

# RECLAMATION

*Managing Water in the West*

**Final Environmental Assessment**

## **West Hills Water Treatment Plant**

**EA-12-096**



**U.S. Department of the Interior  
Bureau of Reclamation**

**March 2015**

## **Mission Statements**

The mission of the Department of the Interior is to protect and manage the Nation's natural resources and cultural heritage; provide scientific and other information about those resources; and honor its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated 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

The Bureau of Reclamation (Reclamation) provided the public with an opportunity to comment on the draft Environmental Assessment (EA) and draft Finding of No Significant Impact between March 10, 2014 and April 9, 2014. No comments were received. Changes from the draft EA that are not minor editorial changes are indicated by vertical lines in the left margin of this document.

## 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 currently use a combination of groundwater and imported Central Valley Project (CVP) surface water. Although treated drinking water in the Hollister Urbanized Area meets all primary federal and state drinking water standards, high total dissolved solids 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 Hollister Urbanized Area. 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 located west of the Hollister Urbanized Area to receive their contracted CVP water at a new point of delivery, from the Hollister Conduit (Conduit), a federal facility. The imported raw water would be treated at the plant and delivered to the existing distribution infrastructure in western Hollister. Permission is needed from Reclamation to tap into the Conduit to receive their CVP water for use by the treatment plant.

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

## 1.2 Need for the Proposed Action

There is a need to improve the reliability and quality of water delivered to residents of the western portion of the Hollister Urbanized Area. The purpose of the Proposed Action is to provide a new point of delivery for San Benito County Water District's CVP water, to serve a new water treatment plant.

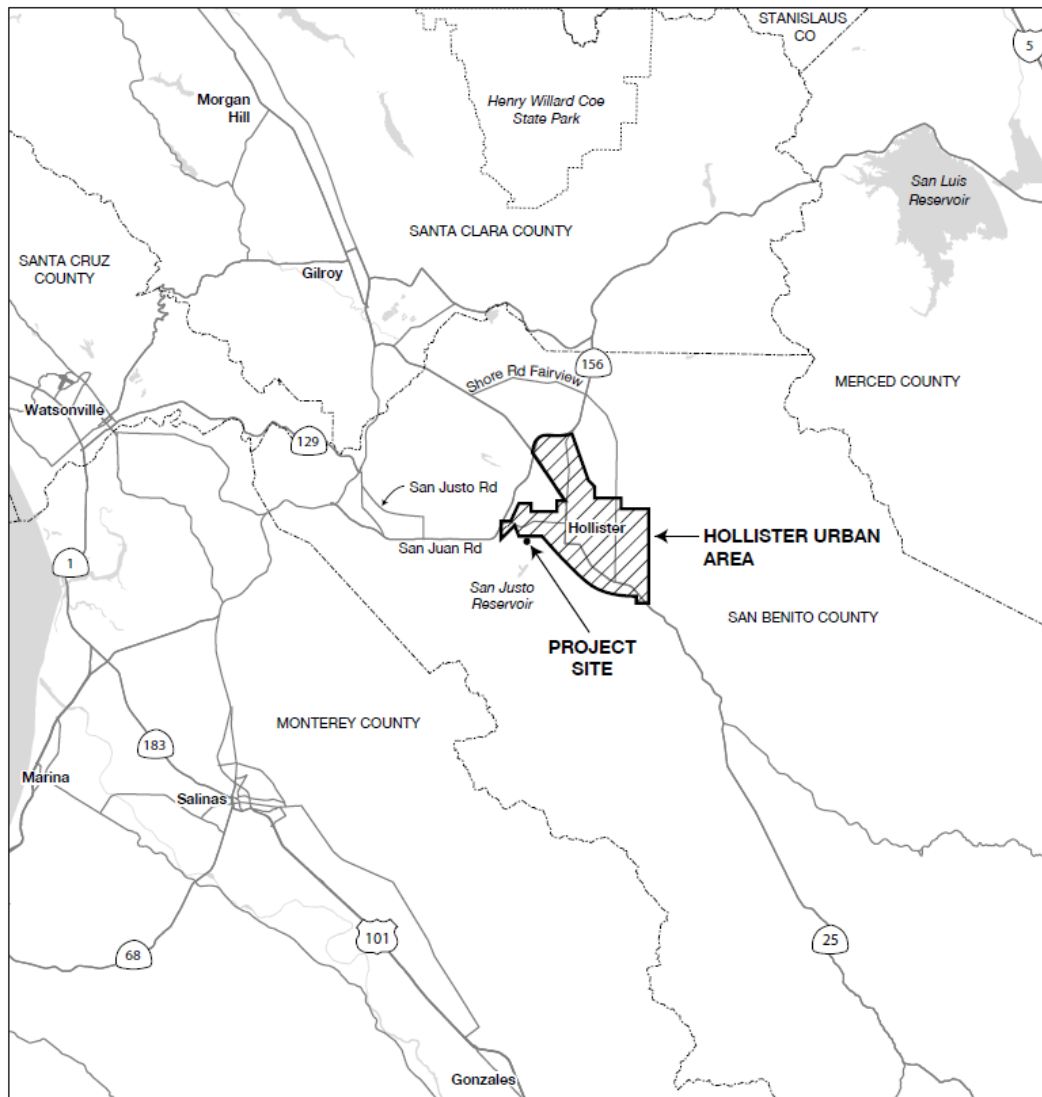


Figure 1-1 Proposed Action Area  
(San Benito County Water District 2014)

### **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 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, San Benito County Water District and Sunnyslope County Water District. 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
- Indian Trust Assets
- Socioeconomic Resources
- Environmental Justice
- Air Quality
- Global Climate
- Noise
- Traffic

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## **Section 2 Alternatives Including the Proposed Action**

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 water treatment plant 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 Hollister Urbanized Area. Without improvements in source water, opportunities for reuse of reclaimed water downstream would be limited.

### **2.2 Proposed Action**

Reclamation proposes to authorize San Benito County Water District to make a connection to the Conduit (at the San Juan Lateral) for the purpose of delivering their CVP water allocation to a proposed new water treatment plant. This would involve issuing a Mid-Pacific Region-specific permit (MP-620) for modification of federal facilities, as well as an authorization to add a new point of delivery for CVP water. As described in Chapter 2 of the Environmental Impact Report (San Benito County Water District 2014), the main components of the Proposed Action include construction and operation of a raw water pump station, the West Hills water treatment plant itself, and raw and treated water transmission pipelines. Preliminary design drawings of the West Hills water treatment plant, 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 water treatment plant via a new pipeline from the Conduit, which follows Union Road southwest of the site. To lift the water to the water treatment plant, a pump station would be built adjacent to Reclamation's 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 water treatment plant. The pipeline would be installed within Richardson Road at a depth of approximately 4 feet.

## **Water Treatment Plant**

The water treatment plant 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 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. Powdered Activated Carbon 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, powdered activated carbon, 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-walled 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 as a separate project, a fourth drying bed would be added.

