

SECTION 5.0

CEQA REQUIRED SECTIONS

CHAPTER 5.0

CEQA-REQUIRED SECTIONS

California Environmental Quality Act (CEQA)-required discussions are included in this section, including the following:

- Growth-inducing impacts of the Proposed Project,
- Cumulative impacts of the Proposed Project,
- Unavoidable significant impacts of the Proposed Project (*i.e.*, residually significant impacts), and
- Effects not found to be significant.

5.1 GROWTH INDUCEMENT IMPACTS OF THE PROPOSED PROJECT

In compliance with CEQA, this EIR discusses ways in which the Proposed Project could induce growth (*CEQA Guidelines Section 15126 [d]*). A growth inducing impact is an effect that directly or indirectly fosters economic or population growth, or the construction of additional housing. Indirect growth inducement could result if a project established substantial new permanent employment opportunities, or if it would remove obstacles to population growth.

Growth inducement is not in and of itself an “environmental impact,” however growth can result in adverse environmental consequences. Growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Local land use plans (e.g., general plans) provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service and solid waste service. A project that would induce “disorderly” growth (*i.e.*, a project in conflict with local land use plans) could indirectly cause adverse environmental impacts, for example, public services impacts. Thus, to assess whether a project with the potential to induce growth is expected to result in adverse secondary effects, it is important to assess the degree to which the growth associated with a project would or would not be consistent with applicable land use plans.

5.1.1 DEVELOPMENT AND GROWTH TRENDS

San Benito County was one of the fastest-growing counties in California during the 1990s. The majority of this growth was concentrated in Hollister, where the population grew from 19,212 in 1990 to 34,413 in

2000, an annual rate of 6 percent (US Census, 2004). Currently the City's population is estimated to be approximately 37,183 (CDOF, 2006). Buildout of the General Plan would result in a population of 55,000 in the year 2023. This would require a 2.6 percent growth rate for housing and population over the next 18 years.

In recent years, the City Council and voters have taken several actions to assist in directing and controlling the future growth of Hollister. These actions include implementation of the Growth Management Program, and approval of the Growth Cap Initiative. These actions, along with the Building Moratorium Ordinance, are discussed in **Section 4.1.1**.

5.1.2 EXISTING AND PREDICTED WASTEWATER FLOWS

CURRENT WASTEWATER TREATMENT FACILITIES AND FLOWS

The existing DWTP serves the domestic wastewater treatment and disposal needs of the City of Hollister. The average annual domestic wastewater flow for the City of Hollister in 2004 was approximately 2.72 million gallons per day (mgd) (HydroScience Engineers, 2005). Wastewater is treated by a dual-powered, multicellular (DPMC) process with the treated wastewater disposed by percolation at the DWTP site just south of the San Benito River and the IWTP just north of the river.

PROJECTED WASTEWATER FLOWS

Projected wastewater flows are based on projected growth for the Hollister Service Area from the beginning of the year 2008. The Hollister Service Area includes the City of Hollister and surrounding areas in unincorporated San Benito County that are within and adjacent to the City's Planning Area (see **Figure 2-4**). The current flow of 2.72 mgd is assumed for the year 2008 since flows are not expected to increase significantly in the interim. Growth projections and associated increases in wastewater flows at the DWTP are based upon the 2005 City of Hollister General Plan (City of Hollister, 2005). Additionally, it is expected that the Sunnyslope County Water District (SCWD), which is comprised primarily of unincorporated County land on the eastern boundary of the City of Hollister (see **Figure 2-4**), would contribute a small amount of flow (approximately 0.25 mgd in 2008) to the treatment facility. The following assumptions were used to estimate future wastewater flows for the Hollister Service Area:

- 2.6% annual increase in residential and school developments;
- 2.9% annual increase in commercial development;
- 2.67% weighted annual average increase in wastewater flow;
- 0.25 mgd flow from SCWD beginning in 2008; and
- 4.2% annual increase in wastewater flow from SCWD

Wastewater flow projections for the Hollister Service Area are shown in **Table 2-1**. These projections estimate that Hollister General Plan buildout in 2023 would have an average dry weather flow of 4.5 mgd.

The City is proposing to construct plant improvements to increase plant capacity to 5 mgd. The design flow is based on the projected average dry weather flow of 4.5 mgd in 2023 and allows for seasonal increases resulting from wet weather inflow and infiltration.

5.1.3 GROWTH INDUCEMENT POTENTIAL OF PROPOSED PROJECT

The proposed DWTP improvements would treat an initial average dry-weather flow of 4.0 mgd, with the ability to expand to 5.0 MGD in the future. The existing DWTP capacity (which is dictated through permits issued by the RWQCB for the discharge of wastewater) is approximately 2.69 mgd. If the proposed improvements at the DWTP are implemented, the building moratorium would be lifted, allowing growth to occur within the City of Hollister, and additional properties beyond the City's jurisdictional limits to connect to the plant. It should be noted that proposed pipeline routes shown in Figure 3-4 illustrate the possible location of disposal areas, not future connections to the DWTP. The use of treated wastewater as an irrigation source is not considered growth facilitating, as other sources of water currently exist. However, increasing the capacity of the DWTP could support a larger population in the area. As discussed previously, the proposed design capacity is adequate to provide wastewater treatment services for buildout of the City of Hollister General Plan, plus additional growth in the Hollister Service Area including the SCWD. The location and amount of future growth would continue to be controlled and guided through the San Benito County Growth Management System and the City of Hollister General Plan, Growth Management Program and adopted growth and development controls and standards. However, this growth would not be possible without the expanded treatment capacity at the DWTP. Therefore, the indirect impacts of buildout of the City's General Plan and additional growth in the Hollister Service Area are discussed below. This discussion is based on the City of Hollister General Plan EIR (City of Hollister, 2005b), which addressed the environmental impacts of growth within the Hollister planning area.

5.1.4 SECONDARY ENVIRONMENTAL IMPACTS OF GROWTH

The secondary environmental impacts associated with growth of the DWTP service area would depend on the actual changes to land use that occur with new developments. The City of Hollister and San Benito County General Plans have been designed to guide land use changes and development in the service area. The expected environmental impacts of residential and commercial developments are incorporated from the *City of Hollister General Plan Final Program Environmental Impact Report* (EIR) (City of Hollister, 2005b). For further evaluation of the impacts of growth within the Hollister planning area consult the City of Hollister General Plan EIR, which is available from the City of Hollister at 375 Fifth Street, Hollister. The following presents potentially significant environmental impacts that are expected to occur as the result of buildout of the General Plan.

LAND USE

CONSISTENCY WITH OTHER ADOPTED LAND USE PLANS

The City of Hollister General Plan EIR identified that development under the General Plan would conflict in a minor way with Association of Monterey Bay Area Governments (AMBAG) forecasts for housing and population through the year 2023. There would only be a minor (insignificant) inconsistency between the General Plan and the forecast assumptions in regional transportation and air quality plans that can be addressed through amendment of the AMBAG forecasts. The minor inconsistency between the General Plan and the adopted AMBAG forecasts would be a significant impact that could be mitigated to a less than significant level with implementation of mitigation measures contained in the General Plan and the additional mitigation measure contained in the EIR.

