

ATTACHMENT A

Written Comment Letters



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Division of Financial Assistance

1001 I Street • Sacramento, California 95814 • (916) 341-5700 FAX (916) 341-5707
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
Internet Address: <http://www.waterboards.ca.gov>

Letter 1



Arnold Schwarzenegger
Governor

SEP 6 2006

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SEP 11 2006

CITY OF HOLLISTER
ENGINEERING DEPT.

Mr. Steve Wittry
Interim Engineering Manager
City of Hollister
375 Fifth Street
Hollister, CA 95023-3832

Dear Mr. Wittry:

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR); CITY OF HOLLISTER (CITY);
DOMESTIC WASTEWATER SYSTEM IMPROVEMENTS AND SAN BENITO COUNTY
WATER DISTRICT RECYCLED WATER FACILITY PROJECT (PROJECT); STATE
CLEARINGHOUSE NO. 2006012149

Thank you for the opportunity to review the above document. The State Water Resources Control Board (State Water Board) staff has reviewed the Draft EIR and has several specific comments. As a state agency with jurisdiction by law to preserve, enhance and restore the quality of California's water resources, the State Water Board is providing the following comments on the environmental document prepared for the Project.

We understand that the City is not presently pursuing a State Revolving Fund (SRF) loan for this Project. The City may want to consider this loan program to provide funding for future construction. The SRF program offers a low interest loan for building or improving wastewater treatment plants, sewers, water reclamation facilities, and storm water drainage. The State Water Board, Division of Financial Assistance is currently responsible for administering SRF loans. Please refer to the State Water Board's SRF website <http://www.waterboards.ca.gov/funding/srf.html> for additional information.

Following are my specific comments relevant to our funding programs:

1. Mitigation Measure 4.4-17 on pages 4.4-55 and 4.4-56 is intended to minimize potential impacts to the California red-legged frog (CRF). Part (e) of this mitigation measure, on page 4.4-56 says, "It is encouraged that all machinery, equipment, and workers observe USFWS decontamination guidelines to prevent the spread of CRF parasites and diseases". Change the language of this sentence to make this action mandatory and not permissive.
2. When an agency makes findings on significant effects identified in an EIR, it must also adopt a program for reporting or monitoring mitigation measures that were adopted or made conditions of project approval (see Pub. Res. Code sec. 21081, 6(a); Guidelines secs. 15091(d), 15097). The monitoring program must include all changes in the proposed Project that would mitigate or avoid each significant

California Environmental Protection Agency

SEP 6 2006

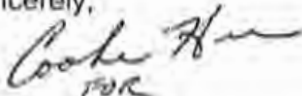
Mr. Steve Wittry

-2-

- environmental effect identified in the EIR. The program must ensure compliance with mitigation measures during Project implementation. Although the draft EIR identified mitigation measures, it did not include a Mitigation Monitoring Program. Please incorporate one into the final EIR. 1-3 cont.
3. The Initial Study for this Project mentions that potential impacts to agricultural resources and mineral resource extraction will be analyzed further in the EIR. These issues are addressed in more detail in the EIR, but they are not addressed under their own headings. Instead, agricultural resources are addressed under Land Use and Planning and mineral resource extraction is discussed under Geology and Soils. Please highlight the presence of these sections in the environmental document to clarify that they have been addressed. 1-4
4. On page 4.5-8, the document states, "A copy of the NAHC correspondence and a contact log for each of the individuals and groups contacted is included as Appendix G to this report". Appendix G is a list of species occurring in the Project area and does not contain this cultural resources information. No other section of the environmental document appears to contain this information either. Provide the copy of the NAHC correspondence and the contact logs as part of the final EIR. 1-5
5. The document discusses population projections, but not in relation to California's State Implementation Plan (SIP). Please specify whether the Project is sized to meet only the needs of current population projections that are used in the approved SIP for air quality. Quantitatively indicate how the proposed capacity increase was calculated using population projections. 1-6

Thank you once again for the opportunity to review the document. If you have any questions, please contact me at (916) 341-7388 or kschumaker@waterboards.ca.gov.

Sincerely,



FOR

Kari Schumaker
Environmental Scientist

cc: State Clearing House
(Re: SCH# 2006012149)
P. O. Box 3044
Sacramento, CA 95812-3044

California Environmental Protection Agency



Recycled Paper

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SEP 11 2006

CITY OF HOLLISTER
ENGINEERING DEPT.

1430 Albright Dr.
Hollister, CA 95023

Sept. 8, 2006

Attn:- City of Hollister Engineering Dept.
Re:- Draft EIR for Waste Water Project

To whom it may concern

The draft EIR describes acreage which could be used for irrigation/sprayfields for treated waste water to be disbursed. Aviation safety hazards are described and how mitigation is proposed. There are various hazards which have not been discussed.

2-1

The high salt content in the treated water will be extremely detrimental to aircraft. Aircraft owners from out-of-county choose to come to Hollister Airport away from the coast. Though the draft EIR proposes to spray at night, aircraft fly in at all hours.

Ditches were built between runways and taxiways, to mitigate water run off to alleviate water build-up and flooding. These need to stay and not be changed. Turf proposed between taxiways and runways needs to be mitigated so that the ground is not wet and watering is subterranean. Grass cutting needs to leave no ruts. All these are safety hazards.

2-2

The draft EIR explains that the airport fences need to be checked to keep out deer and large animals. At Hollister Airport burrowing animals are part of the problem and fences don't keep them out. Animals like ground squirrels and gophers burrows can undermine runways and taxiways and when filled with water can cause even further damage, which in turn causes hazards to pilots. Water or moisture brings more insects and birds both detrimental to aircraft in flight. Further problems occur when raptors swoop down to eat or collect carrion from taxiways and runways causing further hazards to pilots and their aircraft.

2-3

The draft EIR states that the sprayfields will be a temporary measure. How long is temporary and what happens after that? If the temporary management and maintenance will be taken care of by departments other than airport staff, who is responsible after the temporary period is finished?

2-4

Stringent safety guidelines have been set by the Federal Aircraft Administration and by the State of California Department of Transportation Division of Aeronautics, which must be followed, besides the unique problems Hollister Airport has (or will have if not thoroughly mitigated and planned correctly).

2-5

Please consider these potential hazards with care and due diligence to keep the pilots, aircraft and airport safe.

Sincerely,

Ruth Erickson

Ruth Erickson
(Hollister Airmen's Association)



San Benito County Water District

30 Mansfield Road • P.O. Box 899 • Hollister, CA 95024-0899 • (831) 637-8218 • Fax (831) 637-7267

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SEP 11 2006

CITY OF HOLLISTER
ENGINEERING DEPT.

