

DATE: March 31, 2009

TO: Responsible Agencies, Trustee Agencies, and Interested Persons

FROM: San Benito County Water District

SUBJECT: Notice of Preparation of a Supplement to the *Reclaimed Water Irrigation Project Subsequent Environmental Impact Report* for the San Benito County Water District Recycled Water Facility Phase I Demonstration Project.

PUBLIC REVIEW PERIOD: March 31 – April 30, 2009

The San Benito County Water District (District) is the lead agency for the preparation of a Supplement to the *Reclaimed Water Irrigation Project Subsequent Environmental Impact Report* (SEIR) in compliance with the California Environmental Quality Act (CEQA). The purpose of the Supplement is to evaluate additions and changes to the Reclaimed Water Irrigation Project subsequent to certification of the Final SEIR by the City of Hollister. The project changes to be evaluated in the Supplement include additional recycled water use areas during Phase I of the City's Long Term Wastewater Management Plan (LTWWMP) as proposed by the District's Recycled Water Facility (RWF) Phase I Demonstration Project (proposed project).

The purpose of the NOP is to describe the proposed project and potential environmental effects in order to allow agencies and interested parties to provide input on the scope and content of the Supplement. Comments on this NOP are due to the District by 5:00 p.m. on April 30, 2009.

PROJECT DESCRIPTION

The proposed project would result in the use of recycled water treated at the City of Hollister's Domestic Wastewater Treatment Plant (DWTP) for agricultural irrigation on currently irrigated lands located along Wright Road adjacent to the recycled water distribution pipeline that extends to the Hollister Municipal Airport (**Figure 1** and **Figure 2**). The demonstration project would occur over the next 5 years during Phase I of the City's LTWWMP, prior to the demineralization of recycled water anticipated to begin in 2015 or earlier. Under the demonstration project, recycled water would offset use of CVP water or groundwater use for agricultural irrigation. Potential lands being considered for beneficial use of recycled water under the demonstration project are illustrated in **Figure 2**. These lands consist of approximately 1,953 acres of currently irrigated lands within unincorporated San Benito County, just west of the City of Hollister. Up to 800 acres of the total area identified may be selected for recycled water irrigation. Construction activities would be limited to the installation of minor pipeline turn-outs to provide a connection between existing irrigation systems and the approved recycled water distribution line extending from the DWTP to the Airport. No change to existing agricultural land uses would occur.

Implementation of the demonstration project as the first phase of the RWF Project will require approval from the District. Preparation of a Supplement to the 2008 SEIR would meet the need

for environmental review pursuant to the California Environmental Quality Act (CEQA). When deciding whether to approve the demonstration project, the District would consider the 2008 SEIR as revised by the Supplement.

The Supplement will address the increased quantity of recycled water irrigation during Phase I of the LTWWMP not considered within the SEIR. Recycled Water Irrigation would comply with the California Department of Health Services' (DHS) Title 22 recycled water regulations and the California Regional Water Quality Control Board's (RWQCB) Monitoring and Reporting Plan Requirements and Master Reclamation Permit conditions (Order No. R3-2008-0069) issued to the City on December 5, 2008.

PROJECT BACKGROUND

Previous Environmental Review

The City of Hollister certified an EIR for the City of Hollister Domestic Wastewater System Improvements and the San Benito County Water District Recycled Water Facility Project in October 2006 (2006 EIR). The 2006 EIR addressed the construction of improvements to the DWTP, including a Membrane BioReactor (MBR) tertiary treatment facility, septage receiving station, and seasonal storage reservoir. The 2006 EIR also addressed effluent disposal, including the interim use of sprayfields, and the eventual use of recycled water for agricultural and urban irrigation. In October 2006, the City of Hollister approved the construction of the MBR facility and seasonal storage reservoir at the DWTP. The construction of the DWTP improvements was completed in 2008. However, when the City approved the DWTP improvements, it deferred approval of sprayfield development until additional CEQA review was completed for potential sprayfield sites. Accordingly, the City prepared and certified a Subsequent Environmental Impact Report for the Reclaimed Water Irrigation Project in May 2008. The SEIR provided a project-level analysis of reclaimed water irrigation and associated distribution lines on five sites during Phase I of the LTWWMP, but did not analyze impacts associated with the District's RWF project because details of the project had not been fully developed. The City approved construction of recycled water distribution lines and reclaimed water irrigation at the Hollister Municipal Airport and the proposed Riverside Park site. Installation of a recycled water distribution line that extends from the DWTP to the Airport is currently underway.

The District has determined that preparation of a Supplement to the SEIR is warranted due to the addition of proposed Phase I recycled water use areas along Wright Road.

Recycled Water Quality

The new MBR and disinfection system at the DWTP produces a high-quality effluent that meets Title 22 recycled water regulations, which define the treatment processes, water quality criteria, and treatment reliability requirements for the public use of recycled water. The MBR and chlorine disinfection facility produce effluent meeting the category of disinfected tertiary recycled water. Allowable uses for disinfected tertiary recycled water includes, but is not limited to, irrigation of the edible portion of food crops, school yards, golf courses and residential landscaping. Effluent from the MBR and chlorine disinfection system does not have an odor or color that would readily distinguish it from other water sources. The treated effluent is projected to have an average salinity level of approximately 1,200 mg/L of TDS through 2015, which is comparable to existing sources of groundwater irrigation.

ENVIRONMENTAL EFFECTS

The District has determined that the Supplement should address the following issues:

- *Hydrology and Water Quality* – The Supplement will analyze the impacts to groundwater on a local and regional level as a result of the proposed project. Potential reduction of groundwater quality due to elevated salinity levels in treated effluent, and changes in local hydrological conditions will be addressed.
- *Biological Resources* – The EIR will analyze the project’s short-term (construction) and long-term (operation) on waters of the U.S., threatened and endangered species, and other biological resources.
- *Cultural Resources* – The EIR will address potential impacts associated with cultural resources in the areas of pipeline turn-outs.
- *Agricultural Resources* – The EIR will address potential impacts associated with agricultural soil quality and designated prime farmland from application of Phase I recycled water.

Because project-related construction activities would be limited to the installation of minor pipeline turn-outs from the existing reclaimed water distribution line and changes in land use would not occur, potential impacts associated with the following issue areas were either already covered under the SEIR or are not expected: aesthetics, air quality, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems.

DISCUSSION OF ALTERNATIVES

CEQA Guideline 15126.6(a) requires that an EIR describe a range of reasonable alternatives for the project. The Supplement will include a revised discussion of comparative merits of the alternatives evaluated within the SEIR, including the No-Project alternative, when compared to the proposed project. Additional alternatives may be identified, in part, by public input received during the NOP comment period. To ensure that the full range of issues and alternatives related to the proposed project are adequately addressed and that all significant issues are identified, comments and suggestions are invited from all interested parties.

RESPONSIBLE AGENCIES

The District anticipates that approvals for the proposed project may be required from the City of Hollister, San Benito County, RWQCB, California Department of Health, and other agencies. These agencies will likely consider the SEIR as revised by this Supplement in considering whether to grant approvals.

SCOPING MEETINGS

A scoping meeting will be held at 6:00 p.m. on Thursday, April 16, 2009 to solicit input from interested agencies parties. The meeting will occur at the following location:

Veterans' Memorial Building
Room 218
649 San Benito Street
Hollister, CA 95023

NOP RESPONSES

Written comments or questions concerning the Supplement should be received by 5:00 p.m. on Thursday, April 30, 2009. Please address comments or questions to:

San Benito County Water District
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