

RESPONSE TO COMMENTS

This document provides responses to comments on the Draft Subsequent Environmental Impact Report (Draft SEIR) for the City of Hollister Reclaimed Water Irrigation Project (proposed project). This response to comments constitutes Part I of the Final SEIR. Changes to the text of the Draft SEIR that have been made in response to comments are included in Part II of the Final SEIR.

On December 11, 2007, the Draft SEIR was submitted to the State Clearinghouse (SCH# 2007021136) and released for a 45-day public and agency review and comment period. A total of five written comment letters were received by the City of Hollister (City) in response the Draft SEIR and have been included as **Attachment A** to Part I of the Final SEIR. The list of commentators is provided below:

LIST OF COMMENTORS

Comment Letter #	Name, Title	Affiliation	Date Sent
1	Jean Getchell, Supervising Planner, Planning and Air Monitoring Division	Monterey Bay Unified Air Pollution Control District	December 31, 2007
2	Ruth Erickson	Hollister Airmen's Association	January 21, 2008
3	Scott Fuller, General Manager	San Juan Oaks Golf Club	January 22, 2008
4	Patrick Dunn	Dunn Environmental, c/o City of San Juan Bautista	January 25, 2008
5	Lance W. Johnson, District Manager/Engineer	San Benito County Water District	February 6, 2008

A public meeting was also held on January 3, 2008, at the Veteran's Memorial Building in the City of Hollister. A transcript of this meeting is included as **Attachment B** of Part I.

Neither the comments received on the Draft SEIR nor the responses thereto indicate new significant impacts or information that would require recirculation of the Draft SEIR pursuant to CEQA *Guidelines* Section 15088.5. Comments received from both the public meeting and the written letters have been summarized and responded to below:

LETTER 1. JEAN GETCHELL, SUPERVISING PLANNER – MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT

Comment 1-1

The commenter states that the Monterey Bay Unified Air Pollution Control District (MBUAPCD) has no comments to provide on the Draft SEIR.

Response 1-1

The comment has been noted. The City appreciates MBUAPCD review and consideration of the Draft SEIR.

LETTER 2. RUTH ERICKSON – HOLLISTER AIRMEN’S ASSOCIATION

Comment 2-1

The commenter states that Caltrans Aeronautics needs to approve the safety mitigation that is recommended in the Draft SEIR for the airport, and the Airport Land Use Commission (ALUC) needs to approve the plans as the irrigation pipeline will enter the airport from an outside point.

Response 2-1

As discussed within **Section 4.6** of the Draft SEIR, **2006 EIR Mitigation Measure 4.6.10** requires consultation with the San Benito County ALUC, and the California Department of Transportation Division of Aeronautics (Caltrans Aeronautics) to ensure that reclaimed water irrigation will be consistent with applicable safety guidelines and compatible with airport operations. Additionally, review of water reclamation at the Hollister Municipal Airport by Caltrans is listed as a necessary regulatory approval in **Section 3.6** of the Draft SEIR. Consistent with these requirements, the City has engaged in discussions with the ALUC and Caltrans Aeronautics during the ongoing preparation of engineering design plans for the proposed reclaimed water irrigation system on the airport site.

Comment 2-2

The commenter inquires if reclaimed water irrigation on the airport site would effect the percolation rates of storm water detention ponds at various business parks around and adjacent to the airport.

Response 2-2

As discussed in **Section 3.4.2** of the Draft SEIR, compliance with Waste Discharge Requirements set by the RWQCB would ensure irrigation would not occur during rain events or during the winter months to avoid over saturation of soils and standing water. It is not anticipated that reclaimed water irrigation on the airport would affect the percolation rates of nearby storm water detention basins.

Comment 2-3

The commenter states that the Airport Layout Plan (ALP) should show the planned layout of the reclaimed water irrigation system and facilities for Federal Aviation Administration (FAA) approval. The commenter further stated the Airport Advisory Commission (AAC) should approve the plans prior to final approval by the City Council.

Response 2-3

The City is currently engaged in consultation with the FAA to determine the appropriate course of action for FAA approval of the proposed reclaimed water irrigation system. The City will prepare a proposed amendment to the ALP that incorporates the reclaimed irrigation system and submit to the FAA for approval. The AAC would approve any changes to the ALP prior to approval by the City Council.

Comment 2-4

The commenter states that increased ground moisture can be dangerous by causing ground fog over taxiways and runways.

Response 2-4

Because irrigation would primarily occur during the dry season, when weather conditions are naturally warmer, reclaimed water irrigation on the airport property is unlikely to result in groundcover fog over the taxiways and runways.

Comment 2-5

The commenter states that the SEIR should include additional detail concerning how aircraft will be protected during construction, installation, and maintenance of the reclaimed water irrigation system. The commenter also states that all construction workers need to be trained as per FAA regulations and refers to FAA Advisory Circular (AC) 150/5370-2E. Additionally, the commenter states that Notices to Airmen (NOTAMS) must be filed before, during, and after installation of the reclaimed water irrigation system to warn pilots of any potential hazards associated with construction activities within the taxiways and airport runways.

Response 2-5

As discussed in **Section 3.3.5** of the Draft SEIR, the City is currently consulting with the FAA to ensure that construction and operation of reclaimed water irrigation areas at the Hollister Municipal Airport comply with all applicable FAA safety regulations. All maintenance and construction personnel will be trained in FAA safety protocol as appropriate. Additionally, **Section 3.3.5** explains that development of reclaimed water irrigation areas would require an update to the existing Airport Layout Plan, which is subject to review and approval by the FAA. Implementation of **2006 EIR Mitigation Measure 4.6.10** would ensure that the project is consistent with safety guidelines provided by the FAA as well as Caltrans Aeronautics. These guidelines specify procedures for filing NOTAMS.