September 8, 2006

Mr. Steve Wittry, Engineering Manager
City of Hollister, Engineering Department
375 Fifth Street
Hollister, CA 95023

SUBJECT: DEIR on the City of Hollister Domestic Wastewater System
Improvements and San Benito County Water District Recycled Water
Facility Project Draft Environmental Impact Report (SCH#2006012149)


Dear Mr. Wittry:

The San Benito County Water District requests an extension of the
comment period for the City of Hollister Domestic Wastewater System
Improvements and San Benito County Water District Recycled Water
Facility Project Draft Environmental Impact Report (SCH#2006012149).

The District will submit its comments on or before September 15, 2006.
A draft of the District's comments will be a public document on or before
September 11, 2006.

3-1

Sincerely,


John S. Gregg
District Manager/Engineer

JSG/blm

1841 Cushman Street
Hollister, CA 95023
SEPTEMBER 7, 2006

RECEIVED
SEP 11 2006
CITY OF HOLLISTER
ENGINEERING DEPT.

Mr. Steve Whitry
City Hall
375 Fifth Street
Hollister, CA 95023

Dear Mr. Whitry:

When you are considering adding spray fields at the Hollister Municipal Airport, please remember that the Federal Aviation Administration and the California Transportation Department-Aviation Division have strict requirements for the operation of spray fields near airports.

Another concern is the proximity to taxiways and runways where salty spray might come into contact with aircraft as salt is harmful to aircraft finishes and components.

Sincerely,

William J. Brin

William J. Brin

Harriet R. Brin

Harriet R. Brin

4-1

4-2



September 8, 2006

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SEP 11 2006

CITY OF HOLLISTER
ENGINEERING DEPT.

Steve Wittry, Engineering Manager
City of Hollister
375 Fifth Street
Hollister, California 95023

Dear Mr. Wittry:

I'm writing to provide comments on the Draft Environmental Impact Report (DEIR) for the City of Hollister's Domestic Wastewater System Improvements and the San Benito County Water District's Recycled Water Facility Project. San Juan Oaks Golf Club is one of the sites considered in the DEIR as a potential location for recycled water use during Phase I and Phase II. Our comments are as follows:

- On Page 3-19 and elsewhere, the DEIR states that San Juan Oaks owns approximately 1,820 acres. The correct acreage is approximately 1,993 acres.
- On Page 3-19, the DEIR describes the expansion plans of San Juan Oaks and estimates the potential for the City of Hollister's treated effluent use at the site as 135 acre-feet per year. It is unclear from the description as to whether this estimate factors in San Juan Oaks' use of recycled water from its planned on-site treatment facility. At full build-out of the planned expansion, San Juan Oaks' on-site treatment facility will need to dispose of approximately 110 acre-feet per year of recycled water. This disposal will be accomplished through irrigation on the existing 18-hole golf course, which historically uses approximately 365 acre-feet per year. Any further expansion (beyond the current plans) by San Juan Oaks would require additional disposal capacity. Additionally, the DEIR's calculation assumes the construction of an additional 18-hole golf course and a 9-hole executive course. The initiation and timing of these additional golf courses is subject to market conditions and their availability for recycled water use is uncertain.
- The DEIR indicates that for Phase I, treated effluent would be delivered to San Juan Oaks and blended with CVP water and groundwater to achieve an applied TDS concentration of 500mg/L. In general, a TDS concentration of 500mg/L is acceptable to San Juan Oaks for golf course, tree and shrub, and other common landscape area irrigation. However, other recycled water constituents and

5-1

5-2

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5-4

compositions critical to turfgrass growth and management need to be analyzed as well. Prior to accepting treated effluent, San Juan Oaks would need to analyze these other constituents and compositions, including chloride, boron, pH, ECw, Bicarbonate, Soil Water Infiltration (using ECw and SAR together) Sodium (including root absorption and foliar absorption), and other elements that are potentially toxic to turfgrass and other plants when they accumulate in the soil. These constituents would need to be at acceptable levels in order for San Juan Oaks to accept the recycled water for use on the golf course(s) and other common landscape areas.

5-4
cont.

San Juan Oaks Golf Club constructed the irrigation system of our existing golf course to comply with recycled water use, and we look forward to working with the City of Hollister and the San Benito County Water District to bring recycled water to our site. This concludes our comments on the DEIR. Please feel free to contact me at (831) 636-6118 with any questions. Thank you.

5-5

Sincerely,



Scott Fuller, General Manager
San Juan Oaks Golf Club



DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 1001 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2565 • WEBSITE www.servcorp.org

VIA FACSIMILE (331) 636-4340

Mr. Steve Wiltry, Interim Engineering Manager
City of Hollister
375 Fifth Street
Hollister, CA 95023-3876

Subject: City of Hollister Domestic Wastewater System Improvements (DWSI) Project and San Benito County Water District Recycled Water Facility (RWF) Project Draft Environmental Impact Report (DEIR) - SCH# 2008012149, San Benito County

Dear Mr. Wittry:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the DEIR for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources.

Project Description

The project is a proposal to improve the City of Hollister's (City) Domestic Wastewater Treatment Plant (DWTP) to increase treatment capacity and the quality of effluent produced and to reduce the amount of water disposed of by percolation at the DWTP by developing disposal sprayfields and providing effluent for agricultural and urban irrigation. The project site is located in the western portion of the City and adjacent unincorporated San Benito County (County). The project will implement the Groundwater Management Plan among the City, County and local agencies and provide the City sufficient wastewater treatment and disposal to serve population growth to 2023. Phase I of the project includes expansion of the capacity of the DWTP and development of off-site disposal sprayfields. Phase II includes additional sprayfields as necessary and a potential off-site storage basin and evaporation ponds. The project design is to transition from percolation and sprayfield disposal to a recycled water system. Treated effluent would initially be limited to certain types of crops and urban irrigation. With implementation of a Salt Management Program, the range of irrigable

The Department of Conservation's mission is to protect Californians and their environment by:
Protecting lives and property from earthquakes and landslides; Ensuring safe mining and oil and gas drilling;
Conserving California's farmland; and Saving energy and resources through recycling.

Sep-11-2006 15:28 FROM: DIVISION OF LAND RESOURCE PROTECTION 19188613488 1-106 Y-006/006 7-114

Mr. Steve Wiltry, Interim Engineering Manager
 September 11, 2006
 Page 2 of 3

crops would be broadened. It is anticipated that the transition to the Phase II recycled system would take approximately eight years after project initiation.