The General Plan's policies and programs support current procedures followed by the City when development applications are reviewed, including the referral of plans to appropriate federal, state, regional and adjacent jurisdictions and agencies to assure consistency between City and other agency regulations and requirements. These policies include: LU5.1, LU5.2, LU5.3, LU6.1, LU6.2, LU6.3, LU6.4, LU6.5, LU7.2, LU7.3, LU7.4, LU7.5, LU.N, LU.O, LU.P, LU.S, H1.3, H1.4, CSF1.1, CSF1.2, CSF1.3, CSF1.4, CSF1.5, CSF1.6, CSF1.7. In addition, the General Plan EIR identified the following additional mitigation measure to reduce impacts regarding consistency with other adopted land use plans to a less than significant level:

- 4.1-1-1 Initiate a process to amend the AMBAG Forecasts. Initiate a process to amend the 2004 AMBAG Population, Housing Unit and Employment Forecasts for San Benito County to make them consistent with the City of Hollister General Plan and Regional Housing Needs Determinations.

The City adopted this mitigation measure, and has since contacted AMBAG to initiate and is in the process of having AMBAG amend its population forecasts. However, AMBAG has indicated that an amendment would not be necessary as the growth enabled in the General Plan for the year 2023 would not exceed the applicable five year increment forecasted in AMBAG's 2004 Forecasts (Appendix L). As such, the General Plan was determined to be consistent with AMBAG forecasts.

INCOMPATIBLE LAND USES AND CHANGES TO NEIGHBORHOOD CHARACTER

The City of Hollister General Plan EIR identified that development consistent with the General Plan would result in changes in land use type, density, scale and character in the more central area of the City, downtown and surrounding neighborhoods. Implementation of mitigation measures contained in the policies and programs in the General Plan would reduce potential conflicts between new and existing uses, including design and traffic conflicts, and would reduce potential impacts to a less than significant level. These policies include: LU1.1, LU1.2, LU1.3, LU1.4, LU1.9, LU3.5, LU5.2, LU5.3, LU6.1, LU6.2, LU6.3, LU6.4, LU6.5, LU7.4, LU7.5, LU8.1, LU8.2, LU8.3, LU8.4, LU9.1, LU.P, LU.S.

Implementation of these and other General Plan policies and programs would reduce impacts to a less than significant level. No additional mitigation was identified in the General Plan EIR.

GROWTH OF CONCENTRATION OF POPULATION

The City of Hollister General Plan EIR identified that development consistent with the General Plan would induce substantial growth and concentration of the City's population. This would be a significant unavoidable impact. Secondary impacts would also result related to public services and utilities. To accommodate growth in Hollister, the General Plan outlines a series of land use and growth policies and management strategies to intensify "infill" urban uses while preserving the small town character and rural feel of the area. These policies include: LU6.1, LU6.2, LU6.3, LU6.4, LU6.5, LU7.4, LU7.5, LU.S. Implementation of these and other General Plan policies and programs would reduce impacts but this would still be a significant unavoidable impact. No additional mitigation was identified in the General Plan EIR.

EMPLOYMENT GROWTH RATE

The City of Hollister General Plan EIR identified that development under the General Plan would result in an expected increase in employment of 8,970 jobs over 2000 U.S. Census figures. While implementation of the General Plan does not create jobs directly, it fosters job creation through implementing land use changes and improvements designed to create employment opportunities. This would be a significant unavoidable impact. However, General Plan policies related to employment growth that would be implemented as mitigation measures include: LU5.1, LU5.3, LU5.4, LU5.5, LU6.1, LU6.2, LU6.3, LU6.4, LU6.5, LU7.4, LU7.5, LU10.3, H3.7, CSF1.1, CSF1.2, CSF1.3, CSF1.4, CSF1.5, CSF1.6, CSF1.7. Implementation of these and other General Plan policies and programs would reduce impacts but this would still be a significant unavoidable impact. No additional mitigation was identified in the General Plan EIR.

AGRICULTURE

FARMLAND CONVERSION

The City of Hollister General Plan EIR identified that development consistent with the General Plan would result in the irreversible conversion of Prime Farmland to urban development. This would be a significant unavoidable impact. However, General Plan policies related to reducing the area of development and supporting grouped or clustered residential development on large parcels or subdivisions wherever important agricultural resources are present, would be implemented as mitigation measures. These policies include: LU6.1, LU6.4, LU6.5, LU.S, OS1.1, OS1.2, OS1.3, OS1.5, OS1.7, OS2.1, OS2.2, OS2.3, OS2.4, OS.A, OS.C, OS.D, OS.E. Implementation of these and other General Plan policies and programs would reduce impacts but this would still be a significant unavoidable impact. No additional mitigation was identified in the General Plan EIR.

GEOLOGY

SEISMIC GROUND SHAKING

The City of Hollister General Plan EIR identified that seismic hazards in the Hollister Planning Area will expose people and structures to potential, substantial adverse seismic effects, including the potential risk of loss, injury, or death involving strong seismic ground shaking. This would be a significant unavoidable impact. However, General Plan policies related to health and safety would be implemented as mitigation measures reducing potential impacts to what is defined as an "acceptable level of risk," as determined by the City. These policies include: HS1.1, HS1.2, HS1.3, HS1.4, HS1.5, HS1.6, HS1.7, HS2.1, HS2.2, HS2.3, HS2.4, HS2.5, HS2.6, HS.E, HS.G, HS.L, HS.M, HS.Q, HS.S. Implementation of General Plan policies and programs would reduce impacts but this would still be a significant unavoidable impact. No additional mitigation was identified in the General Plan EIR.

SEISMIC RELATED GROUND FAILURE

The City of Hollister General Plan EIR identified that seismic hazards in the Hollister Planning Area will expose people and structures to potential substantial adverse seismic effects, including the risk of loss, injury, or death from seismic-related ground failures of liquefaction, lateral spreading, lurching, differential settlement, and flow failures. This would be a significant unavoidable impact. However, General Plan policies related to health and safety would be implemented as mitigation measures reducing potential impacts to what is defined as an "acceptable level of risk," as determined by the City. These policies include: HS1.1, HS1.2, HS1.3, HS1.4, HS1.5, HS1.6, HS1.7, HS2.1, HS2.2, HS2.3, HS2.4, HS2.5, HS2.6, HS.E, HS.G, HS.L, HS.M, HS.Q, HS.S. Implementation of General Plan policies and programs would reduce impacts but this would still be a significant unavoidable impact. No additional mitigation was identified in the General Plan EIR.

