

August 26, 2021

Governor's Office of Planning & Research

**August 27 2021**

**STATE CLEARINGHOUSE**

San Lorenzo Valley Water District  
Attn: Carly Blanchard  
13060 CA-9,  
Boulder Creek, CA 95006

SAN LORENZO VALLEY WATER DISTRICT (DISTRICT), MITIGATED NEGATIVE DECLARATION (MND) FOR THE CONJUNCTIVE USE PLAN FOR THE SAN LORENZO RIVER WATERSHED PROJECT (PROJECT); SCH #2021070572

Dear Ms. Carly Blanchard:

Thank you for the opportunity to review the Mitigated Negative Declaration for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits administered under the Safe Drinking Water Act and will require a new or amended drinking 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 District (4410014) is made up of the North and South system, as referred to in the MND. San Lorenzo Valley Water District-Fenton (4410002) and the Santa Cruz Water Department (4410010) systems may also be involved in the Project.

In 2019, the District conducted technical evaluations to analyze a wide range of alternative scenarios for conjunctively managing its surface water and groundwater sources to improve the reliability of its water supplies while also maintaining or improving flows and habitat quality for steelhead (*Oncorhynchus mykiss*) and Coho salmon (*O. kisutch*) in the San Lorenzo River watershed. A water Availability Assessment and Fisheries Resource Considerations report was also developed in 2019. From the studies the District selected four conjunctive use scenarios. The four scenarios allow for more flexibility in diverting surface flow during the winter and spring (peak season) and/or provide in-lieu groundwater recharge to improve surface flows during the summer.

The initial study looks at the environmental impacts of three of these scenarios. (The fourth will be looked at in a different document.)

The three proposed Project scenarios looked at include:

1. A water right modification to relieve the District of the low flow requirements that protects minimum low flows in the San Lorenzo River at the San Lorenzo River at Big Trees (SLRBT) gauge. The SLRBT requirement can at times prohibit all diversions for the system. (No new infrastructure is needed with this scenario.)

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

2. Using North System unused potential diversions in the South system in-lieu of pumping groundwater from the Pasatiempo groundwater wells, providing an equal amount of storage in the groundwater basin. Unused potential diversions” is defined as potential diversions within existing water rights, available flows, and diversion capacities that exceed demand within the service area within which they are diverted, but which potentially could be transferred to another system within the District’s service area. (No new infrastructure is required with this scenario. Instead, the interties 3 and 4 would be used for regular operation.)
3. Importing an average of 245 acre-feet per year to the South system from the Loch Lomond Reservoir- a part of the Santa Cruz Water Department system, resulting in 67% reduction in groundwater pumping from the Pasatiempo wells. The North System would also import 4 acre-feet per year of Loch Lomond Reservoir water and the Fenton system would import an average of 50 acre-feet/year of Loch Lomond Reservoir water.

This scenario requires the installation of the following piping:

- A new connection between the Newell Creek pipeline- a part of the Santa Cruz water system, and the Felton raw water system on the west side of the San Lorenzo Way bridge, approximately 0.4 mile north of the Highway 9 and the Graham Hill Road intersection in Felton;
- Installation of a new raw water pipeline across the San Lorenzo River, suspended under the San Lorenzo Way bridge; and
- Installation of a new underground raw water line that would run west from the new San Lorenzo Way bridge in the public right-of-way to tie-in to the existing water line at Farmer Street

This scenario also includes the following upgrades to the Kirby Water Treatment Plant, a part of the Felton system (4410002), within the existing footprint of the plant:

- A 90,000-gallon blending tank;
- A 3,000-gallon waste tank;
- Post-filtration granular activated carbon (GAC) absorption equipment; and
- Magnetic ion exchange (MIEX) filtration equipment.

The State Water Board as a responsible agency under CEQA, has the following comments on the District’s draft MND.

- The document mentions the third scenario, Loch Lomond, includes installing piping to allow surface water from Loch Lomond Reservoir to be transferred to the District. The project also includes upgrades to the Kirby Water Treatment Plant.
  - CCR Title 22, Division 4, Chapter 16, Article 2, 64556 specifies that an application for an amended domestic water supply permit shall be submitted to the State Board prior to any of the following:
    - Adding a new source.
    - Any addition or change in treatment, including design capacity or process.
- Please discuss if a water supply permit will be needed from the District and/or other partnering water systems. If a water supply permit will be needed from the District, discuss how the District will obtain a water supply permit from the State Water Board, DDW. Please include information in Table 1. Summary of Potentially Required Approvals, page 16, for any water supply permit amendments that will be required for the Project and the associated water system(s) that will need to obtain them. Please

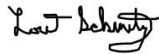
also include the designated State Water Board DDW water system(s) number(s) for clarification purposes.

When the CEQA review process has ended, please forward the following items with your permit application to the Monterey District Office:

- Copy of the draft and final MND and Mitigation Monitoring and Reporting Plan (MMRP)
- Copy of the Resolution or Board Minutes adopting the MND and MMRP;
- Copy of any comment letters received and the lead agency responses as appropriate;
- Copy of the stamped Notice of Determination filed at the Santa Cruz County Clerk's Office and the Governor's Office of Planning and Research, State Clearinghouse.

Please contact Kyle Graff at the Monterey District Office, at (831) 655-6935 or [Kyle.Graff@waterboards.ca.gov](mailto:Kyle.Graff@waterboards.ca.gov) if you have any questions regarding permitting requirements.

Sincerely,



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

Cc:

Office of Planning and Research, State Clearinghouse

Kyle Graff  
Water Resources Control Engineer  
Monterey District