RECLAMATION

Managing Water in the West

Draft Environmental Assessment

West Hills Water Treatment Plant

EA-12-096

U.S. Department of the Interior
Bureau of Reclamation
Mid Pacific Region
South-Central California Area Office
Fresno, California

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Mission Statements

The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to Indian Tribes and our commitments to island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

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Section 1 Introduction

1.1 Background

The City of Hollister (City) is located in northwestern San Benito County, California, east of Monterey Bay and west of Interstate 5 (see Figure 1-1). Residents of the Hollister Urbanized Area (HUA) currently use a combination of groundwater and imported Central Valley Project (CVP) surface water. Although treated drinking water in the HUA meets all primary federal and state drinking water standards, high total dissolved solids (TDS) in source groundwater (800 to 1,200 mg/L, compared to 250 to 300 mg/L for imported surface water) have created a need for home water softeners, particularly in the western portion of the HUA. The high concentration of minerals and salinity also limits options for reuse and disposal of wastewater at the City's water reclamation facility downstream, due to its incompatibility with groundwater and crops.

In order to address long-term water needs, Hollister completed a Master Plan and Coordinated Water Supply and Treatment Plan in 2011 (State Clearinghouse #2010061069). In addition to water quality improvement efforts, the plan also includes additional sources of supply to improve reliability. This includes construction of a new Water Treatment Plant (WTP) located west of the HUA to receive CVP water from the Hollister Conduit (Conduit), which is a federal facility. The raw water would be treated at the plant and delivered to the existing distribution infrastructure in western Hollister. Permission is needed from the Bureau of Reclamation (Reclamation) to tap into the Hollister Conduit to supply water for the WTP.

An Environmental Impact Report (EIR) was prepared for the proposed WTP by Environmental Science Associates on behalf of the San Benito County Water District (SBCWD). Reclamation performed an independent review of the EIR (2014) and determined that much of the analyses are still valid and adequately assesses the environmental effects from the Proposed Action analyzed within this Environmental Assessment (EA). Where appropriate, the contents of this EA are adapted from the broader EIR (SBCWD 2014), which is hereby incorporated by reference.

1.2 Need for the Proposed Action

The specific objectives of the proposed project include:

- Providing a reliable, safe and balanced water supply to meet current and long-term operational needs of the HUA.
- Improving the quality of drinking water in the western portion of the HUA.
- Improving source water quality delivered to the City of Hollister's Water Reclamation Facility, allowing the facility to expand use of recycled water.
- Improve water quality effluent to the City of Hollister's Water Reclamation Facility, to comply with impending changes to the City's discharge requirements by the Central Coast Regional Water Quality Control Board.

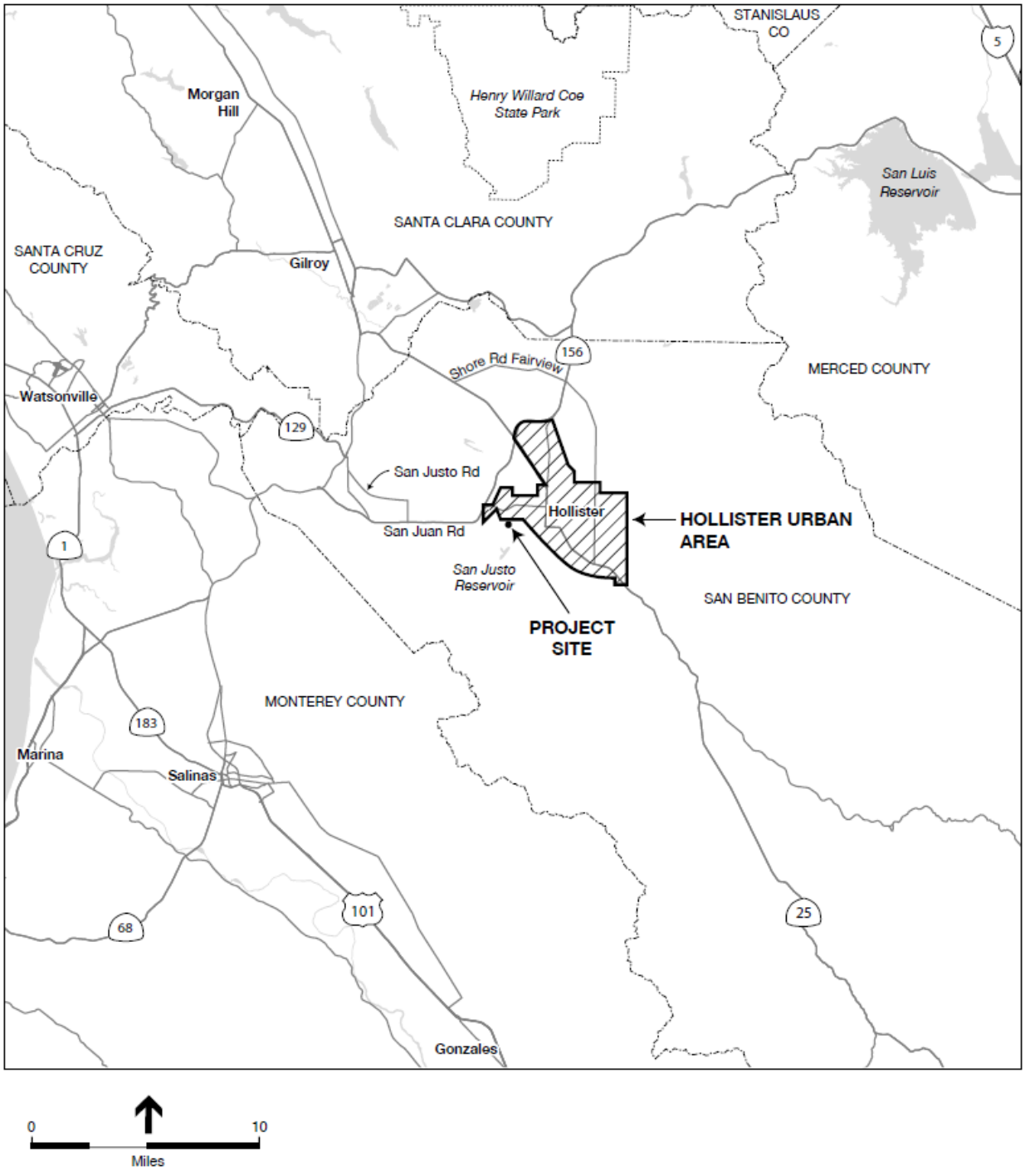

Figure 1-1 Project Area (SBCWD 2014)

1.3 Scope

The project site is located in an unincorporated area of San Benito County just outside of the southwestern boundary of the City of Hollister in the hills north of Union Road (see Figures 1-1 and 2-1). The proposed treatment plant site consists of two vacant parcels totaling approximately 33 acres that are jointly owned by the City, SBCWD and Sunnyslope County Water District (SSCWD). New pipelines would be installed within the footprint of Richardson Road, a private easement north of the treatment plant site, Riverside Road and Nash Road.

Construction is projected to take place over two years. Once constructed, the treatment plant, pipelines and pump station would be considered permanent.

1.4 Resources of Potential Concern

This EA analyzes the affected environment of the Proposed Action and No Action Alternative in order to determine the potential direct and indirect impacts and cumulative effects to the following resources:

- Water Resources
- Land Use
- Biological Resources
- Cultural Resources
- Indian Sacred Sites
- Socioeconomic Resources
- Environmental Justice
- Air Quality
- Global Climate
- Noise
- Traffic

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Section 2 Alternatives Considered

This EA considers two possible actions: the No Action Alternative and the Proposed Action. The No Action Alternative reflects future conditions without the Proposed Action and serves as a basis of comparison for determining potential effects to the human environment.

2.1 No Action Alternative

Under the No Action Alternative, the WTP would not be constructed. Planned improvements to the existing water infrastructure would still be implemented, but the system's capacity would not be expanded. Low-quality groundwater would continue to be used by much of the population of the HUA. Without improvements in source water, opportunities for reuse of reclaimed water downstream would be limited.

2.2 Proposed Action

Reclamation proposes to authorize SBCWD to make a connection to the Hollister Conduit for the purpose of delivering their CVP water allocation to a proposed new WTP. As described in Chapter 2 of the EIR (SBCWD 2014), the main components of the proposed project include construction and operation of a raw water pump station, the West Hills WTP itself, and raw and treated water transmission pipelines. Preliminary design drawings of the West Hills WTP, pipelines, and associated facilities are presented in Figures 2-1 and 2-2.

Raw Water Pump Station
Raw water would be supplied to the West Hills WTP via a new pipeline from the Hollister Conduit, which follows Union Road southwest of the site. To lift the water from the Hollister Conduit to the WTP, a pump station would be built adjacent to the Conduit on the north side of Union Road at the intersection with Richardson Road. Two pumps would initially be installed to meet the project's pumping capacity of 4.5 to 6.0 million gallons per day (mgd) of raw water to the new plant, with a third pump on standby. Sodium permanganate would be stored in a building for use as a preoxidant for seasonal iron and manganese removal.

Raw Water Pipeline
A 20-inch diameter pressurized raw water pipeline would extend 3,500 feet northeast from the pump station to the WTP. The pipeline would be installed within Richardson Road at a depth of approximately 4 feet.

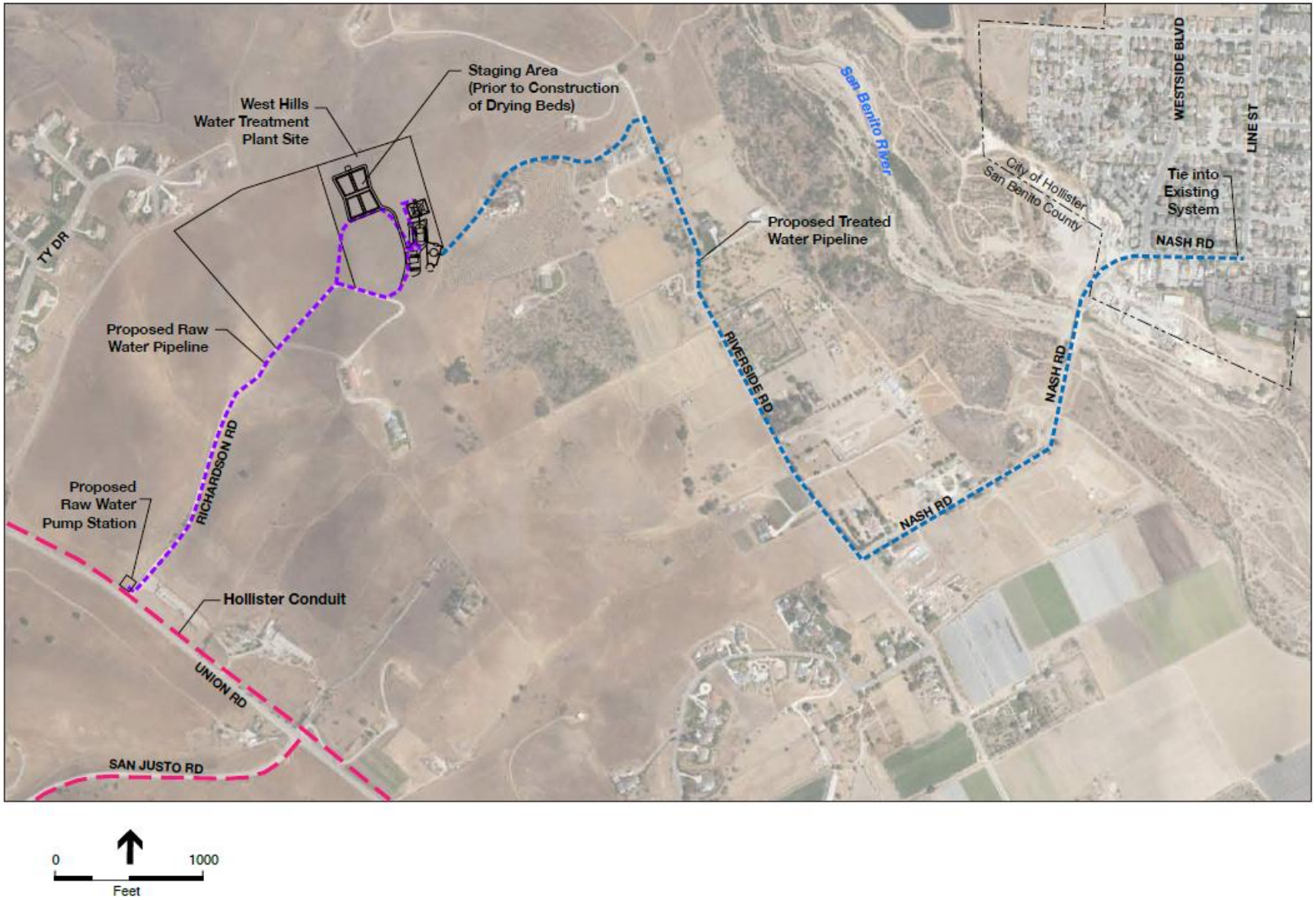

Figure 2-1 Conceptual Proposed Improvements (SBCWD 2014)