HYDROLOGY

WATER SUPPLY

The City of Hollister General Plan EIR identified that development under the General Plan would increase the demand for water in the Hollister Planning Area. Growth projections for Hollister are consistent with adopted AMBAG forecasts except for a minor technical adjustment (forecasting mitigation mentioned above). This would be a potentially significant impact. Water supply issues are addressed in policies of the General Plan to coordinate with other agencies and plan for the provision of adequate infrastructure, services and facilities, and would be implemented as mitigation measures. These policies include: CSF1.1, CSF1.2, CSF1.3, CSF1.4, CSF1.5, CSF1.6, CSF1.7, CSF2.1, LU.N, LU.O, LU.P, LU.S, CSF.D, CSF.F, CSF.G, CSF.I, CSF.M, CSF.Q, CSF.R, CSF.V, CSF.CC, CSF.DD. In

addition, the General Plan EIR identified the following additional mitigation measure for master planning of wastewater and water supplies:

4.10-1-1 Coordinate with the San Benito County Water District, San Benito County and the Sunnyslope County Water District in water and wastewater system expansion needs. As a follow-up to the Memorandum of Understanding (MOU) between the City of Hollister, San Benito County, and San Benito County Water District, the City will work with the San Benito County Water District and San Benito County to develop and implement plans for meeting the water needs of the City of Hollister consistent with the General Plan. Issues to be addressed include:

- 1) Implementation of the Groundwater Management Plan, including:
 - a) Purchasing of additional water supplies.
 - b) Percolation of the San Felipe Project water into the underlying aquifers.
 - c) Obtaining access to water from the San Felipe Project.
 - d) Monitoring groundwater levels and the quantities of water recharged to and extracted from the underlying sub-basins.
 - e) Sharing water resources data between the agencies to allow for responsible decisions regarding water supply development and land use planning.
 - f) Developing policies regarding the provision of service to community water systems and small local water systems.
- 2) Develop and implement the Hollister Urban Water and Wastewater Master Plan, including:
 - a) Purchasing of additional water supplies.
 - b) Percolation of the San Felipe Project water into the underlying aquifers.
 - c) Obtaining access to water from the San Felipe Project.
 - d) Monitoring groundwater levels and the quantities of water recharged to and extracted from the underlying sub-basins.
 - e) Sharing water resources data between the agencies to allow for responsible decisions regarding water supply development and land use planning.
 - f) Developing policies regarding the provision of service to community water systems and small local water systems.

Upon completion of the Hollister Urban Water and Wastewater Master Plan the City will reassess the population, employment and other growth projections of the General Plan to be consistent with the adopted Urban Water and Wastewater Master Plan and in compliance with State law requirements for future water supplies.

Implementation of the additional mitigation measure proposed in this EIR and other General Plan policies and programs would reduce potential significant impacts to a less than significant level.

WATER QUALITY

The City of Hollister General Plan EIR identified that development under the General Plan would result in an increase in the loading of petrochemical contaminants, heavy metals and pesticide, and herbicide residues to natural and artificial drainage-ways and could contribute to groundwater quality degradation and/or contamination within the Planning Area. General Plan policies related to water quality and the recommended use of recycled water that would be implemented as mitigation measures include: CSF1.1, CSF1.2, CSF1.3, CSF1.4, CSF1.5, CSF1.6, CSF1.7, CSF3.3, CSF3.4, CSF3.5, CSF3.6, CSF3.7, LU.N, LU.O, LU.P, LU.S, CSF.D, CSF.F, CSF.G, CSF.O, CSF.CC. In addition, the General Plan EIR identified that mitigation measure 4.10-1-1 identified above would also mitigate this impact. Implementation of the additional mitigation measure proposed in this EIR and General Plan policies and programs would reduce potential significant impacts to a less than significant level.

GROUNDWATER

The City of Hollister General Plan EIR identified that development consistent with the General Plan could result in overall incremental increases in impervious surface cover in some Planning Area watersheds. These increases would be minimal and would not affect groundwater resources. However, use of groundwater for future water supply would have a significant effect on groundwater resources. General Plan policies related to groundwater resources that would be implemented as mitigation measures include: CSF1.1, CSF1.2, CSF1.3, CSF1.4, CSF1.5, CSF1.6, CSF1.7, CSF3.3, CSF3.4, CSF3.5, CSF3.6, CSF3.7, LU.N, LU.O, LU.P, LU.S, CSF.D, CSF.F, CSF.G, CSF.CC. In addition, the General Plan EIR identified that mitigation measure 4.10-1-1 identified above would also mitigate this impact. Implementation of the additional mitigation measure proposed in this EIR and General Plan policies and programs would reduce potential significant impacts to a less than significant level.

BIOLOGICAL RESOURCES

SPECIAL-STATUS PLANT AND ANIMAL SPECIES

The City of Hollister General Plan EIR identified that development under the General Plan could affect a number of federal or state listed plant and animal species directly through incidental take or indirectly through habitat destruction unless the policies and programs in the General Plan are followed. This would be a potentially significant impact. Within the project area, habitat for Special Status species is limited primarily to wetlands and riparian habitats. Mitigation measures include compliance with state and federal wetlands protection regulations and implementation of General Plan policies related to development. These policies include: LU3.5, LU6.1, LU6.3, LU6.4, LU6.5, LU7.1, OS1.1, OS1.2, OS1.3, OS1.4, OS1.5, OS1.6, OS1.7, OS.B, OS.E, OS.F, OS.G, OS.H, OS.I, NRC 1.1, NRC 1.2, NRC 1.3, NRC 1.4, NRC 1.5, NRC 1.6, NRC 1.7, NRC.U, NRC.V, NRC.W, NRC.X, NRC.Y. Implementation of these policies and programs would minimize potential impacts to the various federally and state listed plant and animal species, reducing them to a less than significant level. No additional mitigation was identified in the General Plan EIR.

SENSITIVE NATURAL COMMUNITIES

The City of Hollister General Plan EIR identified that a number of sensitive natural communities could be affected by development under the General Plan either directly in undeveloped areas designated for development or indirectly by intensifying the land use adjacent to current undeveloped lands. Policies and programs in the General Plan call for the protection and avoidance of sensitive habitat. This would be a potentially significant impact. General Plan policies related to the recommendations that new development either avoid, minimize, or compensate for loss of habitat, would be implemented as mitigation measures. These policies include: LU3.5, LU6.1, LU6.3, LU6.4, LU6.5, LU7.1, OS1.1, OS1.2, OS1.3, OS1.4, OS1.5, OS1.6, OS1.7, OS.B, OS.E, OS.F, OS.H, OS.I, NRC 1.1, NRC 1.2, NRC 1.3, NRC 1.4, NRC 1.5, NRC 1.6, NRC 1.7, NRC.U, NRC.V, NRC.X, NRC.Y. Implementation of these policies and programs would minimize potential impacts to sensitive natural communities, reducing them to a less than significant level. No additional mitigation was identified in the General Plan EIR.

CULTURAL RESOURCES

The City of Hollister General Plan EIR identified that no significant impacts to cultural resources would occur from development under the General Plan.

