Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant

Responses to Comments on the Draft IS-MND

prepared by
Soquel Creek Water District
5180 Soquel Drive
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Responses to Comments on the Draft IS-MND

This section includes comments received during the circulation of the Draft Initial Study-Mitigated Negative Declaration (IS-MND) prepared for the Soquel Creek Water District (SqCWD) Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant project (project).

The Draft IS-MND was circulated for a 34-day public review period that began on October 27, 2021 and ended on November 29, 2021. SqCWD received nine comments on the Draft IS-MND, including seven comment letters and two verbal comments received during the public hearing held at the SqCWD Board of Directors meeting on November 16, 2021. The commenters and the page number on which each comment appear are listed below.

The comments and responses follow. The comments have been numbered sequentially, and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment, and then the number assigned to each issue (Response 3.1, for example, indicates that the response is for the first issue raised in Comment 3).

Comment 1

From: Mark Hebard
Sent: Wednesday, October 27, 2021 8:25 AM
To: Michael Wilson
Cc: Taj Dufour; Annaliese Miller
Subject: [EXT] Re: Proposed Country Club Replacement Well

Thanks for the update. Hopefully the "facade" installation will be built instead of the industrial alternative.

Mark Hebard

On Tue, Oct 26, 2021 at 1:36 PM Michael Wilson <michaelw@soquelcreekwater.org> wrote:

> HI Mr. Hebard,
>
> The attached photo is an architectural rendering of what the building will look like before trees and plants are mature. We are going through the County Coastal Development permitting process with County planning and they will be requiring our project to remain within their guidelines. By my estimate, it's not quite as big as some of the neighboring homes. Our alternative to placing the treatment plant in a house facade is to build it without the facade, which will look more industrial.
>
> I recommend you keeping in touch with both the Water District and County Planning as both will have public hearings. Ours will be Nov. 16th. The County's hearing date will not be set until all of our items are submitted to their satisfaction. Instructions on how to receive, review and comment on our environmental document were included with your letter. Although it's a day early, I will include your comment with the others. Thank you for voicing your concerns.
>
> Best Regards,
>
> **Michael J. Wilson, P.E.** | Associate Engineer
> Soquel Creek Water District | 5180 Soquel Dr., Soquel CA 95073 | www.soquelcreekwater.org
> direct 831-475-8501 x122 | main 831-475-8500 | cell 831-706-6216
>
> Please consider the environment before printing this e-mail.
>
> ---
>
> **From:** Mark Hebard <[redacted]>
> **Sent:** Tuesday, October 26, 2021 12:30 PM
> **To:** Michael Wilson <michaelw@soquelcreekwater.org>
> **Subject:** Proposed Country Club Replacement Well
>
> Dr. Mr. Wilson,

Received the letter regarding the proposed Country Club Replacement Well yesterday. The 1862 square foot building that would be 28 feet (three stories) just seems completely out of scale for the neighborhood. I can't support it. Major changes would need to be made before I could.

Regards,
Mark Hebard
[redacted]

Comment 1

COMMENTER: Mark Hebard

DATE: October 26-27, 2021

In his first email, the commenter states an opinion that the proposed water treatment plant structure seems out of scale for the neighborhood and indicates that he cannot support the project. In his second email, the commenter states a preference for having a building façade constructed around the proposed water treatment equipment rather than having the equipment installed without a façade.

As stated on pages 18 through 20 in Section 1, *Aesthetics*, of the Draft IS-MND, the project has been designed to be visually similar to the surrounding residences and is consistent with the height, setback, and lot coverage requirements for R-1 districts in Santa Cruz County Code Section 13.10.323. Furthermore, the project site is not within an area for which the County has special scenic area design criteria or community design criteria, as described in Santa Cruz County Code Chapter 13.20. Therefore, the project would not conflict with applicable zoning and other regulations regarding scenic quality during construction and operational activities. The SqCWD Board of Directors will consider the commenter's concern as they review the project.

In addition, in response to the commenter's first email, SqCWD provided architectural renderings of the proposed project from street view (which are also included as Figures 5 and 6 on pages 9 and 10 of the Draft IS-MND under *Description of Project*) and provided additional context for the reasoning behind the project design and the project approval process through the County of Santa Cruz. The SqCWD Board of Directors will consider the commenter's preference for having a building façade constructed around the proposed water treatment equipment as they review the project.

November 15, 2021

Soquel Creek Water District
Attn: Michael Wilson
5180 Soquel Drive
Soquel, CA 95073

SOQUEL CREEK WATER DISTRICT (DISTRICT), MITIGATED NEGATIVE DECLARATION (MND) FOR THE COUNTRY CLUB REPLACEMENT WELL AND 1,2,3-TRICHLOROPROPANE (1,2,3-TCP) REMOVAL WATER TREATMENT PLANT PROJECT (PROJECT); SCH # 2021100502

Dear Mr. Michael Wilson:

Thank you for the opportunity to review the MND 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 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 title 22, chapter 16 et. seq).