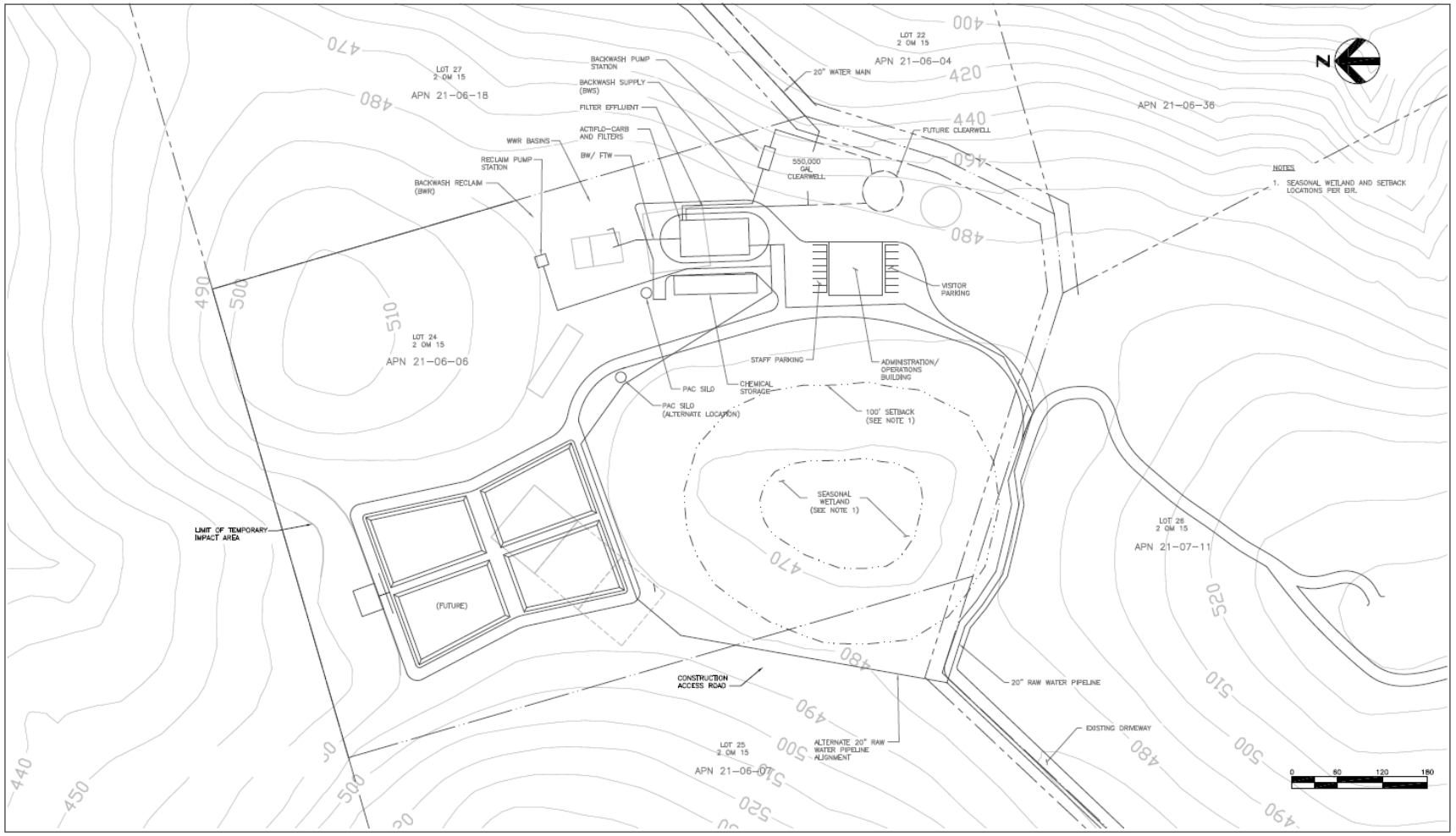

Figure 2-2 Proposed Water Treatment Plant Layout (SBCWD 2014)

Water Treatment Plant

The WTP would be comprised of treatment facilities, solids handling facilities, treated water storage tanks, an administration and operations building and associated facilities. Facilities would be constructed for an initial design capacity of 4.5 to 6 mgd, with the potential for a future design expansion to 9 mgd. The primary treatment processes, storage tank, and the distribution system would be supplied by gravity. Component systems of the treatment plant are described in greater detail below.

Pretreatment

The pretreatment and filtration process would consist of tanks, pipes and equipment within a facility on the eastern portion of the site. The pretreatment system includes a powdered activated carbon (PAC) pre-contact tank, coagulation tank, flocculation tank, and settling tank for enhanced removal and adsorption of organic matter, as well as objectionable taste and odor. PAC would be stored and dosed by a silo feed system adjacent to the pretreatment equipment.

Filtration

Downstream of the pretreatment system, the plant's filtration system would provide supplemental removal of turbidity, coagulated organic material, and oxidized particulate iron and manganese. To keep the plant's filters functional, the filters would be cleaned by backwashing with treated water, and air scouring.

Chemical Feed and Storage Facilities

The chemical systems at the proposed plant site include sulfuric acid, preoxidant, PAC, polymer, coagulant, sodium hydroxide, sodium hypochlorite, and ammonia. In addition, sodium permanganate would be stored and fed at the proposed raw water pump station site. All chemical piping located outside of the chemical containment area would be installed in double-contained piping.

Solids Handling

The solids handling process would include dewatering and storage of sludge generated from the pretreatment system and backwash water. Proposed solids handling facilities would include two wash water basins located north of the pretreatment and filtration components; two reclaimed water pumps at the northern end of the wash water basins; and three drying beds at the northwestern end of the project site. If the water treatment plant is expanded in the future, a fourth drying bed would be added.

Filter backwash waste would be fed to the wash water basins and then to drying beds for evaporative drying prior to ultimate landfill disposal. Excess water would be redirected to the plant influent upstream of the pretreatment system.

Treated Water Storage Tank

A treated water storage tank would be constructed southeast of the administration and operations building. This tank would have an approximate capacity of 550,000 gallons and due to the sloped terrain of the tank site, would likely be partially buried. If the water treatment plant is expanded in the future, a second tank would be constructed at the same location.

Administration and Operations Building
An administration and operations building would accommodate the plant operators and maintenance staff. The approximately 5,000 square foot building would house a control room, laboratory and other facilities.

Site Security
A security monitoring system would be installed at the project site and would include video surveillance, building perimeter and microwave intrusion sensors, an intercom at the plant entrance, and access control systems. Fencing and cameras with lighting would also be constructed along the perimeter of the plant site. Downward-directed outdoor security lighting would be installed at the parking area, along roads within the plant site and along building walls.

Landscaping and Drainage
Landscaping would be installed within and adjacent to the administration building, other facilities and along the plant's perimeter to establish a landscaped setting for the treatment plant. Native plant species around the buildings would be low-lying, and trees would be planted strategically among the facilities to provide shade, and in certain areas where screening would be effective, at the base of larger facilities. Runoff from impervious surfaces at the WTP site would drain to vegetated swales and then to the seasonal relict wetland located on the site in a manner similar to the present condition.

Access Improvements
Access to the WTP would be by way of Union Road and Richardson Road. Richardson Road provides access to two residences east of the proposed West Hills WTP site, ranch facilities and vehicle storage at the base of the hill adjoining Union Road. SBCWD would coordinate with the adjacent landowners to improve Richardson Road to a 20-foot-wide paved road to provide adequate access.

Eight standard mixed use parking stalls and one space reserved for disabled persons would be located at the administration building for employees and visitors. The paved driveway within the plant would be at least 24 feet wide and would loop past the administration building, filter area, and solids lagoon and back to the entrance.

Treated Water Pipeline
To deliver treated water from the water treatment plant to the existing distribution system within the HUA, a new 20-inch diameter gravity flow pipeline would be constructed. The pipeline would extend approximately 1.6 mile from the water treatment plant within an existing right-of-way and driveway on private land to Riverside Road, south along Riverside Road, northeast along Nash Road, and then tie in with the existing water distribution system at the intersection of Nash Road and Line Street. The pipeline trench would be approximately 4 feet wide and 5 feet deep, with the pipeline installed at a depth of approximately 4 feet. At the Nash Road Bridge crossing over the San Benito River, the pipeline would be installed within the existing bridge box, within two bays with utility openings. No construction would be necessary within the river or riverbank.

2.2.1 Environmental Commitments

SBCWD must implement the following environmental protection measures to reduce environmental consequences associated with the Proposed Action (Table 2-1). Environmental consequences for resource areas assume the measures specified would be fully implemented. Copies of all reports would be submitted to Reclamation.

Table 2-1 Environmental Protection Measures and Commitments

Resource	Protection Measure
Water	A site drainage plan shall be prepared and incorporated into the final construction plans.
Water	A Storm Water Pollution Prevention Plan shall be prepared to limit erosion impacts from construction.
Traffic	The construction contractor shall prepare a transportation management plan in coordination with San Benito County and the City of Hollister in order to mitigate traffic disruptions.
Biological Resources	Preconstruction surveys by US Fish and Wildlife Service (USFWS)-approved biologist(s) for California red-legged frog, California tiger salamander, and San Joaquin kit fox will be performed immediately prior to groundbreaking activities.
Biological Resources	A USFWS-approved biological monitor(s) will be onsite at all times during initial ground-breaking activities until wildlife exclusion fencing is installed around perimeter of the proposed action area. Upon completion of these activities, the monitoring biologist will inspect exclusion fencing on a daily basis to look for tears and to ensure no California red-legged frog or California tiger salamander have become trapped along the fence line. The applicant will maintain and/or replace these barriers immediately if necessary.
Biological Resources	No sooner than 30 days prior to construction mobilization, a biologist shall conduct a preconstruction nesting bird survey of the proposed West Hills WTP site, pipeline alignments, and all staging areas and haul routes. The biological monitor shall survey linear features in segments as construction becomes imminent. If nesting birds are identified, the biologist in consultation with the California Department of fish and Wildlife would identify an appropriate protection buffer around the nest based on site conditions, and the buffer area shall be excluded from the approved work area.
Biological Resources	Preconstruction surveys and implementation of avoidance and minimization measures for burrowing owls would be conducted in areas supporting potentially suitable habitat within 30 days prior to the start of project construction according to 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012).
Biological Resources	No more than 30 days prior to mobilization activities, a USFWS-approved biologist shall conduct a preconstruction survey in all off-road construction areas according to established standardized protocols in the 2011 *U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011).
Biological Resources	Any California red-legged frog or California tiger salamander observed during preconstruction surveys will be monitored by the approved biologist and allowed to passively leave the site or, if determined necessary by the USFWS-approved biologist, removed from the work area(s) and relocated to an appropriate location in accordance with a USFWS-approved Relocation Plan.
Biological Resources	Amphibian exclusion fencing will be established around the perimeter of the proposed action, including the West Hills WTP, along both sides of water pipeline construction corridors, and along both sides of access roads. Exclusion fencing will remain around the specified work areas for the duration of ground disturbing activities.
Biological Resources	The Applicant proposes to purchase compensation land for the loss of habitat, temporary and or permanent impact to special-status species from an USFWS-approved conservation bank.

2.3 Other Alternatives Considered

In addition to the two alternatives which are fully evaluated in this EA, two sets of alternative locations and one design variation were assessed by SBCWD. These additional options are described below but are not carried forward for further analysis.

2.3.1 North Site Alternatives

Two sites in the northern portion of the HUA were considered during the WTP site selection process: North Site 1 and North Site 2. North Site 1 is located near the intersection of McCloskey Road and San Felipe Road, and North Site 2 is located adjacent to the Hollister Conduit near the intersection of McCloskey Road and Fairview Road. No specific parcels were identified for this area, but suitable land is known to be available.

The North Site 1 alternative includes a new raw water pipeline from the Hollister Conduit to the new WTP, a distance of approximately 2 miles. A pump station would also be required at the WTP site and a new treated water pipeline would connect the WTP to the Park Hill water storage tanks located just north of Vista Hill Park.

For the North Site 2 alternative, the water treatment plant would be located near existing rural residential housing and actively farmed parcels. This WTP site would include a connection to the Hollister Conduit for raw water supply, a pump station, and a new treated water pipeline that would connect the WTP to the Park Hill tanks.