Comment 2-6

The commenter questions how the irrigation sprinkler systems and timers would be affected by a power outage in the Airport vicinity.

Response 2-6

As a safety precaution, the irrigation system at the airport would not operate during power outages. Loss of power would not effect the operation of sprinkler timers once power is resumed.

Comment 2-7

The commenter states that the Airport has a lot of sensitive issues and aeronautic regulations, for which mitigation must be provided.

Response 2-7

Implementation of the proposed project on the airport site would comply with all applicable regulations of the FAA and Caltrans Aeronautics, as well as local plans, policies, and regulations.

LETTER 3. SCOTT FULLER, GENERAL MANAGER – SAN JUAN OAKS GOLF CLUB

Comment 3-1

The commenter states that the Draft SEIR underestimated the irrigable acreage for the San Juan Oaks Golf Course site and should have considered reclaimed water irrigation on the property to the west of the existing golf course, which is included within the approved San Juan Oaks Residential Resort Project. The commenter states that the expansion project was previously analyzed in an EIR certified by San Benito County (County), and that while reclaimed water irrigation for the expansion project was not specifically analyzed in the County's EIR, it did consider the prospect of reclaimed water being utilized to supply irrigation needs for the existing golf course and western property. The commenter states that the scope of the Final SEIR and groundwater analysis should be expanded to consider 310-irrigable acres for the Golf Course Resort Project site, with a total demand of 646 acre-feet of reclaimed water per year.

Response 3-1

The Draft SEIR was prepared to analyze the effects of reclaimed water irrigation for Phase I of the City's Long Term Wastewater Management Program (LTWMP). Therefore, the operational scenarios analyzed within the Draft SEIR include those that can feasibly accommodate disposal needs for Phase I of the LTWMP. Golf Course acreage and Phase I disposal capacity assumptions used in the Draft SEIR and groundwater modeling analysis were developed in cooperation with the San Juan Oaks Golf Club. While it is possible that reclaimed water from the City's Domestic Water Treatment Plant (DWTP) may be used for the golf course expansion project, the City recognizes that development of the project is subject to market conditions and that the future demand for recycled water will be determined by the extent of facilities developed. Therefore, the Draft SEIR assumed that reclaimed water irrigation would only take place on existing golf course facilities throughout Phase I of the LTWMP. Currently, the irrigated acreage on the golf course is approximately 120 acres with an approximate water usage of 357 acre-feet per year

(AFY). The Draft SEIR and groundwater model analyzed two scenarios for reclaimed water irrigation on the existing golf course facilities: blending with existing water supply sources to achieve a total dissolved solid (TDS) level of 500 mg/L for an annual disposal capacity of 79 AF; and 2) no blending for an annual disposal capacity of 357 AF. The use of reclaimed water irrigation for the expansion project was assumed within the cumulative analysis, which was tiered from the 2006 EIR. The cumulative analysis within the 2006 EIR generally assumed that the use of reclaimed water from the City's DWTP may be expanded on the golf course in the future. The SEIR has been revised to include additional qualitative analysis and discussion of this future cumulative project. Please Refer to **Section 5.2** of the Final SEIR.

Comment 3-2

The commenter states that objectives of the State Water Resources Control Board (SWRCB), Central Coast Regional Water Quality Control Board (CCRWQCB) Basin Plan, and the Draft SEIR emphasize “the beneficial use of reclaimed water to conserve water by supplementing or replacing other water supplies.” The commenter states the reclaimed water irrigation at the airport would not supplement or replace existing or planned use of water and therefore does not meet the goals and objectives stated above. The commenter states that temporary use of reclaimed water irrigation at the airport should not be selected when other alternatives consistent with goals for beneficial use of reclaimed water are currently available. The commenter states that there is no guaranteed plan to phase out reclaimed water at the airport. The commenter states that the cost of developing the airport site is higher than developing the San Juan Oaks and Riverside Park operational scenarios. The commenter states that the Draft SEIR should assess whether or not the project alternatives are consistent with the objectives of the project and the relevant State and RWQCB policies concerning the beneficial use of reclaimed water.

Response 3-2

A discussion of the site selection process and the criteria used to screen potential sites is included in **Section 6.4.1** of the Draft SEIR. As discussed therein, the site selection committee is charged with the selection of a project alternative for approval. While CEQA requires a comparison of the environmental impacts and the identification of an environmentally superior alternative, an evaluation of the comparative merits of reclaimed water usage and associated financial costs at each alternative site is not warranted. CEQA does not require the identification of a “preferred” or “most beneficial” alternative. In accordance with the CEQA *Guidelines*, each of the project alternatives evaluated in the Draft SEIR would accomplish the basic objectives of the project. Consideration of the maximum benefit that could be gained from reclaimed water irrigation at each site is subjective and beyond the scope of analysis required by CEQA.

LETTER 4. PATRICK DUNN, DUNN ENVIRONMENTAL, C/O CITY OF SAN JUAN BAUTISTA

Comment 4-1

The commenter states that the memo has been prepared on behalf of the City of San Juan Bautista and summarizes potential concerns related to nutrient and wastewater application, and associated impacts to hydrology and soils in the San Juan Valley near the City of San Juan Bautista. The commenter stated

that references to the 2006 EIR for regional and site-specific detail burdened review. The commenter stated that critical project description elements should have been repeated in the stand-alone document.