The proposed Project includes drilling a 500-gpm, 530-540-foot deep well to replace an existing well. The new well may act as a monitoring well or it may be brought on-line prior to the old well failing. If the new well is brought on-line both wells would not be run at the same time. When the existing well is no longer operational it will be destroyed.

A 1,862-foot^2, 28-foot tall building would be constructed to house the 1,2,3-TCP granular activated carbon absorption treatment plant. The water treatment plant would include 12-foot tall, 10-foot diameter treatment vessels, pipelines, stormwater, a chemical feed storage, and a restroom. Space would be available in the event a single use anion exchange system would also need to be added in the future for hexavalent chromium. Spent GAC media for the 1,2,3-TCP would be removed every two to three years, characterized for hazardous waste, and sent to the appropriate receiving facility. If spent resin will be removed for hexavalent chromium it may be removed every six months. The new and old well will be connected to the plant via piping under the on-site driveway.

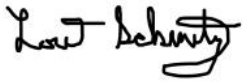
The project would include installing a driveway, and wrought iron, double-leaf swing or slide gates, and replacing the antenna to the existing well pump. A retaining wall may also be installed. Landscaping would also be planted around the site. A sewer lateral that will connect to the existing Santa Cruz Sanitation District sewer main in Baltusrol Drive will be installed for the chorine analyzer discharge and new restroom. An existing chemical feed enclosure would be removed from the site and construction may require the removal of eight trees.

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 any comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes adopting the MND and MMRP;
- Copy of the stamped Notice of Determination filed at the Monterey 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 if you have any questions regarding permitting requirements.

Sincerely,



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

Cc:

Office of Planning and Research, State Clearinghouse

Kyle Graff
Water Resources Control Engineer
Monterey District

Comment 2

COMMENTER: Lori Schmitz, Environmental Scientist, State Water Resources Control Board Division of Financial Assistance

DATE: November 15, 2021

The commenter provides a summary of the proposed project and states the project would require a new or amended water supply permit from the State Water Resources Control Board (SWRCB) Division of Drinking Water. The commenter requests several documents to be submitted to the SWRCB Monterey District Office once the California Environmental Quality Act (CEQA) review process is complete. These documents include the Draft and Final IS-MNDs, the Mitigation Monitoring and Reporting Program (MMRP), any comment letters received and the lead agency responses, a copy of the resolution or Board of Directors minutes adopting the Final IS-MND and MMRP, and a copy of the stamped Notice of Determination filed at the County Clerk and State Clearinghouse.

The commenter did not raise any issues pertaining to the adequacy of the Draft IS-MND. The need for the project to obtain an amended Domestic Water Supply Permit from the SWRCB Division of Drinking Water is indicated in the *Other Public Agencies Whose Approval is Required* section on page 13 of the Draft IS-MND. The requested documents will be provided to the SWRCB following the completion of the CEQA review process.

Because the comment does not address the adequacy of the Draft IS-MND or CEQA process, no further response is required.

Comment 3

COMMENTER: Becky Steinbruner

Hello, this is Becky Steinbruner. Can you hear me? Thank you.

I have some questions about this project that would be right in the middle of a residential neighborhood on a busy school corridor. How will the sodium hypochlorite be transported to the site? How will it be transferred to the treatment plant itself? What would be the contingency plan for a chemical accident? The neighbors adjacent really need to be involved in that, need to be aware of that. **1**

And the school is nearby, and the District needs to notify that school in writing 30 days before you approve the final version of this project. **2**

I see that there will be significant trees removed, but there is no – that I could find anyway - no site plan of that, and forgive me if I've overlooked it. But I do not see where the trees will be, how old they are. It says in the analysis that the current screening of the site from Baltusrol would be eliminated. I am very sad to hear that significant trees would be cut down. **3**

And you're saying that it will begin in March, once again, as what happened with the Twin Lakes Church, that's the torpor time for the solitary roosting bats. If they are disturbed, they will die. So I request that if this project moves forward, that it be started later in the year after the bats are out of torpor and that the nesting birds are not building their nests. If we have a warm, dry spring, they begin building their nests early. The migratory birds will be back. **4** **5**

Comment 3

COMMENTER: Becky Steinbruner (verbal comments transcribed from the Board of Directors meeting)

DATE: November 16, 2021

Response 3.1

The commenter requests additional information about the use of sodium hypochlorite as part of the proposed project, including details on how it would be transported, how it would be transferred to the water treatment plant, and what the contingency plan for an accidental spill would be.