6-2
 cont.

Project Impacts to Agricultural Land

Although specific sites for the storage basin and evaporation ponds have not been identified and would require additional environmental review, within the identified project area, they could convert approximately 445 acres of Prime Farmland and Farmland of Statewide Importance. This is considered a significant impact and is mitigated to less than significant by the requirement to avoid these farmland areas. Development of sprayfields and use of agricultural land for effluent disposal is not considered to have significant impacts because the land use would not change. It appears that effluent disposal would be determined by its suitability with the particular crops. However the Final EIR (FEIR) should clarify whether the land's crop capability would be artificially limited by its use as a sprayfield and what the impacts of such limitation would be, especially considering the potential to involve Prime Farmland or Farmland of Statewide Importance.

6-3

The project is considered growth-inducing by increasing the capacity of the DWTP but is mitigated by implementation of City General Plan policies to limit the area of development and increase density. Cumulative impacts are considered significant and mitigated by avoidance of Prime Farmland and Farmland of Statewide Importance in locating the storage basin and evaporation ponds.

Williamson Act Land

The off-site storage basin and evaporation ponds may be located on contracted land. The DEIR states that these uses may be found to be consistent with the involved contract, or the City may remove the land from contract by eminent domain (page 4.1-32). The City should be advised that compatible uses on contracted land must be consistent with the principles of compatibility under Government Code § 51238.1. In the Department's view, the basin and ponds would not appear to meet the statutory test of compatibility and would first require contract termination by nonrenewal (§ 51245), cancellation (§ 51280 et seq.), annexation under specific conditions (§ 51243.5) or public acquisition (§ 51290 et seq.). Cancellation requires separate notice to the Department under § 51284.1 as does public acquisition under § 51291(b). Both require consideration of the Department's comments and that the board or council, depending on jurisdictional authority, make specific findings. Public acquisition requires acquisition under eminent domain law by eminent domain or in lieu of eminent domain in order to void the involved contract. Notification of public acquisition must occur whenever it appears that Williamson Act land may be required. Please find enclosed Notification Provisions listing items of information required as part of notification. The Department recommends that the FEIR address these comments.

6-4

Mr. Steve Wiltry, Interim Engineering Manager
September 11, 2006
Page 3 of 3

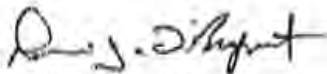
The termination of a Williamson Act contract is considered a potentially significant impact under CEQA. The Department does not consider statutory compliance in prematurely terminating a contract to be appropriate mitigation, nor does CEQA in general. The impact of prematurely removing the contract's agricultural protection and impacting the State and local investment in that protection in the form of lower property taxes and subvention reimbursement should be evaluated as to its significance. Although the City may follow statutory requirements in terminating the contract, the impact of contract termination is not thereby reduced. We recommend that the FEIR provide an evaluation of the impacts of potential Williamson Act contract terminations for this project.

6-4
cont.

Thank you for the opportunity to comment on this DEIR. Pursuant to Public Resources Code §21092.5(a), the Department looks forward to receiving your response and a copy of the FEIR. If you have questions on our comments or require technical assistance or information on agricultural land conservation, please contact Bob Blanford at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 327-2145.

6-5

Sincerely,



Dennis J. O'Bryan
Program Manager

Enclosure

cc: State Clearinghouse

San Benito Resource Conservation District
2377 Technology Parkway, Suite C
Hollister, CA 95023



MONTEREY BAY

Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER
Douglas Quinlan

24590 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

DISTRICT BOARD MEMBERS

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Santa Cruz
County

VICE CHAIR:
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San Benito
County

Anna Caballero
Salinas

Lou Calacaban
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Bo Manera
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John Meyer
King City

Denise Norton
Castroville

Ellen Pate
Santa Cruz
County

Jerry Smith
Marina County

September 11, 2006

Mr. Steve Wittry, Engineering Manager
City of Hollister Engineering Department
375 Fifth Street
Hollister, CA 95023

Sent by Facsimile to:
(831) 636-4349

SUBJECT: DEIR FOR HOLLISTER WASTEWATER SYSTEM IMPROVMENTS

Dear Mr. Wittry:

Unavoidable Adverse Environmental Impacts, Page 1-5 – 1-7.

The Hollister General Plan (2005) identified significant and unavoidable impacts from growth, including traffic. Traffic could have a significant impact on air quality, on both a project level and on a cumulative basis. The proposed project would support additional growth beyond that anticipated under the Hollister General Plan by allowing for growth within the unincorporated service area. Mitigation measures that might ensure that the DWTP is not expanded beyond the capacity to serve the planned growth in the service area, do not address the air quality impacts of the proposed project. These impacts would have to be addressed and quantified in the application for an Authority to Construct Permit.

7-1

Demolition of Existing Wastewater Storage Basin, Page 1-56.

If any structures or load-bearing supports would be demolished, please contact Mike Sheehan of the District's Compliance Division regarding applicable requirements.

7-2

Impact and Mitigation 4-82, Page 1-57.

Emissions of NO_x, ROG and PM₁₀ from construction equipment would not be mitigated by Mitigation Measure 4.8.1, which would apply to emissions of fugitive dust. Please provide a mitigation measure for this impact.

7-3

Impact and Mitigation 4.8.3, Page 1-57.

Before an Authority to Construct Permit is issued by the Air District, the District will require the information specified in Section 3.2 of Rule 216, Permit Requirements for and Sewage Treatment Facilities. This includes, but is not limited to:

7-4

- The nature and amounts of emissions from:
- Construction and operation of the facility; and
- Direct and indirect emissions of population served, industrial growth and/or induced wastewater expansion of existing emission sources.

Permits from the Air District and Consistency

Rule 216 also requires that wastewater and sewage treatment facilities serve populations consistent with the forecasts in the AQMP. Please contact AMBAG and obtain a consistency determination for the population to be served in Hollister and the unincorporated area of the county, and include it in the Final EIR.

7-5

Impacts and Mitigations 4.8.4 – 4.8.8. Pages 1-58 – 1-60.

These impacts and required mitigations would be addressed in the application for a District Authority to Construct Permit, so no additional comment is provided here.

7-6

Impact and Mitigation 4.8.9. Page 1-60.

Please confirm with Lance Erickson, Manager of the District's Engineering Division that no additional regulatory requirements would be required of the proposed emergency diesel generators.