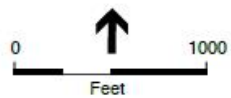
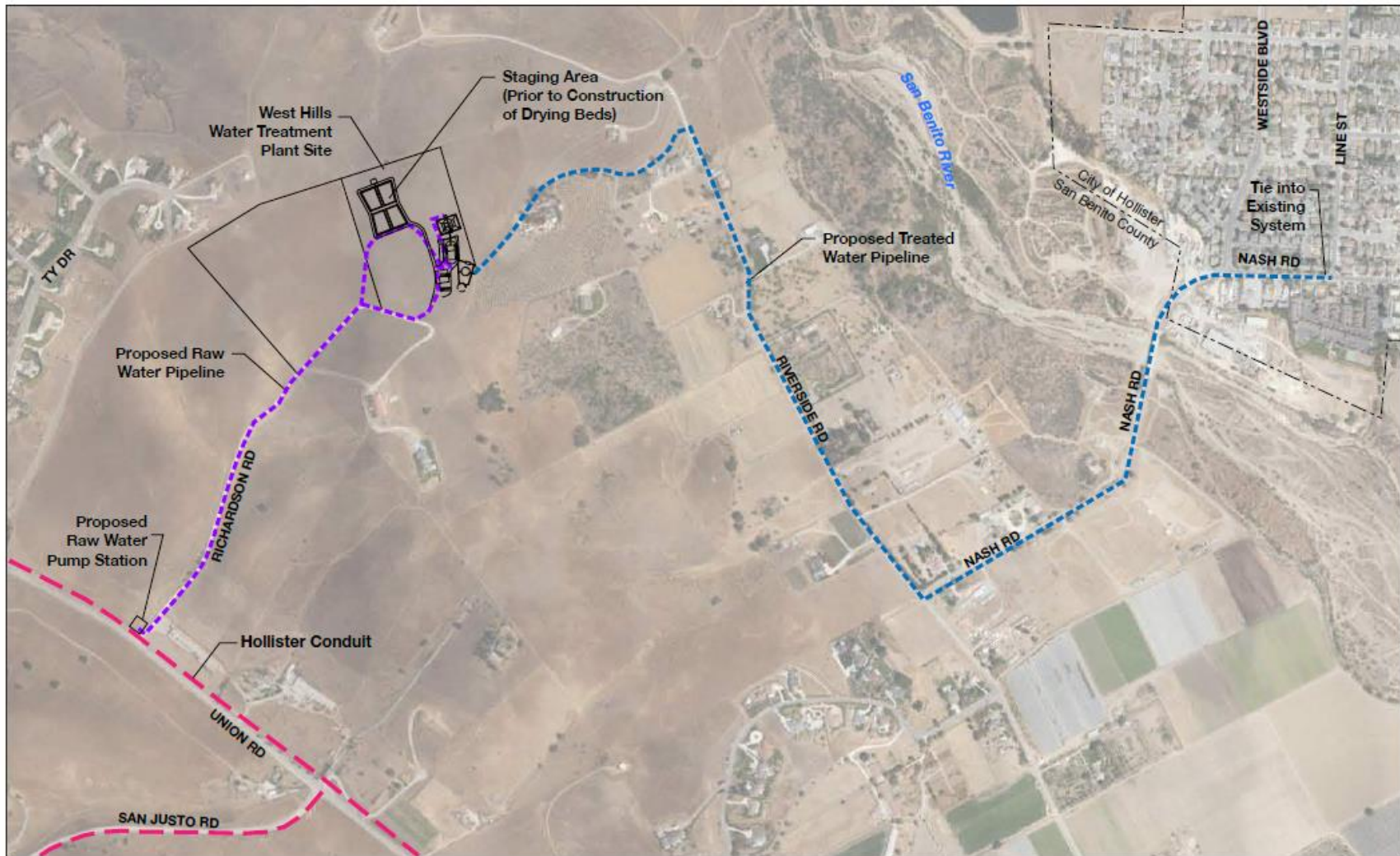


Figure 2-1 Conceptual Proposed Improvements  
(San Benito County Water District 2014)

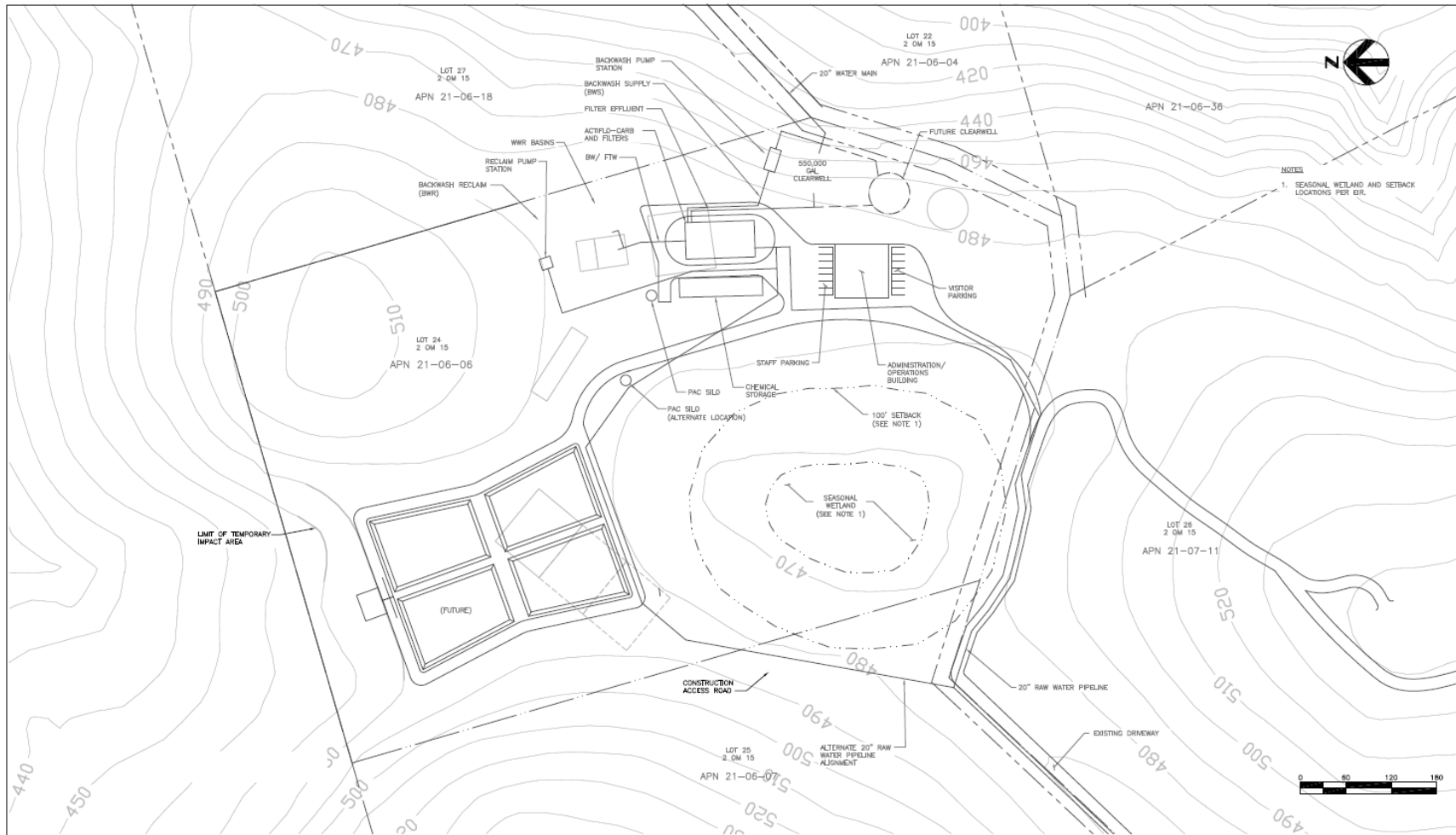


Figure 2-2 Proposed Water Treatment Plant Layout  
(San Benito County Water District 2014)

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 water treatment plant 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 (see Figure 2-2).

### **Access Improvements**

Access to the water treatment plant would be by way of Union Road and Richardson Road. Richardson Road provides access to two residences east of the proposed West Hills water treatment plant site, ranch facilities and vehicle storage at the base of the hill adjoining Union Road. San Benito County Water District 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 Hollister Urbanized Area, 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**

San Benito County Water District must implement the following environmental protection measures to avoid and/or reduce environmental consequences associated with the Proposed Action (Table 2-1) as well as all measures and terms and conditions included in the associated Section 7 Endangered Species Act compliance document (see Appendix C). Environmental consequences for resource areas assume the measures specified would be fully implemented. Copies of all environmental compliance reports will be submitted to Reclamation.