Response 4-1

As discussed in **Section 1.3** of the Draft SEIR, CEQA *Guidelines* encourages the use of tiered environmental documents to reduce delays and excessive paperwork in the environmental review process. Section 15150(e) of the CEQA Guidelines specifically states “materials that may be incorporated by reference include, but are not limited to, a description of the environmental setting from another EIR.” While the Draft SEIR did incorporate regional and regulatory setting descriptions from the 2006 EIR, site-specific information for each of the alternative project sites was described in full within each environmental issue area discussed in **Chapter 4.0** of the Draft SEIR. Additionally, all critical components of the project description were discussed in detail within **Chapter 3.0**.

Comment 4-2

The commenter states that the Draft SEIR provides discharge limits for several inorganic compounds only and that the analyses focus on the varying trends in TDS and groundwater levels due to the application of reclaimed water. The commenter states that “the project description does not contain the required nutrient loading/management and disposal plan for the nitrates, pathogens, pharmaceuticals chemicals or heavy metals.”

Response 4-2

As discussed in **Section 3.3.4** of the Draft SEIR, reclaimed water produced at the City’s new membrane bio-reactor (MBR) facility would comply with Department of Health Services (DHS) recycled water regulations contained in Title 22, Division 4, Chapter 3 of the California Administrative Code, which define treatment processes, water quality criteria, and treatment reliability requirements for the public use of recycled water. Furthermore, as discussed in **Section 3.4.2** of the Draft SEIR, operation of the proposed project would be subject to Waste Discharge Requirements issued by the CCRWQCB, which sets effluent limitations as a condition of approval. WDRs include receiving water limitations, monitoring and reporting requirements, and operational requirements.

Comment 4-3

The commenter summarizes Phase I and Phase II of the City’s LTWMP. The commenter provides a description of operational Scenarios A, B, and E. The commenter states that Scenario A is considered the “No Project Alternative” with two subsets that include urbanization and land application in significant areas near the City of San Juan Bautista.

Response 4-3

The commenter’s interpretation of Scenario A is incorrect. Scenario A involves the application of reclaimed water to the Airport and Riverside Park sites and is not considered the “No Project Alternative.” The two sub-sets of analysis referenced by the commenter include scenarios for off-site irrigation in Phase II of the City’s LTWMP. As discussed in **Appendix F** of the Draft SEIR, the groundwater model assumed that in Phase II of the LTWMP, the San Benito County Water District’s (District) Recycled Water

Program would be implemented, which would result in the extended use of recycled water for agricultural irrigation. The Recycled Water Program is a separate project currently in the planning phase and is being managed by the District in cooperation with the City and the County of San Benito. At this time, it is unknown specifically where the off-site irrigation will occur because the Recycled Water Program is evaluating the availability of recycled water, potential customers, locations, distribution system, and impacts. Although the District's Recycled Water Program is not a component of the proposed project, it was considered a future cumulative condition within the groundwater modeling analysis. Because the precise location of future recycled water use areas is unknown, the groundwater analysis analyzed two theoretical scenarios for Phase II recycled water irrigation: Scenario A1 assumed that the off-site irrigation water would be delivered to existing Central Valley Project (CVP) users in the San Juan Valley; Scenario A2 assumed that the off-site irrigation water would be delivered to several large areas of land on the north side of the City. The results of this comparison showed that the location of the off-site irrigation did not affect the evaluation of the potential impacts for this project, so the off-site irrigation was maintained in the San Juan Valley for the subsequent modeled scenarios to maintain consistency.

Off-site irrigation water was assumed to be used on cropland presently served with CVP water and to replace CVP water on a one-to-one basis. Salinity (total dissolved solids concentration) of the irrigation supply would increase because CVP water has a TDS concentration of about 300 mg/l and the Phase II recycled water is expected to have an average salinity of approximately 600 mg/l. This change causes a slight, gradual increase in the average salinity of recharge and in the simulated groundwater salinity of the shallowest groundwater (Model Layer 1). Additional impact evaluation will be conducted for the Recycled Water Program as part of its CEQA process. The approach to considering recycled water irrigation during Phase II of the LTWMP throughout the evaluation of this project is discussed within **Appendix F** of the Draft SEIR.

Comment 4-4

The commenter states that groundwater modeling results in the Draft SEIR that are used to evaluate groundwater conditions anticipated a water table increase of less than two feet beneath the sod and golf course sites during the operational stages of Phase I and Phase II. The commenter states that the Draft SEIR estimates migration of a TDS plume of less than 500 feet over 7 years and 1,000 feet over 30 years would correlate into a travel time of 500 years for the TDS plume to reach the City. The commenter states that independent estimates indicate a faster rate of travel, potentially less than 10 years.

Response 4-4

The Draft SEIR evaluated groundwater conditions for a 30-year period, and any inference or implication of groundwater conditions beyond this period of time was not intended. The comment letter does not specify the methodology, including distance and area assumptions, used in the "independent calculations". A more comprehensive response to these findings is therefore not possible. **Figure 4.2-4b** of the Draft SEIR shows 6 and 30 year estimated water quality conditions under Operational Scenario B at the Sod Farm and Golf Course after initiating irrigation in Phase I of the LTWMP, based on the groundwater modeling analysis included as **Appendix F**. Please refer to **Response 4-9** for a description of the groundwater model used to support conclusions in the Draft SEIR concerning impacts to groundwater quality.