7-7

Impact and Mitigation 4.8.10. Page 1-60-61.

Please confirm with Mr. Erickson that no additional regulatory requirements exist for the 175 HP diesel generator.

Impact and Mitigation 4.8.11. Page 1-61.

Please contact me to discuss a dust abatement program for the collection and trucking of salt concentrate from the evaporation ponds, to avoid any impacts on residences, schools or businesses.

7-8

Attainment Status. Page 4.8.4.

Individual counties are classified only for carbon monoxide. All other classifications are made on a basinwide basis.

7-9

Impact 4.8.1. Page 4.8.16.

Please provide the complete URBEMIS work product, including detail. This should be included in the application for the Authority to Construct. A distinction between PM₁₀ emissions from construction equipment (exhaust) and fugitive dust should be documented.

7-10

Impact 4.8.3. Page 4.8.20.

Please describe and quantify the indirect / and growth-inducing impacts associated with the proposed project.

7-11

Section 5.2.2, Cumulative Impact Assessment, Page 5-22

What are the cumulative impacts? Discussion of construction impacts only, omits the operational impacts that most likely would be cumulatively considerable.

7-12

Thank you for the opportunity to comment on the project.

Yours truly,



Jean Getchell
Supervising Planner
Planning and Air Monitoring Division

Attachment: Rule 216, Permit Requirements for Wastewater and Sewage Treatment Facilities

cc: Lance Erickson, District Engineering Manager
Mike Sheehan, Compliance Division
Todd Muck, AMBAG

MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT

RULE 216 -- PERMIT REQUIREMENTS FOR WASTEWATER AND SEWAGE TREATMENT FACILITIES*(Adopted 10-29-86) (Revised 01-21-87, 06-14-89, and 10-16-02)*

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PART 1 GENERAL**1.1 Purpose**

The purpose of this Rule is to provide that the projected served population of a Wastewater or Sewage Treatment facility is consistent with the Air Quality Plan as approved by the Monterey Bay Unified Air Pollution Control District Board of Directors for addressing the current State Implementation Plan requirements for attaining and maintaining federal ambient air quality standards and consistent with the Plan to attain and maintain the State Ambient Air Quality Standards.

1.2 Applicability**10/16/02**

Rule 216
(Permit Requirements for Wastewater and Sewage Treatment Facilities)

The provisions of this Rule shall apply to any person seeking to obtain an Authority to Construct or a Permit to Operate for a Wastewater or Sewage Treatment facility.

1.3 Exemptions

Reserved.

1.4 Effective Dates

This Rule, as most recently revised, is effective on October 16, 2002.

1.5 References

Other related or referenced District rules or regulations include: Rule 101 (Definitions); Rule 200 (Permits Required); Rule 201 (Sources not Requiring Permits); Rule 207 (Review of New or Modified Sources).

PART 2 DEFINITIONS

2.1 Anthropogenic Pollutant

Air pollution which results directly or indirectly from human activities.

2.2 Indirect Source

Any structure, building, facility, equipment, installation or operation (or aggregation thereof) which is located on one or more bordering properties within the District and which is owned, operated or under shared entitlement to use by the same person.

2.3 Modification

means any physical change in, change in method of, or addition to an existing facility, any change in the direct or indirect growth inducing capacity of the subject facility including, but not limited to, changes in population projections used in prior Nonattainment Plan consistency determinations, except that routine maintenance or repair shall not be considered to be a physical change

10/16/02

Rule 216
(Permit Requirements for Wastewater and Sewage Treatment Facilities)

2.4 Population Projections

Population forecasts contained in the latest Air Quality Management Plan as approved by the MBUAPCD Board of Directors.

PART 3 REQUIREMENTS

3.1 Permit

A governmental agency or district, including joint powers agencies or organizations shall not initiate, modify, construct or operate any wastewater or sewage treatment facility or conveyance mechanism or pipeline which will directly or indirectly through population or industrial growth inducement cause the emission of any anthropogenic air pollutant for which there is a State or national ambient air quality standard without first obtaining an Authority to Construct or a Permit to Operate from the Air Pollution Control Officer.

3.2 Application Content

Before granting or denying an Authority to Construct or a Permit to Operate for any new facility or modification thereto subject to the requirements of this rule, the Air Pollution Control Officer shall:

- 3.2.1 Require the applicant to submit information sufficient to specifically describe the nature and amounts of emissions, location, design, construction and operation of the facility, emitted directly or indirectly through population, industrial growth and/or the induced expansion of existing emission sources;
- 3.2.2 Require the applicant to submit the projected expansion plans for the facility for the ten-year period subsequent to the date of the application for the permit;
- 3.2.3 Require an analysis of the new facility or modification on air quality. Such analysis shall consider expected air contaminant emissions and the impact on air quality in the vicinity of the facility, or modification as well as within the total Air Basin; and
- 3.2.4 Require that the projected served population of the facility, or modification, related indirect growth of industry and induced growth external to the service area to be fully consistent with the Population Projections.

PART 4 ADMINISTRATIVE REQUIREMENTS

4.1 Permit Denial

The Air Pollution Control Officer shall deny a permit for any new wastewater or sewage treatment facility or conveyance mechanism or pipeline or modification which he determines will cause a violation or contribute to the continued violation of any State or national ambient air quality standard.

4.2 Permit Conditions

The Air Pollution Control Officer shall impose conditions on the permit as necessary to ensure the subject facility or modification will be operated in the manner assumed in making analysis required by this rule.

* * * * *



San Benito County Water District

30 Mansfield Road • P.O. Box 899 • Hollister, CA 95024-0899 • (831) 637-8218 • Fax (831) 637-7267

September 15, 2006

Mr. Steve Wittry, Engineering Manager
City of Hollister, Engineering Department
375 Fifth Street
Hollister, CA 95023

**RE: COMMENTS ON CITY OF HOLLISTER DOMESTIC WASTEWATER
SYSTEM IMPROVEMENTS AND SAN BENITO COUNTY WATER
DISTRICT RECYCLED WATER FACILITY PROJECT DRAFT
ENVIRONMENTAL IMPACT REPORT**

Dear Mr. Wittry:

The San Benito County Water District (SBCWD) appreciates the opportunity to provide comments on the Draft EIR for the City of Hollister Domestic Wastewater System Improvements (DWSI) and San Benito County Water District Recycled Water Facility Project Draft Environmental Impact Report (DEIR) (SCH # 2006012149). The SBCWD supports the efforts of the City of Hollister to address local groundwater issues including the inability to adequately treat and dispose of wastewater, the elimination of water quality degradation of local water supplies (groundwater and subsurface flows) from wastewater disposal at the City of Hollister Industrial and Domestic Wastewater Treatment Plants, the imbalance of areas of high and low groundwater, the accumulation of salts and nitrates in the basin, and the management of local water supplies. However, the City of Hollister Phase I Project does not address these local groundwater issues and continues to burden the surrounding area with the impacts of Hollister "GROWTH".

