office of Land Use and Climate Innovation recommends presuming that residential development that is 100 percent affordable and constructed on an infill parcel would have a less than significant VMT impact. The project site is an infill parcel. To reduce the significant and unavoidable VMT impact to a less than significant level, this alternative is a project comprised of 100 percent affordable housing including low and very low-income units.

Therefore, this 100 percent affordable housing alternative would consist of constructing 219 low- and/or very low-income level units on the same project site.

Attainment of Project Objectives

This alternative would meet all five of the project objectives.

Alternative Impacts Comparison

This analysis identifies the potential impacts associated with developing the site with 100 percent affordable housing units and compares them with the significant and unavoidable and significant, mitigatable impacts of the proposed project.

Vehicle Miles Traveled (VMT)

As discussed above, the California Governor's Office of Land Use and Climate Innovation recommends presuming that residential development that is 100 percent affordable and constructed on an infill parcel would have a less than significant VMT impact. The purpose of this alternative is

to reduce the significant and unavoidable VMT impact of the proposed project to a less-than-significant level. This alternative would do so. Therefore, this alternative is superior to the proposed project regarding VMT impacts.

Air Quality

This alternative involves the same number of residential units and, therefore, would be below the 810-unit screening size for residential development that could potentially generate significant operational and construction criteria air pollutant emissions, as identified in Table 5-4 of the air district's CEQA Guidelines.

The volume and concentration of toxic air contaminants that would be generated during construction under this alternative would also be the same as the proposed project given the same intensity and duration of construction activities to build out the site with residential uses. This alternative would have the same construction health risk effects as the proposed project.

Biological Resources

Like the proposed project, this alternative would disturb the entire site. Therefore, this alternative would have the same potential impacts from potential disturbance/loss of special-status species relative to the proposed project.

Cultural Resources

Like the proposed project, this alternative would disturb the entire site. Therefore, this alternative would have the same potential impacts from potential disturbance/loss of cultural resources as would the proposed project.

Geology and Soils

This alternative, like the proposed project, would disturb the entire project site. Therefore, the potential damage caused by expansive properties in the site soils as well as the potential to discover buried, unknown paleontological resources during construction activities would be the same under this alternative as for the proposed project.

Hazards and Hazardous Materials

The proposed project has the potential to release hazardous arsenic concentrations from the site soils into the environment during excavation of the project. Like the proposed project, this alternative would disturb the entire site and includes a similar level of excavation and grading. Therefore, this alternative would have the same impact as the proposed project.

Noise

This alternative would result in similar construction noise levels as the proposed project because the area of disturbance, type of construction, and duration of construction would be similar.

Wastewater

This alternative would result in a similar number of residents as the proposed project and, therefore, the generation of wastewater would be similar. The potential for the proposed project to result in a determination by the City of Hollister that the Water Reclamation facility has inadequate capacity to serve the alternative's demand would be the same under this alternative as for the proposed project.

Alternative 3: 25 Percent Affordable Housing

Alternative Description

Residential development capacity under this alternative is assumed to be the same as the proposed project at 219 units. However, the purpose of this alternative is to increase the number of affordable units and reduce the number of market rate units as a basis to reduce daily vehicle trip volume and associated daily VMT.

According to Hexagon Transportation Consultants, to reduce VMT below the threshold of 18.79 VMT per capita, at least 61 percent of the proposed multi-family units must be affordable. Therefore, this alternative would result in at least 55 of the proposed apartment units being affordable for low or very low-income levels (90 originally proposed apartment units x 0.61) while the residual 164 units (35 apartment units and 129 condominiums) would remain above moderate-income level units. This alternative results in a total of 25 percent affordable housing (55 affordable apartment units / 219 total units).

This change in income levels for the proposed units (i.e., making the units affordable) would change the daily VMT per capita and reduce it to below the threshold of 18.79 VMT per capita. This results from the lower daily vehicle trip rate for affordable units relative to market rate units (assumed lower vehicle ownership, higher use in transit and walking/bicycling, etc.). See the discussion under VMT below.

This alternative also assumes the project site area of disturbance would be the same as for the proposed project.

Attainment of Project Objectives

This alternative would meet all five of the project objectives.

Alternative Impacts Comparison

This analysis identifies the potential impacts associated with developing the site with 55 low and very low-income level units and 164 above moderate-income level units and compares them with the significant and unavoidable and significant, mitigable impacts of the proposed project.