Table 2-1 Environmental Protection Measures and Commitments

<b>Resource</b>	<b>Protection Measure</b>
Water	A site drainage plan shall be prepared and incorporated into the final construction plans.
Water and Biological Resources	A Storm Water Pollution Prevention Plan shall be prepared to limit erosion impacts from construction.
Air Quality	Fugitive dust shall be controlled as required by local air quality regulations.
Noise	Pipeline installation within paved roads will be limited to the hours of 8:30 a.m. and 4:30 p.m.
Noise	Noise barriers will 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 will be constructed along the east side of the raw water pump station.
Traffic	The construction contractor shall prepare a transportation management plan in coordination with San Benito County and the City in order to mitigate traffic disruptions.
Biological Resources	A U.S. Fish and Wildlife Service (USFWS)-approved biologist will conduct preconstruction burrow inspections to identify California tiger salamanders and California red-legged frogs in underground burrows. The name(s) and credential(s) of the biologist(s) will be submitted to the USFWS at least 30 days prior to the commencement of work.

Resource	Protection Measure
Biological Resources	<p>All animal burrows occurring within the proposed exclusion fence area will be visually scoped and hand excavated by the USFWS-approved biologist.</p> <ol style="list-style-type: none"> <li>The first burrow inspection will occur after survey stakes are installed to identify the location of exclusion fencing, and before any other activity in the proposed work area.</li> <li>The second burrow inspection will occur after installation of the exclusion fence.</li> </ol>
Biological Resources	<p>If substantial rainfall (&gt; 0.5 inch of rain in a 24-hour period) occurs, work activities must cease until the USFWS-approved biologist has surveyed the work area for dispersing frogs and/or salamanders. Work activities will resume once the USFWS-approved biologist has determined that California red-legged frogs and/or California tiger salamanders that are likely to be killed or injured by work activities are no longer present in the work site.</p>
Biological Resources	<p>A USFWS-approved biologist will train an on-site biological monitor to oversee work areas for the duration of the project.</p> <ol style="list-style-type: none"> <li>The biological monitor will ensure project compliance with wildlife protective measures.</li> <li>The biological monitor will be able to identify California tiger salamander and California red-legged frog, as well as San Joaquin kit fox and their burrows.</li> <li>If at any time California tiger salamander or California red-legged frog occupancy is identified in the Proposed Action Area, the biological monitor will immediately notify San Benito County Water District. San Benito County Water District will halt localized work activities with potential to affect the species, and San Benito County Water District or the biological monitor will contact the USFWS and Reclamation. The individual animal/s will then be managed according to the provisions of the USFWS-approved Capture, Storage, and Release/Relocation Plan and project permits, and the USFWS-approved biologist will perform any capture or relocation.</li> </ol>
Biological Resources	<p>The work area will be delineated by installing amphibian exclusion fencing around the perimeter of the Proposed Action Area.</p> <ol style="list-style-type: none"> <li>Preconstruction surveys will be conducted before exclusion fences are installed around work areas.</li> <li>The perimeter fence will be constructed according to USFWS recommendations, consisting of 5-foot tall, 0.25-inch wire mesh keyed 6 inches into the ground with one-way amphibian doors installed every 100 feet of fenceline to provide egress opportunities.</li> <li>Installation of exclusion fencing will be completed prior to any other activities.</li> <li>The biological monitor will monitor the work area for sensitive species as the perimeter exclusion fence is installed. Trenching for fence installation will be immediately preceded by a visual inspection of the area by the biological monitor.</li> <li>The exclusion fence will remain in place until construction is completed and hydroseeding of temporarily-disturbed grasslands is complete.</li> <li>The USFWS-approved biologist will ensure that the exclusion fence is constructed in such a manner as to lead the animals to an area of suitable habitat that is not near project activities or a road.</li> </ol>
Biological Resources	<p>If a California tiger salamander or California red-legged frog is found within the Proposed Action Area and is in harm's way, a USFWS-approved biologist will capture and relocate them from the work area in</p>

Resource	Protection Measure
	accordance with the Capture, Storage, and Release/Relocation Plan. The Capture, Storage, and Release/Relocation Plan will be submitted to the USFWS for approval at least 10 days prior to the onset of work.
Biological Resources	A USFWS-approved biologist will conduct preconstruction den inspections for San Joaquin kit fox within 200 feet of work areas no more than 14 days before work begins. The name(s) and credential(s) of the biologist(s) will be submitted to the USFWS at least 30 days prior to the proposed commencement of work.
Biological Resources	All identified potential dens will be monitored for evidence of San Joaquin kit fox use by placing an inert tracking medium at den entrances and monitoring for at least 3 consecutive nights.
Biological Resources	For San Joaquin kit fox dens that occur within the construction footprint, if no activity is detected at these den sites, they will be closed following guidance established in the 2011 <i>U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance</i> (USFWS 2011). <ul style="list-style-type: none"> <li>a. No active kit fox dens will be destroyed.</li> <li>b. Potential dens (that have been determined to not be in use by the methods described above) in proximity to the construction area, but are outside the construction footprint, may be covered with plywood to prevent use.</li> </ul>
Biological Resources	To prevent accidental entrapment of San Joaquin kit fox or other animals during construction, all excavated holes or trenches greater than 2 feet deep will either be suitably covered at the end of each work day, fenced, or escape routes constructed of earthen materials or wooden planks. Before filling, such holes will be thoroughly inspected for trapped animals.
Biological Resources	If at any time San Joaquin kit fox individuals or den occupancy is identified in the Proposed Action Area, the biological monitor shall have authority to halt work and will immediately notify San Benito County Water District or its contractor to halt work within 200 feet of the den or San Joaquin kit fox. San Benito County Water District or the biological monitor will immediately contact the USFWS and Reclamation.
Biological Resources	Prior to the start of daily activities, the biological monitor will inspect the work area and the exclusion fenceline for amphibians and reptiles, and will relocate any non-listed amphibians outside of the active work area. Only a USFWS-approved biologist will capture and relocate California tiger salamanders and California red-legged frogs and all such activities will be conducted according to the USFWS-approved Capture, Storage, and Release/Relocation Plan.
Biological Resources	Construction related activities, vehicle operation, material and equipment storage, and other ground-surface disturbing activities will be restricted to the limits of work identified in construction plans.
Biological Resources	A USFWS-approved biologist will conduct a training session for all on-site personnel. At a minimum, the training will include a description of California tiger salamander, California red-legged frog, and San Joaquin kit fox and their habitat; the importance of these species and their habitat; the general measures that are being implemented to conserve them as they relate to the activity; and the boundaries within which the work will occur.
Biological Resources	If work requires on-site personnel and equipment to encroach within 100 feet of the San Benito River, all personnel will limit the number of access routes and the total area of activity to the minimum necessary to achieve the goal. All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 65 feet from the San Benito River.
Biological Resources	All food-related trash items (e.g., wrappers, cans, bottles, and food