The EIR is generally thorough. In order for it be fully defensible, the following issues must be addressed:

1. The strong reliance of future (Phase II) water quality improvement action to avoid significant water quality impact; and
2. The impact(s) of delay in implementing water quality improvements and recycled water are not addressed; and
3. Sprayfield mitigation measures include not irrigating if water or soil quality problems occur but maintenance of disposal capacity is not addressed; and

8-1

8-2

4. The inconsistencies in the Project Description, particularly the maximum quantities of wastewater to be disposed of at each disposal site (Industrial Wastewater Treatment Plant, Domestic Wastewater Treatment Plant and specific additional disposal site). There are also inconsistencies between the Project Description and groundwater modeling assumptions; and
5. The thresholds of significance for water quality (regional and site specific) should be reviewed and supported; and
6. The groundwater modeling assumptions appear to be different than the project description and the City of Hollister and the San Benito County General Plans.

8-2
cont.

The existing groundwater conditions in the vicinity of the City of Hollister Industrial and Domestic Wastewater Treatment Plants, including the degradation of the groundwater and the subsurface flows, must be included and addressed in the DEIR. These conditions are detailed in the City of Hollister Hydrogeologic Report, May 2004.

8-3

Other key CEQA issues that must be addressed relate to support for alternatives evaluation, certain significance thresholds, substantiation of certain impacts, objective monitoring action levels and certainty of mitigation to reduce impacts to a less-than-significant level (where "if feasible" is used). The document, while thorough in its description of project components within Phase 1 and Phase 2, is unclear regarding which project components are covered in the EIR at a project level versus a program level of detail. The project analyzed within the EIR at a project level of detail should have been separate from other project components analyzed at a program level of detail.

8-4

SBCWD's detailed comments are attached.

We request that subsequent documents related to the project be submitted to SBCWD for our review. If you have any questions regarding our comments, please contact me at (831) 637-8218.

8-5

Sincerely,



SAN BENITO COUNTY WATER DISTRICT

John S. Gregg
District Manager/Engineer

JSG/blm

SAN BENITO COUNTY WATER DISTRICT

DETAILED COMMENTS ON

THE CITY OF HOLLISTER DOMESTIC WASTEWATER SYSTEM IMPROVEMENTS
AND SAN BENITO COUNTY WATER DISTRICT RECYCLED WATER FACILITY
PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Comment Table

No.	Page	Specific Text	Comments	
1	Chapter 1	All	The summary never specifically mentions that this EIR is a program- and project-level EIR. The components that are treated at program and project levels of detail are unclear or conflicting in several places in the document.	8-6
2	1-2 – 1-3	Table 1-1	The definition of the project that is being analyzed in the EIR is unclear throughout the document and in the summary. Page 1-2, 2 nd paragraph states "the level of CEQA compliance is shown in Table 1-1", but it is not shown in Table 1-1. Table 1-1 needs to be revised to reflect specifically which Phase I components are analyzed at a project level of detail. It's unclear. For example, "Additional disposal sprayfields in the project area" in Table 1-1 are not analyzed at project-level. The "Salinity Management Program" in Table 1-1 is analyzed at project-level. Page 1-3, 2 nd paragraph infers RO Treatment is analyzed at project-level, but RO is an "Infeasible Alternative" on Page 6-17. Page 1-3 1 st paragraph states, "...most of the Phase II project is evaluated at a broader level in this EIR...", but is unclear which projects are included at the project versus the program level.	8-7
3	2-2	Last paragraph	This paragraph lists project components analyzed at project level and does not list any Stage 2 components. The list is inconsistent with Table 1-1 (and same Table 3-1 on page 3-2)	8-8
4		Figure 3-3	This Figure showing the proposed Phase I sprayfield irrigation boundary should have a legend with labels for Zone 6 and the sprayfield irrigation boundary.	8-9
5	3-5	Project Objectives	A Table should be created showing achievement of Project Objectives by Phase.	8-10
6	3-7	Table 3-1	The maximum quantity of wastewater to be disposed of at each location must be stated (Table 1-1 and Table 3-1). The additional disposal sprayfields in the project area must be identified.	8-11

7	3-19	Additional Sprayfield Development	Additional Sprayfield Development at Pacific Sod Farm is a Phase II component but it is discussed as a Phase I component. Phase I and Phase II components and which are covered under program- vs. project-level of detail is confusing throughout.	8-12
8	3-20	Table 3-6	The irrigated acreage listed (195 acres) conflicts with the acreage being considered in the City of Hollister, San Benito County and the San Benito County Water District Disposal Site Selection process.	8-13
9	3-29 thru 3-30	All of 3-29 thru paragraph 1 on 3-30	<p>Table 3-3 on page 3-16 shows TDS reduction to 500 mg/l as a water quality output, and footnotes reliance on reverse osmosis (RO). Although the specific facility that would be constructed has not been designed, the EIR needs to make assumptions around the parameters of how it could be designed. In order for this part of the project to be addressed sufficiently to make an informed decision (CEQA requirement), some assumptions regarding where the RO/demineralization facility would be placed/its footprint, where ponds would be, and how the facility would operate (power consumption and infrastructure needs are required). These should be described in this section of the EIR so the assumptions that go into subsequent analysis are spelled out.</p> <p>Further, the potential costs of the RO plant construction and operation should be disclosed. While the cost is not an economic effect, it could affect feasibility of this key element of the project. How would it be funded? If through utility fees, the costs could generate substantial opposition. This issue is important because so much of the success of the project hinges on the ability to remove salts.</p>	8-14
10	3-34 thru 3-35	Section 3.5.1	While entitled Project Construction and Operation, this section addresses construction associated with Phase I storage facilities. Assumptions are needed for the magnitude of construction/timing for all facilities (Phase I and II) in order for EIR to analyze related impacts.	8-15
11	Chapter 4	All	The description of impacts from any mitigation measures for the intended use of the Emergency Storage Basins is not apparent. Reference should be made to the stipulation For Order Granting Preliminary Injunction and Order Thereon, San Benito County Water District, plaintiff, vs. City of Hollister, defendant, Case Number: CVPT 0228735; Superior Court of the State of California in and for the County of San Benito.	8-16
12	Chapter 4	All	The description of impacts from any mitigation measures for the construction and operation of the MBR basins and foundation are not apparent.	8-17

