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CEQA Addendum

West Hills Water Treatment Plant
Expansion

San Benito County Water District

State Clearinghouse No. 2012081028

April 2025





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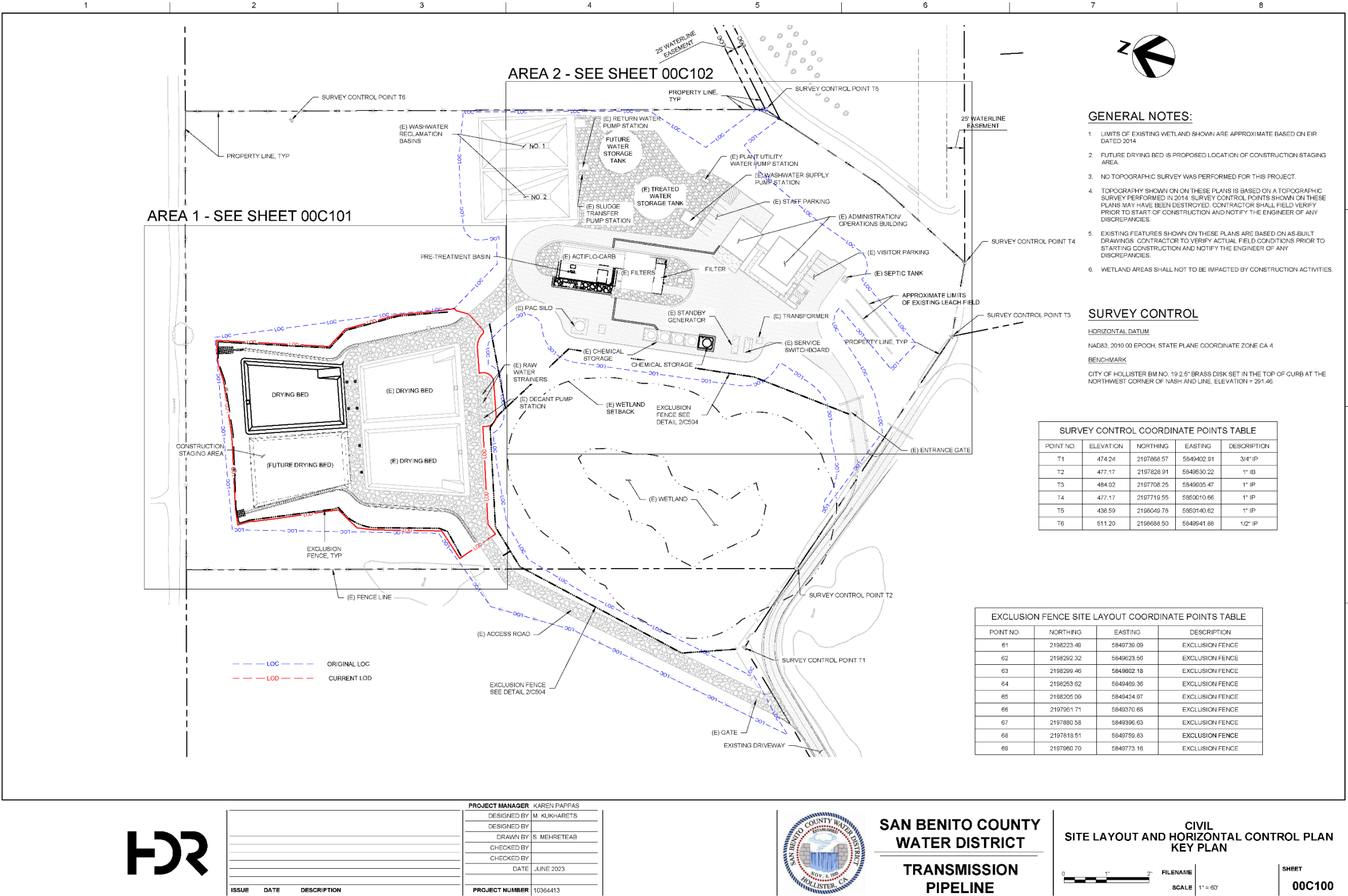
- Appendix A. Biological Resources Tech Memo**
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1.0 Background

In April 2014, the San Benito County Water District (District) adopted an Environmental Impact Report (EIR; State Clearing House No. 2012081028) for the West Hills Water Treatment Plant (WHWTP) Project. The 2014 EIR assessed the potential impacts of the proposed Project based on a full buildout capacity of 9 million gallons per day (MGD). In 2017 the WHWTP was constructed with an initial design capacity of 4.5 MGD. In April 2024, the District adopted a CEQA NOD that found that the phased expansion of the WHWTP from 4.5 MGD to 6.75 MGD was covered by the 2014 EIR and did not require additional CEQA review.