PUBLIC SERVICES AND FACILITIES

LANDFILL CAPACITY

The City of Hollister General Plan EIR identified that development consistent with the General Plan will result in increased solid waste generation. Depending on the accuracy of the population projections and business growth for both the City of Hollister and County of San Benito, there is expected to be sufficient landfill capacity until approximately 2016. This could be a potentially significant impact unless plans are made for countywide refuse disposal needs. General Plan policies related to landfill capacity that would be implemented as mitigation measures include: LU2.1, LU6.2, LU6.3, LU6.4, LU.O, LU.P, LU.Q, CSF1.1, CSF1.2, CSF1.3, CSF1.4, CSF1.7, CSF4.10, CSF.AA, CSF.GG. In addition, the General Plan EIR identified the following additional mitigation measure for planning of waste management:

- 4.5-7-1 Coordination with the County of San Benito in addressing solid waste management needs consistent with the Hollister General Plan.
- 4.5-7-2 Coordinate with San Benito County and San Benito County Integrated Waste Management to expand landfill capacity beyond the currently expected life of the John Smith Road Landfill.

Implementation of the additional mitigation measure proposed in this EIR and other General Plan policies and programs would reduce potential significant impacts to a less than significant level.

AIR QUALITY

The City of Hollister General Plan EIR identified that no significant impacts to air quality would occur from development under the General Plan.

NOISE

The City of Hollister General Plan EIR identified that no significant noise impacts would occur from development under the General Plan.

VISUAL RESOURCES

NIGHTTIME LIGHTING AND GLARE

The City of Hollister General Plan EIR identified that development consistent with the General Plan could create new sources of light or glare and increase nighttime lighting in the area. This would be a significant impact. A number of General Plan policies related to reducing nighttime lighting and glare impacts due to new development, would be implemented as mitigation measures. These policies include: LU1.3, LU1.6, LU1.7, LU1.8, LU1.9, LU6.5, LU7.1, LU8.2, LU8.3, LU9.1, LU11.1, LU11.2, LU.A, LU.F, LU.G, LU.H. However, this would still be a significant impact. In addition, the General Plan EIR identified the following additional mitigation measure to reduce impacts regarding nighttime lighting and glare to a less than significant level:

- 4.7-4-1 Develop guidelines for the preparation of lighting plans. In order to minimize light trespass and greater overall light levels in the city, new development and projects making significant parking lot improvements or proposing new lighting shall be required to prepare a lighting plan for review by City planning staff. Require a design guidelines to include the following provisions for lighting plans:
- a) All light sources should be fully shielded from off-site view.
 - b) All lights to be downcast except where it can be proved to not adversely affect other parcels.
 - c) Escape of light to the atmosphere should be minimized.
 - d) Low intensity, indirect light sources should be encouraged, except where other types of lighting is warranted for public safety reasons.
 - e) On-demand lighting systems should be encouraged.
 - f) Mercury, metal halide, and similar intense and bright lights should not be permitted except where their need is specifically approved and their source of light is restricted.

Implementation of EIR mitigation and other General Plan policies and programs would reduce any potential impacts to a less than significant level.

TRAFFIC

INCREASES IN TRAFFIC VOLUMES

The City of Hollister General Plan EIR identified that development consistent with the General Plan would cause increases in traffic volumes resulting in unacceptable levels of service at two intersections: San Benito Street and Fourth Street, and Airline Highway (State Route 25) and Sunnyslope Road. This would be a significant unavoidable impact. However, General Plan policies related to increased traffic volumes that would be implemented as mitigation measures including: LU6.1, LU6.2, LU6.3, LU6.4, C1.1, C1.2, C2.1, C3.1, C3.2, C.C, C.E, C.F, C.F.1, C.F.2, C.F.3, C.F.4, C.F.5, C.F.6, C.F.7, C.F.8, C.F.9, C.F.10, C.F.11, C.F.12, C.F.13, C.F.14, C.F.15, CSF1.3, CSF1.4, CSF1.5, CSF1.6. In addition, the General Plan EIR identified the following additional mitigation measure to reduce impacts:

- C3.5 The City will coordinate with appropriate agencies to assure that development projects planned adjacent to or near the rail corridor will be planned with safety of the rail corridor in mind. This includes consideration of pedestrian circulation patterns/destinations, planning for grade separations, improvements to existing at-grade rail crossings, and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

Implementation of these and other General Plan policies and programs would reduce impacts at all intersections to a less-than-significant level except for two intersections: San Benito Street and Fourth Street; and Airline Highway (State Route 25) and Sunnyslope Road. The LOS at these intersections would still result in a significant unavoidable impact.

ROADWAY CAPACITY DEFICIENCIES

The City of Hollister General Plan EIR identified roadway capacity deficiencies in several areas. These deficiencies are directly related to the future land use designations shown on the updated General Plan Map. The deficiencies can be grouped into several categories of roadway capacity needs. These include: (a) regional commuting; (b) Northwest Hollister circulation needs; (c) Southeast Hollister circulation needs; and, (d) additional roadway capacity serving the Industrial Park. This would still be a significant unavoidable impact. However, General Plan policies related to roadway capacity deficiencies that would be implemented as mitigation measures include: LU6.1, LU6.2, LU6.3, LU6.4, C1.1, C1.2, C2.1, C3.1, C3.2, C.C, C.E, C.F, C.F.1, C.F.2, C.F.3, C.F.4, C.F.5, C.F.6, C.F.7, C.F.8, C.F.9, C.F.10, C.F.11, C.F.12, C.F.13, C.F.14, C.F.15, CSF1.3, CSF1.4, CSF1.5, CSF1.6. Implementation of these and other General Plan policies and programs would reduce impacts but they would still be at a significant level and unavoidable. No additional mitigation was identified in the General Plan EIR.

SUMMARY OF SECONDARY ENVIRONMENTAL IMPACTS

The Proposed Project would result in the expansion of the capacity of the DWTP to 4.0 MGD in Phase I with eventual expansion during Phase II to 5.0 MGD. This expansion would support growth anticipated

under the City of Hollister General Plan and the San Benito County General Plan. This growth would occur predominately within the City of Hollister Planning Area. Significant impacts of this growth have been identified in the Hollister General Plan EIR and have been summarized above.