13	Chapter 4	All	The existing water quality conditions in the vicinity of the City of Hollister Industrial Wastewater Treatment Plant (IWTP) and Domestic Wastewater Treatment Plant (DWTP) and the San Juan Sub-basin are not adequately described. Accordingly, the water quality impacts of the project, particularly Phase I are not adequately assessed nor, if necessary, mitigated. The cumulative water quality impacts of the current and continued disposal of industrial wastewater and storm water at the IWTP and the project disposal of "domestic" wastewater at the IWTP and DWTP are not described or assessed.	8-18
14	4.1-24	Impact 4.1.2, last paragraph	Reliance on RO/demineralization is used to assert impact is less-than-significant. See comment 9.	8-19
15	4.1-31	Impact 4.1.9	Thresholds of significance (p 4.1-23) correctly identify the three categories of farmland considered significant ("Important Farmland") pursuant to CEQA (Appendix G, Section 21095, etc.), including Unique Farmland. The Soils Resources Map on Figure 4.1-4 identifies only Prime and Statewide important farmland. The Impact discussion only considers these 2 categories. Unique Farmland needs to be mapped and added to the impact discussion.	8-20
16	4.1-31	Mitigation Measure 4.1-9	Is this a feasible mitigation measure? When Figure 4.1-3 and Figure 4.1-4 are examined together, it appears the land not in agriculture is floodplain or developed. The true extent of CEQA Farmland is not mapped. Are there 670- and 400- acre (plus whatever acreage is needed for an RO facility and related infrastructure) sites in the project boundary area that are not Important Farmland but are available for siting facilities? We strongly advise that this issue is explored in the final EIR; otherwise, the lead agencies may find the mitigation is infeasible at a future date, and be faced with a new EIR because a significant (unavoidable) impact was not disclosed.	8-21
17	4.1-32	Impact 4.1.10, last paragraph	The discussion of Williamson Act contract impacts related to storage facilities is conclusory. What findings would need to be made to conclude a 670-acre storage or 400-acre evaporation pond would not be in conflict with Williamson Act provisions (uses intended to maintain agricultural economy of the state; see page 4.1-17). Further, condemnation proceedings that ultimately vacate the Williamson Act contract do not appear to be consistent with the intent of the Williamson Act. The discussion needs to be supported.	8-22

18	4.2-13	Bulleed mitigation measures	While they sound good, these measures would likely not be possible to implement. At what point would one know that beneficial uses are being affected? How would it be determined/monitored (if the measures are to stand, they need a lot more definition to assure they are feasible). It would probably be more effective to establish what the agronomic application rate is, limit application to that rate, and establish standards (e.g., no application during rainy season, defined as months XX thru YY, or no application within X days of rainfall totaling Z inches)	8-23
19	4.2-13	Impact 4.2.5	This discussion is conclusory; no facts are introduced to demonstrate that application of high salt load irrigation water would not affect soil/groundwater quality. How much annual rainfall is needed to flush the soils? Given that there is high groundwater, will the surface flushing introduce high salts concentration to groundwater? What if there is drought; a foreseeable circumstance that needs to be considered? What if the demineralization/RO plant is delayed due to very high cost, feasibility, etc.?	8-24
20	4.2-14	Mitigation measure 4.2.7(b)	How are "weak slopes" defined? Need a performance standard that allows the measure to be implemented.	8-25
21	4.3-5	4.3.1	Specific median groundwater objectives are presented without the requirements for application. The Basin Plan states "Therefore, application of these objectives must be consistent with the objectives previously stated in this chapter and synchronously reflect the actual ground water quality naturally present." Accordingly, the impacts of percolation of wastewater at the Industrial and Domestic Wastewater Treatment Plants must be evaluated based on the water quality naturally present at those sites.	8-26
22	4.3-10	4.3.1	SBCWD manages and distributes CVP surface water supplies to agricultural and Municipal and industrial users.	8-27
23	4.3-18	4.3.1	SBCWD is both a wholesaler and a retailer of CVP surface water through the San Felipe Distribution System.	8-28
24	4.3-18	4.3.1	SBCWD does not deliver water from Hernandez or Paicines reservoirs to agricultural users. The water rights are for recreation and groundwater storage for later extraction.	2-29
25	Fig. 4.3-2		The legend should be corrected by changing "roundwater" to "groundwater".	8-30
26	4.3-21	4.3.3	The groundwater model developed by SBCWD and San Benito County was first developed in the early 1990's and has been significantly modified and updated in 2001.	8-31

27	4.3-23	4.3.3 Model Scenarios	This discussion does not clearly present the assumptions regarding total water use in the basins. Do the Phase II simulations include increased deep percolations from municipal irrigation associated with City and County General Plan growth through 2023, significant increases in agricultural irrigation in the Hollister Valley and increase groundwater pumping for Urban and Agricultural development/expansion? Do the Phase II simulations include analysis of the case where water quality improvements and recycling are not implemented?	8-32
28	4.3-30	4	The discussion of thresholds of significance for salts in the groundwater basin is well done; however, no basis is provided to support the defined threshold of statistically detectable over a period of several decades. Given the current concerns over salinity in groundwater, a more supportable threshold would be tied directly to standards and contributions. Example: Where existing salinity is less than 500 mg/l, an impact would be significant if the project would cause this standard to be exceeded; where salinity is between 500-1000 mg/l, an impact would be significant if the project would increase salinity by 3 mg/l; where groundwater exceeds 1000 mg/l, an impact would be significant if it increase salinity by 1 mg/l. We are not suggesting that these thresholds should replace the ones in use, but the contribution should be measured based on the ability to adversely affect water quality (one standard) or to exacerbate current problems (which would have a lower threshold standard).	8-33
29	4.3-32	Table 4.3-1	The table and subsequent impact assessments are based on median values and not site specific values as required by the Basin Plan.	8-34
30	4.3-33	2 (first full paragraph)	Phase I of the project would increase salt loading by around 4% annually, but this is deemed to not be significant. Is this based on the threshold of "not statistically detectable"? If so, the results of the modeling that support this conclusion should be described. Otherwise, the conclusion is not supported by any facts. The impact(s), if Phase II is not implemented, should be assessed for this impact and all other ground water impacts.	8-35
31	4.3-33 thru 40	Impact 4.3.2	The discussion is fairly dismissive of very large increases in salinity (in same instances, long term increases of 1300 mg/l are described, p 4.3-28). What is the basis of using 3000 mg/l as a threshold? What standard/beneficial use does this protect? Does this meet the requirements of the Basin Plan? Once above a standard that protects beneficial uses, any measurable increase would be significant under CEQA. It seems to be suggesting that groundwater in some areas is poor, so large increases elsewhere are fine so long as they stay below 3000 mg/l.	8-36