Comment 4-5

The commenter summarizes the existing geology and hydrology conditions in the project area. The commenter states that very few wells have been installed in the San Juan Valley for the purposes of monitoring groundwater. The commenter states that the Draft SEIR references findings as speculative due to the lack of model calibration and existing data within the San Juan Valley.

Response 4-5

The SEIR does not reference findings as speculative or infer that there is insufficient information for groundwater in the San Juan Valley to adequately calibrate the model. Please refer to **Response 4-11** for a discussion of the methodology used to estimate impacts to groundwater quality and future monitoring efforts, and **Response 4-9** for a discussion of the sources of San Juan Valley information used to develop the model.

Comment 4-6

The commenter states that surface water impacts could add to conditions that have already been deemed significant due to sediment and nitrate levels, in addition to the 303(d) listing. Additionally, the commenter refers to Federal Emergency Management Agency (FEMA) flood designations and potential impacts resulting from increased tail water return and floodwater storage values at the Sod Farm. The commenter states nutrient management plans will have to be developed as part of the National Pollutant Discharge Elimination System (NPDES) permitting process.

Response 4-6

Reclaimed water irrigation areas would be operated in accordance with Title 22 Water Quality Objectives and restrictions set forth in associated WDRs issued by the CCRWQCB, which is the jurisdictional agency responsible for water quality issues. As described in **Section 3.4.2** of the Draft SEIR, standard provisions of WDRs define and limit application rates to prevent off-site discharges of recycled water to surface waters, including potential discharge through irrigation runoff commingling with storm water runoff during wet weather.

The Sod Farm site is currently irrigated and application of reclaimed water would offset the use of groundwater pumped from on-site wells. No increase in irrigation rates or quantities would occur; however, the decrease in groundwater pumping would affect water levels in the vicinity of the site. As discussed under Impact 4.2-7, in **Section 4.2** of the Draft SEIR, an existing tile drain system is in place that would alleviate increased water levels on the Sod Farm site from operation of the proposed project. Therefore, irrigation with reclaimed water would not influence the FEMA flood designation of the site or the floodwater storage values.

Irrigation with recycled water could contribute to loading of specific constituents within groundwater supplies in the vicinity of irrigation sites. The comment identified nitrates, arsenic, and pharmaceuticals as contaminants of concern. An evaluation of impacts to water quality was included within **Section 4.3** of the Draft SEIR. It was determined that all impacts can be reduced to less-than-significant levels through

implementation of recommended mitigation measures. The discussion of impact thresholds used to evaluate impacts to water quality has been expanded within **Section 4.2.4** the Final SEIR. As discussed therein, the project would have an adverse impact if it resulted in a violation of the Anti-degradation policy of the Basin Plan. The table below summarizes the compliance terms of the project with the Basin Plan's Antidegradation policies. It was determined that project implementation would: (1) decrease overall basin-wide salt loading; (2) would not violate any adopted water quality standards; and (3) that effects to beneficial uses of groundwater would be mitigated through well-head treatment or alternative water supply sources. Therefore, the proposed project would not violate any SWRCB anti-degradation policies.

Basin Plan Anti-Degradation Policy	Project Compliance?	Discussion
Existing water quality that is better than required under water-quality standards will be maintained unless:		
1) The change will be consistent with maximum benefit to the people of the State;	Yes	Although TDS levels would increase in local groundwater beneath the project site, reclaimed water irrigation disposal methods would decrease the overall basin-wide salt loading. Therefore implementation of the project would meet this requirement of the Anti-Degradation Policy to be consistent with the maximum benefit to the people of the state.
2) Will not unreasonably affect present and anticipated beneficial use of such water; and/or	Yes	To ensure the project related effects on beneficial uses of groundwater are adequately mitigated, the City would conduct extensive groundwater monitoring throughout the project to measure the extent and level of groundwater quality impacts. In the event the groundwater quality is reduced to a point that beneficial uses are impaired – the City would provide wellhead treatment or alternative water supply sources to owners of impacted municipal or agricultural water supply wells. Therefore, after mitigation, the project would be consistent with this requirement of the Anti-Degradation Policy to not unreasonably affect present and anticipated beneficial uses of groundwater.
3) The change would not violate water-quality standards.	Yes	The proposed project would comply with all applicable standards for reclaimed water irrigation. The application of recycled water will be required to conform to DHS established water quality criteria and RWQCB waste discharge requirements as set forth under State of California Title 22 regulations.
		It should be emphasized that the Basin Plan objective of 1,200 TDS is a median value objective established for the entire groundwater basin. While localized groundwater may exceed this objective – the overall salt loading in the basin under plus project conditions would actually be reduced. Reclaimed water irrigation is a component of the City's Long-term Wastewater Management Plan, and is proposed as an alternative to disposal of treated effluent through percolation beds, which have been identified as contributing to high salinity levels in the

Basin.

Therefore, it was determined that while localized TDS levels may increase, the project would actually assist in reducing the median TDS level in the basin – which is not a violation of water quality standards and in compliance with the anti-degradation policy of the RWQCB.

Source: CCRWQCB, Water Quality Control Plan for the Central Coast Basin, 1994; AES, 2008.

Please refer to **Response 4-12** for a discussion of nitrates and arsenic. Specific water quality parameters have not been developed for pharmaceuticals. The DHS is in the process of drafting regulations for monitoring endocrine disruptors found in certain pharmaceutical compounds and the City will continue to work with both the DHS and CCRWQCB regarding water quality requirements as they arise within the regulatory framework, and as applicable for reclaimed water use.