Impact

- 5.1 The Proposed Project would result in expansion of wastewater treatment and disposal capacity. This expansion would support growth anticipated under the City of Hollister General Plan. Significant and unavoidable impacts of this growth have been identified in the Hollister General Plan EIR. Additionally, the expansion could result in additional growth beyond that anticipated under the Hollister General Plan by allowing for growth within the unincorporated service area. This could occur as the result of service connections for new homes or businesses located outside of the Hollister Planning Area, within the service area identified for the DWTP (Figure 2-4).**

Mitigation Measure

- 5.1 (a) The City of Hollister shall prepare an annual wastewater demand report for the DWTP, and make the report available to San Benito County and the public. The report shall provide updated assessments of plant capacity, anticipated flow increases from urban growth in the service area, and updated timetables for plant expansions matching service area demands. The City of Hollister shall utilize information provided by San Benito County to estimate the demands of the unincorporated portion of the DWTP service area.**
- (b) The City of Hollister shall work cooperatively with San Benito County to serve the unincorporated portion of the DWTP service area in order to support the County's Growth Management System.**

Significance After Mitigation

Implementation of the above mitigation measures would provide the City of Hollister and San Benito County with annual assessments of wastewater demands and would assist in the provision of wastewater treatment in the service area. The annual report would ensure that the DWTP is not expanded beyond the capacity needed to serve planned growth in the service area. However, the proposed DWTP improvements would accommodate planned growth and the associated contribution to secondary environmental effects of such growth would be significant and unavoidable.

5.2 CUMULATIVE IMPACTS

This section evaluates the cumulative effects of the Proposed Project when considered in the context of other similar projects within the vicinity of the Proposed Project. "Cumulative impacts" refer to two or

more impacts that, when combined, are considerable or compound other environmental effects. The California Environmental Quality Act (CEQA) *Guidelines* Section 15130(b) require that cumulative impacts must reflect the severity of the impacts and their likelihood of occurrence. The cumulative discussion need not provide as much detail as provided for impacts of the project alone and should be guided by the standards of practicality and reasonableness.

In addition, Section 15130(b) of the CEQA *Guidelines* identifies that the following three elements are necessary for an adequate cumulative analysis:

- 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 (referred to as the list approach), or a summary of projections contained in an adopted general plan or related planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency (referred to as the plan approach);
- A summary of expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
- A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects of a Proposed Project.

5.2.1 PROJECTS CONSIDERED IN CUMULATIVE IMPACT ANALYSIS

Because the Proposed Project would directly influence regional development activities, cumulative impacts are evaluated on a regional scale. In order to ensure a thorough analysis, the cumulative setting considered within this document incorporates both a summary of projections contained within the City of Hollister and San Benito County General Plans, and a list of reasonably foreseeable projects. Plans and projects included in the cumulative setting are discussed below.

REGIONAL PLANNING ENVIRONMENT

Growth provided for in the City of Hollister General Plan and the San Benito County General Plan was included within the context of the cumulative setting. A detailed summary of each plan is provided in **Section 4.1.1.**

LIST OF RELATED PROJECTS

In order to identify additional projects that may contribute to cumulative environmental impacts, local agencies were contacted, including the City of Hollister, the City of San Juan Bautista, and San Benito County. Through this consultation, several projects were identified for potential consideration in the cumulative setting of this DEIR. These projects are described below.

SAN JUAN OAKS GOLF CLUB EXPANSION

The 2,000-acre project site is located off Union Road in San Benito County approximately two miles south of the DWTP site. The site consists of the existing 237-acre San Juan Oaks Golf Club, and surrounding land. An expansion project was approved by the County in July 2004 and includes the development of an 18-hole golf course, a 9-hole golf course, 154 single-family homes, two ranch estates, 30 multi-family housing units, a 200-room resort hotel, commercial center, and a wastewater treatment plant. The proposed wastewater treatment plant is a 95,000-gpd package plant that would provide tertiary quality effluent for irrigation of the golf courses and grounds. As an additional water source, treated effluent from the Hollister DWTP would be blended with groundwater and CVP water and used for irrigation of the golf course property. Construction of the expansion project is anticipated to begin in 2007 and would be restricted by the County's 1% growth cap. In order to comply with this policy, construction would be limited to 29 homes per year over a 6-year period.

NORTHEAST FAIRVIEW SPECIFIC PLAN AT SANTANA RANCH

The 292-acre plan area is located in unincorporated San Benito County, adjacent to the City of Hollister, along Fairview Road across from existing neighborhoods between Hillcrest Road and Sunnyslope Road. The Northeast Fairview Specific Plan proposes development of up to 1,092 dwelling units, neighborhood commercial mixed use, parks and an elementary school. Additionally, the project proposes its own package wastewater treatment plant (Ortwein, 2006). Treated wastewater would be used to irrigate landscaping in the development, and a man-made lake would be built to hold treated wastewater during rainy months. A second option for wastewater treatment that is favored by the RWQCB would be a connection with the Hollister DWTP or the proposed SCWD wastewater treatment facilities. Because the project is subject to County jurisdiction, buildout would be restricted by the County's 1% growth cap and would require incremental phasing over a multiple year period. The applicant is requesting an exemption from this restriction that would require approval by the Board of Supervisors (Ortwein, 2006). The Northeast Fairview Specific Plan has not yet been approved and would require an amendment to the San Benito County general plan and re-zone of the project site from agricultural to residential and industrial uses.

SUNNYSLOPE COUNTY WATER DISTRICT

The SCWD is located in the southeastern portion of Hollister's planning area and provides water and wastewater service to residences within the district's boundaries. Currently the SCWD is in the process of planning improvements to its wastewater treatment facilities to meet current and future growth needs within the district's boundaries. An alternative to expanding the SCWD wastewater treatment facilities is connection to the Hollister DWTP. Currently, the district operates two wastewater treatment plants and wastewater disposal is achieved through evaporation and percolation. Potential improvements to the existing wastewater treatment facilities would improve the quality of treated effluent, and options for increasing disposal capacity include improvements to existing percolation and storage ponds, construction

of additional ponds, or use of treated wastewater for pasture irrigation. At this time, it is unknown whether the SCWD will move forward with improvements to on-site facilities, or if it will connect to the Hollister DWTP. In the case of the latter, flows from the SCWD have been assumed in the design and analysis of the proposed DWTP improvements project. See **Section 3.0** for further discussion of this issue.

STATE ROUTE 25 BYPASS

Construction of the State Route 25 Bypass is expected to begin in 2006, and would be overseen by the San Benito County Council of Governments (SBCCOG). The State Route 25 Bypass would provide alternative access to the residential neighborhoods on the east side of Hollister. Currently, State Route 25 passes directly through the downtown core of the City. Construction of the bypass would re-route the state highway through the eastern portion of the City, reducing traffic congestion and promoting pedestrian oriented uses downtown.

CITY OF HOLLISTER APPROVED RESIDENTIAL DEVELOPMENTS

Currently, the City of Hollister has approved a number of residential development projects that would occur throughout the City. Implementation of these projects would result in a total of 1,159 additional housing units within the City boundaries. A portion of these projects were approved prior to implementation of the Growth Management System and Measure U. Although these projects are exempt from the development restrictions imposed by these policies, construction has been postponed by the building moratorium ordinance. Once improvements at the DWTP are implemented, and the moratorium is lifted, construction of these projects could feasibly begin immediately. A list of these projects is provided below in **Table 5-1**.