Resource	Protection Measure
	scraps) will be disposed of in closed containers and removed daily from the work area. After completion of the work, San Benito County Water District or its contractor will remove all trash and construction debris from work area.
Biological Resources	Vehicles will observe a maximum 20 miles per hour daytime speed limit. Nighttime vehicle traffic will be kept to a minimum. Off-road traffic outside the designated work area is prohibited.
Biological Resources	The USFWS, Reclamation, and California Department of Fish and Wildlife (CDFW) will be notified immediately in the case of a dead or injured California tiger salamander, California red-legged frog, or San Joaquin kit fox. If bodily harm to a California tiger salamander or California red-legged frog occurs during implementation of the Proposed Action, injured specimens will be transported to the nearest cooperating wildlife rehabilitation center; dead individuals will be deposited with the Museum of Vertebrate Zoology at Berkeley, the California Academy of Sciences, or as directed by the USFWS.
Biological Resources	All pipes with a diameter of 1 inch or greater will be capped, plugged, taped, or otherwise covered at both ends. Tubular structures with a diameter of 1 inch or greater (such as rolls of fencing) and chamber-like structures (such as culvert or vaults) with an opening that is 1 inch or greater will also be covered at entrances. Pipes greater than 1 inch in diameter will be capped upon delivery immediately after unloading. Capping or plugging will remain in place until installation is imminent.
Biological Resources	Any pipe left open overnight must be inspected by the biological monitor prior to being handled. If a California tiger salamander or California red-legged frog is discovered inside a pipe, the pipe will remain undisturbed until the USFWS approved biologist relocates the species outside the construction area. If a San Joaquin kit fox is discovered inside a pipe, the pipe will not be handled until the USFWS has been consulted. If a San Joaquin kit fox, construction personnel, or project equipment is at immediate risk of injury, the pipe may be moved once to remove it from the path of activity, until the fox has escaped; if this occurs, it must be under direct supervision of the USFWS-approved biologist and the USFWS must be contacted immediately.
Biological Resources	Maintenance actions (such as mowing) will not impact surrounding grassland habitat during regular facility operations.
Biological Resources	The San Benito County Water District proposes to install temporary amphibian exclusion fencing around the water treatment plant entrance road and main facility.
Biological Resources	The San Benito County Water District proposes to direct bio-filtered stormwater runoff to the relict seasonal wetland through an approximately 100-foot vegetated buffer.
Biological Resources	Any maintenance activities within the relict wetland will be restricted to the dry season or when no water is present, and be limited to activities that are designed to preserve the health and function of the wetland for sensitive or rare species. Except for the maintenance activities described in this measure, the relict wetland shall be off-limits to all persons. No one will be allowed to enter the wetland when there is standing water.
Biological Resources	During the rainy season, the San Benito County Water District will restrict periodic large-truck deliveries to the construction site to daytime hours between 1 hour after sunrise and 1 hour before sunset.
Biological Resources	The San Benito County Water District will use downward-directed lighting to minimize the effects of nighttime lighting on wildlife.
Biological Resources	San Benito County Water District proposes habitat compensation for the temporary and permanent loss of special-status species habitat from a CDFW-approved conservation bank.
Biological Resources	No sooner than 30 days prior to construction mobilization, a qualified biologist shall conduct a preconstruction nesting bird survey of the proposed West Hills water treatment plant site, pipeline alignments,

Resource	Protection Measure
	and all staging areas and haul routes. The biologist shall survey linear features in segments as construction becomes imminent. If nesting birds are identified, the biologist 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 shall be conducted in areas supporting potentially suitable habitat within 30 days prior to the start of project construction according to the 2012 <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012).
Biological Resources	All protection measures outlined in the Biological Opinion (see Appendix C) shall be followed.

## 2.3 Other Alternatives Considered

In addition to the two alternatives (the No Action Alternative, and the Proposed Action) which are fully evaluated in this EA, two sets of alternative locations (north and south) and one design variation were assessed by San Benito County Water District in the Environmental Impact Report. These additional alternatives are described below, along with the reasons that they were considered but not carried forward for further study.

### 2.3.1 North Site Alternatives

Two sites in the northern portion of the Hollister Urbanized Area were considered during the water treatment plant 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 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 Conduit to the new water treatment plant, a distance of approximately 2 miles. A pump station would also be required at the water treatment plant site and a new treated water pipeline would connect the water treatment plant 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 water treatment plant site would include a connection to the Conduit for raw water supply, a pump station, and a new treated water pipeline that would connect the water treatment plant 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, simplifying design and construction.

### **2.3.2 South Site Alternatives**

During the site selection process, two different southern water treatment plant 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 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 Conduit to the water treatment plant 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 powdered activated carbon 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. No final determination has been made whether this variation will be adopted. Environmental impacts for this alternative would be similar to the Proposed Action; therefore no separate, difference in impacts is anticipated and no additional analysis was required.

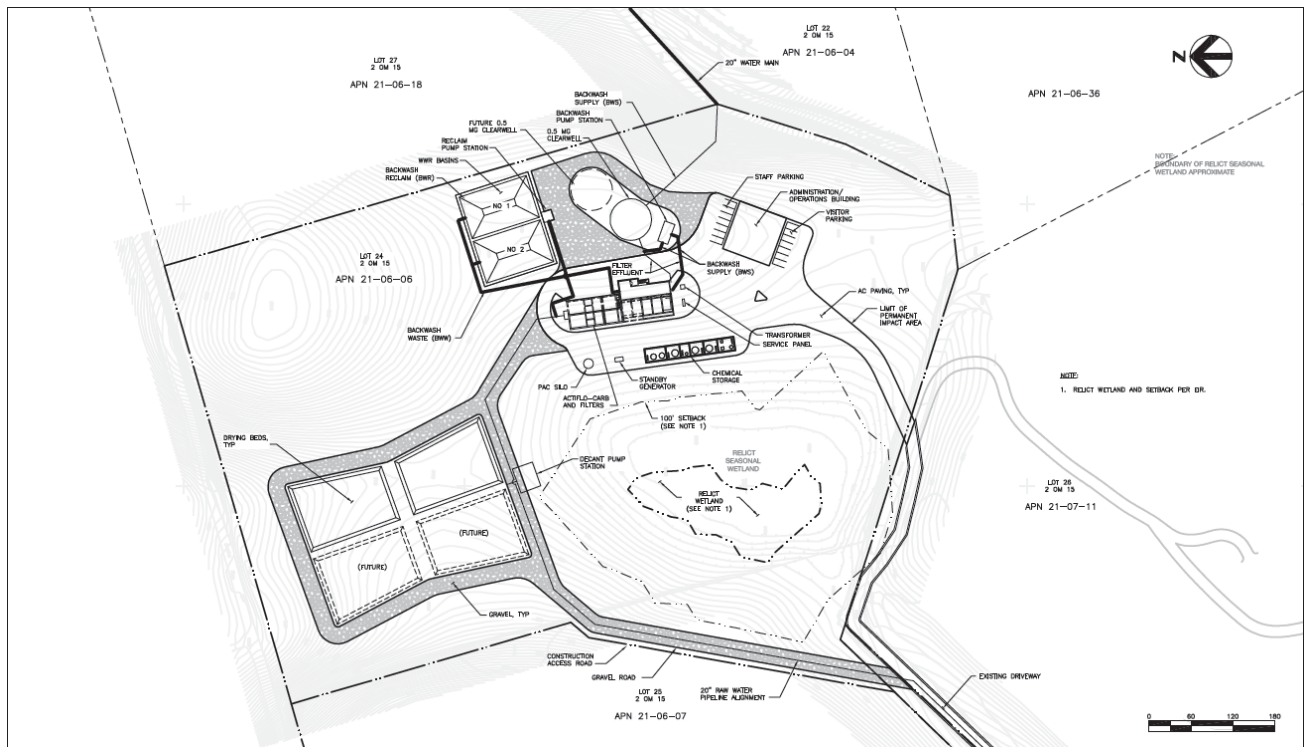


Figure 2-3 Alternative Site Layout  
(San Benito County Water District 2014)

## 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	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.
Indian Sacred Sites	The project does not have a potential to affect Indian Sacred Sites on federal lands, as there are none in the Proposed Action Area.

### 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 Hollister Urbanized Area. The San Benito River flows from southeast to northwest in the southern portion of the Hollister Urbanized Area 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 (San Benito County Water District 2011). Santa Ana Creek, an intermittent creek, flows southeast to northwest across the northern portion of the Hollister Urbanized Area 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 Conduit. Water from San Justo Reservoir is delivered to agricultural, municipal and

industrial customers within the Hollister Urbanized Area. 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 Hollister Urbanized Area, 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 from 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 and urbanization, 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 water treatment plant site is located on a saddle between hilltops with flat and gently sloping topography. No waterways are present within the project footprint that would be regulated as a water of the U.S. However, the isolated depression on the proposed water treatment plant 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 (San Benito County Water District 2014).

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 construction of the Hernandez Reservoir.

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. Total dissolved solids 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 total dissolved solids (San Benito County Water District 2011; HDR 2008).