32	4.3-40	Mitigation measure 4.3-40	Are these measures feasible? Is 3000 mg/l supportable? Measure (c) suggests wellhead treatment without specifying what that would be (RO?) and suggests alternative water supplies (from where...would it be feasible to provide?) Further, if blending becomes a necessity, would this not increase the irrigation quantity? Is there enough land to accommodate? If alternative supplies will be used, how will treated wastewater be disposed? In most years, CVP (San Felipe Project) water is fully allocated. The option of using CVP water appears impractical.	8-37
33	4.3-45	4.3.8	The DEIR states "Overall wastewater percolation at the DWTP would decrease if Phase I were implemented." The DEIR discussion that follows this quotation is confusing. A clear presentation of the operations of the DWTP and IWTP should be provided. The current City of Hollister work on "Site Selection" assumes continued use of the DWTP and IWTP at current levels. Are the DEIR and The City of Hollister "Site Selection" work consistent? Do the simulations include percolation from the Seasonal Storage Reservoir?	8-38
34	4.3-57	4.3.11	The City of Hollister recently conducted certain geotechnical investigations at the Hollister Municipal Airport including ground water level measurement. Are these groundwater level measurements consistent with the simulations?	8-39
35	4.4-6	San Benito County Water District	The San Benito County Water District does <u>not</u> maintain an encroachment permit process.	8-40
36	4.4-46	Mitigation measure 4.4-5(c)	Obtaining a permit is not mitigation, although there will likely be conditions required by the permit that serve as mitigation. Performance standards (e.g., replace habitat value on a 1:1 basis) should be added.	8-41
37	4.4-47	Mitigation measure 4.4-6(c)	This measure has several steps to mitigate impacts to any listed plant species, progressing from avoidance to transplantation if feasible, then concludes the mitigation reduces the impact to less than significant. If transplantation is not feasible, will impact be unavoidable? Because each of the measures rely on unknown feasibility, the conclusion that the impact is mitigated is not supported. Because of these unknowns, this impact should be considered mitigated to extent feasible, but it may be unavoidable due to unknowns.	8-42

38	4.4-50	Mitigation measure 4.4-10 (b)	Are these mitigation measures feasible? Is there enough land to accommodate additional irrigation water if dilution is needed? Is there enough land available to accommodate any buffers? This impact should be considered mitigated to extent feasible, but it may be unavoidable due to unknowns.	8-43
39	Section 4.7		The potential power requirements for operation of an RO facility are not considered. Even small RO plants typically require new substations. A 7.5 MGD plant would likely have substantial power requirements that could result in the construction of new power facilities, including new power lines. The power requirements for well head treatment should also be considered.	8-44
40	Section 4.8		The construction and operation of an RO/demineralization facility is not analyzed in the air quality analysis. The analysis should be expanded to evaluate construction (including drying beds) and operation (especially as it relates to power requirements for RO operation, brine drying and vehicular transport of brine). When considered cumulatively with operation of the RO and MBR facility, there is a potential to exceed air quality thresholds.	8-45
41	4.8-20	Impact 4.8-3	Vehicular traffic for biosolids disposal is not evaluated. While clean out and disposal would be infrequent, the number of trips and associated air quality effects from disposal could be substantial for the short term of the disposal.	8-46
42	Chapter 6	All	A matrix summarizing the screening criteria and results would be extremely helpful to guide the reader through the screening process. Such a matrix would show how alternatives are screened, with certain alternatives carried forward. The descriptions of the alternatives are skeletal and could be described in greater detail. The level of analysis provides little justification for selecting the proposed project over other alternatives. Arranging the analyses by alternative rather than resource area would have greatly strengthened the presentation and analysis.	8-47
43	6.7 – 6.11	All	The impacts of alternative treatment processes are lumped within resource categories and are very generally described. Similar comments apply to the effluent disposal alternatives section. This section should reference Appendix D, where this information is derived. The matrices mentioned on page 6-10 and 6-11 should be presented to clarify the selection of these particular alternatives for evaluation.	8-48

44	6-17	Program-level components	It is unclear what components are covered at a project versus a program level of detail. Program-level actions not specifically covered under a project level of analysis should be identified.	8-49
45	6-19	1 st paragraph	The EIR states that each alternative "produces a lesser quality effluent", but no information is provided that shows how much this difference is. Since this statement is critical to identifying the Environmentally Superior Alternative, some additional information would provide more defensibility as nearly all other resources appear to have "similar" or "lesser" impacts compared to the proposed project.	8-50



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

September 11, 2006

Steve Wittry
City of Hollister
375 Fifth Street
Hollister, CA 95023-3876

RECEIVED

SEP 19 2006

CITY OF HOLLISTER
ENGINEERING DEPT.

Subject: City of Hollister Domestic Wastewater System Improvements Project and San Benito County
Water District Recycled Water Facility Project
SCH#: 2006012149

Dear Steve Wittry:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 8, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

9-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

Letter 9

SCH# 2006012149
Project Title City of Hollister Domestic Wastewater System Improvements Project and San Benito County Water
Lead Agency District Recycled Water Facility Project
Hollister, City of

Type EIR Draft EIR
Description The proposed project consists of improvements to the Domestic Wastewater Treatment Plant (DWTP) to increase the quality of effluent produced and to increase the treatment and disposal capacity of the plant. The proposed project would reduce the amount of water disposed of by percolation by developing disposal sprayfields and providing tertiary treated effluent as a recycled water supply for agricultural and urban irrigation.