In addition, several residential projects have been approved since the enactment of the Growth Management Program and Measure U. These projects are subject to the growth restrictions imposed by these policies and construction shall be limited to a Citywide total of 244 dwelling units per year (not including exempt projects). Development of these projects is also postponed until the building moratorium is lifted. **Table 5-2** provides a list of the approved residential projects that are subject to growth control measures. The West of Fairview project has a development agreement with the City that assures a certain number of homes per year can be constructed.

PROJECTS NOT CONSIDERED IN THE CUMULATIVE ANALYSIS

El Rancho San Benito

The representatives of El Rancho San Benito (DMB) have expressed their intention to apply for the development of a residential community consisting of 6,800 homes and ancillary facilities north of Hollister in the County of San Benito. The El Rancho San Benito properties consist of 11,000 acres

TABLE 5-1
PROJECTS APPROVED PRIOR TO IMPLEMENTATION OF
CURRENT GROWTH MANAGEMENT POLICIES

Project	Total Units
Eden West	55
Palmtag Sudivision	2
Hillock Ranch	41
La Baig 5 (Koch)	45
Vista Meadows Senior Apartment	72
Las Brisas 7	3
Las Brisas 8	14
Walnut Park 8A	5
Walnut Park 8B	27
Valley View Phase 3	9
Valley View Phase 6	5
Anderson Homes	6
Total	284

Source: City of Hollister, 2006.

TABLE 5-2
APPROVED PROJECTS SUBJECT TO CURRENT
GROWTH MANAGEMENT POLICIES

Project	Total Units
Intravia Duplex	2
Hillview Subdivision	25
Westside Apartments	11
Annottii Senior Project	170
West of Fairview	667
Total	875

Source: City of Hollister, 2006.

located at the northern border of the County, adjacent to Highway 25. DMB has shared a conceptual plan that would include major improvements to transportation facilities and the development of water and wastewater treatment facilities that could accommodate the needs of the conceptual community. Because a formal application has not been submitted, the El Rancho San Benito development is considered to be speculative and is not included in the cumulative setting of the this DEIR.

Sun City

Signatures have been collected to place an initiative on the November 2006 ballot for a proposed General Plan amendment to the City of Hollister General Plan. The amendment would be for a proposed Sun City resort styled senior community near the Hollister Municipal Airport. The 1,300 acre project site is located just north of State Route 156 in San Benito County. If the initiative passes it would be necessary to prepare a Specific Plan and obtain approval from the Local Agency Formation Commission of San Benito County for annexation into the City of Hollister Sphere of Influence and city limits.

5.2.2 CUMULATIVE IMPACT ASSESSMENT

LAND USE, PLANNING, AND RECREATION

As growth occurs within the City of Hollister and San Benito County, cumulative effects to land use and planning may take place as the result of the development of conflicting land uses, unplanned growth, and resulting public service impacts. Existing land uses surrounding the project site include agriculture, industrial, and residential as described in **Section 4.1**. The project site is bordered by the San Benito River to the north with designated agricultural uses. Future land uses are expected to conform to the designated uses identified in the City of Hollister and San Benito County General Plans. The surrounding designated uses are shown in **Figures 4.1-1** and **4.1-2**. Future uses in the vicinity of the DWTP are expected to consist primarily of the continuing dominant presence of agriculture, with limited industrial uses located to the east.

As discussed in **Section 4.1**, the improvements to the DWTP would not result in significant conflicts with existing or planned land uses in the area. The Proposed Project would not result in significant cumulative impacts when considered in conjunction with other related projects. The Proposed Project has been designed to accommodate projected growth in the City of Hollister as identified in the General Plan, and therefore would not result in public service impacts, or induce growth beyond that identified in the General Plan. No recreational uses have been identified that would be impacted by the Proposed Project in combination with other development in the project area.

The development of the off-site storage basin and evaporation ponds could potentially result in the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural use. This is considered to add to the cumulative loss of farmland in San Benito County. Development of the San Juan Oaks Expansion project would remove approximately 300 acres of Farmland of Local Importance, and approximately 18 acres of Prime Farmland in San Benito County. Additionally, as identified in the Hollister General Plan EIR, buildout of land designated for development would result in the conversion of prime farmland within the City's planning area. The loss of Prime Farmland and Farmland of Statewide Importance as the result of the construction of the off-site storage basin, evaporation ponds and other cumulative development is considered a significant cumulative impact. Mitigation measures recommended in **Section 4.1** would reduce project impacts to a less than significant level.

GEOLOGY

The Proposed Project and future development in San Benito County and the Hollister could lead to cumulative impacts to geology resulting from topographical alteration, the potential for increased erosion during construction, exposure of persons and structures to adverse seismic related effects, and degradation of soil quality.

As with the Proposed Project, buildout of the Hollister General Plan and other identified potential projects would require earthwork and topographic alteration. Pursuant to RWQCB requirements, a general

NPDES permit for construction activities would be obtained for the Proposed Project and other potential future construction projects over one acre in size. While increased erosion could occur during the construction of the Proposed Project and other projects, the preparation and implementation of detailed erosion and sedimentation control plans or similar mitigation would be required as a condition of the NPDES permit for each project. Because this mitigation would be implemented, significant cumulative impacts to geology resulting from erosion would not occur.

Cumulative growth in the region including construction of the Proposed Project and buildout of the Hollister General Plan, San Juan Oaks, and Santana Ranch, would expose people and structures to potential substantial adverse seismic effects, including the risk of loss, injury, or death. The San Juan Oaks expansion project would avoid adverse impacts through lot-specific technical studies and project design strategies. Although this impact is considered unavoidable in the Hollister General Plan EIR, the City has developed numerous policies and programs that reduce this risk to an "acceptable" level. All development within the Hollister Planning area would be subject to these programs, including the proposed Santana Ranch, and Sunnyslope County Water District improvements. Nevertheless, the potential exists for structural damage at the Hollister DWTP resulting from possible ground rupture and liquefaction from seismic events or expansive soils. Mitigation Measures recommended in Section 4.2 would reduce this risk to less than significant. Therefore, with the development of disaster preparedness plans and design techniques intended to reduce structural damage, cumulative impacts resulting from exposure of persons and structures to adverse seismic effects would be less than significant.

The regional increase in wastewater treatment capacity resulting from the Proposed Project in combination with the development of a 95,000 gallons per day WWTP at San Juan Oaks, and possible expansion of the SCWD facilities, could result in degradation of soil quality due to salt accumulation in percolation ponds or spray fields from elevated TDS levels in treated effluent. However, the Proposed Project would not significantly degrade soil quality at disposal sites due to the effect of winter rains leaching salts from the root zone and because the TDS level of treated effluent would be addressed by the Salt Management Program. It should also be noted that impacts to soils would be localized and would not combine cumulatively. Therefore the Proposed Project's contribution to cumulative soil quality impacts would be less than significant.

HYDROLOGY AND WATER QUALITY

The Proposed Project and future development in San Benito County and the Hollister could lead to cumulative impacts to water quality, groundwater levels, and flood hazards.