The District analyzed the previously permitted WHTP Project footprint against the current WTP expansion plans. Several areas of potential disturbance to non-native grasslands were identified in the plans. Based on CDFW concerns, these areas have been removed from the plan and the new expansion will not affect areas outside of the original project footprint. A current planned stockpile location on non-native grassland will be removed from the plans and excess soil will be hauled offsite. Figure 1 shows the original WHTP Limits of Disturbance superimposed with the current Limits of Disturbance.

Figure 1. Project Footprint



2.0 Purpose of this Addendum

The purpose of this addendum is to provide specific information related to potential habitat disturbance within the WHWTP expansion Project area. It includes the results of focused biological and cultural resources surveys that augment past studies and provide current resource information. The Limits of Disturbance identified in the previous EIR is compared to the current expansion plans to identify whether the expansion Project limits of disturbance exceed the extent of previous analysis.

CEQA Guidelines Sections 15162 and 15164 require that a lead agency prepare an addendum if some changes or additions to the environmental evaluation of a Project are necessary but none of the following occurs:

- 1) There are no substantial changes in the Project which require major revisions to the environmental document or a substantial increase in the severity of previously identified significant effects;
- 2) There are no substantial changes with respect to the circumstances under which the Project is undertaken which require major revisions to the environmental document; or
- 3) No new information is of substantial importance, which could not have been known with the exercise of reasonable diligence at the time of the environmental document adoption, shows any of the following:
 - a. The Project will have one or more significant effects not discussed in the environmental documents,
 - b. The Project will result in impacts substantially more severe than those disclosed in the EIR,
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponent declines to adopt it, or
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the environment, but the Project proponent declines to adopt it.

3.0 Description of Current Project and Proposed Changes

The WHWTP expansion is necessitated by forecasted increases in treated water demand and the need for drought resilience in the District's service territory. The expansion will be based on retaining the same processes and system design as the existing WHWTP. The 2025 Accelerated Drought Response Project Initial Study/Mitigated Negative Declaration (EIR; State Clearing House No. 2025021019) contains a detailed description of the planned WHWTP expansion.

The environmental analysis contained in the 2014 WHWTP EIR considered future expansion and installation of additional water treatment equipment and related improvements to a buildout capacity of 9 MGD. Thus, the current interim expansion falls within the design capacity evaluated in the EIR.

4.0 Biological Resources and Findings

On March 24, 2025, a supplemental site visit to the West Hills Water Treatment Plant (WHWTP) was conducted. The Biological Resources Tech Memo is included in this Addendum as Attachment A.

The existing facility is built on a paved and graveled pad that is surrounded by annual grasslands. The unpaved margins immediately surrounding all built elements within the plant's boundaries are routinely mowed. An additional area to the east of the entrance road is also mowed. Other areas are unmaintained, and vegetation reaches heights of one to two feet. All disturbance areas for the plant expansion will occur within paved/graveled or routinely mowed areas. All disturbed areas will be located within the originally permitted Limits of Disturbance that was established and permitted for the WHWTP's initial construction.

Twelve ground squirrel burrow complexes within the area of disturbance were GPS mapped and flagged during the site visit (Figure 2). Nine of the burrows occur within the routinely mowed or previously disturbed area. The remaining four burrows occur within unmowed annual grasslands on the perimeter of the Project footprint. Ground squirrels were observed actively utilizing burrows near the disturbance footprint. There was no sign of utilization of any burrows by western burrowing owl.

The burrows have the potential to be suitable upland habitat for CTS. However, the surrounding environment limits the accessibility of the habitat. Water and emergent wetland vegetation was observed in the seasonal wetland during the site visit. The edges of the ponded area are overgrown with emergent vegetation that would limit the ability of CTS to easily enter and exit the pond for breeding.

Figure 2. Ground Squirrel Burrow Locations



5.0 Cultural Resources Findings

On June 14, 2024, HDR surveyed portions of the WHWTP that had not been surveyed previously. The Cultural Resources Tech Memo is included as Attachment B. At the time of the survey, ground visibility was poor due to thick ground covering vegetation throughout the area. The WHWTP Project area encompasses a total of 18 acres. Of this, 12.67 acres had previously been surveyed to modern standards. The June 14 survey entailed an intensive pedestrian survey of 3.3 acres (Figure 3). The remaining 2.1 acres, a pond, could not be surveyed. No cultural resources were observed as a result of the pedestrian survey.