Compared to the Proposed Action, impacts for the North Site Alternatives would be greater in the following areas:

- Both sites would be at substantially lower elevations than the Park Hill water storage tanks. The additional pumping required would increase electricity usage.
- A large portion of the McCloskey corridor is within the flood inundation area.
- Pipeline lengths would be longer, increasing the length of construction and causing greater traffic disruption on a heavily-used roadway.

Compared to the Proposed Action, impacts for the North Site Alternatives would be less in the following areas:

- Slopes at the north site locations are relatively flat, meaning that risks related to slope instability and landslides would be less.

2.3.2 South Site Alternatives

During the site selection process, two different southern WTP sites were considered: South Site 1 and South Site 2. The locations of the two sites are described below.

South Site 1 is a parcel commonly referred to as the “Brigantino” property, located adjacent to the San Benito River at the intersection of Southside Road and Hospital Road. This option would require a new raw water pipeline from the Hollister Conduit to the site, as well as a pump station and treated water pipeline to convey treated water to the low pressure zone. The new connection would occur at the intersection of Nash Road and San Benito Street.

South Site 2 is located on a parcel commonly referred to as the "Campisi" property, which is adjacent to the San Benito River and Hospital Road. Similar to South Site 1, this site would require a new raw water pipeline that would extend from the Hollister Conduit to the WTP site. This site would also require a new pump station and a treated water pipeline to convey treated water to the distribution system. Like South Site 1, the point of connection would occur at the intersection of Nash Road and San Benito Street.

Compared to the Proposed Action, impacts for the South Site Alternatives would be greater in the following areas:

- Both sites are in close proximity (0.05 mile) to the Calaveras Fault, representing a greater risk from earthquake damage.
- Both sites are within the 100-year flood inundation zone.
- Both sites would be at substantially lower elevations than the Ridgemark water storage tanks. The additional pumping required would increase electricity usage.

Compared to the Proposed Action, impacts for the South Site Alternatives would be less in the following areas:

- Slopes at the south site locations are relatively flat, meaning that risks related to slope instability and landslides would be less.
- Surrounding development patterns are similar to the location selected under the Proposed Action, but the south sites are not located on a ridgeline. As a result, longer-distance visual impacts would be less.

2.3.3 Tank Location Variation

This design variation would include constructing the treated water storage tanks north of the parking lot and administration and operations building, and the PAC silo on the western side of the ridge (see Figure 2-3). While the total height of the water storage tanks would be 34 feet, the tanks would be partially buried, such that the aboveground portion would be 13 feet tall. Similar to the Proposed Action, the silo would be approximately 38 feet tall but would be located at a lower elevation on the opposite side of the ridge, west of the water storage tanks and pretreatment and filter systems. The pretreatment system, filter system, and chemical storage area would also be shifted to the west.

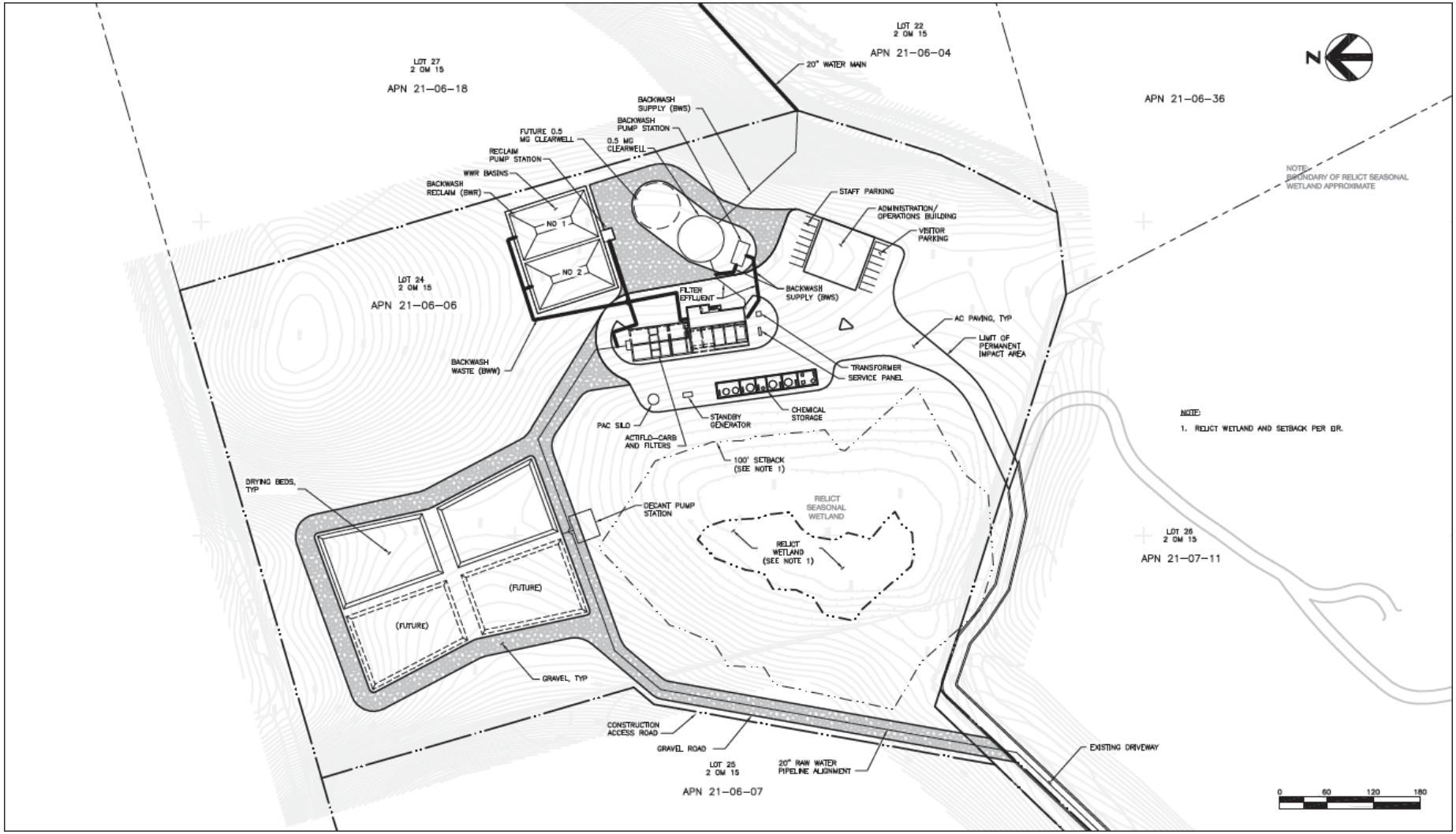

Figure 2-3 Alternative Site Layout (SBCWD 2014)

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Section 3 Affected Environment and Environmental Consequences

This section identifies the potentially affected environment and the environmental consequences involved with the Proposed Action and the No Action Alternative, in addition to environmental trends and conditions that currently exist.

3.1 Resources Eliminated from Further Analysis

Reclamation analyzed the affected environment and determined that neither Proposed Action nor the No Action Alternative have the potential to cause direct, indirect, or cumulative effects to the resources listed in Table 3-1.

Table 3-1 Resources Eliminated from Further Analysis

Resource	Reason Eliminated
Indian Trust Assets	On July 22, 2013, Reclamation determined that the Proposed Action had no potential to affect Indian Trust Assets, as there are none in the area. The nearest Indian Trust Asset is a Public Domain Allotment approximately 10 miles south of the project site.

3.2 Water Resources

3.2.1 Affected Environment

Local Surface Water
The San Benito River and Santa Ana Creek are the two main waterways that pass through the HUA. The San Benito River flows from southeast to northwest in the southern portion of the HUA and has a drainage area of approximately 661 miles. During the dry season, flows in the San Benito River are largely governed by releases from Hernandez Reservoir for groundwater recharge (SBCWD 2011). Santa Ana Creek, an intermittent creek, flows southeast to northwest across the northern portion of the HUA and eventually flows into Tequisquita Slough before joining Pacheco Creek above San Felipe Lake, approximately seven miles north of the Hollister Municipal Airport (City of Hollister 2005).

The San Justo Reservoir has a storage capacity of 10,300 acre-feet. It is located approximately 1.3 miles southwest of the project site and is used exclusively for storage of CVP water imported from the San Luis Reservoir via the Hollister Conduit. Water from San Justo Reservoir is delivered to agricultural, municipal and industrial customers within the HUA. Historically it has also been released at controlled rates to local creeks and the San Benito River for groundwater recharge. However this practice has been temporarily discontinued due to zebra mussel infestation (HDR 2008).

Hernandez Reservoir and Paicines Reservoir, located 45 miles and 10 miles southeast of the HUA, respectively, serve as the primary sources of local surface water supply in the area. Hernandez Reservoir is designed and operated to supplement the groundwater supply in northern San Benito County. Paicines Reservoir receives water from the San Benito River via a

combination of natural runoff and releases form Hernandez Reservoir. Water is released for percolation to Tres Pinos Creek and the San Benito River to provide additional groundwater recharge during the dry season (HDR 2008).

Water bodies in the area are broadly impacted by pollutants originating from non-point sources such as regional agricultural activities, grazing practices, urbanization and hydromodification, as well as from certain point sources such as mining, agricultural and waste water treatment operations. Common pollutants include excess sediment, nutrients, and fecal coliform.

The proposed WTP site itself is located on a saddle between hilltops with flat and gently sloping topography. No waterways are present within the project footprint that appear to be jurisdictional as a water of the U.S. However, the isolated depression on the proposed WTP site which receives the site's drainage may be protected under the jurisdiction of the Regional Water Quality Control Board as a water of the state. Wetland vegetation is present within the depression feature, but soils do not appear to be hydric, and no wetland hydrology was observed. The feature is highly seasonal, and modeling has determined that since 1995 it has likely held water into or through May in only three years.

In the area of the proposed raw water pipeline and pump station, runoff drains via sheet flow in a southwesterly direction, while along the treated water pipeline alignment, runoff drains overland towards the San Benito River.

Groundwater
Groundwater levels in the Gilroy-Hollister Valley Groundwater Basin showed significant declines from the early 1900s to the early 1970s. However, groundwater levels have risen over 100 feet in the past 35 years due to delivery of imported surface water and the SSCWD use groundwater wells for municipal and industrial water supply.

Generally, groundwater within the Gilroy-Hollister Valley Groundwater Basin is marginally acceptable for potable and irrigation use, with a high mineral content that occasionally exceeds drinking water standards. TDS concentrations range from below 500 mg/L to over 1,500 mg/L, which greatly exceeds the California recommended secondary drinking water standard of 500 mg/L TDS (SBCWD 2011; HDR 2008). Total hardness concentrations in groundwater range from 295 to 594 mg/L CaCO3. Most of the minerals in the local groundwater derive from dissolution of aquifer materials, but some is due to human activities such as agriculture and the disposal of treated wastewater.

CVP Water
The West Hills WTP would be supplied by water from the Hollister Conduit, which is a large diameter pipeline that conveys CVP water from San Luis Reservoir to San Benito County. Imported CVP water generally has TDS concentrations ranging from 250 to 300 mg/L, which is below the California recommended secondary drinking water standard of 500 mg/L. Based on sampling events from 2005 to 2009, average hardness was approximately 112 mg/L (HDR 2010).

3.2.2 Environmental Consequences

No Action

If no action were taken, water customers in the western HUA would continue to rely heavily on low-quality groundwater for their needs. The water entering the City's Water Reclamation Facility would continue to have elevated levels of minerals and TDS, limiting the potential for reuse. Continued use of this poorer quality source water would also make it more difficult for the City's wastewater treatment plant to meet its effluent limits.

Proposed Action

Construction, operation and maintenance of the proposed project could temporarily degrade water quality through erosion, accidental release of pollutants or discharge of polluted runoff, and/or a change in the volume of runoff. Compliance with National Pollutant Discharge Elimination System permit requirements, including preparation of a Stormwater Pollution Prevention Plan (SWPPP), and implementation of appropriate best management practices would reduce the potential for these impacts to water quality.

Construction Impacts

Construction and soil disturbance could lead to increased erosion, and sedimentation within nearby receiving waters. Construction activities could also result in the accidental release of chemicals used during construction, waste concrete, and wash water. Contaminated runoff could enter on-site drainage channels and ultimately drain off-site to downstream water bodies, or infiltrate and contaminate groundwater.

All construction activities would be subject to the provisions and requirements of the State Water Resource Control Board's (SWRCB's) General Construction Permit (SWRCB Order 2009-0009-DWQ). The SBCWD and/or the contractor would be required to prepare a SWPPP, which would include relevant measures and conditions to reduce or eliminate the impacts of construction on stormwater and receiving water quality and quantity.