Decreased surface water quality could result from construction and grading activities associated with buildout of the Hollister and San Benito General Plans, and proposed development projects described previously. Construction activities could result in erosion and sediment discharge to surface waters. In addition, construction equipment and materials have the potential to leak thereby discharging additional pollutants into stormwater. Pollutants potentially include particulate matter, sediment, oils and greases

and construction supplies such as concrete, paints, and adhesives. Discharge of these pollutants could result in contamination of the San Benito River, or other nearby waterways causing an exceedance of water quality objectives. The Proposed Project and other development projects over one acre in size within Hollister and San Benito County would require NPDES permits (including Storm Water Pollution Prevention Plans) from the RWQCB, which would include strict guidelines to protect water quality. Projects involving the use of recycled water would be required to abide by RWQCB waste discharge requirements to avoid impacts to water bodies. With adherence to these strict regulatory requirements, significant cumulative impacts to surface and groundwater quality within the vicinity of the Proposed Project would not occur.

Additionally construction within the 100-year flood plain may impede or redirect flood flows or impact surface water quality during a flood event. While the expected increase in stormwater volume resulting from the construction of impervious surfaces at the DWTP alone would not be significant, this increase could result in cumulative downstream flooding impacts when combined with increases resulting from other projects in the vicinity. Because of the implementation of project-specific mitigation measures and implementation of an on-going regional flood control program, significant cumulative flooding impacts would not occur.

The regional increase in wastewater treatment and disposal resulting from implementation of the Proposed Project, development of the wastewater treatment plant at the San Juan Oaks Golf Club, and potential expansion of the SCWD treatment facilities could result in cumulative impacts to water quality. As with the Proposed Project, wastewater disposal at San Juan Oaks, and the SCWD could involve the use of percolation ponds, sprayfields or landscape irrigation. High groundwater tables beneath percolation ponds would reduce the capacity of soils to treat wastewater leading to contamination of groundwater resources. Additionally, sprayfield irrigation may increase soil erosion causing increase sedimentation of surface waters and introduce an additional source of bacteria and TDS contamination to the areas surface waters. The Proposed Project includes improving the wastewater treatment process at the DWTP using membrane bioreactors. Proposed wastewater treatment facilities at San Juan Oaks and the SCWD would also utilize the MBR process. The resulting effluent would be consistent with Title 22 quality requirements for recycled water. However, due to the existing high TDS levels in groundwater and the general increase of TDS levels as water goes through municipal water and wastewater systems, significant cumulative impacts could occur as elevated TDS levels result in increased TDS levels in the groundwater basin. As identified in Section 4.3, a hydrogeologic study completed in 2004 (Geomatrix, 2004) revealed impacts on salinity concentrations attributable to the existing disposal of treated wastewater at the DWTP and IWTP. Impacts identified include rising groundwater levels and addition of salts to groundwater. The primary salts identified in groundwater were sodium, chloride, potassium, and TDS. The study also showed that highest concentrations of groundwater salts in the area are in the Freitas Road/Mitchell Road area. This increase in salt concentrations is likely due to reduced dilution (from San Benito River recharge) and leaching of minerals from the finer-grained soils naturally present in the San Juan Valley and due to application of fertilizers and soil amendments from agricultural practices. As

~~identified in Section 4.3, localized impacts to groundwater would be mitigated by implementation of Mitigation Measure 4.3.13. Basin-wide impacts would be mitigated by implementation of the Salt Management Program, which would result in beneficial impacts to the overall salt budget in the groundwater basin. As discussed in Section 4.3, during Phase I, the impact on shallow groundwater salinity near the DWTP is less than significant because the increase the effluent quality would improve and TDS concentrations would be to a level that is less than or equal to the typical concentration in shallow groundwater beneath downgradient agricultural fields. With implementation of demineralization in Phase II, effluent quality would improve significantly and the continued disposal at the DWTP would result in beneficial impacts to groundwater quality in the area. Therefore the cumulative groundwater impacts of the Proposed Project in combination with other projects is less than significant.~~

BIOLOGICAL RESOURCES

The Proposed Project and other development in the City of Hollister and San Benito County could lead to cumulative impacts to biological resources, resulting in the loss of wildlife and plant habitat, the loss of special-status species, and impacts to wetlands and waters of the U.S.

The potential loss of special-status species and impacts to wetlands and waters of the U.S. are regulated by the U.S. Fish and Wildlife Service (USFWS), the California Department of Fish and Game (CDFG), and the U.S. Army Corps of Engineers (USACE). Projects (including the Proposed Project) that could impact special status species would require consultation with the USFWS and/or the CDFG, and if impacts were to occur, would require the applicable permits. Projects that could impact wetlands and/or waters of the U.S. would require a Section 404 permit from the USACE, and projects impacting streams would require a Streambed Alteration Agreement from the CDFG. Because mitigation required as part of these permits would be implemented, significant cumulative impacts to biological resources would not occur.

Continued growth in the region would reduce available wildlife habitat, including San Joaquin kit fox foraging habitat. The San Benito General Plan contains growth controls for unincorporated areas of the County to prevent urban sprawl and build-out of the Hollister Valley. Additionally, with implementation of policies and programs included in the Hollister General Plan, buildout of the City would not result in any significant unavoidable biological impacts (City of Hollister, November 2005). Most of the impacts resulting from the Proposed Project on wildlife and plant habitat are temporary in nature and would be avoided by scheduling construction activities for periods of time when the animals are either not present or are not as vulnerable. Mitigation would ensure that construction of pipelines and the location of sprayfields would avoid riparian zones and wetlands as well as minimize the impacts to drainages through avoidance, suspension from existing bridges, or tunneling. The removal of the annual grassland at the airport and its replacement with turf may impact listed species occurring there, but these impacts would be mitigated. Therefore, with incorporation of mitigation measures included in Section 4.4, and implementation of both the San Benito and Hollister general plan policies, cumulative impacts on biological resources would be less than significant.

CULTURAL RESOURCES

The Proposed Project and future development in San Benito County and Hollister could lead to cumulative impacts to cultural resources resulting from the disturbance of artifacts or other resource materials during construction. Cultural resources are afforded substantial legal protection (e.g., through Section 106 of the National Historic Preservation Act and CEQA Section 15064.5), and impacts to cultural resources are required to be mitigated through avoidance or through data recovery programs. With the exception of inadvertent discovery, existing protections ensure that cumulative impacts to cultural resources do not occur.

Buildout of the Hollister and San Benito County general plans as well as the potential development projects described previously would involve construction and grading activities that could inadvertently disrupt historical, archaeological, and unique paleontological resources, or disturb human remains, including those interred outside of formal cemeteries. The Proposed Project includes the construction of pipelines, 400 acres of evaporation ponds and an approximately 670-acre foot off-site storage basin. Mitigation measures discussed in Section 4.5 include monitoring during all ground disturbing activities. If any significant cultural resources or human remains are discovered, construction activities would be halted until the appropriate measures are taken to protect significant resources. Other development projects in the area would have similar restrictions. Therefore, cumulative impacts to cultural resource would be less than significant.