6.0 Analysis of Potential Environmental Effects

6.1 Biological Resources

The 2014 EIR determined that the Project would have no significant impacts on biological resources after mitigation measures were implemented. The phased expansion detailed in the 2024 NOD would not alter the conclusions of the EIR, result in any new significant impacts, or substantially increase the severity of previously identified impacts to biological resources.

6.2 Cultural Resources

The 2014 EIR determined that the Project would have no significant impacts on cultural resources after mitigation measures were implemented. The phased expansion detailed in the 2024 NOD would not alter the conclusions of the EIR, result in any new significant impacts, or substantially increase the severity of previously identified impacts to cultural resources.

7.0 Conclusion

The phased expansion detailed in the 2024 NOD would not alter the conclusions of the 2014 EIR, result in any new significant impacts, or substantially increase the severity of previously identified impacts. Pursuant to Public Resources Code Section 21166 and CEQA guidelines 15162 and 15164, the District has determined that (1) there is substantial evidence that none of the conditions requiring preparation of a subsequent or supplemental EIR exist, and (2) the District will rely on the previous environmental document, which adequately addresses this Project. This document will be made part of the administrative record and will be sent to the lead agency decision-making body to provide clarification regarding the proposed Project.

Figure 3. Cultural Resources Survey Coverage





Appendix A. Biological Resources Tech Memo

Biological Resources Survey of West Hills Water Treatment Plant

An additional site visit to the West Hills Water Treatment Plant (WHWTP) was conducted on March 24, 2025. The purpose of this visit was to document current conditions at the facility in preparation for a CEQA addendum and to further inform the Incidental Take Application (ITP) for California tiger salamander (CTS).

The existing facility is built on a paved and graveled pad that is surrounded by annual grasslands. These grasslands consist of plant species such as brome (*Bromus* sp.), common vetch (*Vicia sativa*), mustard (*Brassica nigra*), and bluebonnet (*Lupinus* sp.). The unpaved margins immediately surrounding all built elements within the plant's boundaries are routinely mowed. An additional area to the east of the entrance road is mowed. Other areas are unmaintained and vegetation reaches heights of one to two feet. All disturbance areas for the plant expansion will occur within paved/graveled or routinely mowed areas. All disturbed areas will be located within the originally permitted Limits of Disturbance that was established and permitted for the WHWTP's initial construction.

Twelve ground squirrel burrow complexes within the area of disturbance were GPS mapped and flagged during the site visit. The locations of all ground squirrel burrows mapped during the site visit are shown in the Addendum as *Figure 2. Ground Squirrel Burrow Locations*. Nine of the burrows occur within the routinely mowed or previously disturbed area. The remaining four burrows occur within unmowed annual grasslands on the perimeter of the project footprint. Ground squirrels were observed actively utilizing burrows near the disturbance footprint. All observed burrows within the survey area were flagged for further observation during pre-construction surveys. There was no sign of utilization of any burrows by western burrowing owl, as indicated by the absence of any white-wash, feathers, or owl pellets at the mouth of burrows.

The burrows would be suitable upland habitat for CTS, but the surrounding environment limits the accessibility and suitability of the habitat. Water and emergent wetland vegetation was observed in the seasonal wetland during the site visit. Natural vernal pools and features that mimic the hydrology of vernal pools, such as cattle stock ponds, are the most successful CTS breeding habitats (USFWS 2023). Approximately 70 percent of the seasonal wetland contained emergent wetland vegetation cattails (*Typha latifolia*). The edges of the ponded area are overgrown with emergent vegetation that would limit the ability of CTS to easily enter and exit the pond for breeding (EDAW 2008).

Figure 1 below shows multiple photopoints established during the site visit which will be used to document changes to the project area throughout construction. The photo appendix below documents the current conditions at the site as of March 24, 2025.

Figure 1. Photopoints



References

- EDAW. 2008. California tiger salamander upland habitat study report. Naval Weapons Station Seal Beach Detachment, Concord, Contra Costa County, California. Prepared by EDAW, Walnut Creek, California. December 3, 2008
- United States Fish and Wildlife Service (USFWS). 2023. 5-YEAR REVIEW California Tiger Salamander Central California Distinct Population Segment (*Ambystoma californiense*). Online at: https://ecosphere-documents-production-public.s3.amazonaws.com/sams/public_docs/species_nonpublish/5721.pdf. Accessed April 1, 2025.

Photo Appendix



Photopoint 1a. View of routinely mowed open area to the east of the entrance road. Photo taken facing 129 degrees SE on 3/24/2025.