Comment 4-7

The commenter references the 1998 version of the Groundwater Management Plan (GWMP) for the San Benito County Part of the Gilroy-Hollister Groundwater Basin. The commenter states that application of recycled wastewater during Phase I of the LTWMP will not meet the groundwater protection measures that are part of the 1998 GWMP.

Response 4-7

The GWMP for the San Benito County Part of the Gilroy-Hollister Groundwater Basin was last updated in 2004 by the Water Resources Association of San Benito County (WRASBC); therefore, the 1998 version referenced within the comment is no longer applicable. The project's consistency with the 2004 GWMP is discussed in **Section 3.3.2** of the Draft SEIR. As discussed therein, the proposed project would assist in meeting the objectives of the GWMP as it would provide for beneficial uses of reclaimed water and would assist in the management of groundwater levels by allowing effluent percolation at the DWTP and IWTP to remain at or below existing levels. It is acknowledged that the project's Phase I water quality does not meet the regional TDS goals set by the 2004 GWMP. The detailed evaluation of potential project groundwater quality and groundwater level changes was conducted in part to assess possible impacts. Mitigations have been recommended within **Section 4.3** of the Draft SEIR to reduce any potential impacts.

Comment 4-8

The commenter states that the Draft SEIR was presented in several date sensitive time stages back to 2005, so review was cumbersome as it was not a stand-alone document that was completed within a short time frame.

Response 4-8

Please refer to **Response 4-1** for a discussion of the tiering of a CEQA document.

Comment 4-9

The commenter refers to hydrological modeling that used “limited regional San Juan information,” and further states that scenarios used in the modeling analysis focused on the viability of the use of the areas downgradient and hydraulically separated from the City of Hollister.

Response 4-9

The model used to evaluate groundwater level and quality changes was developed using extensive groundwater data from the District, groundwater monitoring data conducted by the City for the DWTP, and groundwater investigations conducted at the former Whittaker Ordinance and Teledyne facilities. Data from state and federal reports have also been incorporated into the model. The model was calibrated to include water level data published in annual District groundwater reports. Those reports are readily available and routinely used by local agencies and consultants to support local and regional water resource management activities. The District has used the model since 2001 to support its water management activities. Additionally, it should be noted that the model and its application to the project have undergone independent review by the District. References and discussion of the model development and calibrations are included in **Appendix F** of the Draft SEIR.

Selection of sites evaluated for reclaimed water irrigation was based on several factors, including acreage available for irrigation and the landowner’s willingness to be participants. Hydraulic separation from the City of Hollister was not considered. The site selection process is described in further detail in **Section 6.4.1** of the Draft SEIR.

It is unclear whether the “planned application area” mentioned in the comment refers to the five sites evaluated for potential irrigation with reclaimed water within the Draft SEIR, or the broader agricultural region where off-site irrigation with recycled water could occur during Phase II of the LTWMP. Because the two evaluated project sites (San Juan Oaks golf club and Pacific Sod Farm) are three to five miles from City of San Juan Bautista, it is assumed that the comment references the area that could be considered for off-site irrigation. Off-site irrigation is an assumed future condition that would be implemented through the District’s Recycled Water Program, and is not a component of the proposed project analyzed within the Draft SEIR. Please refer to **Response 4-3** for a discussion of the District’s Recycled Water Program.

Comment 4-10

The commenter states that information used to support the groundwater modeling results is not detailed enough to support future modeling scenarios. The commenter states that certain water level and water quality impacts were observed from the groundwater modeling analysis such as elevated TDS levels. The commenter has requested clarification on planning, decision, and data collection.

Response 4-10

Please refer to **Response 4-3** for a discussion of the groundwater modeling results for Scenario A and the District’s Recycled Water Program, and **Response 4-9** for a discussion of the groundwater model used to estimate impacts to groundwater quality and levels in the Draft SEIR.

Comment 4-11

The commenter states that only limited site-specific soil and groundwater data has been collected and the use of such limited data may have resulted in questionable findings that are not reflective of site-specific baseline conditions.

Response 4-11

The level of evaluation conducted for the Draft SEIR enabled a comparison of site characteristics and potential local and regional water quality and water level impacts. Although monitoring wells are not located on each site, groundwater and soil conditions in the Hollister area and within each sub-basin are well studied. Conditions at the evaluated sites are considered to be similar to sites where site-specific information is available, with the exception of the Brookhollow Ranch site.

The District monitors water level and water quality conditions in its production wells as well as a series of monitoring and irrigation wells (see Draft SEIR **Appendix F**, Figure 3). Annual groundwater reports are prepared by the District that discuss groundwater conditions, changes from previous conditions, and actual and potential groundwater impacts. These reports, as well as other available reports and information from the District, were used to assess the impacts of the proposed alternatives within the Draft SEIR and will be used by the site-selection committee for project approval. Once the CEQA process for the proposed project is complete and the site-selection committee has made its decision, groundwater monitoring wells will be installed and other investigations conducted at each of the selected site(s) that will be part of the reclaimed water management plan developed in accordance with **2006 EIR Mitigation Measure 4.2.5**. As recommended in **Mitigation Measure 4.7-2a** of the Draft SEIR, the monitoring wells will be used to collect site-specific data both before and during project implementation to confirm the actual changes are similar to those predicted by the CEQA analysis.

Comment 4-12

The commenter states that site-specific calculations for the nutrient loading and removal of constituents of concern, such as nitrates, arsenic, and boron, should be incorporated within cropping and management plans. The commenter states “mitigation measures related to exotic constituents observed in the effluent should be provided.”