Vehicle Miles Traveled (VMT)

The City of Hollister has a VMT evaluation tool that can take into account affordability. This tool treats VMT estimates differently in that a VMT estimate is provided for each component (e.g., single-family and multi-family components) as opposed to a combined value for all residential uses on the project site (Luis Descanzo, email message, January 7, 2026).

As described in Section 5.0, Transportation (VMT), the proposed project would need to achieve a 17.4 percent reduction in VMT per capita to reduce the impact to less than significant. According to Hexagon Transportation Consultants, if 61 percent of the apartment units were affordable (low or very low-income; 55 units total), daily trip volume would decline to the point that a less than significant VMT impact would be achieved (Luis Descanzo, email message, January 7, 2026). The reduction would reduce the significant and unavoidable VMT impact of the proposed project to less than significant. This alternative is superior to the proposed project from a VMT impact perspective.

Air Quality

This alternative involves the same number of residential units and, therefore, would be below the 810-unit screening size for residential development that could potentially generate significant operational and construction criteria air pollutant emissions, as identified in Table 5-4 of the air district's CEQA Guidelines.

The volume and concentration of toxic air contaminants that would be generated during construction under this alternative would also be the same as the proposed project given the same intensity and duration of construction activities to build out the site with residential uses. This alternative would have the same construction health risk effects as the proposed project.

Biological Resources

Like the proposed project, this alternative would disturb the entire site. Therefore, this alternative would have the same potential impacts from potential disturbance/loss of special-status species relative to the proposed project.

Cultural Resources

Like the proposed project, this alternative would disturb the entire site. Therefore, this alternative would have the same potential impacts from potential disturbance/loss of cultural resources as would the proposed project.

Geology and Soils

This alternative, like the proposed project, would disturb the entire project site. Therefore, the potential damage caused by expansive properties in the site soils as well as the potential to discover buried, unknown paleontological resources during construction activities would be the same under this alternative as for the proposed project.

Hazards and Hazardous Materials

The proposed project has the potential to release hazardous arsenic concentrations from the site soils into the environment during excavation of the project. Like the proposed project, this alternative would disturb the entire site and includes a similar level of excavation and grading. Therefore, this alternative would have the same impact as the proposed project.

Noise

This alternative would not change the construction of the residential units in a manner that would change the requirement for installation of mechanical ventilation or air conditioning to be installed. Therefore, this alternative would have a same impact as the proposed project.

Wastewater

This alternative would result in a similar number of residents as the proposed project and, therefore, the generation of wastewater would be similar. The potential for the proposed project to result in a determination by the City of Hollister that the Water Reclamation facility has inadequate capacity to serve the alternative's demand would be the same under this alternative as for the proposed project.

10.5 Comparison of Alternatives

Pursuant to CEQA Guidelines section 15126.6(a), an EIR shall evaluate the comparative merits of the alternatives. The significance of effects of the alternatives relative to the proposed project are summarized in Table 10-1, Comparison of Alternatives Impacts to Proposed Project Impacts. The table identifies whether the alternatives have potential to lessen or avoid the significant and unavoidable impact of the proposed project, and whether the alternatives have potential to lessen significant, mitigable impacts of the proposed project.

10.6 Environmentally Superior Alternative

Alternatives 2 and 3, 100 Percent Affordable and 25 Percent Affordable Housing, respectively, are equally considered to be the environmentally superior alternative. Both would reduce the significant and unavoidable VMT impact of the proposed project to a less-than-significant level while meeting all of the project objectives. Alternative 1, No Project, would also reduce the significant and unavoidable project VMT impact to a less-than-significant level, but would not meet any of the project objectives.