Total hardness concentrations in groundwater range from 295 to 594 mg/L calcium carbonate. 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.

On July 1, 2014, the California Department of Drinking Water adopted new regulations for the regulation of hexavalent chromium (Cr6+) in drinking water. The City has performed water quality testing for Cr6+ on their existing groundwater supplies, and made the determination that new facilities or operational changes will be required to comply with the new Cr6+ regulations.

### ***CVP Water***

The West Hills water treatment plant would be supplied by water from the Conduit, which is a large diameter pipeline that conveys CVP water from San Luis Reservoir to San Benito County Water District. Imported CVP water generally has total dissolved solids 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 Hollister Urbanized Area 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 total dissolved solids, limiting the potential for reuse. Levels of Cr6+ in the City's drinking water would also continue to be elevated, requiring greater expenditures for system treatment improvements. Finally, continued use of this poorer quality source water makes it more difficult for the City's wastewater treatment plant to meet its effluent limits.

### ***Proposed Action***

Construction of the water treatment plant 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, 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 temporarily 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 General Construction Permit (Order 2009-0009-DWQ). The San Benito County Water District and/or the contractor would be required to prepare a Stormwater Pollution Prevention Plan, which would include relevant measures and conditions to reduce or eliminate the impacts of construction on stormwater and receiving water quality and quantity.

Short-term dewatering may be necessary to accommodate installation of the treated water pipeline, if groundwater infiltration in work areas adjacent to the San Benito River becomes a problem. Although dewatering could temporarily affect groundwater levels in the shallow groundwater zones, wells located in the Proposed Action Area generally pump groundwater from deeper aquifers and would not be affected. 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 water treatment plant 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 on the water treatment plant site.

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 any offsite water bodies.

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 water treatment plant 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 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 total dissolved solids concentrations than groundwater in the Hollister Urbanized Area, so increasing the proportion of the area's water supply



derived from surface sources would improve the quality of water delivered to users. It would also provide low-Cr6+ drinking water to the City's service area within the compliance timeframes being mandated by California Department of Drinking Water, reducing the need for other costly system improvements. Finally, improvement in the quality of the water supply would improve effluent quality from the wastewater treatment plants serving the same portion of the Hollister Urbanized Area.

### ***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 Action, 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 San Benito County Water District, the City, and Sunnyslope County Water District in 1993 for the purposes of constructing a water treatment plant. 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 water treatment plant 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, 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 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 Proposed Action 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 water treatment plant. The proposed alignment of the raw water pipeline and the West Hills water treatment plant 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 San Benito County and City would be more difficult to achieve without these benefits.

### ***Proposed Action***

Implementation of the West Hills water treatment plant 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 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 Action 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. 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 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 change 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 San Benito County Water District (Reclamation 2014). 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 existing 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 Proposed 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 Proposed Action Area, and in fields and roadsides along Riverside Road in the eastern Proposed Action 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 Proposed Action 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 2013a). 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 (USFWS 2013b). Reclamation further queried the CDFW's California Natural Diversity Database (CDFW 2014) for listed species within 10 miles of the Proposed 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 Proposed Action Area (Table 3-2).

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

Species	Status <sup>1</sup>	Effects <sup>2</sup>	Summary Basis for ESA Determination
<b>AMPHIBIANS</b>			
California red-legged frog ( <i>Rana draytonii</i> )	T, X	MAA	<b>Moderate species occurrence and habitat presence.</b> No confirmed breeding locations occur within 1.2 miles of the Proposed Action Area. In 2001, adults were reported from San Benito River approximately 1.4 miles downstream. Abundant small mammal burrows in and adjacent to the Proposed Action 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 ( <i>Ambystoma californiense</i> )	T	MAA	<b>Moderate species occurrence and habitat presence.</b> No confirmed breeding locations occur within 1.2 miles of the Proposed Action Area, but an adult was observed in 2006 at a seasonal wetland 0.4 miles south of the Proposed Action Area. Abundant small mammal burrows in and adjacent to the Proposed Action 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.
<b>BIRD</b>			
Burrowing owl ( <i>Athene cunicularia</i> )	MBTA	NE	<b>Foraging presence.</b> A feather and whitewash were observed within a burrow complex on the proposed water treatment plant 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 ( <i>Gymnogyps californianus</i> )	E	NE	<b>Absent.</b> Lack of suitable habitat in the Proposed Action Area.
Least Bell's vireo ( <i>Vireo bellii pusillus</i> )	E	NE	<b>Low nesting potential.</b> The area is outside the recognized breeding range for the species, but USFWS has documented infrequent nesting along the San Benito River (USFWS 2013a). Suitable habitat is present at the Nash Road bridge crossing. Nearest record is 12 miles north of the Proposed Action Area, along Llagas Creek. San Benito County shall implement environmental protective measures as described in Section 2.2.1.
Southwestern Willow flycatcher ( <i>Empidonax traillii extimus</i> )	E	NE	<b>Low nesting potential.</b> The area is outside the recognized breeding range for the species, but USFWS has documented infrequent nesting along the San Benito River (USFWS 2013a). 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.
<b>FISH</b>			
South-Central California Coast Steelhead ( <i>Oncorhynchus mykiss</i> )	T NMFS	NE	<b>Presumed seasonally present.</b> 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 Proposed Action Area at the river crossing. No natural waterways within the species' range will be affected by the Proposed Action.
<b>INVERTEBRATES</b>			
Vernal pool fairy shrimp ( <i>Branchinecta lynchi</i> )	T, X	NE	<b>Low presence potential.</b> Critical habitat absent but potential habitat in the 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 2013a).

<b>MAMMALS</b>			
Giant kangaroo rat ( <i>Dipodomys ingens</i> )	E	NE	<b>Absent.</b> Known from southeastern San Benito County, but nearest recorded occurrence is 43 miles southeast.
San Joaquin kit fox ( <i>Vulpes macrotis mutica</i> )	E	MAA	<b>Moderate foraging potential.</b> Most recent documentation in the area is from 1992. The project footprint and proposed West Hills water treatment plant 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 2.2.1.
<b>PLANTS</b>			
Marsh sandwort ( <i>Arenaria paludicola</i> )	E	NE	<b>Absent.</b> No records from San Benito County. Nearest reported occurrence is 46 miles northwest.
San Benito evening-primrose ( <i>Camissonia benitensis</i> )	T	NE	<b>Absent.</b> Habitat absent from the Proposed Action Area. Nearest reported occurrence is 54 miles south.
San Joaquin woolly-threads ( <i>Lembertia congdonii</i> )	E	NE	<b>Absent.</b> Habitat absent from the Proposed Action Area. Nearest reported occurrence is 55 miles south.
<b>REPTILES</b>			
Blunt-nosed leopard lizard ( <i>Gambelia silus</i> )	E	NE	<b>Absent.</b> A Central Valley species. Nearest reported occurrence is 31 miles east.
<sup>1</sup> Status= Listing of Federally special status species E: Listed as Endangered MBTA: Bird species protected under the Migratory Bird Treaty Act NMFS: species under the jurisdiction of the National Marine Fisheries Service T: Listed as Threatened X: Critical Habitat designated for this species <sup>2</sup> Effects = Effect determination MAA: Proposed Action may affect this species and its critical habitat NE: No Effect			

Federally protected species with the potential for occurring in the Proposed Action Area include the following: California red-legged frog, California tiger salamander, and San Joaquin kit fox (Table 3-2). The non-native grassland provides burrowing habitat that could 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 Proposed Action 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 Action Area.

### 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 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, 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 Proposed Action Area. Potential impacts to burrowing owls or other nesting birds 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 water treatment plant. 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 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: acquisition of habitat conservation credits, performing preconstruction surveys, installation of “amphibian-friendly” exclusion fencing, amphibian relocation, construction monitoring, construction personnel training, and use of qualified biologists during surveys and monitoring.