Construction of the proposed project may also require short term dewatering to accommodate installation of the treated water pipeline adjacent to the San Benito River. If required, this could temporarily affect groundwater levels in the shallow groundwater zones. However, wells located in the project area generally pump groundwater from deeper aquifers (SBCWD 2011) and would not be affected by dewatering activities in the shallow groundwater zone. Furthermore, any effects related to lowering the shallow groundwater table would be temporary since dewatering would be required for only a limited period during construction.

Operation and Maintenance Impacts

Installation of the proposed WTP and raw water pump station would increase the amount of impervious surfaces at the project site, and could alter the drainage pattern by reducing infiltration and increasing the rate and volume of surface runoff. Runoff from the treatment plant site would drain to vegetated swales and then to the central depression feature in a manner similar to the present condition. The swales would slow runoff, allowing for some infiltration, and would reduce the potential for runoff from the project site to cause erosion or flooding in the project area.

Ongoing operation and maintenance of the proposed water treatment plant would involve the use and storage of various chemicals and fuels used in the water treatment process. Chemicals would be stored in bulk chemical storage tanks located in an enclosed area, and chemical piping located outside of the chemical containment area would be double-contained. With these precautions any leak or spill would be contained onsite and would not reach receiving waters.

The project would not deplete groundwater supplies or interfere with groundwater recharge. Runoff from impervious surfaces would be directed via vegetated swales to areas that would allow for infiltration of stormwater (HDR 2011) and, in the case of the WTP site, to the depression feature. In either case, there would be no substantial change to existing infiltration and recharge processes. Long-term, use of surface water supplies from the proposed project for municipal supply would reduce reliance on groundwater, providing a benefit to groundwater supplies.

The Proposed Action would provide a new source of imported surface water for municipal supply, by treating and distributing CVP water. Imported water generally has lower TDS concentrations than groundwater in the HUA and would improve the quality of municipal supply. Improvement in the quality of the water supply would in turn improve effluent quality from the wastewater treatment plants serving the same portion of the HUA.

Cumulative Impacts

A variety of other actions in the surrounding area would involve excavation of soil or discharges of stormwater or groundwater, and could affect the same water conveyance systems as the Proposed Action. However, the proposed project, as well as the other construction activities, would be covered by the permitting programs established by the Clean Water Act. These permits contain stipulations and requirements designed to minimize and mitigate adverse impacts to protected water bodies. Typical conditions include measures to control stormwater runoff, soil erosion, and the potential for spills of objectionable materials during construction. It is expected that these measures would be adequate to mitigate the risk of adverse cumulative impacts to water resources.

3.3 Land Use

3.3.1 Affected Environment

The proposed treatment plant site consists of two parcels (a total of 33 acres) in San Benito County located on a ridge just west of the San Benito River valley. The parcels were purchased jointly by SBCWD, the City of Hollister, and SSCWD in 1993 for the purposes of constructing a WTP. The parcels are in the county's Agricultural Productive Zoning district and are currently used only for livestock grazing. Land uses surrounding the proposed West Hills WTP site are primarily agricultural and are also used for grazing. The closest residence is a single-family home located at the end of Riverside Road approximately 530 feet south of the water treatment plant site.

The raw water pump station, raw water pipeline, and western portion of the treated water pipeline would also be constructed on lands within San Benito County, within existing road right of way and utility easements, as shown in Figure 2-1. The western portion of the treated water

pipeline would traverse across land designated as unique farmland and prime farmland. The remaining portions would be within Riverside Road and Nash Road, adjacent to grazing land and built-up land. The eastern portion of the treated water pipeline would be located within the City of Hollister, with some areas zoned as open space land and some areas designated for various residential uses (City of Hollister 2010). Land uses surrounding the raw water pump station and raw water pipeline alignment are primarily agricultural with some recent residential development (Union Heights Road) to the southeast. Water pump and valve facilities for the existing Hollister Conduit are located about 50 feet southeast, on the north side of Union Road.

The Farmland Protection and Policy Act
The Farmland Protection and Policy Act of 1981 requires an evaluation of the relative value of farmland that could be affected by decisions sponsored in whole or part by the federal government. Farmland mapping designations within the West Hills project area consist of Grazing Land, Unique Farmland, Prime Farmland, Urban and Built-Up, and Low Density-Rural. These designations are based on the underlying soil types.

Williamson Act
The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is the state's primary program aimed at conserving private land for agricultural and open space use. It is a voluntary, locally administered program that offers reduced property taxes on lands whose owners place enforceable restrictions on land use through contracts between the individual landowners and local governments. The western portion of the treated water pipeline alignment would be installed on a parcel that is currently under a Williamson Act contract (San Benito County 2010).

Flood Hazard
The Federal Emergency Management Agency has mapped the 100-year flood zone (also known as a 1 percent annual chance flood) for the San Benito River in the vicinity of the proposed project. The proposed alignment of the raw water pipeline and the West Hills WTP site itself are not within the 100-year flood zone. However, the portion of the proposed alignment of the treated water pipeline that runs along Nash Road and across the San Benito River is within the 100-year flood zone (City of Hollister 2005).

3.3.2 Environmental Consequences

No Action
If no action were taken, the treatment plant and associated pipelines would not be constructed. The parcels under consideration would remain undeveloped and would continue to be used for livestock grazing. However, the improved water quality and reliability benefits of the proposed action would not be achieved. The long-term development goals of the county and City would be more difficult to achieve without these benefits.

Proposed Action
Implementation of the West Hills WTP project would include construction of a new water treatment plant, raw water pump station, raw water pipeline, and treated water pipeline which would be constructed primarily in an undeveloped area of unincorporated San Benito County.

The site and surrounding areas are currently used for agricultural (livestock grazing) and low-density rural residential purposes. The proposed pipelines would be below-grade and in suitable existing easements, so they would not change overall land usage or appearance. The treatment plant itself would represent a change from current land use patterns; however San Benito County and the City of Hollister have specifically excluded water treatment plants and associated facilities from zoning restrictions. Further, the overall project is consistent with the land development plans for the area in that its purpose is to provide water supplies which support planned development.

The western portion of the treated water pipeline would be located on land which is classified as Unique Farmland. However, it would be installed within an existing right-of-way dedicated for the purpose. Therefore the presence of the pipeline is not expected to interfere with ongoing agricultural use of the property. Similarly, in the area covered by a Williamson Act contract, the pipeline would be beneath an existing residential driveway. Because the treated water pipeline would not compromise the long-term productive agricultural capability of the land, nor would it displace or impair current agricultural operations, the proposed project would be compatible with Williamson Act contract land uses.

A portion of the treated water pipeline would cross the 100-year flood hazard area of the San Benito River. The treated water pipeline would be buried at a depth of approximately four feet within or adjacent to Nash Road and would be installed within the Nash Road Bridge at the river crossing. As such, the pipeline would not impede or redirect flood flows.

Cumulative Impacts

A variety of other development projects have been proposed within San Benito County and the City of Hollister. Some of these, such as planned residential subdivisions, would represent a change in land use patterns. Both jurisdictions have enacted formal plans to manage growth in a responsible manner which is consistent with public needs and expectations. Zoning and other land use controls are in place to ensure that any cumulative effects from land use are limited and do not conflict with other public goals and needs.

3.4 Biological Resources

3.4.1 Affected Environment

Biological field surveys were conducted on September 28, 2012 and February 6, 2013 by Environmental Science Associates biologists, on behalf of SBCWD. A Reclamation Biologist also accompanied Environmental Science Associates on a reconnaissance-level field visit on May 16, 2013. Information on the biological resources within this area, such as dominant vegetation type, habitat features, and overall site conditions, was noted during the surveys. These resources were further evaluated as to their potential to support special-status plant and wildlife species in the area.

Habitats within the area are predominately annual grassland. Remaining areas (approximately 20 percent) are comprised of cropland, rural residential neighborhoods, urban areas, manufacturing companies on large parcels, San Justo Reservoir, Brigantino Park, the industrial

and domestic wastewater treatment plants serving the West Hills area of Hollister, and riparian scrub associated with San Benito River and its floodplain. The action area itself, outside of paved roadways in rural residential areas and the Nash Road crossing of San Benito River, is comprised of annual grasslands. Action area grasslands contain abundant surface cracks in expansive soils and some fossorial rodent burrows.

California ground squirrel (*Spermophilus beecheyi*) burrow complexes occur at the base of steep slopes parallel to Richardson Road in the western project area, and in fields and roadsides along Riverside Road in the eastern project area. Burrows or runs of Botta's pocket gopher (*Thomomys bottae*), California vole (*Microtus californicus*), moles (*Scapanus* spp.), and deer mice (*Peromyscus maniculatus*), were observed throughout project area grasslands.

An official list of endangered, threatened, and proposed species that have the potential to occur in the vicinity of the proposed action was obtained from the USFWS's Ventura office (USFWS 2013). Reclamation reviewed the USFWS - Information, Planning, and Conservation System (IPaC) website, http://ecos.fws.gov/ipac/ April 10, 2013, and again on February 4, 2014 (Version 1.4) for San Benito County. Reclamation further queried the California Natural Diversity Database (CNDDB 2014) for listed species within 10 miles of the action area. This information, in addition to information within Reclamation's files, was compiled and reviewed to determine which species have the potential to occur within the action area (Table 3-2).

Table 3-2 Federally Protected Species List for the Proposed Action

Species	Status [1]	Effects [2]	*Summary Basis for ESA Determination*
AMPHIBIANS			
California red-legged frog (*Rana draytonii*)	T, X	MAA	**Moderate.** No confirmed breeding locations occur within 1.2 miles of the project area. In 2001, adults were reported from San Benito River approximately 1.4 miles downstream. Abundant small mammal burrows in and adjacent to the project area offer aestivation and foraging opportunities. Critical habitat absent. San Benito County shall implement environmental protective measures as described in Section 2.2.1.
California tiger salamander, central population (*Ambystoma californiense*)	T	MAA	**Moderate.** No confirmed breeding locations occur within 1.2 miles of the project area, but an adult was observed in 2006 at a seasonal wetland 0.4 miles south of the project area. Abundant small mammal burrows in and adjacent to the project area offer aestivation and foraging opportunities. Adults may persist in area grasslands. San Benito County shall implement environmental protective measures as described in Section 2.2.1.
BIRD			
Burrowing owl (*Athene cunicularia*)	MBTA	NE	**Foraging presence.** A feather and whitewash were observed within a burrow complex on the proposed WTP property. No pellets or owls were observed. Nearest recorded nesting occurrence is 2 miles west. San Benito County shall implement environmental protective measures as described in Section 2.2.1.
California condor (*Gymnogyps californianus*)	E	NE	**Absent.** Lack of suitable habitat in the project area.

Least Bell's vireo (*Vireo bellii pusillus*)	E	NE	**Low nesting potential.** The area is outside the recognized breeding range for the species, but USFWS has documented infrequent nesting along the San Benito River (USFWS 2013). Suitable habitat is present at the Nash Road bridge crossing. Nearest record is 12 miles north of the project area, along Llagas Creek. San Benito County shall implement environmental protective measures as described in Section 2.2.1.
Southwestern Willow flycatcher (*Empidonax traillii extimus*)	E	NE	**Low nesting potential.** The area is outside the recognized breeding range for the species, but USFWS has documented infrequent nesting along the San Benito River (USFWS 2013). Suitable habitat is present at the Nash Road bridge crossing. San Benito County shall implement environmental protective measures as described in Section 2.2.1.
FISH			
South-Central California Coast Steelhead (*Oncorhynchus mykiss*)	T NMFS	NE	**Presumed seasonally present.** San Benito River is designated critical habitat for steelhead, serving as a migration pathway to the Pajaro River spawning area. Present, at least seasonally, in the project area at the river crossing. No natural waterways within the species' range will be affected by the proposed action.
INVERTEBRATES			
Vernal pool fairy shrimp (*Branchinecta lynchi*)	T, X	NE	**Low.** Critical habitat absent but potential habitat in onsite relict seasonal wetland. Ditch along Richardson Road observed in September 2012 was not present in February 2013, apparently due to road grading. The species was discovered in the Hollister area in 2012 in low elevation hills east of the valley, where habitat consisted of a tire rut within an agricultural field (USFWS 2013).
MAMMALS			
Giant kangaroo rat (*Dipodomys ingens*)	E	NE	**Absent.** Known from southeastern San Benito County, but nearest recorded occurrence is 43 miles southeast.
San Joaquin kit fox (*Vulpes macrotis mutica*)	E	MAA	**Moderate foraging potential.** Most recent documentation in the area is from 1992. The project footprint and proposed West Hills WTP parcels lack dens, but dens could be present in the surrounding area. Some gently sloping areas within the project parcel and surrounding area provide suitable foraging and dispersal habitat. San Benito County shall implement environmental protective measures as described in Section 2.1.
PLANTS			
Marsh sandwort (*Arenaria paludicola*)	E	NE	**Absent.** No records from San Benito County. Nearest reported occurrence is 46 miles northwest.
San Benito evening-primrose (*Camissonia benitensis*)	T	NE	**Absent.** Habitat absent from the project area. Nearest reported occurrence is 54 miles south.
San Joaquin woolly-threads (*Lembertia congdonii*)	E	NE	**Absent.** Habitat absent from the project area. Nearest reported occurrence is 55 miles south.
REPTILES			
Blunt-nosed leopard lizard (*Gambelia silus*)	E	NE	**Absent.** A Central Valley species. Nearest reported occurrence is 31 miles east.