HAZARDOUS MATERIALS/PUBLIC HEALTH

The Proposed Project and future development in San Benito County and Hollister could lead to cumulative impacts related to hazardous materials and public health. The impacts would result from the increased potential for accidental releases of hazardous materials in the area.

Grading and construction activities associated with buildout of the Hollister and San Benito General Plans, as well as the other development projects listed previously, would involve the use of miscellaneous hazardous substances, such as gasoline, diesel fuel, hydraulic fluid, solvents, oils, paints, etc. During transportation of these materials the potential for an accidental release exists. Depending on the relative hazard of the material, if a spill were to occur of significant quantity, the accidental release could pose both a hazard to construction employees as well as the environment.

Operation of the Proposed Project would include the use of sodium hypochlorite, phosphoric or citric acid, sodium hydroxide, and diesel fuel. The transport, use and storage of these materials are highly regulated to maintain public and worker safety and prevent accidental release into the environment. On-site storage and containment systems, administrative controls, and emergency response planning will decrease the likelihood of an accidental release, and in the event of an accidental release, minimize and contain the environmental impact. The cumulative impacts of hazardous materials on public health is considered less than significant.

UTILITIES AND SERVICE SYSTEMS

The Proposed Project and future development in San Benito County and the City of Hollister could lead to cumulative impacts on utilities and service systems due to increased demand and disposal requirements. Buildout of the City and County General Plan, as well as other development projects mentioned previously could exceed the capacity of the existing water supply and distribution, wastewater treatment and disposal, and solid waste collection and disposal.

Growth that would occur through buildout of the Hollister General Plan and additional projects would be required to provide for adequate utility and public services prior to specific project approval. It is not expected that these projects would require more utility service than could be provided through normal procedures. The Proposed Project would not result in a significant increased demand for utilities and public services, but would in itself provide additional wastewater treatment capacity. Therefore, the cumulative impact to public services is considered less than significant.

AIR QUALITY

The Proposed Project and future development in San Benito County and Hollister could lead to cumulative impacts to air quality and odors. These impacts would result from increased emissions of criteria air pollutants and toxic air contaminants during construction and operation of future development, and the creation of odors during the operation of the DWTP project. Growth in the region would occur over time as a result of San Benito County's 1 percent growth cap and Hollister's Growth Management Program as discussed in **Section 5.1.1**. This would reduce cumulative impacts to air quality resulting from operational and construction activities.

Construction of the Proposed Project and other cumulative projects would involve land disturbance by heavy equipment. This would create a temporary but potentially significant source of air pollutants, primarily from fugitive dust. Implementation of mitigation measures included in Section 4.8 would ensure that construction-related fugitive dust emissions are reduced to a less than significant level. Because of the City's building moratorium ordinance, it is unlikely that significant unplanned additional construction activities would occur in conjunction with the Proposed Project. Therefore, potentially significant cumulative impacts to air quality as a result of construction activities would not occur.

Operation of the Proposed Project and cumulative projects could also potentially create a significant source of air pollutant. However, as shown in Table 4.8-9, it is anticipated that the long term operational emissions resulting from the project would be substantially below significance thresholds, and therefore would not be cumulatively considerable. Fugitive dust resulting from operation of evaporation ponds in Phase II of the project in combination with dust resulting from construction or operation of cumulative projects in the area could result in nuisances to nearby sensitive receptors and exceed applicable air quality thresholds. Implementation of mitigation measures provided in Section 4.8 would ensure that

operational dust is kept to a minimum. Therefore significant cumulative impacts to air quality resulting from operation of the Proposed Project would not occur.

TRAFFIC

Construction of the Proposed Project would result in cumulative impacts if other projects were implemented, on or near a roadway that would be disrupted by the Proposed Project. The roadways identified to be affected as a result of the DWTP construction activities are identified in **Section 4.9**. Since the operation of the DWTP is not considered a traffic generating activity, cumulative impacts during operation of the Proposed Project would be negligible. Thus, cumulative impacts would most likely occur during the construction phase of the Proposed Project. As the building moratorium in Hollister restricts development until the completion of improvements to the DWTP, it is unlikely that significant construction of housing or commercial development would occur concurrently with the Proposed Project. However, construction of the State Route 25 bypass is anticipated to occur during 2006 and 2007. This could overlap with construction of the Proposed Project resulting in cumulative traffic impacts. This potentially significant cumulative impact would be mitigated by ensuring coordination with local jurisdictions and agencies responsible for issuing construction and encroachment permits. Implementation of mitigation measures included in **Section 4.9** would result in the development of a Traffic Management Plan. This plan would take into account other construction projects to ensure no significant cumulative impacts would occur.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The implementation of the Proposed Project is not expected to result in significant irreversible environmental changes. The construction and operation of the proposed facilities would require consumption of non-renewable resources, however this would not represent a large commitment of resources. Facility operation would not result in significant irreversible environmental change, due to the relatively small scale of the project and since the system would provide for the safe handling of wastewater to minimize the potential for environmental and public health impacts. The use of hazardous materials to process the wastewater would not pose a health risk and would not result in irreversible environmental changes. While the construction of the off-site storage basin and evaporation ponds could result in the loss of Prime Farmland and/or Farmland of Statewide Importance, it is possible that the storage basin could be re-graded in the future and agriculture could resume.

5.4 UNAVOIDABLE SIGNIFICANT IMPACTS

The potential environmental impacts that would result from implementation of the Proposed Project are summarized in **Table 1-1** in Chapter 1.0 (Executive Summary) of this document. In some cases, impacts resulting from the Proposed Project are expected to be less than significant. In most other instances, the implementation of mitigation measures summarized in **Table 1-1** and described in **Chapter 4.0**, Environmental Setting, Impacts, and Mitigation Measures, are expected to reduce residual impacts to

levels that are less than significant. However, the Proposed Project would result in expansion of treatment capacity that would support growth anticipated under the City of Hollister General Plan and the San Benito County General Plan. The Hollister General Plan EIR identified significant and unavoidable impacts of this growth including the conversion of farmland, seismic impacts, traffic impacts, and impacts from population and job growth. The Proposed Project would also support additional growth beyond that anticipated under the Hollister General Plan by allowing for growth within the unincorporated service area. This could occur as the result of service connections for new homes or businesses located outside of the Hollister Planning Area, within the service area identified for the DWTP. Mitigation measures have been identified that would provide the City of Hollister and San Benito County with annual assessments of wastewater demands and would assist in the provision of wastewater treatment in the service area. These measures would ensure that the DWTP is not expanded beyond the capacity needed to serve planned growth in the service area. However, the proposed DWTP improvements would accommodate planned growth and the associated contribution to secondary environmental effects of such growth would be significant and unavoidable.