Response 4-12

Expected reclaimed water quality is included in **Table 3-2** of the Draft SEIR. The table lists key constituents of concern when reclaimed water is proposed for beneficial uses, as well as irrigation water quality concerns. **Section 3.3.4** also discusses the proposed treatment methods (membrane bioreactor [MBR] and chlorine disinfection).

The GWMP lists several water quality objectives summarized below:

- Water Quality Criterion 1-1. Minimize imported salts and manage long-term groundwater salinity.
- Water Quality Criterion 1-2. Protect groundwater resources from infiltration of nitrates and salt.

- Water Quality Criterion 1-3. Deliver Municipal and Industrial water that meets primary and secondary drinking water standards.
- Water Quality Criterion 1-4. Deliver agricultural water meeting established quality parameter (salinity: <700 mg/L, SAR: <6.5, Boron: <0.5 mg/L, TDS: levels that range from 480-1920 mg/L are considered marginal for irrigation, per Regional Water Quality Control Board Basin Plan).

Constituents of concern identified in the comment are discussed further below.

Nitrates. MBR is an effective treatment method for the removal of nutrients. Nitrate concentration of the reclaimed/recycled water is expected to be less than 5 mg/L (Draft SEIR **Table 3-2**). The maximum contaminant level (MCL) for nitrates is 45 mg/L. The City of Hollister's 2006 Annual Drinking Water Quality Report (the most recent report available) provides water quality data for the City's three sources of water – groundwater from City of Hollister (7 wells), groundwater from the Sunnyslope County Water District (SSCWD) (4 wells) and the Lessalt surface water treatment plant. Nitrates in Hollister's wells ranges from 4 to 38 mg/L and 2.9 to 29 in SSCWDs wells. Nitrates are 5 mg/L in water from the Lessalt plant. Decreasing nitrate levels to meet basin plan and GWMP objectives are addressed by the implementation of MBR treatment at the upgraded WWTP. Therefore, because the level of nitrates in the delivered reclaimed/recycled water is expected to be generally lower than current groundwater conditions, no adverse impacts related to nitrates are expected from this project.

Arsenic. Arsenic concentrations in the existing water sources range from non-detect to 4 mg/L and are below the current MCL of 10 mg/L. There are no other known sources of arsenic into the wastewater stream, therefore, arsenic is not considered a contaminant of concern for this project.

Boron. The anticipated concentration of boron in the reclaimed/recycled water is 0.7 mg/L, which is based on the average boron levels of the existing Hollister water supply (Draft SEIR **Table 3-2**). The GWMP update identifies a target goal of 0.5 mg/L for boron, which is lower than the current average conditions. As reported in the 2006 City of Hollister Annual Drinking Water Quality Report, boron concentrations in the District, Lessalt, and SSCWD water sources ranges from below detection levels to 1.38 mg/L. Boron is a naturally occurring mineral within the basin and is higher in some parts of the basin (for example areas along the eastern foothills south of Pacheco Creek) than in others. The current groundwater work does not address the impact to groundwater conditions associated with project irrigation of water with boron concentrations higher than the GWMP goal of 0.5 mg/L. In accordance with 2006 EIR **Mitigation Measure 4.2.5**, boron would be monitored once the site-specific monitoring wells are installed and crops tolerant of the expected boron concentration will be grown at the project sites.

Comment 4-13

The commenter states that site-specific information, such as data from pump tests, would be necessary to determine the potential environmental impacts resulting from TDS plumes that could potentially travel within the groundwater aquifer. The commenter states that the range in aquifer velocity may support a 10-year travel time of a TDS plume from the golf course, compared to a 500-year travel time as referenced in the SEIR.

Response 4-13

Please refer to **Response 4-4** for a discussion of contaminant travel times in groundwater and **Response 4-9** for a description of the groundwater model used to support conclusions in the Draft SEIR concerning impacts to groundwater quality.

Comment 4-14

The commenter references existing GWMP and regulatory requirements and states that Phase I is not in compliance with these regulatory requirements. Specifically, elevated TDS levels do not meet the regional TDS water quality goals. The commenter also states that increases in groundwater levels within the basin represent a deviation from the GWMP established criteria.

Response 4-14

It is acknowledged that the water quality of treated effluent would not meet the region-wide TDS goals set by the CCRWQCB in their Basin Plan and the GWMP during Phase I of the LTWMP. The detailed evaluation of potential project-related groundwater quality and groundwater level changes was conducted in part to assess possible impacts. Mitigations for these effects have been proposed within **Section 4.3** of the Draft SEIR.

The 200-foot increase in water levels since 1976 appears to refer to the hydrograph for well 22C (Draft SEIR **Appendix F, Figure 3**), which is not located in the San Juan Valley. The water level changes in this well represent conditions changing from drought after long-term overdraft conditions to importation of CVP water. Hydrographs for most wells in the San Juan Valley show water-level increases of 60 to 100 feet during this same time period.

Water Quality Criterion 2 and 3, included in the update to the GWMP Update, are to “Maintain groundwater levels, where practical, no higher than 20-30 feet below ground surface.” The GWMP acknowledges that there will be areas where “it will be impractical to achieve these groundwater levels” based on existing sub basin conditions or “where artificial percolation occurs.” It is not apparent that the GWMP establishes any criteria for precluding increasing groundwater levels.

Groundwater monitoring and managed irrigation practices are planned to reduce the potential for adverse impacts resulting from high groundwater levels resulting from project implementation. Overall, the evaluation conducted for the Draft SEIR indicates that the decrease in groundwater pumping at Pacific Sod Farm results in a small, local increase in water levels that is offset within a few years by reducing percolation at the DWTP and IWTP and increasing municipal groundwater pumping in the Hollister area. Substitution of recycled water for CVP water in a broader part of the San Juan Valley during Phase II of the LTWMP has no effect on groundwater levels because it is a direct substitution.