Photopoint 1b. View of routinely mowed open area to the east of the entrance road. Photo taken facing 196 degrees S on 3/24/2025.



Photo 2a. View of the paved facility area where the new chemical storage tank will be placed. Photo taken facing 240 degrees on 3/24/2025.



Photo 2b. View of the seasonal from the facility area. Photo taken facing 68 degrees on 3/24/2025.



Photo 3a. View of the drying beds from the main facility pad. Photo taken facing 181 degrees S on 3/24/2025.



Photo 3b. View of seasonal wetland and facility pad curb. Photo taken facing 317 NW on 3/24/2025.



Photo 4. View of the water basin. Photo taken facing 284 degrees NW on 3/24/2025.



Photo 5a. Photo of the drying bed and facility from the mowed grassland east of the drying bed, Photo taken facing 180 degrees S on 3/24/2025.

Photo Appendix



Photo 5b. Photo of the drying bed from the mowed grassland to the east. Photo taken facing 237 degrees S on 3/24/2025.



Photo 6a. View of the proposed drying bed area in previously disturbed land. Photo taken facing 233 SW on 3/24/2025.



Photo 6b. View of the proposed drying bed area. Photo taken facing 294 degrees NW on 3/24/2025.



Photo 6c. View of the proposed drying bed area currently used for sludge drying. Photo taken facing 183 degrees SW on 3/24/2025.

Photo Appendix



Photo 7a. View of the northern extent of proposed drying bed area. Photo taken facing 230 degrees SE on 3/24/2025.



Photo 7b. View of the facility boundary from proposed drying bed area. Photo taken facing 330 degrees NW on 3/24/2025.



Photo 7c. View of the proposed drying bed location. Photo taken facing 62 degrees NE on 3/24/2025.



Photo 8a. View of the undisturbed grassland at the northern boundary. Photo taken facing 166 degrees S on 3/24/2025.

Photo Appendix



Photo 8b. View of the undisturbed slope to the west of the drying beds. Photo taken facing 316 degrees NW on 3/24/2025.



Photo 9a. View of the drying bed. Photo taken facing 18 degrees N on 3/24/2025.



Photo 9b. View of the slope along the exit road. Photo taken facing 274 degrees west on 3/24/2025.



Photo 10. View of a small mammal burrow found during the 3/24/2025 site visit.



Appendix B. Cultural Resources Tech Memo

Cultural Resources Survey of the West Hills Water Treatment Plant

The Accelerated Drought Response Project (ADRoP) is an Aquifer Storage and Recovery (ASR) project that will store treated excess Central Valley Project (CVP) water via ASR wells and extract the stored water from the same wells with wellhead treatment, such as disinfection, during drought periods. ADRoP can store between 1,600 acre-feet-per-year (AFY) and 2,700 AFY of excess CVP surface water in wet years and generate an average annual yield of 650 acre-feet (AF) to 1,035 AF. The project components consist of three to five ASR wells, the expansion of the existing West Hills Water Treatment Plant (WHWTP), and associated transmission pipelines. The wells are spaced to allow for efficient injection, the WHWTP is expanded to treat excess CVP water to be injected into the ASR wells, and the pipelines are sized to convey the injection and extracted water as well as to remove hydraulic bottlenecks in the existing City of Hollister (COH) distribution system.

ADRoP is an ASR project that will store treated excess CVP water via ASR wells and extract the stored water from the same wells with wellhead treatment, such as disinfection, during drought periods. ADRoP can store between 1,600 AFY and 2,700 AFY of excess CVP surface water in wet years and generate an average annual yield of 650 AF to 1,035 AF¹. The project components consist of three to five ASR wells, the expansion of the existing WHWTP, and associated transmission pipelines. The wells are spaced to allow for efficient injection, the WHWTP is expanded to treat excess CVP water to be injected into the ASR wells, and the pipelines are sized to convey the injection and extracted water as well as to remove hydraulic bottlenecks in the existing COH distribution system.

Project Area

The Project is located over 76.44 acres within and north of the City of Hollister in San Benito County, California, (Figure 1) and falls over portions of the San Felipe and Hollister Geological Survey (USGS) 7.5-minute quadrangles. Land in the area consists of agriculture, commercial, and residential uses. The San Benito River is approximately 0.5 miles northeast of the WHWTP portion of the Project area.

