



San Benito County Water District

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April 15, 2025

City Council Members
City of Hollister
375 Fifth Street
Hollister, CA 95023

Subject: Ordinance Approving an Amendment to Title 13 Public Services to Adopt Chapter 13.04 of the Municipal Code Related to Outside Sewer Connections.

Dear City Council Members,

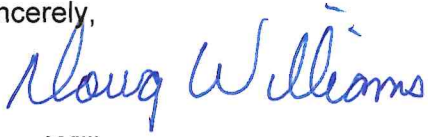
The San Benito County Water District (District) appreciates the opportunity to comment on the City of Hollister's (City) proposed ordinance (Ordinance) approving an amendment to Title 13 of the Municipal Code to include standards and regulations for outside sewer connections. As you know, the District has limited jurisdiction over land use decisions in San Benito County (County) and typically defers to the City and County on issues related to urban development. The District's primary function is to manage water supplies and protect water quality within the County, as described in our District Act and further clarified under California's Sustainable Groundwater Management Act. It is within this narrow context that we submit the following comments.

While the Ordinance is clearly intended to codify current practice and encourage urban development to occur within City limits, it could result in unintended consequences and potentially negative environmental impacts, particularly related to groundwater quality. Because the City does not have jurisdiction over urban development outside of City limits, it is possible that development could still occur in these areas but would not have access to the City's Wastewater Treatment Plant for the treatment of municipal wastewater. If the County approved development outside City limits, it would require alternative wastewater treatment facilities to meet this need. In this case, it is conceivable that the requirements imposed on such facilities may not be as stringent as those imposed on the City or that the effectiveness of such facilities could degrade over time and lead to additional salt and nutrient loading in the groundwater basin.

The District, City, and County have a long history of working collaboratively to solve issues related to water and wastewater, as documented in the Memorandum of Understanding for the Hollister Urban Area Water and Wastewater Master Plan, which was first executed by our respective agencies in 2004. The jointly funded MOU has resulted in a number of infrastructure improvements to address drinking water and wastewater quality for residents of the greater Hollister urban area, both within and outside City limits. The District would like to remind the City of this history, and that the Master Plan clearly indicates that the City's Wastewater Treatment Plant was intended to be regional in nature such that alternative treatment facilities would not be developed outside City limits.

Thank you for considering our comments. District staff are available to coordinate on this matter as necessary. Please address any questions to the District's General Manager, Dana Jacobson, by email at djacobson@sbcwd.com, or by telephone at (831) 637-8218.

Sincerely,



Doug Williams
Board President

Cc: David Mirrione, County Supervisors