[1] Status= Listing of Federally special status species
E: Listed as Endangered
MBTA: Bird species protected under the Migratory Bird Treaty Act
T: Listed as Threatened
X: Critical Habitat designated for this species
NMFS: species under the jurisdiction of the National Marine Fisheries Service
[2] Effects = Effect determination
NE: No Effect
MAA: Proposed Action may affect this species and its critical habitat

Federally protected species with the potential for occurring in the action area include the following: California red-legged frog (*Rana draytonii*), California tiger salamander (*Ambystoma californiense*), and San Joaquin kit fox (*Vulpes macrotis mutica*) (Table 3-2). The non-native grassland provides burrows that can be used by California red-legged frog, California tiger salamander, and may also be used by San Joaquin kit fox. Also, there are a few seasonal wetlands within the vicinity of the project area which may provide breeding habitat to amphibians, including California red-legged frog and California tiger salamander. No designated or proposed critical habitat exists within the proposed project area, so no primary constituent components would be impacted.

3.4.2 Environmental Consequences

No Action

Under the No Action Alternative, there would be no impacts to wildlife and special status species, as no new facilities would be constructed. The conditions of special status wildlife species and habitats under the No Action Alternative would be the same as they would be under existing conditions described in the Affected Environment; therefore, no additional effects to special status species or critical habitats are associated with this alternative.

Proposed Action

Many of special-status plants and animals described in Table 3-2 above are unlikely to occur within the boundaries of the disturbed land areas. However, birds protected under the Migratory Bird Treaty Act and federally-protected species that may occur in the vicinity of the Proposed Action areas include: burrowing owl (*Athene cunicularia*), California red-legged frog, California tiger salamander, and San Joaquin kit fox. Habitat loss along with habitat disturbance and the resulting impact to wildlife is the primary potential effect of the proposed action.

Migratory Birds There is potential nesting habitat for burrowing owl in the action area. Potential impacts to burrowing owls would be avoided and or minimized by implementing the environmental protection measures described above in Section 2.2.1. Therefore, there would be no take of birds protected under the Migratory Bird Treaty Act.

Federally-listed Species Permanent habitat loss would result from construction of the West Hills WTP. Temporary habitat loss would result from construction of the raw water and treated water pipelines. Effects associated with the Proposed Action also include mortality, injury, or physiological stress during project construction because of ground disturbance, operation of construction equipment, worker vehicles, increased human presence, dewatering activities, unplanned spills of toxic substances, and potential rescue and relocation activities. Long-term effects resulting from project operation include potential for mortality, injury, or physiological

stress due to worker vehicles, persistent human presence, operational noise, and nighttime lighting.

Environmental protective measures as described above in Section 2.2.1 would be implemented in order to avoid and/or minimize potential impacts to federally listed species and their habitat. These measures would include, but are not limited to, the following: preconstruction surveys, installation of "amphibian-friendly" barrier fencing, amphibian relocation, construction monitoring, construction personnel training, and use of qualified biologists during surveys and monitoring.

Cumulative Impacts

Numerous activities, regardless of what agency (Federal or non-Federal), continue to eliminate habitat for listed and proposed threatened and endangered species. Habitat loss and degradation affecting both animals and plants continue as a result of several factors, including urbanization, oil and gas development, road and utility right-of-way management, flood control projects, climate change, grazing by livestock, and agricultural practices. Listed and proposed animal species may be affected by poisoning, shooting, increased predation associated with human development, and reduction of food sources. All of these nonfederal activities are expected to continue to adversely affect listed and proposed species. The Proposed Action would temporarily disturb California red-legged frog and California tiger salamander uplands habitat during construction activities. The temporary disturbed habitat would be returned to its preexisting condition once construction is complete. However, the Proposed Action would also eliminate non-native grassland habitat that is considered suitable habitat for San Joaquin kit fox and which could also be utilized by California red-legged frog and California tiger salamander. SBCWD would implement the appropriate avoidance and minimization measures, including compensatory habitat, to address impacts to habitat as needed to minimize potential cumulative impacts.

3.5 Cultural Resources

Cultural resources is a broad term that includes prehistoric, historic, architectural, and traditional cultural properties. The National Historic Preservation Act (NHPA) of 1966 is the primary Federal legislation that outlines the Federal Government's responsibility to cultural resources. Section 106 of the NHPA requires the Federal Government to take into consideration the effects of an undertaking on cultural resources listed on or eligible for inclusion in the National Register of Historic Places (National Register); such resources are referred to as historic properties.

The Section 106 process is outlined in the Federal regulations at 36 Code of Federal Regulations (CFR) Part 800. These regulations describe the process that the Federal agency (Reclamation) takes to identify cultural resources and the level of effect that the proposed undertaking will have on historic properties. In summary, Reclamation must first determine if the action is the type of action that has the potential to affect historic properties. If the action is the type of action to affect historic properties, Reclamation must identify the area of potential effects (APE), determine if historic properties are present within that APE, determine the effect that the undertaking will have on historic properties, and consult with the State Historic Preservation Office, to seek concurrence on Reclamation's findings. In addition, Reclamation is required

through the Section 106 process to consult with Indian Tribes concerning the identification of sites of religious or cultural significance, and consult with individuals or groups who are entitled to be consulting parties or have requested to be consulting parties.

3.5.1 Affected Environment

Reclamation coordinated cultural resources identification with the SBCWD who contracted a consulting firm to conduct cultural resources inventory for the proposed project. A record search was conducted at the Northwest Information Center, a Sacred Lands File search was requested from the Native American Heritage Commission (NAHC), groups and individuals identified by the NAHC were contacted soliciting information, and pedestrian survey were conducted of the APE. Through these efforts no cultural resources were identified in the APE. Due to the depth of the proposed project's construction elements a geoarchaeological assessment of the APE was conducted. The geoarchaeological assessment identified the APE as evincing a low to very low potential for the presence of buried historic properties.

3.5.2 Environmental Consequences

No Action

Under the No Action Alternative, existing conditions would persist and the proposed project would not be implemented. As a result, the No Action alternative would result in no impacts to cultural resources.

Proposed Action

The proposed action involves the construction of a water treatment plant and its ancillary components (i.e., pipelines and pump house). Drawing water from the Hollister Conduit requires Reclamation permission which constitutes an undertaking as defined by Section 301(7) of the NHPA initiating Section 106 and its implementing regulations at 36 CFR § 800. The proposed project area has been investigated for the presence of cultural resources as part of the Section 106 process pursuant to 36 CFR § 800.4. No cultural resources were identified within the project APE resulting in a determination of no historic properties affected. As such, should the Proposed Action be implemented, the resulting activity will have no impact on properties listed, or eligible for listing, on the National Register of Historic Places.

3.6 Socioeconomic Resources

3.6.1 Affected Environment

According to the Association of Monterey Bay Area Governments (AMBAG), the population of San Benito County was 57,324 in 2005 and it is projected to increase 65 percent by 2035, faster than the other counties in the Monterey Bay region (AMBAG 2008). Hollister is the largest city in San Benito County, with 65 percent of the county population (37,002 persons and 10,587 housing units) as of 2005. Hollister is anticipated to grow slightly faster than the county as a whole, with a 70% increase in population expected by 2035 (City of Hollister 2005).

3.6.2 Environmental Consequences

No Action

Under the No Action Alternative, the land within the project site would remain undeveloped and used for grazing purposes. Without the proposed improvements to the water treatment and distribution system, meeting the objectives of the City's Master Plan would be more difficult. This would impede development, which would have an adverse effect on quality of life for the population of the HUA.

Proposed Action

The Proposed Action would support the planning goals of the County and the City of Hollister. Improving the reliability and drinking water quality for the HUA is a benefit to the residents and businesses of the area.

Cumulative Impacts

The Proposed Action does not directly promote additional development, but it removes a possible obstacle (limited utility capacity) to future growth. All future development in the HUA would be subject to the planning policies and regulations enforced by various jurisdictions to ensure that growth proceeds in a way that is responsible and consistent with public expectations. Allowing land use to proceed in accordance with land use plans would provide a cumulative socioeconomic benefit to the area.

3.7 Environmental Justice

Executive Order 12898 (February 11, 1994) mandates Federal agencies to identify and address disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

3.7.1 Affected Environment

The project area is encompassed by Census Tracts 2, 4, 7.01 and 7.02. The demographic characteristics of each of these tracts relative to San Benito County are shown below in Table 3-3. For each tract, the racial composition is similar to the composition of the County's population as a whole. Poverty rates in Census Tracts 4 and 7.01 are higher than the rate for the overall County population, while the poverty rates in Tract 2 and Tract 7.02 are lower. Census Tracts 4 and 7.01 have Hispanic/Latino populations near 75%, well above the countywide rate of approximately 56%. Census Tract 2's percentage of Hispanic/Latino population is slightly lower, at approximately 40%, and Tract 7.02's composition is similar to the County's.

Table 3-3 Study Area Demographics

Demographics	San Benito County	Tract 2	Tract 4	Tract 7.01	Tract 7.02
Race					
White	63.7%	67.1%	60.3%	52.1%	64.3%
Black or African American	0.9%	0.9%	1.0%	0.9%	1.8%
American Indian and Alaska Native	1.6%	1.7%	1.8%	3.0%	1.4%
Asian	2.6%	3.0%	0.7%	2.1%	3.2%
Native Hawaiian and Other Pacific Islander	0.2%	0.2%	0.3%	0.5%	0.2%
Two or more races	4.9%	5.5%	4.9%	4.2%	5.3%
Hispanic or Latino (of any race)	56.4%	40.8%	73.4%	78.5%	54.1%
Economic Characteristics					
Families below poverty level [a]	11.3%	6.6%	12.8%	16.8%	3.9%

[a]Value is between 2007 and 2011
Sources: U.S. Census Bureau 2010 and 2013

3.7.2 Environmental Consequences

No Action

Under the No Action alternative, the proposed water treatment plant would not be constructed. There would be no traffic, air quality, noise or other impacts on environmental justice populations. However, the benefits of the treatment plant would also not be realized. Low-income residents of Census Tracts 4, 7.01 and 7.02, in the western portion of the HUA, would continue to use groundwater containing high levels of dissolved solids. While this continues current conditions, delaying or eliminating a benefit (improved source water) is considered adverse relative to the Proposed Action.

Proposed Action

The Proposed Action could result in temporary impacts to nearby residences during the construction phase (between late 2014 and summer 2016), particularly in the form of short-term increases in noise and traffic disruptions. There would also be a long-term change in the visual character of the proposed treatment plant site, with the introduction of new buildings and treatment facilities. These localized impacts and inconveniences are not expected to affect the environmental justice populations in the project area, which are primarily located in the HUA, one mile east of most of the planned construction.

Once the water treatment plant is operational, it would provide a reliable, high-quality water supply to meet current and future operational needs of the residents of the HUA. The City's residents in the western portion of the HUA, who are disproportionately low-income and/or minorities, would benefit directly from improved source water quality that is lower in dissolved solids.

3.8 Air Quality

Section 176 (C) of the Clean Air Act [CAA] (42 U.S.C. 7506 (C)) requires any entity of the federal government that engages in, supports, or in any way provides financial support for,

licenses or permits, or approves any activity to demonstrate that the action conforms to the applicable State Implementation Plan (SIP) required under Section 110 (a) of the Federal CAA (42 U.S.C. 7401 [a]) before the action is otherwise approved. In this context, conformity means that such federal actions must be consistent with SIP's purpose of eliminating or reducing the severity and number of violations of the National Ambient Air Quality Standards and achieving expeditious attainment of those standards. Each federal agency must determine that any action that is proposed by the agency and that is subject to the regulations implementing the conformity requirements would, in fact conform to the applicable SIP before the action is taken.

