



**SAN BENITO COUNTY
AGENDA ITEM
TRANSMITTAL FORM**

Dom Zanger
District No. 1
Vice-Chair

Kollin Kosmicki
District No. 2
Chair

Mindy Sotelo
District No. 3

Angela Curro
District No. 4

Ignacio Velazquez
District No. 5

Item Number: 1.29

MEETING DATE: 08/12/2025

DEPARTMENT: RESOURCE MANAGEMENT AGENCY

AGENDA ITEM PREPARER: Jonathan Olivas

DEPT HEAD/DIRECTOR: Abraham Prado

SUBJECT:

RESOURCE MANAGEMENT AGENCY - A. PRADO, PLANNING AND BUILDING DIRECTOR

Approve contract with EMC Planning Group for the period of August 13, 2025 through March 31, 2028 for preparation of an Initial Study and Mitigated Negative Declaration (ISMND) for the amended Conditional Use Permit for biosolids land application at Tobias Ranch, located on Santa Anita Valley Road (County Planning File PLN240025), in an amount not to exceed \$91,660.00, and authorize the Chair of the San Benito County Board of Supervisors to execute said contract.

SBC FILE NUMBER: 790

AGENDA SECTION:

CONSENT AGENDA

BACKGROUND/SUMMARY:

The San Benito County Resource Management Agency proposes to enter into a retroactive contract with EMC Planning Group, Inc. to prepare an Initial Study and Mitigated Negative Declaration (ISMND) for County Planning File PLN240025, which involves an amendment to a previously approved Conditional Use Permit (PLN220011). The project site, commonly referred to as Tobias Ranch, is located approximately 3.5 miles east of Tres Pinos along Santa Anita Valley Road in unincorporated northeastern San Benito County.

The proposed amendment would expand the biosolids land application program by an additional 579.4 acres, incorporating three new fields designated SB-01-04 through SB-01-06. These new areas are proposed to be added to the previously approved 613.13-acre application area, bringing the total acreage subject to evaluation under this environmental review to approximately 1,192 acres. The project continues the use of Class-B biosolids to support wheat hay cultivation, while refining operational practices, updating compliance protocols, and strengthening alignment with current State and County environmental and agricultural standards. Application of biosolids will follow guidelines established by the

State Water Resources Control Board Water Quality Order No. 2004-0012-DWQ, including requirements for nutrient monitoring, setbacks from sensitive areas, and timely incorporation of materials into soil. The project site is designated Rangeland (RG) under the San Benito County 2035 General Plan and zoned Agricultural Rangeland (AR). It is also subject to a Williamson Act contract. The site primarily consists of rolling rangeland and steep slopes and is surrounded by similarly designated grazing lands, with some scattered row crops and rural residential development in the vicinity. Environmental features on the site include mapped cultural resources, areas within FEMA-designated flood zone A, a freshwater emergent wetland, the Quien Sabe Fault Zone in the northern portion of the property, and wildfire hazard areas.

Pursuant to the California Environmental Quality Act (CEQA), the County has contracted with EMC Planning Group to prepare the required Initial Study and associated Mitigation Monitoring and Reporting Program (MMRP). The contract is authorized in an amount not to exceed \$91,660.00 and is fully funded by the applicant under an existing reimbursement agreement. As of this date, the consultant has not commenced any work beyond the submission of a proposal in response to the County's request for services.

The Initial Study will analyze the entire 1,192-acre property, with focused environmental review on biological and cultural resources, air quality, greenhouse gas emissions, energy, hydrology, and water quality. Special attention will be given to habitat suitability for special-status species, including California red-legged frog, California tiger salamander, San Joaquin kit fox, and others identified in the California Natural Diversity Database and U.S. Fish and Wildlife Service records. The analysis will also consider the potential for jurisdictional wetlands and waterways, as well as potential impacts related to emissions from transportation and biosolids application operations.