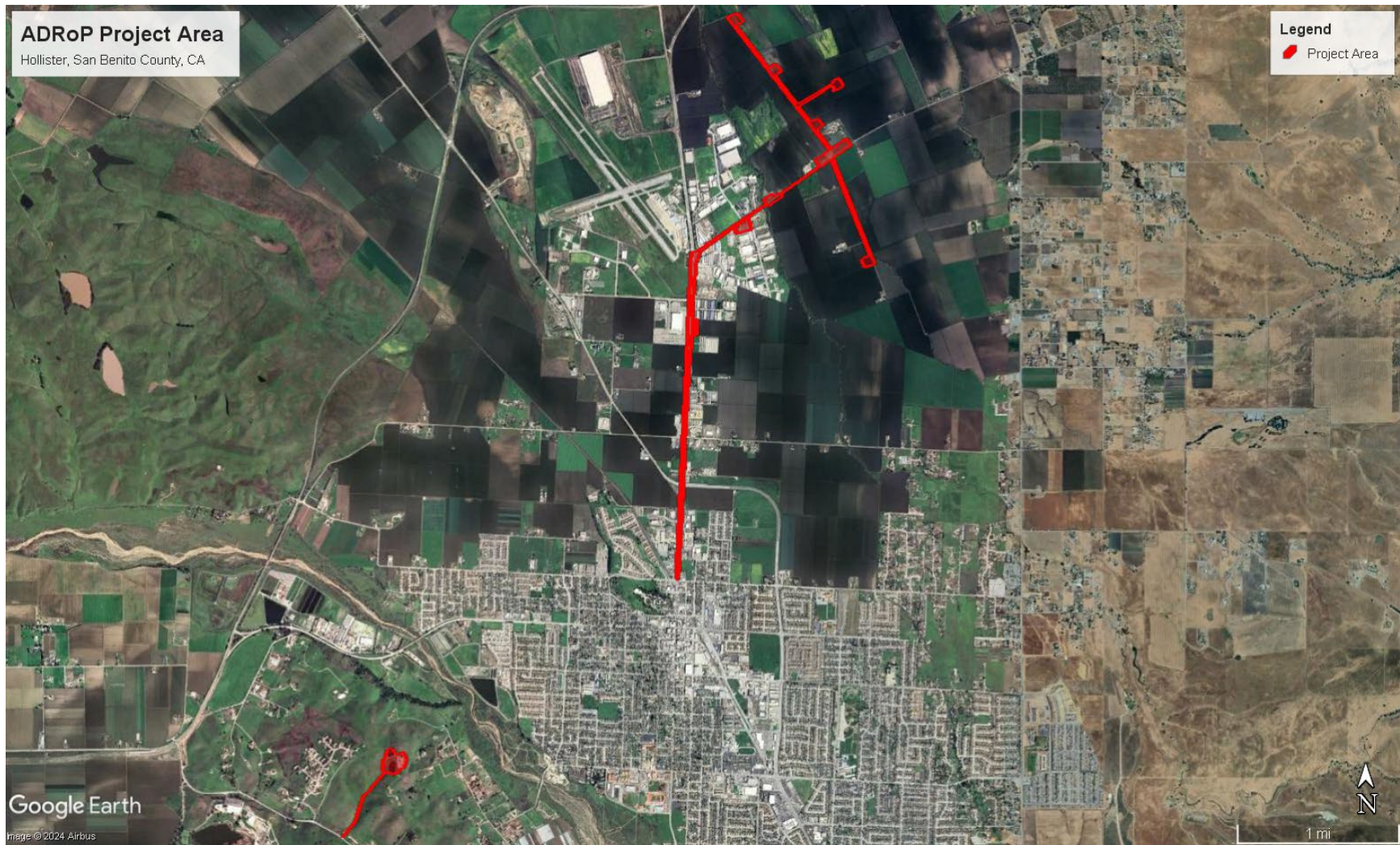


Figure 1. Project Area and Vicinity

Cultural Survey Results

It was determined that 12.67 acres of the total 76.44-acre Project area were previously and adequately surveyed. Three pedestrian surveys of the remaining 63.77 acres were conducted by HDR in support of the Project on June 14, 2024, August 30, 2024, and September 24, 2024.

June 14, 2024

On June 14, 2024, HDR surveyed portions of the WHWTP that had not previously been surveyed (see *Figure 3. Cultural Resources Survey Coverage* in the Addendum).

Ground visibility was poor, due to thick ground covering vegetation throughout the area surveyed, 0-5%. The WHWTP encompasses 18 acres of the Project area. Of this, 12.67 acres had previously been surveyed to modern standards (Figure 2). The June 14 survey entailed an intensive pedestrian survey of 3.3 acres. The remaining 2.1 acres, a pond, could not be surveyed. No cultural resources were observed as a result of the pedestrian survey.



Figure 2. Ground Conditions During June 14, 2024 Survey