LETTER 5. LANCE W. JOHNSON, DISTRICT MANAGER/ENGINEER – SAN BENITO COUNTY WATER DISTRICT***Comment 5-1***

The commenter states ‘the District’s further comments will address only the SEIR’s suitability as a project-level CEQA document for the selection and use of reclaimed water sites for use during Phase I’.

Response 5-1

The City shall consider all comments submitted by the District.

Comment 5-2

The commenter states that the Draft SEIR does not clearly delineate how the cooperative process between the City, County, and District would occur when implementing various elements of Phase I. Although the collaborative spirit is reaffirmed in the City’s MOU dated October 9, 2006, the commenter states the Draft SEIR should discuss the recent ongoing cooperation and progress made between the City, District, and County to better explain each entity’s role in helping the City address current wastewater issues.

Response 5-2

As discussed in the Comment, the MOU is perhaps the most relevant example of the cooperative process between the City, County, and District for the management of water resources. A detailed discussion of the MOU and the cooperative process between the City, County, and District for the management of water resources in the region is included in the discussion of the Hollister Urban Area Water and Wastewater Management Plan (HUAWWMP) in **Section 3.2.3** of the Draft SEIR. Additionally, the discussion of the site selection process within **Section 6.4** of the Draft SEIR discusses the role of the Governance Committee, which was formed as a condition of the MOU and is comprised of two representatives each from the City, District, and County. Although, the ongoing cooperative process is not appropriately categorized as a “regulatory requirement, condition, or approval” and therefore does not warrant discussion within **Section 3.6**, in response to the comment, a brief description of the site selection process has been added to the discussion of the MOU within **Section 3.2.3**.

Comment 5-3

The commenter states that groundwater simulation and scope of analysis only extends 30 years into the future. The commenter states that the Draft SEIR should identify the continuing responsibility of the City to mitigate for any adverse impacts to groundwater quality or groundwater levels during the lifetime of the project, regardless of whether Phase II occurs when anticipated.

Response 5-3

Although the Draft SEIR was prepared to analyze the effects of reclaimed water irrigation projects implemented during Phase I of the City’s LTWMP, it is acknowledged that irrigation with effluent from the City’s DWTP on the project sites would likely extend into Phase II. 2006 EIR **Mitigation Measures 4.3.11a** and **4.3.11b** recommended to reduce impacts associated with shallow and deep groundwater

levels specify that monitoring of groundwater levels shall occur “semi-annually until irrigation for DWTP effluent disposal purposes ceases.” Therefore, mitigation associated with groundwater levels would apply throughout the lifetime of the project. 2006 EIR **Mitigation Measure 4.3.2** recommended for impacts associated with degradation of water quality states that monitoring groundwater for TDS, sodium, chloride, and sulfate shall be conducted “at least semiannually until 2023.” In response to the comment, **Mitigation Measure 4.2-5b** has been included in the Final SEIR to ensure that the City is responsible for monitoring and the implementation of mitigation for impacts to water quality throughout the lifetime of the project. Please refer to **Section 4.2.4** of the Final SEIR.

Comment 5-4

The commenter refers to CEQA *Guidelines* that require an EIR to provide a detailed discussion of each resource category’s standards of significance and mitigation measures. The commenter states that due to the complexity of the project and the various operational scenarios, the Draft SEIR cannot provide an exact level of detail for all potential future operational scenarios and the resulting potential impacts. The commenter specifically stated that this is “especially true of Brookhollow Ranch Sub-area B.”

Response 5-4

Assumptions used for the Brook Hollow Ranch Site groundwater modeling were based on known information for areas with similar geologic features in the region, which is an appropriate level of analysis to estimate impacts for the purposes of CEQA. CEQA guidelines Section 15151 states “ An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers within information which enables a them to make a decision which intelligently takes into account environmental consequences.” It is unlikely that further site-specific data gathering at the Brookhollow Ranch Site would result in substantially different conclusions. In response to the comment, the mitigation recommended to avoid impacts associated with groundwater levels at the Brookhollow Ranch Site has been revised to include specific standards for implementation. Please refer to **Mitigation Measure 4.2-7c** within the Final SEIR for details.

Comment 5-5

The commenter states that under the No Project Alternative analyzed in the 2006 EIR, no future improvements would be made to the “quality or quantity” of treated effluent. The commenter suggests that “the City may want to include an additional or alternative No Project Alternative in the SEIR,” due to the current upgrades in technology to the City’s wastewater treatment system.

Response 5-5

Further analysis and discussion of the No Project Alternative has been added to **Section 6.0** of the Final SEIR.

Comment 5-6

The commenter states that the Draft SEIR should indicate whether or not an annual Wastewater Demand Report for the DWTP was prepared for 2007 as indicated in the 2006 FEIR (**Mitigation Measure 5.1**). If

the City has not completed the annual report, the commenter urges the completion of the report and requests a copy once the annual report is completed.

Response 5-6

Completion of the annual wastewater report, as required by 2006 EIR **Mitigation Measure 5.1**, is not relevant to the environmental consequences of the proposed project or the scope of analysis required by CEQA; therefore, a discussion has not been included within the Final SEIR. However, it should be noted that the Mitigation Monitoring Reporting Plan (MMRP) adopted by the City Council when the City certified the 2006 EIR guides the implementation and timing of mitigation measures recommended within the 2006 EIR. The MMRP states that preparation of a Wastewater Demand Report for the City's DWTP shall occur annually throughout the operation of the City of Hollister Domestic Wastewater Systems Improvement Project (DWSI). Because the City's DWTP was under construction and improvements were not operational in 2007, preparation of a report for that year is not a requirement of the MMRP.