On February 11, 2015, a Biological Opinion was issued by USFWS for the effects of construction and operation of the West Hills water treatment plant (Appendix C). They concluded the proposed water treatment plant would not jeopardize the continued existence of the federally listed California red-legged frog, California tiger salamander, and the San Joaquin kit fox. Reclamation and San Benito County Water District will comply with requirements of the Biological Opinion issued by USFWS (USFWS 2015).

### ***Cumulative Impacts***

Numerous activities 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 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. San Benito County Water District would implement the appropriate avoidance and minimization measures, including acquiring compensatory habitat credits, 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 of 1966 is the primary Federal legislation that outlines the Federal Government's responsibility to cultural resources. Section 106 of the National Historic Preservation Act 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 Effect (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 San Benito County Water District, who contracted a consulting firm to conduct cultural resources inventory for the Proposed Action. 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 Action's construction elements a geoarchaeological assessment of the APE was conducted. The geoarchaeological assessment identified the APE as having a low to very low potential for the presence of buried historic properties.

The western terminus of the proposed raw water pipeline ties into the Conduit, which is a component of the San Felipe Division of the CVP. The San Felipe Division was authorized in 1960 to provide water for the municipal and industrial use in California's central coastal area, the Santa Clara Valley, the northern portion of San Benito County, the southern portion of Santa Cruz County, and the northern edge of Monterey County. Water is conveyed from the San Joaquin and Sacramento Rivers Delta through the Delta-Mendota Canal and pumped into San Luis Reservoir. From there, the water is transported through the Pacheco Tunnel and other project features, including 48.5 miles of closed conduits. Water flows through the Pacheco Tunnel through the Pacheco Conduit to the bifurcation of the Santa Clara and Hollister Conduits. The Hollister Conduit, constructed from 1980 to 1987, is a 54- and 60-inch buried pipe that runs approximately 17.09 miles and terminates at the San Justo Dam and Reservoir.

Reclamation has determined the CVP to be eligible for listing on the National Register as a multiple property listing. The primary period of significance is the early construction period from 1935 to 1956. The San Felipe Division was authorized in 1960, and the Conduit was constructed from 1980 to 1987. While these dates are later than the primary identified period of significance for the CVP and less than 50 years, the San Felipe Division could contribute to the eligibility of the CVP within the themes of significance under criteria considerations in 36 CFR § 60.4. For the purposes of this project, Reclamation is assuming eligibility for the Conduit as part of the San Felipe Division which potentially could contribute to the eligibility of the CVP.

### 3.5.2 Environmental Consequences

#### ***No Action***

Under the No Action Alternative, existing conditions would persist and the Proposed Action 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). Receiving water from the Conduit requires Reclamation permission which constitutes an undertaking as defined by Section 301(7) of the National Historic Preservation Act, Section 106 and its implementing regulations at 36 CFR § 800. The Proposed Action Area has been investigated for the presence of cultural resources as part of the Section 106 process pursuant to 36 CFR § 800.4. No archaeological resources were identified within the project APE. However, the Conduit is assumed to be an eligible property as a contributing element of the CVP. Implementation of the Proposed Action would not affect those characteristics that contribute to the eligibility of the CVP for listing on the National Register. Reclamation made a determination of no adverse effect to historic properties pursuant to 36 CFR § 800.5(b). Reclamation received concurrence with this determination from State Historic Preservation Officer and has concluded the Section 106 process (see Appendix B). 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.

### ***Cumulative Impacts***

As the Proposed Action would have no impact on properties listed, or eligible for listing, on the National Register, there would be no potential for cumulative effects.

## **3.6 Socioeconomic Resources**

### **3.6.1 Affected Environment**

According to the Association of Monterey Bay Area Governments, 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 (Association of Monterey Bay Area Governments 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 Hollister Urbanized Area.

### ***Proposed Action***

The Proposed Action would support the planning goals of San Benito County and the City Hollister. Improving the reliability and drinking water quality for the Hollister Urbanized Area 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 Hollister Urbanized Area 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 Proposed Action 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

<b>Demographics</b>	<b>San Benito County</b>	<b>Tract 2</b>	<b>Tract 4</b>	<b>Tract 7.01</b>	<b>Tract 7.02</b>
<b>Race</b>					
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%

Demographics	San Benito County	Tract 2	Tract 4	Tract 7.01	Tract 7.02
<b>Economic Characteristics</b>					
Families below poverty level	11.3%	6.6%	12.8%	16.8%	3.9%
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 Hollister Urbanized Area, 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, 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 Proposed Action Area, which are primarily located in the Hollister Urbanized Area, 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 Hollister Urbanized Area. The City's residents in the western portion of the Hollister Urbanized Area, who are disproportionately low-income and/or minorities, would benefit directly from improved source water quality that is lower in dissolved solids.

#### **Cumulative Impacts**

The net impact of the Proposed Action on the low-income and/or minority population of the Hollister Urbanized Area would be improved drinking water quality. Cumulative adverse impacts are not anticipated.

## 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 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 State Implementation Plan'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 State Implementation Plan 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 Action Area is located in an unincorporated area of San Benito County, within the North Central Coast Air Basin. Air quality in the North Coast Central Air Basin, which is comprised of San Benito, Santa Cruz, and Monterey Counties, is overseen and managed by the Monterey Bay Unified Air Pollution Control District. 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 Monterey Bay Unified Air Pollution Control District operates a regional monitoring network that measures the ambient concentrations of the criteria air pollutants within the North Central Coast Air Basin. The nearest station in San Benito County to the project site is the Fairview Road station in Hollister, which measures criteria pollutants, including ozone, particulate matter smaller than 10 microns (PM<sub>10</sub>), and particulate matter smaller than 2.5 microns (PM<sub>2.5</sub>). The current attainment status for San Benito County is provided in Table 3-4.

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 <sub>10</sub>	Unclassified	Nonattainment
PM <sub>2.5</sub>	Unclassified/Attainment	Attainment
Carbon Monoxide	Unclassified/Attainment	Unclassified
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Unclassified	Attainment
Lead	Unclassified/Attainment	Attainment

Pollutant	Federal Standard	State Standard
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
Source: California Air Resources Board 2011		

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

Table 3-5 Monterey Bay Unified Air Pollution Control District 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	N/A	550 lb/day
Lead	N/A	N/A
Source: Monterey Bay Unified Air Pollution Control District 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 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, although temporary, would incrementally add to the regional atmospheric loading of ozone precursors during project development. However, the Monterey Bay Unified Air Pollution Control District 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 (Monterey Bay Unified Air Pollution Control District 2008a).

Fugitive dust would temporarily 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, San Benito County Water District modeled anticipated emissions and compared the results to the Monterey Bay Unified Air Pollution Control District threshold (San Benito County Water District 2014). As shown in Table 3-6, the resulting emissions are anticipated to be below the threshold of concern. Compliance with relevant Monterey Bay Unified Air Pollution Control District Rules and Regulations (such as Rule 403 – Particulate Matter) would be implemented in order to minimize fugitive dust.

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

Project Component	PM <sub>10</sub> (lb/day)
Water Treatment Plant and Raw Water Pump Station	42
Raw and Treated Water Pipelines	2
Total Emissions	44
Monterey Bay Unified Air Pollution Control District Construction Threshold	82
Source: San Benito County Water District 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

San Benito County Water District 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 Action (430 kilovolt-amperes total daily demand assumed) (San Benito County Water District 2014). As shown in Table 3-7, the anticipated emissions would not exceed applicable Monterey Bay Unified Air Pollution Control District operational significance thresholds.

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

Source	ROG	NOx	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
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
Monterey Bay Unified Air Pollution Control District Operation Threshold	137	137	550	150	82	None
Source: San Benito County Water District 2014						

Carbon monoxide can be a localized problem at high concentrations. However, construction of the water treatment plant would be relatively short-term and would not emit carbon monoxide 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 carbon monoxide concentrations that would exceed the California 1-hour ambient air quality standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm because of the negligible amount of carbon monoxide generated by operational sources (San Benito County Water District 2014).