Table 10-1 Comparison of Alternatives Impacts to Proposed Project Impacts

Environmental Impact	Proposed Project	Alternative 1 No Project	Alternative 2 100 Percent Affordable Housing	Alternative 3 25 Percent Affordable Housing
VMT	SU	NI (Improved from Proposed Project)	LTS (Improved from Proposed Project)	LTS (Improved from Proposed Project)
Air Quality	LTSM	NI (Improved from Proposed Project)	LTSM (Same as Proposed Project)	LTSM (Same as Proposed Project)
Biological Resources	LTSM	NI (Improved from Proposed Project)	LTSM (Same as Proposed Project)	LTSM (Same as Proposed Project)
Cultural Resources	LTSM	NI (Improved from Proposed Project)	LTSM (Same as Proposed Project)	LTSM (Same as Proposed Project)
Geology and Soils	LTSM	NI (Improved from Proposed Project)	LTSM (Same as Proposed Project)	LTSM (Same as Proposed Project)
Hazards/Hazardous Materials	LTSM	NI (Improved from Proposed Project)	LTSM (Same as Proposed Project)	LTSM (Same as Proposed Project)
Noise	LTSM	NI (Improved from Proposed Project)	LTSM (Same as Proposed Project)	LTSM (Same as Proposed Project)
Wastewater	LTSM	NI (Improved from Proposed Project)	LTSM (Same as Proposed Project)	LTSM (Same as Proposed Project)
Meets Objectives?	Yes	No	Yes	Yes

SOURCE: EMC Planning Group 2026
NOTES:
SU = significant and unavoidable
LTS = less than significant
LTSM = less than significant with mitigation
NI = No Impact

11.0 Sources

11.1 Documents, Persons Contacted and Web Sources

This section provides the document, persons contacted and web sources referenced in the supplemental EIR. Sources are provided by section.

Introduction

None.

Summary

Hanna-Brunetti. January 2024. *Tentative Map-Meridian Village.*

Environmental Setting

California Department of Finance. May 2025. *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2025, with 2020 Benchmark.* https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/

City of Hollister. December 2005. City of Hollister 2005 General Plan. https://files.hollister.ca.gov/Community%20Development%20Department/Planning/General%20Plan/Complete_General_Plan.pdf

———. September 2020. General Plan Map. https://files.hollister.ca.gov/Community%20Development%20Department/Planning/General%20Plan/COH_General%20Plan%20Map_9-24-2020%20(1).pdf

———. 2021. Zoning Map. https://files.hollister.ca.gov/Community%20Development%20Department/Building/Resources%20Page/ZoningMap2021StreetNames%20(1).pdf

———. August 2025. Hollister Code of Ordinances. https://library.municode.com/ca/hollister/codes/code_of_ordinances

———. January 2026. City of Hollister 2040 General Plan Public Review Draft. https://hollister2040.org/wp-content/uploads/2026/01/Hollister-General-Plan_Draft_Jan2026.pdf

———. "Housing Element" Accessed on February 10, 2026. https://hollister.ca.gov/government/departments/development_services/planning/housing_element.php

San Benito County Airport Land Use Commission. June 2012. https://files.hollister.ca.gov/Airport/ADOPTED%20%20ALUCP%20-June%202012.pdf

Project Description

Hanna-Brunetti. January 2024. *Tentative Map-Meridian Village.*

Transportation

City of Hollister. December 2005. *City of Hollister 2005 General Plan*. https://files.hollister.ca.gov/Community%20Development%20Department/Planning/General%20Plan/Complete_General_Plan.pdf

Governor's Office of Planning and Research. December 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Hexagon Transportation Consultants, Inc. May 2024. *Meridian Village Residential Development Transportation Analysis*.

DTSC Comment Letter on NOP

Purvis, Tamara, Associate Environmental Planner, California Department of Toxic Substances Control. Comment letter to Magda Gonzalez, Senior Planner, City of Hollister, dated 7 January 2026.

Significant and Unavoidable Impacts

None.

Growth Inducing Impacts

City of Hollister. December 2005. *City of Hollister 2005 General Plan*. https://files.hollister.ca.gov/Community%20Development%20Department/Planning/General%20Plan/Complete_General_Plan.pdf

Cumulative Impacts

City of Hollister. December 2005. *City of Hollister 2005 General Plan*. https://files.hollister.ca.gov/Community%20Development%20Department/Planning/General%20Plan/Complete_General_Plan.pdf

———. October 2005. *Final Environmental Impact Report City of Hollister General Plan (March 2005 Public Review Draft).* https://hollister.ca.gov/government/departments/development_services/planning/general_plan.php

Monterey Bay Air Resources District (MBARD). February 2026. *Air Monitoring 2025 Annual Report.* https://www.mbard.org/files/c6caad4b1/23+RegularAirMonitoringCY2025BoardReport_and_Attachment.pdf

Alternatives

City of Hollister. April 2016. *City of Hollister Housing Element of the General Plan*. Hollister, CA.

Descanzo, Luis, Associate, Hexagon Transportation Consultants, Inc. Email message to consultant, 7 January 2026.

This side intentionally left blank.