



Governor's Office of Planning & Research

August 16, 2021

**August 17 2021**

## STATE CLEARINGHOUSE

East Palo Alto  
Attn: Art Henriques  
1960 Tate Street  
East Palo Alto, CA 94303

EAST PALO ALTO (CITY), ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE WOODLAND PARK EUCLID IMPROVEMENTS PROJECT (PROJECT); SCH # 2020040270

Dear Mr. Art Henriques:

Thank you for the opportunity to review the Environmental Impact Report for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board) is responsible for issuing water supply permits administered under the Safe Drinking Water Act and may require a new or amended water supply permit for the above referenced Project. A project requires a permit if it includes water system consolidation or changes to a water supply source, storage, or treatment or a waiver or alternative from Waterworks Standards (California Code of Regulations [CCR] title 22, chapter 16 et. seq).

The proposed Project includes demolishing 161 existing apartment units and replacing all structures with 605 new residential units and 5,000 square-feet of neighborhood commercial and open space. The Project also includes constructing a 625-space central parking garage. This portion of the Project would be constructed on a group of 14 individual parcels bounded by West Bayshore Road, Manhattan Avenue, and O'Connor Street in East Palo Alto's west side, totaling 3.92 acres.

The Project proposes a 1.5 million-gallon storage tank and 4,500 to 5,000 gallon per minute pump station at 375 Donohoe Street to provide a minimum of four hours of continuous fire flow. The tank and related pump infrastructure would tie into the existing water system.

Construction would also include installation of a 14-inch water main from the tank site, continuing within Donohoe Street and West Bayshore Road, ultimately connecting to upsized 12-inch mains that surround the project site. The project would install 1,090 linear feet of new or upsized 14-inch pipe and 1,700 feet of upsized 12-inch pipe.

The State Water Board as a potential responsible agency under CEQA, has the following comments on the City's draft EIR.

- What water system would the storage reservoir belong to? Please specify if the water storage tank meets the definition of a distribution reservoir (CCR §64551.10). "Distribution reservoir" means any tank or other structure located within or connected to the distribution system and used to store treated/finished drinking water.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

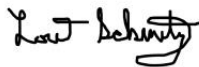
- If it does meet the definition of a distribution reservoir, the water system is required to apply for a water supply permit amendment from the State Water Board, Santa Clara District.
  - An application for an amended domestic water supply permit shall be submitted to the State Board prior to the addition of a new distribution reservoir (100,000 gallon capacity or greater) to the distribution system (Title 22, Division 4, Chapter 16, Article 2, 64556 (a)(1)).
  - If the Project will require a permit amendment, please send designs to the State Water Board prior to construction.
    - The water supplier shall submit to the State Board for review the design drawings and specifications for each proposed distribution reservoir prior to its construction (Title 22, Chapter 16, Article 6, Section 64585(b)).
- The document states, “The water tank is not required for the project’s water service but is being planned as a community benefit to enhance city-wide storage and fire flow”, (page 18-12, pdf 376).
  - Please further explain this by supporting the current need for the city-wide storage. Is it due to current system demands, water supply security, or fire-flow only?

Once the document is adopted, please forward the following items in support of the water system’s permit application to the State Water Board, Santa Clara District Office:

- Copy of the draft and final EIR and Mitigation Monitoring and Reporting Plan (MMRP)
- Copy of the Resolution or Board Minutes certifying and adopting the EIR and MMRP and approving the Project;
- Copy of the EIR with any comment letters received and the lead agency responses as appropriate; and
- Copy of the stamped Notice of Determination filed at the San Mateo County Clerk’s Office and Governor’s Office of Planning and Research, State Clearinghouse.

Please contact Eric Lacy at the Santa Clara District Office, at (510) 620-3453 or [Eric.Lacy@waterboards.ca.gov](mailto:Eric.Lacy@waterboards.ca.gov) if you have any questions regarding permitting requirements.

Sincerely,



Lori Schmitz  
Environmental Scientist  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> floor  
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Eric Lacy  
District Engineer  
Santa Clara District