Construction of the water treatment plant would also temporarily 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 (San Benito County Water District 2014).

Long-term operation of the water treatment plant 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 Monterey Bay Unified Air Pollution Control District rules.

### ***Cumulative Impacts***

According to the Monterey Bay Unified Air Pollution Control District, 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, 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 Air Quality Management Plan, then the project is considered to not be in conflict with air quality goals. Since the Proposed Action would be consistent with the Air Quality Management Plan and emissions generated during construction and operation would not exceed Monterey Bay Unified Air Pollution Control District's air quality thresholds, it is expected that it would not result in cumulative adverse impacts to the basin's air quality.



### 3.9 Global Climate Change

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. Some greenhouse gases, such as carbon dioxide (CO<sub>2</sub>), occur naturally and are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g., fluorinated gases) are created and emitted solely through human activities. The principal greenhouse gases that enter the atmosphere because of human activities are: CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide, and fluorinated gasses (EPA 2011a).

During the past century humans have substantially added to the amount of greenhouse gas 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<sub>2</sub> and CH<sub>4</sub>, 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 to develop and enforce regulations for the reporting and verification of statewide greenhouse gas emissions. California Air Resources Board is further directed to set a greenhouse gas 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 greenhouses gases by large source emitters and suppliers that emit 25,000 metric tons or more of greenhouse gases [as CO<sub>2</sub> equivalents (CO<sub>2e</sub>) 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).

Monterey Bay Unified Air Pollution Control District has not yet set a significance threshold for greenhouse gases, so as a conservative approach San Benito County

Water District has adopted the interim threshold of 10,000 metric tons CO<sub>2e</sub>/year used by the Bay Area Air Quality Management District and the South Coast Air Quality Management District. Under South Coast Air Quality Management District guidelines, emissions from construction are amortized over thirty years and added to operational emissions for comparison to the threshold. San Benito County Water District 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 greenhouse gases 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 greenhouse gas 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** Greenhouse gases 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 San Benito County Water District using CalEEMod, based on the Proposed Action's anticipated schedule and construction methods. Using this data, the annual emissions (2014 and 2015) of greenhouse gases would total 1,896 metric tons of CO<sub>2e</sub>. Amortized over 30 years, the Proposed Action would result in approximately 63 metric tons CO<sub>2e</sub>/year.

**Operations** Once operational, emissions sources associated with the Proposed Action 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

San Benito County Water District 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 Action (430 kilovolt-amperes total daily demand assumed). The calculated emissions are shown in Table 3-8, below.

Table 3-8 Estimated Project Greenhouse Gas Emissions

<b>Emission Source</b>	<b>Greenhouse Gas Emissions (Metric Tons CO<sub>2e</sub>/yr)</b>
<i>Construction</i>	
Total	1896
Construction (amortized over 30 years)	63
<i>Operations</i>	
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 (Metric Tons/yr)	322
Greenhouse Gas Threshold	10,000
Source: San Benito County Water District 2014	

The annual greenhouse gas emissions associated with operation of the water treatment plant were estimated to be approximately 259 metric tons CO<sub>2e</sub>/year. Combined with the amortized construction emissions, the Proposed Action would result in approximately 322 metric tons CO<sub>2e</sub>/year, which would be well below the 10,000 metric tons CO<sub>2e</sub>/year threshold adopted by San Benito County Water District.

### **Cumulative Impacts**

Greenhouse gases by their nature are global and cumulative in effect. While this project would add to the global inventory of greenhouse gases, its total emissions are below the conservative threshold of significance used by South Coast Air Quality Management District. Therefore it is expected that the Proposed Action's contribution to cumulative impacts would be relatively minor.

### 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: San Benito County Water District 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 is traffic on Nash Road.

The General Plans adopted by San Benito County and the City 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 San Benito County Water District's modeling were analyzed in Section 3-11 of the draft Environmental Impact Report (San Benito County Water District 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 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 mitigate the inconvenience and annoyance caused by the temporary increase in noise.

**Operations Noise** The main sources of noise from operations at the water treatment plant 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 water treatment plant, and would include the operation of three water pumps. Based on modeling of the noise propagation, unmitigated noise exposure from operation of the proposed water treatment plant and raw water pump station equipment is expected to exceed San Benito County's permitted nighttime ambient noise levels. In order to mitigate 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 residences.

### ***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 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. The incorporation of noise barriers into the Proposed Action is also expected to adequately mitigate ongoing noise from the water treatment plant and associated facilities. 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, 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 to the San Benito-Santa Clara County line and State Route 152 to the north. Within the City, local Business Route 156 is a rural highway from the State Route 156 Bypass to San Felipe Road.

Union Road is an east-west roadway that extends from Calistoga Drive within the City to State Route 156 in unincorporated San Benito County. Union Road provides access to various regional roadways, including State Route 25 (Airline Highway) and State Route 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 water treatment plant 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 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 State Route 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 State Route 25 (Airline Highway). There is no direct transit service to the water treatment plant 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.

Pedestrian facilities in the area generally consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. Roadways located within the City 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 water treatment plant 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 (San Benito County Water District 2014).

## **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 Action 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 water treatment plant 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 (San Benito County Water District 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 State Route 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.



In order to address these, 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, 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 Action. However several have defined, known schedules which are anticipated to coincide with the construction of the water treatment plant. 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. 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 water treatment plant, as construction traffic from both of these projects could utilize the same regional and local roadways (i.e., State Route 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. Construction traffic associated with the water treatment project 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., State Route 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. Construction of the pipeline could overlap with construction activities associated with the West Hills water treatment plant 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. Coordination between contractors and local jurisdictions is expected to adequately address the potential for cumulative traffic impacts.

## **Section 4 Consultation and Coordination**

### **4.1 Public Review Period**

Reclamation provided the public with an opportunity to comment on the Draft Finding of No Significant Impact and Draft EA from March 10, 2014 to April 9, 2014. No comments were received.

### **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.

On February 11, 2015, USFWS issued a Biological Opinion which concluded that the proposed water treatment plant was not likely to jeopardize the continued existence on federally listed California red-legged frog, California tiger salamander, and the San Joaquin kit fox (Appendix C). The execution of the Project will be subject to the terms and conditions as specified in the Biological Opinion.

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 listed in Table 2-1. 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 National Historic Preservation Act 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 National Historic Preservation Act.

Section 106 of the National Historic Preservation Act 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.

After reviewing the Proposed Action, Reclamation made a determination of no adverse effect to historic properties pursuant to 36 CFR § 800.5(b). Reclamation received concurrence with this determination from State Historic Preservation Officer and has concluded the Section 106 process. 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.

## **Section 5 Preparers and Reviewers**

### **Bureau of Reclamation**

Ben Lawrence, Natural Resources Specialist, SCCAO

Jennifer Lewis, Wildlife Biologist, SCCAO

Mark Carper, Archaeologist, MP-153

Patricia Rivera, ITA, MP-400

Rain L. Emerson, Supervisory Natural Resources Specialist, SCCAO – reviewer

David E. Hyatt, Resource Management Division Chief, SCCAO – reviewer

### **San Benito County Water District**

Dale Rosskamp - reviewer

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## **Appendix A    Indian Trust Assets Determination**



Lawrence, Benjamin &lt;blawrence@usbr.gov&gt;

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

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**RIVERA, PATRICIA** <privera@usbr.gov>

Mon, Jul 22, 2013 at 1:12 PM

To: Benjamin Lawrence &lt;blawrence@usbr.gov&gt;

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]

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Kristi Seabrook



## **Appendix B      Cultural Resources Consultation**

**CULTURAL RESOURCE COMPLIANCE**  
**Mid-Pacific Region**  
**Division of Environmental Affairs**  
**Cultural Resources Branch**

**MP-153 Tracking Number:** 13-SCAO-054

**Project Name:** Proposed West Hills Water Treatment Plant Project, San Benito County, California

**NEPA Document:** EA-12-096

**Project Manager/NEPA Contact:** Ben Lawrence

**MP 153 Cultural Resources Reviewer:** Mark Carper

**Determination:** No Adverse Effect to Historic Properties

**Date:** 9/15/2014

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This proposed undertaking by Reclamation is to issue a permit to the city of Hollister to modify the Hollister Conduit, a Reclamation owned property. The City of Hollister proposes the construction of a Water Treatment Plant (WTP) to improve water quality and provide an additional water source in support of their 2011 Master Plan and Coordinated Water Supply and Treatment Plan. Raw water would be supplied to the WTP from the Hollister Conduit, a component of the Central Valley Project (CVP), requiring a permit from Reclamation for modifications to the conduit. Reclamation's issuance of a permit for this purpose constitutes an undertaking pursuant to Section 301(7) of the NHPA (16 U.S.C. 470), as amended, which requires compliance with Section 106 of the NHPA.