Comment 5-7

The commenter states that the City is preparing an update to the Hollister Urban Area Wastewater Master Plan (HUAWWMP), which includes a regional salinity control program that is an integral part of the City's overall program and the District is available to assist in the effort.

Response 5-7

A discussion of the HUAWWMP is included within **Section 3.2.3** of the Draft SEIR. This discussion notes the ongoing cooperative process between the City, District, and County to complete the plan. The City will continue to work with the District to complete this effort in a timely fashion.

Comment 5-8

The commenter states that a significant effort will be required to develop and implement the Reclaimed Water Irrigation Management Plans for the selected Phase I irrigation site(s). The commenter states that the District looks forward to continued cooperative efforts in working with the City in developing and implementing the management plans.

Response 5-8

Comment noted. The City looks forward to cooperating with the District throughout the preparation and implementation of Reclaimed Water Irrigation Management Plans for the selected irrigation site(s) during Phase I of the LTWMP.

Comment 5-9

The commenter states that the District requests that the City allow it to review and participate in the contract negotiations with owners of private land to be used for reclaimed water irrigation during Phase I, if deemed necessary.

Response 5-9

Comment noted. The City will consult with the District prior to entering into legal agreements with private landowners for reclaimed water irrigation areas during Phase I of the LTWMP.

Comment 5-10

The commenter states that pursuant to Public Resources Code section 21092.5(a), the District looks forward to receiving responses to comments '10 days prior to certification of the Final SEIR'. The commenter states that the District is looking forward to working with the City in future wastewater issues.

Response 5-10

Comment noted. The City appreciates the District's participation and input provided throughout the CEQA environmental review process for the proposed project.

PUBLIC MEETING, JANUARY 3, 2008

A public meeting was held to address questions and issues regarding the Draft SEIR for the proposed project at the Veteran's Memorial Building in the City of Hollister on January 3rd, 2008. All of the issues raised were addressed at the meeting by City staff. The complete transcript of the public meeting is provided as **Attachment B** of this Final EIR, Volume I. Relevant issues discussed at the public meeting that relate to environmental issues within the scope of this document are briefly summarized and responded to below.

Meeting Comment 1 – Capacity of Sprayfields, Disposal Requirements, and Application Rates

Several questions were raised regarding the capacity and acreage of proposed reclaimed water irrigation areas, and the quantity of reclaimed water that would need to be irrigated each year.

Response

The proposed reclaimed water irrigation sites evaluated in the Draft SEIR are shown in **Figure 3-2** and the capacity and acreage of each site is provided in **Table 3-4**. The anticipated volume of reclaimed water irrigation per year is provided in **Table 3-3**. As discussed in the meeting and **Section 3.3.4** of the Draft SEIR, the existing percolation volumes at the DWTP and IWTP would be maintained and reclaimed water irrigation would be utilized to provide additional capacity for increased wastewater flows as a result of growth and urbanization within the service area. As discussed in the meeting and **Section 3.3.5** of the SEIR, the Riverside Park Site and San Juan Oaks Golf Course would not provide the total irrigation capacity goals identified for Phase 1 of the City's LTWMP and would need to be developed in conjunction with another site.

Meeting Comment 2 – Site Selection Process

Several commenters questioned how the preferred reclaimed water irrigation site(s) would be selected.

Response

Please refer to the discussion of the Site Selection process in **Section 6.4.1** of the SEIR.

Meeting Comment 3 – Airport Safety Concerns

Several commenters raised concerns that reclaimed water irrigation at the airport may result in safety hazards. Specifically, the following concerns were raised: 1) application of reclaimed water would result in standing water and soggy conditions that would cause a safety hazard if aircraft were to inadvertently travel off the runways and taxiways; 2) application of reclaimed water could attract birds and wildlife; and 3) reclaimed water could damage aircraft and equipment due to the high salinity content.

Response

Potential impacts associated with safety hazards created through reclaimed water irrigation at the airport are discussed under **Impact 4.7-8** of the Final SEIR. As discussed in the EIR, in accordance with mitigation measures recommended in the 2006 EIR, consultation with the Federal Aviation Administration, the San Benito County Airport Land Use Commission, and the State of California Department of Transportation Division of Aeronautics would occur to ensure that the proposed irrigation system would be compatible with airport operations. Further clarification of the safety design measures proposed to ensure the irrigation system is compatible with aeronautic operations has been included within the Final SEIR. Please refer to revisions to **Impact 4.7-8** discussed in **Section 4.7.4** in the Final SEIR.

Meeting Comment 4 – Airport Groundwater Levels

One commenter questioned how reclaimed water irrigation would affect groundwater levels at the airport.

Response

Potential impacts associated with groundwater levels at the airport are discussed under **Impact 4.2-7** of the Final SEIR. As discussed in the EIR, although the increase in groundwater levels as a result of sprayfield operation at the Hollister Airport is not expected to affect the root zone of plants or future construction activities, because groundwater levels are expected rise in the project area, mitigation has been recommended to avoid potential impacts. These measures will include measuring of groundwater levels at several monitoring wells down gradient of the sprayfields. If significant changes in groundwater levels are observed, increased pumping of municipal wells in the area would be used to bring the water table down.