On November 30, 1993, the Environmental Protection Agency (EPA) promulgated final general conformity regulations at 40 CFR 93 Subpart B for all federal activities except those covered under transportation conformity. The general conformity regulations apply to a proposed federal action in a non-attainment or maintenance area if the total of direct and indirect emissions of the relevant criteria pollutants and precursor pollutant caused by the Proposed Action equal or exceed certain *de minimis* amounts thus requiring the federal agency to make a determination of general conformity.

3.8.1 Affected Environment

The proposed project is located in an unincorporated area of San Benito County, within the North Central Coast Air Basin (NCCAB). Air quality in the NCCAB, which is comprised of San Benito, Santa Cruz, and Monterey Counties, is overseen and managed by the Monterey Bay Unified Air Pollution Control District (MBUAPCD). Ambient concentrations of air pollutants depend on the qualities and quantities of emissions released by various sources and the atmosphere's ability to transport, dilute, and transform the emissions. Air quality trends in an area are determined by natural factors such as topography, meteorology, and climate, in addition to the sources and amounts of emissions.

The MBUAPCD operates a regional monitoring network that measures the ambient concentrations of the criteria air pollutants within the NCCAB. The nearest station in San Benito County to the project site is the Fairview Road station in Hollister, which measures criteria pollutants, including ozone, PM_{10}, and $PM_{2.5}$. The current attainment status for San Benito County is provided below.

Table 3-4 Attainment Status for San Benito County

Pollutant	Federal Standard	State Standard
Ozone – one hour	No Federal Standard	Moderate Nonattainment
Ozone – eight hour	Unclassified/Attainment	Nonattainment
PM_{10}	Unclassified	Nonattainment
$PM_{2.5}$	Unclassified/Attainment	Attainment
CO	Unclassified/Attainment	Unclassified
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Unclassified	Attainment
Lead	Unclassified/Attainment	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
SOURCE: CARB 2011		

Projects located within the MBUAPCD's jurisdiction are required to evaluate their air quality impacts in accordance with the MBUAPCD's California Environmental Quality Act Air Quality Guidelines (MBUAPCD 2008). The thresholds of concern established by the guidelines are shown below in Table 3-5.

Table 3-5 MBUAPCD Air Quality Significance Thresholds

Pollutant	Construction Threshold	Operational Threshold
Oxides of Nitrogen (NOx)	N/A	137 lb/day
Volatile Organic Compounds or Reactive Organic Gases	N/A	137 lb/day
PM10	82 lb/day	82 lb/day
PM2.5	N/A	N/A
Oxides of Sulfur (SOx)	N/A	150 lb/day
Carbon Monoxide (CO)	N/A	550 lb/day
Lead	N/A	N/A
Source: MBUAPCD 2008		

3.8.2 Environmental Consequences

No Action

If no action were taken, there would be no resultant air emissions. Air quality trends would be unaffected.

Proposed Action

The proposed construction would take place between late 2014 and the summer of 2016. It would include the construction of a water treatment plant, raw water pump station and pipelines for raw and treated water. During construction, ozone precursors and criteria pollutants would be emitted by operation of construction equipment as well as vehicles traveling to and from the project site. These emissions would incrementally add to the regional atmospheric loading of ozone precursors during project development. However, the MBUAPCD has determined that emissions from construction projects using typical equipment are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone ambient air quality standards (MBUAPCD 2008a).

Fugitive dust would also be produced by various construction activities, including clearing and grading, excavation, vehicle movement over paved and unpaved surfaces, and wind action over disturbed surfaces. To determine impacts, SBCWD modeled anticipated emissions and compared the results to the MBUAPCD threshold. As shown in Table 3-6, the resulting emissions are anticipated to be below the threshold of concern. Compliance with relevant MBUAPCD Rules and Regulations (such as Rule 403 – Particulate Matter) would be required in order to minimize fugitive dust.

Table 3-6 Peak Day Construction-Related Fugitive Dust Emissions

Project Component	PM10 (lb/day)
Water Treatment Plant and Raw Water Pump Station	42
Raw and Treated Water Pipelines	2
Total Emissions	44
MBUAPCD Construction Threshold	82
Source: SBCWD 2014	

Once operational, emissions sources associated with the proposed treatment plant would include:

- On-road vehicles such as employee vehicles, chemical deliveries, and waste hauling trucks
- Off-road material handling equipment (front loader)
- Area sources such as landscaping equipment and re-application of architectural coatings
- Energy from natural gas combustion and indirect electricity generation
- Solid waste degradation in landfills
- Electricity for water/wastewater conveyance and treatment
- Emergency generator operation

SBCWD modeled expected annual emissions with CalEEMod, using emission factors for an assumed reference diesel generator (200 kW, tier-3 standby generator, operated a maximum of 50 hours per year), and emission factors associated with indirect electricity generation for the proposed project (430 kilovolt-amperes total daily demand assumed). As shown in Table 3-7, the anticipated emissions would not exceed applicable MBUAPCD operational significance thresholds.

Table 3-7 Peak Day Operation-Related Pollutant Emissions (lb/day)

Source	ROG	NOx	CO	SO2	PM10	PM2.5
Area	0	0	0	0	0	0
Energy	0	0	0	0	0	0
Mobile	1	6	4	0	1	0
Generator Testing	0	3	0	0	0	0
Total	1	9	4	0	1	0
MBUAPCD Operation Threshold	137	137	550	150	82	None
Source: SBCWD 2014						

Carbon monoxide can be a localized problem at high concentrations. However, construction of the proposed project would be relatively short-term and would not emit CO in quantities that would pose a health concern. Operation of the water treatment plant and pipeline are also not anticipated to result in or contribute to CO concentrations that would exceed the California 1-hour ambient air quality standard of 20 ppm or the 8-hour standard of 9 ppm because of the negligible amount of CO generated by operational sources.

Construction of the proposed project would also result in short-term exhaust emissions of diesel particulate matter, which is a toxic air contaminant, from on-site heavy duty-equipment. However, the duration of construction (~600 days) would be short relative to the standard exposure period of 70 years. Also, most construction would take place at a substantial distance from sensitive residential receptors, with the nearest residence being 400 feet from the water treatment plant and the nearest residence being 800 feet from the raw water pump site. Portions of the conveyance pipeline would be installed closer to residences; however the pipeline installation would be a continually moving activity, and would not take place at any particular location for an extended period of time.

Long-term operation of the project would not result in any unpermitted sources of toxic air contaminant emissions in the respective air district jurisdictions. Testing of the emergency

generator would be required occasionally, but would result in negligible particulate emissions and would comply with applicable MBUAPCD rules.

Cumulative Impacts

According to the MBUAPCD, no single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project exceeds the identified significance thresholds or is inconsistent with the Air Quality Management Plan (AQMP), its emissions would be considered to be a significant contributor to the region's air quality problems. Alternatively, if a project does not exceed the significance thresholds and is consistent with the AQMP, then the project is considered to not be in conflict with air quality goals. Since the proposed project would be consistent with the AQMP and emissions generated during construction and operation would not exceed MBUAPCD's air quality thresholds, it is expected that it would not result in cumulative adverse impacts to the basin's air quality.

3.9 Energy Use and Global Climate

Climate change refers to significant change in measures of climate (e.g., temperature, precipitation, or wind) lasting for decades or longer. Many environmental changes can contribute to climate change [changes in sun's intensity, changes in ocean circulation, deforestation, urbanization, burning fossil fuels, etc.] (EPA 2011a).

Gases that trap heat in the atmosphere are often called greenhouse gases (GHG). Some GHG, such as carbon dioxide (CO_2), occur naturally and are emitted to the atmosphere through natural processes and human activities. Other GHG (e.g., fluorinated gases) are created and emitted solely through human activities. The principal GHG that enter the atmosphere because of human activities are: CO_2, methane (CH_4), nitrous oxide, and fluorinated gasses (EPA 2011a).

During the past century humans have substantially added to the amount of GHG in the atmosphere by burning fossil fuels such as coal, natural gas, oil and gasoline to power our cars, factories, utilities and appliances. The added gases, primarily CO_2 and CH_4, are enhancing the natural greenhouse effect, and likely contributing to an increase in global average temperature and related climate changes. At present, there are uncertainties associated with the science of climate change (EPA 2011b).

Climate change has only recently been widely recognized as an imminent threat to the global climate, economy, and population. As a result, the national, state, and local climate change regulatory setting is complex and evolving.

In 2006, the State of California issued the California Global Warming Solutions Act of 2006, widely known as Assembly Bill 32, which requires California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is further directed to set a GHG emission limit, based on 1990 levels, to be achieved by 2020.

In addition, the EPA has issued regulatory actions under the CAA as well as other statutory authorities to address climate change issues (EPA 2011c). In 2009, the EPA issued a rule (40 CFR Part 98) for mandatory reporting of GHG by large source emitters and suppliers that emit 25,000 metric tons or more of GHG [as CO_2 equivalents (CO_{2e}) per year] (EPA 2009). The rule is intended to collect accurate and timely emissions data to guide future policy decisions on climate change and has undergone and is still undergoing revisions (EPA 2011c).

MBUAPCD has not yet set a significance threshold for GHGs, so as a conservative approach SBCWD has adopted the interim threshold of 10,000 MT CO_{2e}/year used by the Bay Area Air Quality Management District and the South Coast Air Quality Management District (SCAQMD). Under SCAQMD guidelines, emissions from construction are amortized over thirty years and added to operational emissions for comparison to the threshold. SBCWD adopted the same approach for their analysis.

3.9.1 Affected Environment

Global mean surface temperatures have increased nearly 1.8°F from 1890 to 2006 (Intergovernmental Panel on Climate Change 2007). Models indicate that average temperature changes are likely to be greater in the northern hemisphere. Northern latitudes (above 24°North) have exhibited temperature increases of nearly 2.1°F since 1900, with nearly a 1.8°F increase since 1970 alone (Intergovernmental Panel on Climate Change 2007). Without additional meteorological monitoring systems, it is difficult to determine the spatial and temporal variability and change of climatic conditions, but increasing concentrations of GHG are likely to accelerate the rate of climate change.

More than 20 million Californians rely on the State Water Project and CVP. Increases in air temperature may lead to changes in precipitation patterns, runoff timing and volume, sea level rise, and changes in the amount of irrigation water needed due to modified evapotranspiration rates. These changes may lead to impacts to California's water resources and project operations.

While there is general consensus in their trend, the magnitudes and onset-timing of impacts are uncertain and are scenario-dependent (Anderson et al. 2008).

3.9.2 Environmental Consequences

No Action

If no action were taken, there would be no resultant GHG emissions. Current trends would be unaffected.

Proposed Action

Project-related air emissions fall into two categories: short-term impacts due to construction, and long-term impacts due to project operation.

Construction

GHGs would be generated during construction as a result of the use of equipment and construction-related on-road vehicular activity. These sources were modeled by SBCWD using CalEEMod, based on the proposed project's anticipated schedule and construction methods.

Using this data, the annual emissions (2014 and 2015) of GHGs would total 1,896 MT of CO_{2e}. Amortized over 30 years, the proposed project would result in approximately 63 MT CO_{2e}/year.

Operations
Once operational, emissions sources associated with the proposed project would include:

- On-road vehicles such as employee vehicles, chemical deliveries, and waste hauling trucks
- Off-road material handling equipment (a front loader)
- Area sources such as landscaping equipment and re-application of architectural coatings
- Energy from natural gas combustion and indirect electricity generation
- Solid waste degradation in landfills
- Electricity for water/wastewater conveyance and treatment
- An emergency generator

SBCWD modeled expected annual emissions with CalEEMod, using emission factors for an assumed reference diesel generator (200 kW, tier-3 standby generator, operated a maximum of 50 hours per year), and emission factors associated with indirect electricity generation for the proposed project (430 kilovolt-amperes total daily demand assumed). The calculated emissions are shown in Table 3-8, below.

Table 3-8 Estimated Project GHG Emissions

Emission Source	**GHG Emissions (MT CO_{2e}/yr)**
Construction	
Total	1896
Construction (amortized over 30 years)	63
Operations	
Area	0
Energy (natural gas and electricity)	45
Mobile (off-road/on-road vehicles)	9
Waste	135
Water	62
Emergency Generator Testing	8
Total Operations	259
Total Estimated Emissions (MT/yr)	322
GHG Threshold	10,000
Source: SBCWD 2014	

The annual GHG emissions associated with operation of the proposed project were estimated to be approximately 259 MT CO_{2e}/year. Combined with the amortized construction emissions, the proposed project would result in approximately 322 MT CO_{2e}/year, which would be well below the 10,000 MT CO_{2e}/year threshold adopted by SBCWD.