In addition to preparation of the Initial Study and draft Mitigated Negative Declaration, EMC Planning Group will also prepare responses to public comments following the public review period and a final Mitigation Monitoring and Reporting Program. The consultant will provide support at one public hearing. The County is responsible for conducting tribal consultation, issuing and posting all required notices, circulating the CEQA document for public review, and uploading all documents to the State Clearinghouse. This environmental review process is intended to ensure compliance with CEQA and to identify, analyze, and mitigate all potentially significant environmental effects of the proposed project amendment.

RESOLUTION OR ORDINANCE NEEDED FOR THIS ITEM:

No

CONTRACT NEEDED FOR THIS ITEM:

Yes

RFP AND BID HISTORY:

Planning staff distributed a detailed scope of work on November 22, 2024, to a selection of pre-qualified environmental consultants (pre-screening described later). Two responsive proposals were received by the submission deadline of December 3, 2024. Proposals were submitted by EMC Planning Group Inc. in the amount of \$91,660 and Denise Duffy & Associates in the amount of \$106,895. EMC Planning Group was selected based on their relevant experience, proposed project timeline, and cost efficiency. They will prepare an Initial Study and Mitigation Monitoring and Reporting Program (MMRP) evaluating environmental impacts, specifically addressing critical areas such as agricultural resources, biological and cultural resources, hydrology, geology, air quality, greenhouse gas emissions, transportation, and energy use. The environmental review will comply with CEQA requirements and identify necessary mitigation measures to minimize potential impacts. (See attached CEQA Proposal Procurement Documentation Summary and consultant proposals for further information.)

Current Contracts for On-Call Environmental Review Services (RFQ PWQ 2023-002)

#	CONTRACTOR	Amount	Comments
1	RCH Group Planning & Environmental Consulting	n/a	Did not respond
2	SWCA Environmental Consultants	n/a	Did not respond
3	Aspen Environmental Group	n/a	Did not respond
4	M-Group	n/a	Did not respond
5	CSG Consultants Inc.	n/a	Did not respond
6	EMC Planning Group Inc.	\$91,660	Staff recommends this contract. Consultant sent proposal. (See attached proposal.)
7	Dewberry Engineers Inc	n/a	Did not respond
8	FirstCarbon Solutions International Inc.	n/a	Did not respond
9	Ascent Environmental, Inc.	n/a	Did not respond
10	JHS Consulting LLC	n/a	Did not respond
11	PlaceWorks Inc.	n/a	Did not respond
12	Denise Duffy & Associates, Inc.	\$106,895	Consultant sent proposal. (See attached proposal.)
13	ICF	n/a	Did not respond

The County distributed a Request for Proposals (RFP) for CEQA consulting services for the Tobias Ranch CUP Amendment project. Two responsive proposals were received:

- **a. Scope of Work:** Both EMC Planning Group and Denise Duffy & Associates (DD&A) submitted detailed scopes of work for preparing an Initial Study/Mitigated Negative Declaration (IS/MND), with technical analyses in biological resources, cultural resources, air quality, GHG emissions, and energy.
- **b. Specific Experience Related to Scope :** Both firms provided relevant experience. EMC included extensive biosolid-related CEQA and planning work. DD&A demonstrated experience on several San Benito County projects.
- **c. Minimum Qualifications:** Not explicitly listed in the proposals, but both firms demonstrated qualifications through resumes, credentials, and relevant past work. They are both on the Counties list of approved environmental consultants as approved by the Board of Supervisors.
- **d. Scoring Criteria:** No formal scoring rubric was included in the RFP but was used for selection (See Below). However, the applicant selected **EMC primarily based on cost.**
- **e. Deadline to Complete the Work:**
 - **EMC:** 19 weeks (including 30-day public review)

- **DD&A:** 26 weeks
- EMC proposed the shorter schedule.
- **f. Insurance Requirements:** Not explicitly addressed in either proposal. It is assumed the selected consultant will be required to provide insurance documentation upon contract award, as standard County procedure. (See attached EMC contract for specific amount.)
- **g. Personnel Experience and Capacity :** Both firms submitted qualified and experienced teams. EMC’s staff includes CEQA specialists, biologists, and archaeologists with 15–30+ years of experience. DD&A’s team includes certified planners, attorneys, biologists, and cultural resources experts.
- ***See attached RFP and proposal for more details***