Lead Agency Contact

Name Steve Wittry
Agency City of Hollister
Phone (831) 636-4340 **Fax**
email
Address 375 Fifth Street
City Hollister **State** CA **Zip** 95023-3878

Project Location

County San Benito
City Hollister
Region
Cross Streets State Route 156 and San Juan Hollister Road
Parcel No. Various
Township 12,13S **Range** 4E, 6E **Section** Unsect **Base** MD

Proximity to:

Highways 156
Airports Hollister Municipal
Railways Southern Pacific Railroad
Waterways San Benito River
Schools Calaveras Elementary School
Land Use Public Institutional, Agriculture, Various

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 3; Department of Parks and Recreation; Native American Heritage Commission; Integrated Waste Management Board; Public Utilities Commission; Reclamation Board; Department of Health Services; Department of Fish and Game, Region 3; Department of Conservation; California Highway Patrol; Caltrans, District 5; Caltrans, Division of Aeronautics; Department of Toxic Substances Control; State Water Resources Control Board, Clean Water Program

Date Received 07/25/2006 **Start of Review** 07/26/2006 **End of Review** 09/08/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

September 12, 2006

RECEIVED

SEP 19 2006

CITY OF HOLLISTER
ENGINEERING DEPT.

Steve Wittry
City of Hollister
375 Fifth Street
Hollister, CA 95023-3876

Subject: City of Hollister Domestic Wastewater System Improvements Project and San Benito County
Water District Recycled Water Facility Project
SCH#: 2006012149

Dear Steve Wittry:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on September 8, 2006. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2006012149) when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

10-1

RECEIVED

SEP 19 2006

CITY OF HOLLISTER
ENGINEERING DEPT

September 14, 2006

Hand Delivery

City of Hollister, Engineering Department
c/o Steve Wittry, Engineering Manager
375 Fifth Street
Hollister CA, 95023

Re: Comments on Draft Environmental Impact Report
City of Hollister Domestic Wastewater System Improvements

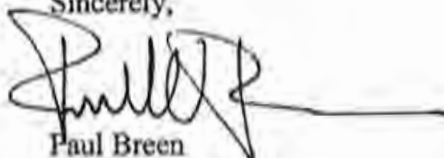
Dear Mr. Wittry:

Please accept these brief comments on the Draft Environmental Impact Report addressing the City of Hollister's Domestic Wastewater System Improvement plans. As a member of the Hollister farming community with property west of the city limits I would like to state support of the proposed development of a wastewater solution for Hollister. However, I am also concerned about the costs related to the need to modify our irrigation practices to eliminate runoff of reclaimed waters in the areas that accept reclaimed water.

I support the expansion of the wastewater treatment plant and we want to be part of the solution. However, The project should evaluate additional public uses of the reclaimed wastewater, including existing public landscaped areas, within the Hollister and the surrounding region. The Draft EIR should include additional information on the economic impacts of the project on the community and proposed financing.

Thank you for your time and we wish you and the City of Hollister much success in crafting the best possible project.

Sincerely,



Paul Breen
1255 Paullus Drive
Hollister CA, 95023



COUNTY OF SAN BENITO
BOARD OF SUPERVISORS

481 FOURTH STREET, HOLLISTER, CALIFORNIA 95023

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October 3, 2006

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Fax: 916.614.3580

City Manager Clint Quilter
City of Hollister
375 Fifth Street
Hollister, CA 95023

Subject: Board of Supervisors Comments on Hollister Waste Water System
Improvements Project and related Recycled Water Facility Project Draft EIR

Dear Mr. Quilter and Mr. Hill:

The San Benito County Board of Supervisors has reviewed the DEIR for the City of Hollister's proposed wastewater treatment facility expansion and recycled water facility project and has the following comments and concerns, in addition to the comments previously sent by our staff. We appreciate the overall examination of the issues in this area pertaining to a significant part of this County and the desire to improve the quality of the water in the area over time. There is concern with some of the elements of Phase One such as the proposed spray fields potentially affecting the quality and quantity of water. There is also concern with the timing of Phase Two being so far into the future. We recommend the plans and the DEIR be further developed as to a solution to go to Phase Two more quickly and minimize concepts like the spray fields in Phase One unless more concrete back-up plans are made in case there is a problem. We do not want the City to inadvertently make decisions now or in the future in this area that could lead to further damage of the County's groundwater and aquifers:

12-1

- a. Does the City have a plan if issues arise during Phase One of the project and there is no Phase Two? Also, if there were contamination of surrounding wells or other issues that might arise, what would this do to Phase Two? There needs to be a concrete plan for these potential problems along with the cost of potentially going to Phase Two sooner. At what point will the project meet the water quality standards detailed in the City, County and Water District MOU?
- b. Spray field development is explored for Phase One at the Hollister Municipal Airport and the San Juan Oaks Golf course (page 3-14 et seq and Tables 3-5 and 3-6). The DEIR projects disposal capacity of 745 Acre Feet per Year or 0.66 Million Gallons Per Day (MGD). The DEIR notes this would exceed the projected needs for spray field disposal of 0.5 MGD as noted in Table 3-5. The County is concerned about the damage that these spray fields might do to the soil and groundwater even during Phase One, for example if there are a series of heavy rains, the plants do not successfully absorb the salts and the salts get into the groundwater. Additional concrete options need to be considered to disperse the salts to avoid water problems.
- c. The document also discusses additional spray field development such as north of Freitas Road at the Pacific Sod Farm and the eastern portion of the Flint Hills (page 3-19 et seq). Various ways to distribute the recycled water are also discussed. It is the Board's concern again about the damage that these spray fields might do to the soil and groundwater during any phase, for example if there are a series of heavy rains, the plants do not successfully absorb the salts and they get into the groundwater. The Board is concerned that Phase Two is set off some time in the future and might not even occur. In that case, other options need to be considered to treat/disperse the salts to avoid water problems.
- d. The amount of acreage to be used in Phase Two of the proposed spray-field project is unclear. The Pacific Sod Farm again is mentioned (page 3-19, 275 acres) and the recycled distribution pipelines are mentioned. The Recycled Water Project has more specific acreage used in the spray-field study. Phase Two and its determined acreage use should be more clearly defined and consistent between the two documents.
- e. Section 4.1-32 mentions that some of the proposed project facilities may conflict with a Williamson Act Contract. Further investigation must be made as to whether/not public services can be implemented on Williamson Act contracted land. Specific wording should be mentioned that states the whether or not there will be an issue/remedies for it.

12-2

12-3

12-4

12-5

- f. The County has some concerns about the existing plant's outfall operations contributing to some of the water degradation in the San Juan Valley. Some discussion and thoughts on how to address this issue in the DEIR would be appreciated.

12-6

The Board of Supervisors will continue to follow this project as it progresses and will review the final EIR document to see if we have any further comments. We appreciate your review and thank you in advance for responding to our concerns.

Sincerely,



Pat Loe
Chair, San Benito County Board of Supervisors

CC: City of Hollister Mayor and City Council
SBC Water District
SBC Director of Planning and Building