Cumulative Impacts
GHG by their nature are global and cumulative in effect. While this project would add to the global inventory of GHG, its contribution would be so minor in the context of overall climatic trends that it can be discounted.

3.10 Noise

3.10.1 Affected Environment

Existing ambient noise levels were measured at four different locations. The locations were selected to represent typical noise levels at existing residential uses, and were conducted over 15 minutes during daytime hours. The results are shown in Table 3-9.

Table 3-9 Summary of Ambient Noise Level Measurements

Site	Description	Measured L_{eq}, dB
1	2860 Ty Road (County)	37
2	1090 Riverside Road (County)	39
3	1560 Nash Road (County)	56
4	1035 Nash Road (City)	64

Source: SBCWD 2014
L_{eq} represents an average of noise levels recorded over the measuring period.

Nighttime ambient noise level measurements were not recorded for this project; however, existing nighttime noise levels in the project vicinity are expected to be as much as 10 decibels (dB) less than daytime measurements due to decreased traffic, as well as reduced agricultural, construction, and community activity. Primary noise sources associated with the ambient noise environments included local and distant roadway traffic, distant aircraft traffic, distant construction and industrial operations, distant agricultural operations, community activities, and natural sources (e.g., birds, insects, wind). The dominant source of noise near the east end of the project in the City of Hollister is traffic on Nash Road.

The General Plans adopted by San Benito County and the City of Hollister place limitations on noise levels in developed areas, both during construction and as a result of long-term operations. Permitted noise levels vary with time of day and surrounding land use. In general, noise limits are lower in residential areas, at night, and for sources which operate over a longer period. Abatement measures such as work hour restrictions and source shielding are encouraged for noise sources located near sensitive land uses.

3.10.2 Environmental Consequences

No Action

If no action were taken, noise levels in the area would be unaffected. There would be no construction noise, nor would there be any long-term noise from treatment plant operations.

Proposed Action

Noise impacts from the Proposed Action would be in two areas: temporary, construction-related noise; and long-term noise from daily operation of the proposed facilities. The results of SBCWD's modeling were analyzed in Section 3-11 of the draft EIR (SBCWD 2014) and are summarized below.

Construction Noise
Project construction, daily project operation, and project traffic increases on local area roadways would temporarily increase noise levels in the project vicinity. Unmitigated, this noise exposure could exceed applicable County of San Benito and City of Hollister noise exposure criteria.

Many residential properties adjacent to both the proposed raw water pipeline and treated water pipeline are expected to be within 50 feet of construction equipment. Assuming typical operations of an excavator, front-end loader, and material haul truck at any given location along the project pipeline, noise levels could temporarily exceed the City and County's exposure limit. However, pipeline installation within paved roads would be limited to the hours of 8:30 a.m. and 4:30 p.m., which would reduce the inconvenience and annoyance caused by the temporary increase in noise.

Operations Noise
The main sources of noise from operations at the WTP would be from the reclaim pump station, an air scouring system located in the vicinity of the filter effluent, and one water pump located at the backwash pump station. The proposed raw water pump station would be located on the east side of Union Road, southwest of the proposed WTP, and would include the operation of three water pumps. Based on modeling of the noise propagation, unmitigated noise exposure from operation of the proposed WTP and raw water pump station equipment is expected to exceed San Benito County's permitted nighttime ambient noise levels. In order to reduce impacts, noise barriers would be constructed along the north and east sides of the water treatment plant air scouring system and backwash pump station, respectively. Additionally, a permanent barrier would be constructed along the east side of the raw water pump station.

Peak traffic to and from the treatment plant following construction is expected to be approximately 10 vehicles per hour, at the beginning and end of the work day. This low volume of traffic is not expected to affect ambient noise levels at nearby noise-sensitive receivers.

Cumulative Impacts

Construction-Related Cumulative Noise
The nearest planned construction project is the proposed Rodriguez Union Road subdivision, to the south of the proposed treatment plant site. Noise from the construction of the subdivision is likely to be similar to noise produced by construction of the proposed treatment plant and pipelines. The schedule for subdivision construction has not been established, but it is possible that the construction schedules for the two actions would overlap. Both projects would be subject to the same requirements for noise mitigation such as work hour restrictions and maintaining equipment in good working condition. With appropriate mitigation measures the net effect should not be unreasonable or unusual for such temporary sources of noise.

Operations-Related Cumulative Noise
Once constructed, the Rodriguez Union Road subdivision described above is not expected to generate substantial long-term noise, and would not result in a cumulative noise effect. There are also additional road projects planned (Union Road Bridge and Hospital Road Bridge) which

could result in a localized increase in traffic noise, but they are located over a mile from the project site. Therefore cumulative impacts are not expected.

3.11 Traffic

3.11.1 Affected Environment

Road Characteristics
State Route 25 extends northwesterly to southeasterly through the City of Hollister and transverses the entire length of San Benito County. Within the boundaries of the City of Hollister, the roadway is called Airline Highway, Tres Pinos Road, Nash Road, and San Benito Street, and connects U.S. Highway 101 to the north and the Pinnacles National Monument in southern San Benito County, and various neighborhoods and commercial areas in between.

State Route 156 is an east-west expressway that extends through portions of northern San Benito County and provides a connection between U.S. Highway 101 to San Juan Bautista, and bypasses the City of Hollister to the San Benito-Santa Clara County line and SR 152 to the north. Within the City of Hollister, local Business Route 156 is a rural highway from the SR 156 Bypass to San Felipe Road.

Union Road is an east-west roadway that extends from Calistoga Drive within the City of Hollister to SR 156 in unincorporated San Benito County. Union Road provides access to various regional roadways, including SR 25 (Airline Highway) and SR 156, and to various residential, agricultural, and open space areas along the roadway.

Richardson Road is a gravel access road which provides access to two residences east of the proposed West Hills WTP site, ranch facilities and vehicle storage at the base of the hill adjoining Union Road.

Riverside Road is a north-south, unstriped, paved two-lane roadway that extends north from Union Road, intersecting with Nash Road, and then continuing as a local-access-only road north of Nash Road. Riverside Road provides access to adjacent residences as well as agricultural uses and open space.

Nash Road is an east-west roadway that extends from Riverside Road (west of the City of Hollister boundary) to Rancho Drive (east of San Benito Street). Within the city limits, east of Cushman Street, the roadway becomes Tres Pinos Road and also becomes a four-lane roadway with a continuous two-way left-turn lane to Airline Highway. From San Benito Street to Airline Highway, the roadway is designated as SR 25.

Westside Boulevard is a north-south, paved two-lane roadway that extends from Westside Road (to the north) to Nash Road (to the south).

Transit Service
Near the project site, County Express lines operate along San Benito, Nash and Tres Pinos Roads as well as SR 25 (Airline Highway). There is no direct transit service to the proposed project site.

Facilities for Non-Motorized Travel
While there are no existing bicycle facilities located along roadways adjacent to the project site, there are existing bicycle facilities along roadways in proximity to the project site. Specifically, there are bicycle lanes along both sides of Tres Pinos Road, between Airline Highway and Memorial Drive; bicycle lanes along both sides of Union Road, from Airline Highway to Cerro Vista Road; and bicycle lanes along both sides of Westside Boulevard, from Buena Vista Road to Nash Road. There are also several bicycle facilities planned throughout San Benito County and the City of Hollister.

Pedestrian facilities in the area generally consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. Roadways located within the City of Hollister and in proximity to the project (i.e., Nash Road and Westside Boulevard) include raised, concrete sidewalks and pedestrian-level signage and crosswalks. The proposed WTP site itself is located around rural roadways with minimal development and pedestrian facilities.

Existing Traffic Conditions
Existing traffic conditions along roadways near the project site were analyzed based on current traffic counts. The average daily traffic (ADT) observed on nearby roadways were 4,600 vehicles on Nash Road, 3,600 vehicles on Westside Boulevard, and 8,000 vehicles on Union Road. Based on roadway classifications, congestion is considered to be acceptable as long as traffic volumes remain below 20,000 ADT on Union and Nash Roads and 8,000 ADT on Westside Boulevard. Since the measured traffic counts were below these thresholds, the roads are considered to be operating below capacity.

3.11.2 Environmental Consequences

No Action
If no action were taken, traffic patterns would be unaffected.

Proposed Action
The Proposed Action would involve work within and adjacent to roadways, with the potential to disrupt existing traffic patterns and increase hazards associated with large, slow-moving vehicles. Traffic impacts from the Proposed Action would take place in two major phases: during construction, and during full-time operation of the planned water treatment plant.

Construction Traffic
The proposed project would be phased throughout an approximate two-year construction period (early 2015 – late 2016). Construction of each portion of the proposed improvements would result in short-term, localized increases in the traffic volume. The number of construction-related vehicle trips would vary each day, depending on the type of project component, construction phase, planned activity, and material needs.

Construction of the WTP facility would be concentrated on-site, while construction of the proposed raw water and treated water pipelines would require construction workers and haul trucks to travel to multiple heading locations, as each section of pipeline would be worked on in succession by various crews. As one crew completes its stage in the process, the next crew would move into position to complete the next stage.

The estimated daily vehicle trips would represent less than one percent of existing traffic on regional roads (SBCWD 2014), and would not be expected to substantially inconvenience the traveling public. Construction traffic would be more noticeable on local two lane roads (e.g., Union Road, Nash Road, and Westside Boulevard), but the increased traffic volumes would remain at levels lower than the carrying capacity of those roads and would not exceed the congestion thresholds established by San Benito County.

Due to the existing 18-foot width of Riverside Road and 12-foot width of Richardson Road, installation of the planned treated water pipeline would result in the temporary closure of those roads during construction. Access along the roadways would only be permitted for construction vehicles, local residents, and emergency vehicles. Although local access would be provided throughout construction, short-term congestion events could limit accessibility and result in increased travel times.

Project construction could also temporarily impair access to alternative transportation facilities (public transit, bicycle, or pedestrian facilities), and could temporarily decrease the performance or safety of such facilities. Specifically, the temporary increase in traffic associated with construction-related vehicles (especially slow-moving trucks) accessing the project site via Nash Road and SR 25 (Airline Highway) could disrupt or cause the slowing of County Express transit vehicles along these roadways. The influx of haul trucks during construction period could also conflict with existing and planned bicycle facilities and users of such facilities.

The construction contractor would be required to prepare and implement a traffic control plan to reduce traffic impacts on the roadways at and near the work site, as well as to reduce potential traffic safety hazards and ensure adequate access for emergency responders. Development and implementation of this plan shall be coordinated with jurisdictional agencies (e.g., City of Hollister, San Benito County, Caltrans), as appropriate.

Operations Traffic

Operational activities at the proposed treatment plant would generate a small amount of new traffic. Most of this traffic is expected to be passenger automobiles, although deliveries and waste hauling would require larger trucks. This minor amount of traffic is not anticipated to meaningfully affect traffic patterns or challenge capacity on the area's road network.

Cumulative Impacts

There are several planned and proposed projects located within the vicinity of the project site. The construction timing of the majority of those additional projects has not been established, and therefore it is not known whether any or all of them would be under construction during construction of the proposed project. However several have defined, known schedules which are anticipated to coincide with the construction of the WTP. They are described below.

Union Road Bridge Project. This project involves the replacement of the existing Union Bridge over the San Benito River. The replacement bridge would be built adjacent to the existing bridge, located approximately two miles southeast of the project site. Construction of the replacement bridge project is scheduled to occur between June 2015 and October 2016. As such, construction-related activities and associated traffic from the Proposed Action could coincide with construction activities related to the replacement bridge project.

Hospital Road Bridge Project. This project involves a new bridge to be constructed over the San Benito River, at the Hospital Road crossing in the City of Hollister. The existing crossing is located approximately three miles southeast of the project site, and the new bridge is to be constructed between June 2014 and December 2016. Construction of this project could coincide with the construction of the proposed project, as construction traffic from both of these projects could utilize the same regional and local roadways (i.e., SR 25 and Union Road) to access each project site.

Lessalt Water Treatment Plant Upgrades. This project involves modifications to the existing treatment plant located in the City of Hollister. Construction traffic associated with the water treatment project is scheduled to occur between early 2014 and late 2014. As such, construction-related activities with the treatment plant could coincide with project-related construction traffic, as construction vehicles could utilize the same regional and local roadways in order to access each site (i.e., SR 25 and Nash Road).

New Ridgemark Pipeline. This project includes construction of a new underground pipeline which would extend from the existing Lessalt Water Treatment Plant and travel south to the Ridgemark service area in the City of Hollister. Construction of the pipeline is scheduled to take place between early-2014 and mid-2014, which could overlap with construction activities associated with the WTP project.