Selection was made informally by the **applicant**, who chose EMC **primarily based on cost and time frame proposed**. The following criteria were used in recommending the consultants to the applicant:

Evaluation Criteria	Points EMC DD&A		
Relevant CEQA Experience	20	18	20
Staff Qualifications & Capacity	20	18	20
Understanding of Scope	10	10	10
Schedule/Timeline	10	10	8
Cost	30	30	15
Responsiveness/Completeness	10	10	10
Total Score	100	96	83

- **Lowest Responsive Proposal:** EMC Planning Group (\$91,660)
- EMC met the project requirements and had qualified personnel.
- Selection was consistent with County practice of choosing the **lowest responsive and responsible proposer** when qualifications are comparable.

Selected Firm: EMC Planning Group

Selection Basis: EMC submitted the lowest responsive proposal. The applicant selected EMC **primarily based on cost and time frame**, and their proposal met the required technical qualifications and schedule expectations. (See RFP & Bid History for further information.)

The prescreening of CEQA-compliance consultants took place in early 2023. Planning staff published a request for qualifications (RFQ), seeking to establish a list of 10 to 20 qualified environmental review firms that could enter into on-call contracts with the County. The review and acceptance of responses resulted in a list 13 qualified consultants, and this list would remain effective for three years, through 2026. Evaluation of each consultant's proposal was based primarily on understanding of the work to be done, experience with similar kinds of work, and quality of staff for work to be done, with further consideration for capability of

developing innovative or advance techniques, familiarity with state and federal procedures, financial responsibility, and demonstrated technical ability. The on-call tasks expected of consultants included:

- Independent peer review of documents or reports submitted to the County. Such reports may be as varied as the subject matters included in the CEQA Checklist: Aesthetics, Agriculture Resources, Air Quality, Biological Resources, Cultural Resources, Forestry, Geology/Soils, Global Greenhouse Gasses, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation/Traffic, Tribal Consultation, Utilities/Service Systems. This task may include peer review of other documents, reports or information as may be needed by the County.
- Preparation of Initial Studies and a determination whether a Negative Declaration (ND), Mitigated Negative Declaration (MND), or Environmental Impact Review (EIR) is necessary for CEQA compliance.
- Preparation of environmental impact reports and supporting documentation.
- Preparation of mitigation monitoring and reporting programs.
- Preparation of technical documents including but not limited to air quality/greenhouse gas modules, noise and vibration analysis, traffic studies, soil reports, biological surveys, geohydrology reports, septic suitability reports, geologic reports, cultural surveys, etc.
- In addition to CEQA compliance, the RFQ further asked consultants for more complex professional County planning functions and assignments; developing of planning studies, environmental reviews, community design, and general plan preparation; housing element preparation; zoning and other county code updates; responsibility for the development, coordination, and completion of assigned planning projects; assisting with planning policy formulation and implementation; zoning enforcement; explanation of planning and zoning ordinances, regulations, and policies to the public; and related work as required.

LAST CONTRACT AMOUNT OR N/A:

N/A

CONTRACT HISTORY (Describe all amendments and previous contracts):

N/A

STRATEGIC PLAN GOALS: 1. Operational Development & Excellence

No

STRATEGIC PLAN GOALS: 2. Planning And Sustainable Growth

Yes

STRATEGIC PLAN GOALS: 3. Technology

No

STRATEGIC PLAN GOALS: 4. Community Engagement

Yes

STRATEGIC PLAN GOALS: 5. Health & Safe Community

Yes

BUDGETED:

Yes

BUDGET ADJUSTMENT NEEDED:

No

SOURCE OF FUNDING:

General Fund

UNFUNDED MANDATE:

No

SBC BUDGET LINE ITEM NUMBER:

101.65.1265.1000.619.222

CURRENT FY COST:

\$91,660.00

STAFF RECOMMENDATION:

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ATTACHMENTS:

[Contract - EMC Planning Group- Santa Anita Road Project](#)
[RFP for CEQA Initial Study Sent 11/22/24](#)
[DD&A Proposal Received](#)
[EMC Proposal Received](#)