Components of the project will include a raw water pump station, a raw water pipeline to the WTP, the WTP, and a treated water pipeline to tie into the existing water system in western Hollister. Raw water would be supplied to the West Hills WTP from the Hollister Conduit, which follows Union Road to the southwest of the proposed WTP site. To lift the water from the conduit to the plant, a pump station would be built adjacent to the conduit on the north side of Union Road at the intersection with Richardson Road.

In an effort to identify historic properties, the City of Hollister contracted ESA to conduct a Phase I cultural resources investigation. A record search was conducted at the Northwest Information Center; a Sacred Lands File search was requested from the Native American Heritage Commission (NAHC); and a pedestrian survey was conducted of the APE. No cultural resources were identified by the NAHC as

**CULTURAL RESOURCE COMPLIANCE**  
**Mid-Pacific Region**  
**Division of Environmental Affairs**  
**Cultural Resources Branch**

being located in the APE. Because of the depth of certain project construction elements, at the direction of Reclamation, the investigation also included a geoarchaeological assessment. No cultural resources were identified in the APE by ESA during these endeavors.

The western terminus of the proposed project ties into the Hollister Conduit, which is a component of the San Felipe Division of the CVP. Reclamation considers the CVP to be eligible for listing on the National Register of Historic Places as a multiple property. The primary period of significance is the early construction period from 1935 to 1956. The San Felipe Division was authorized in 1960, and the Hollister Conduit was constructed from 1980 to 1987. While these dates are later than the primary identified period of significance for the CVP and less than 50 years, the San Felipe Division could contribute to the eligibility of the CVP within the themes of significance under criteria considerations in 36 CFR § 60.4. For the purposes of this project, Reclamation is assuming eligibility for the Hollister Conduit as part of the San Felipe Division which potentially could contribute to the eligibility of the CVP.

The proposed activity will not affect those characteristics of the conduit or lateral that could contribute to the eligibility of the CVP. The proposed facilities are consistent with existing facilities along this conveyance system, and the connection to the conduit will be with existing components. Therefore, Reclamation has made a determination of no adverse effects to historic properties for this undertaking.

Pursuant to 36 CFR § 800.3(f)(2) Reclamation attempted to identify federally recognized Indian tribes; however, none were known to have inhabited the current project area. Reclamation identified two non-federally recognized Native American organizations that may have an interest in the project area: the Ama Mutsun Tribal Band and the Indian Canyon Mutsun Band of Costanoan. Letters were sent to both groups affording them the opportunity to assist in the identification of cultural resources of concern that may be affected by this undertaking. No responses were received.

Reclamation initiated consultation with the California State Preservation Office (SHPO) by letter on September 2, 2014. SHPO responded by letter on October 1, 2014 concurring with Reclamation's determination of no adverse effects to historic properties by the undertaking.

This memorandum is intended to convey the completion of the NHPA Section 106 process for this undertaking. Please retain a copy in the administrative record for this action. Should changes be made to

**CULTURAL RESOURCE COMPLIANCE**  
**Mid-Pacific Region**  
**Division of Environmental Affairs**  
**Cultural Resources Branch**

this project, additional NHPA Section 106 review, possibly including consultation with the State Historic Preservation Officer, may be necessary. Thank you for providing the opportunity to comment.



**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

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October 1, 2014

Reply in Reference To: BUR\_2014\_0902\_002

Anastasia T. Leigh  
Regional Environmental Officer  
Bureau of Reclamation, Mid-Pacific Regional Office  
2800 Cottage Way  
Sacramento, CA 95825-1898

RE: West Hills Water Treatment Plant (WTP) Project, San Benito County, California;  
(13-SCAO-054).

Dear Ms. Leigh:

Thank you for seeking my consultation regarding the above noted undertaking. Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act (NHPA), the Bureau of Reclamation (Reclamation) is seeking my comments regarding the effects that the above named project will have on historic properties and my concurrence of a *Finding of No Adverse Effect to Historic Properties* for the project.

The City of Hollister proposes to construct a Water Treatment Plant (WTP) to improve water quality and provide an additional water source as part of their Master Plan. Raw water would be supplied to the WTP from the Hollister Conduit; a component of the Central Valley Project. The proposed project includes the construction of four main components:

1. The West Hills WTP and associated facilities: Treatment facilities, water basins, drying beds, storage tanks, operations building & solids handling facilities.
2. Raw water pump station;
3. Raw water pipeline and Richardson Road improvements;
4. Treated water pipeline.

The Area of Potential Effects (APE) is primarily lies within a 14.7 acre parcel APN #21-06-06, between Union and Riverside Roads. The APE also includes Richardson Road, Riverside Road and Nash Road. Temporary staging will be located at the proposed location of the project drying beds. The vertical APE will range from four to eight feet in depth for most of the project components, twelve feet for the drying beds and to sixteen feet for the water storage tanks.

In addition to your letter received September 2, 2014, you have submitted the following documents as evidence of your efforts to identify and evaluate historic properties in the project APE:

- *West Hills Water Treatment Plant Project; Phase I Cultural Resources Survey Report* (ESA, November 2013).
- *San Felipe Division, The Central Valley Project; (Whynot & Simonds, 1994).*

Archival research included a records search at the Northwest Information Center on September 26, 2012. No previously recorded cultural resources were determined to lie within the APE.

Native American consultation included contact with the Native American Heritage Commission (October 16, 2012) and Native American tribes and individuals likely to have knowledge of sites of religious or cultural significance to them in the project area (October 19, 2012). No such properties were identified through consultation efforts.

Pedestrian surface survey was conducted on October 8, 2012 and May 4, 2013 utilizing transect intervals of fifteen meter or less in width. No cultural resources were identified within or immediately adjacent to the APE.

The Hollister Conduit does not meet the fifty year threshold for historic properties; however, Reclamation has considered it as a contributor to the eligibility of the Central Valley Project to the National Register of Historic Places for purposes of this project. The connection to the Hollister Conduit will be through existing facilities; therefore will not be an adverse effect to this historic property.

Pursuant to 36 CFR §800.5(b) Reclamation has determined a *Finding of No Adverse Effect* to historical properties by the proposed project. Based on your identification efforts, I concur with the *Finding of No Adverse Effect*. Identification efforts are sufficient and I also have no objections to the delineation of the APE, as depicted in the supporting documentation.

Thank you for considering effects to historic properties in your project planning. Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, Reclamation may have additional future responsibilities for this undertaking under 36 CFR Part 800. Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns regarding archaeological resources, please contact Associate State Archaeologist, Kim Tanksley at (916) 445-7035 or by email at [kim.tanksley@parks.ca.gov](mailto:kim.tanksley@parks.ca.gov). Any questions concerning the built environment should be directed to State Historian, Kathleen Forrest at (916)445-7022 or by email at [kathleen.forest@parks.ca.gov](mailto:kathleen.forest@parks.ca.gov).

Sincerely,



Carol Roland-Nawi, PhD  
State Historic Preservation Officer