Roadways adjacent to and within the vicinity of the projects listed above could experience an increase in traffic volumes and reduced capacity as a result of these construction projects with overlapping schedules. While the effects of the additional construction vehicles are expected to be accommodated within the capacity of the roadways and intersections, the increased traffic volumes associated with the overlapping and concurrent projects could increase potential traffic hazards for vehicles, bicycles, and pedestrians on affected roadways during construction of each planned facility. Implementation of the mitigation measures described above, as well as coordination with between contractors and local jurisdictions, is expected to adequately address the potential for cumulative traffic impacts.

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Section 4 Consultation and Coordination

4.1 Public Review Period

Reclamation intends to provide the public with an opportunity to comment on the Draft Finding of No Significant Impact and Draft EA for thirty days.

4.2 Endangered Species Act (16 U.S.C. § 1531 et seq.)

Section 7 of the Endangered Species Act requires Federal agencies, in consultation with the Secretary of the Interior and/or Commerce, to ensure that their actions do not jeopardize the continued existence of endangered or threatened species, or result in the destruction or adverse modification of the critical habitat of these species.

Reclamation has determined the Proposed Action may affect, but is not likely to adversely affect the California red-legged frog, California tiger salamander, and the San Joaquin kit fox. Reclamation will initiate consultation with USFWS pursuant to section 7 of the Endangered Species Act. This EA will not be finalized until consultation is complete.

No anadromous fish species or their critical habitat occurs in the affected area; therefore, no consultation with the National Marine Fisheries Service is needed.

4.3 Migratory Bird Treaty Act (16 U.S.C. § 703 et seq.)

The Migratory Bird Treaty Act implements various treaties and conventions between the United States and Canada, Japan, Mexico and the former Soviet Union for the protection of migratory birds. Unless permitted by regulations, the Act provides that it is unlawful to pursue, hunt, take, capture or kill; attempt to take, capture or kill; possess, offer to or sell, barter, purchase, deliver or cause to be shipped, exported, imported, transported, carried or received any migratory bird, part, nest, egg or product, manufactured or not. Subject to limitations in the Act, the Secretary of the Interior may adopt regulations determining the extent to which, if at all, hunting, taking, capturing, killing, possessing, selling, purchasing, shipping, transporting or exporting of any migratory bird, part, nest or egg will be allowed, having regard for temperature zones, distribution, abundance, economic value, breeding habits and migratory flight patterns.

Potential impacts to burrowing owls would be avoided and or minimized by implementing the environmental protection measures. Therefore, there would be no take to birds protected under the Migratory Bird Treaty Act.

4.4 National Historic Preservation Act (16 U.S.C. § 470 et seq.)

The NHPA of 1966, as amended (16 U.S.C. 470 et seq.), requires that federal agencies give the Advisory Council on Historic Preservation an opportunity to comment on the effects of an

undertaking on historic properties, properties that are eligible for inclusion in the National Register. The 36 CFR Part 800 regulations implement Section 106 of the NHPA.

Section 106 of the NHPA requires federal agencies to consider the effects of federal undertakings on historic properties, properties determined eligible for inclusion in the National Register. Compliance with Section 106 follows a series of steps that are designed to identify interested parties, determine the APE, conduct cultural resource inventories, determine if historic properties are present within the APE, and assess effects on any identified historic properties.

The Proposed Action has the potential to affect cultural resources. Therefore the State Historic Preservation Officer will be offered an opportunity to comment on the impacts of the Proposed Action.

Section 5 Preparers and Reviewers

Bureau of Reclamation
Ben Lawrence, Natural Resources Specialist, SCCAO-412
Michael Inthavong, Natural Resources Specialist- Reviewer
Jennifer Lewis, Wildlife Biologist, SCCAO-422
Mark Carper, Archaeologist, MP-153
Patricia Rivera, Native American Affairs Specialist, MP-400

San Benito County Water District
Dale Rosskamp, Reviewer

Section 6 References

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Appendix A Indian Trust Assets Determination

Appendix B Cultural Resources Report Executive Summary

Appendix A Indian Trust Assets Determination

Lawrence, Benjamin <blawrence@usbr.gov>

SCCAO EA 12-096, West Hills Water Treatment Plant- ITA Determination Request

RIVERA, PATRICIA <privera@usbr.gov> Mon, Jul 22, 2013 at 1:12 PM
To: Benjamin Lawrence <blawrence@usbr.gov>

Ben,

I reviewed the proposed action to approve the San Benito County Water District's proposal to construct a new drinking water treatment plant to serve the city of Hollister. The new facilities would start at the Hollister Conduit at the intersection of Union Road and Richardson Road in San Benito County.

A new pumping station and raw water pipeline would deliver water up Richardson Road from the Conduit to the proposed treatment plant site. The treatment plant facility would consist of the treatment equipment itself (pretreatment, filtration, chemical dosing and solids handling), an administration/operations building, and a treated water storage tank. A second new pipeline would be used to deliver treated water down a private easement to Riverside Road and then to Nash Road, where it would connect to the existing distribution system.

The proposed action does not have a potential to impact Indian Trust Assets. The nearest ITA is a Public Domain Allotment approximately 10 miles South of the project location.

Patricia Rivera
Native American Affairs Program Manager
US Bureau of Reclamation
Mid-Pacific Region
2800 Sacramento, California 95825
(916) 978-5194

On Mon, Jul 22, 2013 at 12:25 PM, Seabrook, Kristi <kseabrook@usbr.gov> wrote:

> Hello Patricia,
>
> Here is the ITA Response;
>
> ITA Response
>
> CEC or EA Number: EA-12-096
> Project Name: West Hills Treatment Plant
> Requester: Ben Lawrence
>
> The nearest ITA is a PDA, approximately 9.9 miles South of the project location.
>
> Thank you,
>
> Kristi Seabrook
> [Quoted text hidden]
>
> --
> Kristi Seabrook

Appendix B Cultural Resources Report Executive Summary

EXECUTIVE SUMMARY

This cultural resources study has been prepared for the San Benito County Water District (SBCWD) West Hills Water Treatment Plant (West Hills WTP) Project (proposed project). The proposed project would improve drinking water quality, water supply reliability, and would serve to balance regional water resources in the Hollister Urban Area (HUA). The proposed project would serve the HUA, which includes the City of Hollister and adjacent unincorporated areas of San Benito County designated for urban development. SBCWD is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA).

Because the proposed project requires a federal permit, it constitutes an undertaking as defined by Section 301(7) of the National Historic Preservation Act of 1966 (NHPA), as amended, and thus requires compliance under Section 106. The U.S. Bureau of Reclamation (USBR) was identified as the lead federal agency. USBR will serve as the lead federal agency responsible for compliance with Section 106 of the NHPA.

The proposed project would be located in an unincorporated area of northern San Benito County, approximately 50 miles southeast of the City of San Jose and 40 miles east of Monterey Bay, just outside of the southwestern boundary of the City of Hollister in the hills north of Union Road. The proposed project is located in an un-sectioned portion of the San Justo Land Grant on the Hollister 7.5-minute USGS topographic quadrangle. The proposed project would be located primarily within the boundary of a vacant 14.7-acre parcel (Assessor's Parcel Number [APN] 21-06-06) and within existing roadways.

The proposed project includes the construction of four main components: (1) the West Hills WTP and associated facilities; (2) raw water pump station; (3) raw water pipeline; and (4) treated water pipeline. The West Hills WTP would be comprised of treatment facilities, solids handling facilities (including wash water basins and drying beds), an administration and operations building with associated facilities, treated water storage tanks, as well as access road improvements. The West Hills WTP and associated facilities, as well as temporary staging, would be located within the boundaries of the 14.7-acre parcel. The staging area would encompass the proposed location for the drying beds. The proposed raw water pump station would be built adjacent to the Hollister Conduit on the northwest side of the intersection of Union Road and Richardson Road, located at the southwestern end of the raw water pipeline. The raw water pipeline would begin at the pump station and would travel northeast to the West Hills WTP within an existing easement. The treated water pipeline would be located in an existing easement on private property and within existing paved roadways.

For the purposes of compliance with Section 106 of the NHPA, a historic architectural/ archaeological Area of Potential Effects (APE), defined as the "geographic area or areas

within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties…" (36 CFR 800.16(d)), was established for the proposed project in coordination with USBR. For both historic architectural and archaeological resources, the horizontal APE encompasses the project footprint, including areas of permanent and temporary ground disturbance. The total acreage for the APE is 19.9 acres. The vertical APE for archaeological resources corresponds to the individual ground-disturbing project components and varies between 2 and 16 feet below present ground surface.

A records search for the proposed project was conducted on September 26, 2012, at the California Historical Resources Information System (CHRIS) Northwest Information Center (NWIC) housed at Sonoma State University in Rohnert Park, California. The records search indicated that a total of three cultural resources studies (S-17611, -22749, and -27148) have been conducted within a ½-mile radius of the APE. Of these three studies, two (S-17611 and -27148) included portions of the APE. Approximately 90 percent of the APE has been previously surveyed. No archaeological resources have been previously identified within a ½-mile radius of the APE or within the APE itself. No historic built resources have been previously identified within or adjacent to the APE.

A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) on October 16, 2012. The SLF search results prepared by the NAHC on October 17, 2012, indicated that no Native American resources were identified in or within a ½-mile radius of the APE. The closest site identified by the NAHC SLF search is in Township 12 South, Range 5 East of the Hollister 7.5-minute USGS topographic quadrangle, which is about 3 miles from the APE. Contact letters were sent on October 19, 2012 to all individuals and groups indicated by the NAHC as having affiliation with the general project vicinity. Recipients were requested to reply with any information they are able to share about Native American resources that might be affected by the proposed project. To date, no responses have been received.

Cultural resources surveys for the proposed project were conducted on October 8, 2012 by Candace Ehringer, M.A., R.P.A., and Jennifer Bowden, and by Ms. Ehringer on May 4, 2013 to identify the presence of surface archaeological materials and historic built resources within the APE. Approximately 98 percent of the APE was accessible. Ground visibility ranged from 0 to 50 percent across the APE. No cultural resources were identified within the APE.

Geoarchaeological review of the APE was conducted by Chris Lockwood, Ph.D., R.P.A. The APE was divided into an Upland area and Lowland area to facilitate discussion. The Upland area begins at the intersection of Union Road and Richardson Road, and encompasses the raw water pump station, raw water pipeline, West Hills WTP, and the treated water pipeline west of Riverside Road. The Lowland area begins along the treated water pipeline at Riverside Road, extends across the San Benito River, and ends at the intersection of Nash Road and Line Street in Hollister. Dr. Lockwood concluded that due to the absence of natural deposition processes, any archaeological resources in the Upland area dating from the Late Pleistocene/Holocene may not have been buried quickly or deeply enough to have been preserved, and therefore the Upland area contains a very low potential for buried archaeological resources. Although the Lowland area has the potential for Holocene archeological resources, this area has been subject to fluvial erosion, agriculture, and urbanization, which may have previously disturbed or destroyed archaeological

resources, particularly those at shallow depths. The Lowland area therefore has a low likelihood of containing intact archaeological resources.

No known archaeological or historic built resources were identified within the APE as a result of this study and direct impacts to historical resources or unique archaeological resources pursuant to CEQA, or adverse effects to historic properties pursuant to Section 106 of the NHPA, are not anticipated as a result of the proposed project. Indirect impacts to historic built resources adjacent to the APE (within 50 feet) are not anticipated given the nature of the proposed project. While the West Hills WTP facilities and the raw water pump station include facilities that will be constructed above ground and have the potential to introduce a new visual element that could negatively affect adjacent historic built resources, no historic built resources were identified adjacent to either the West Hills WTP or the raw water pump station. The remainder of the proposed project consists of below-ground pipelines that would not affect adjacent historic built resources.

However, impacts to unknown archaeological resources that could qualify as historical resources or unique archaeological resources under CEQA, or adverse effects to historic properties under Section 106 of the NHPA, could occur as a result of project-related ground-disturbing activities. Surface visibility during the survey was low in most areas and it is possible that archaeological materials could be buried or otherwise obscured. There is potential for buried prehistoric archaeological resources within the APE given the close proximity of the proposed project to water sources, including Pleistocene Lake San Benito, the San Benito River, and a relict lake/pond (vernal pool), which would have been attractive resource procurement areas to early inhabitants of the region. There is also potential for buried historic-period archaeological resources within the APE.

Recommendations for the proposed project include: (1) survey of any and all areas added to the project after completion of this study; (2) pre-construction cultural resources sensitivity training prior to the commencement of ground-disturbing activities; and (3) cease work and evaluation procedures in the event of inadvertent discovery of cultural resources or human remains. In addition, in the event of discovery of cultural resources or human remains within the APE, SBCWD should immediately notify appropriate USBR staff.