Sodium hypochlorite is a liquid disinfection agent added to the water and is commonly referred to as "bleach." Sodium hypochlorite is not the equivalent of chlorine gas, and chlorine gas would not be used or released during project operation. Sodium hypochlorite would be delivered to the site once a week by SqCWD personnel using a flatbed pickup truck mounted with a secondarily contained 500-gallon tank.[1] Sodium hypochlorite would be pumped from the truck-mounted tank into the secondarily-contained storage tank inside the proposed water treatment plant. (SqCWD is not introducing a new chemical to the site; sodium hypochlorite was regularly delivered to the project site when the existing Country Club well was online prior to 2017 and stored on site in a 45-gallon secondarily contained tank that is currently located in the northeastern portion of the project site.)

SqCWD maintains an internal Hazardous Materials Handling and Spill Response Program for all of its facilities, which includes spill control and containment procedures and a chain of emergency notification for spills that either 1) pose significant safety or health hazards to employees, 2) have the potential to become an emergency within a short time frame, or 3) have the potential to affect the environment outside of the facility. In addition, this program includes specific provisions for safely unloading sodium hypochlorite at SqCWD facilities and for handling accidental spills of sodium hypochlorite, such as avoiding contamination of spills with acidic materials. Furthermore, SqCWD maintains a Consolidated Emergency Response/Contingency Plan specifically for the existing Country Club well that is submitted to the California Environmental Protection Agency through the California Environmental Reporting System in accordance with regulatory requirements. This plan includes a list of emergency contact information, an outline of emergency containment and cleanup procedures for accidental spills and other emergencies, a list of emergency equipment located on site, and details on relevant hazardous materials emergency response services available to SqCWD. The plan would be updated and submitted for the proposed project prior to its operation. The Consolidated Emergency Response/Contingency Plan for the existing Country Club well is included as Attachment 1 to this Response to Comments.

Response 3.2

The commenter notes there is a school nearby and states that SqCWD must notify the school in writing 30 days before the Board of Directors approves the project.

[1] Secondary containment refers to a second layer of containment placed around a storage vessel to prevent its contents from being released into the environment should an accidental leak in the storage vessel occur.

Public Resources Code Section 21151.4(a) states:

> An environmental impact report shall not be certified or a negative declaration shall not be approved for any project involving the construction or alteration of a facility within one-fourth of a mile of a school that might reasonably be anticipated to emit hazardous air emissions, or that would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code, that may pose a health or safety hazard to persons who would attend or would be employed at the school, unless both of the following occur:
>
> (1) The lead agency preparing the environmental impact report or negative declaration has consulted with the school district having jurisdiction regarding the potential impact of the project on the school.
>
> (2) The school district has been given written notification of the project not less than 30 days prior to the proposed certification of the environmental impact report or approval of the negative declaration.

Rio Del Mar Elementary School is located approximately 600 feet southeast of the project site boundary. As stated on page 69 in Section 9, *Hazards and Hazardous Materials*, of the Draft IS-MND, hazardous materials/waste associated with the proposed project would include sodium hypochlorite and exhausted resin material associated with the potential hexavalent chromium treatment process. These materials do not produce hazardous air emissions under normal operating conditions when handled properly by trained personnel (i.e., the SqCWD operator). Furthermore, neither of these materials meet the definition of "extremely hazardous substances," which are defined by California Health and Safety Code Section 25532(j) as:

- A regulated substance listed in Section 68.130 of Title 40 of the Code of Federal Regulations pursuant to paragraph (3) of subsection (r) of Section 112 of the federal Clean Air Act (42 United States Code Section 7412[r][3]);[2] or
- An extremely hazardous substance listed in Appendix A of Part 355 (commencing with Section 355.1) of Subchapter J of Chapter I of Title 40 of the Code of Federal Regulations[3]

Therefore, notification of Rio Del Mar Elementary School 30 days prior to consideration of the Final IS-MND and project approval by the SqCWD Board of Directors is not required under CEQA. However, SqCWD chose to voluntarily submit a courtesy email notification of the proposed project to the Principal, Assistant Principal, and two administrative staff members of Rio Del Mar Elementary School on November 17, 2021, which is more than 30 days in advance of the SqCWD Board of Directors' meeting to consider adoption of the Final IS-MND and project approval scheduled for December 21, 2021. This notification is provided as Attachment 2 to this Response to Comments.

[2] United States Environmental Protection Agency. 2021. "Initial List of Hazardous Air Pollutants with Modifications." Last modified: June 11, 2021. https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications (accessed November 2021).

[3] Appendix A of Part 355 (commencing with Section 355.1) of Subchapter J of Chapter I of Title 40 of the Code of Federal Regulations is available at: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-J/part-355.

Response 3.3

The commenter expresses concern that significant trees would be removed and requests information on where the existing trees are located and how old they are.

As stated on page 41 in Section 4, *Biological Resources*, of the Draft IS-MND, there is only one significant tree on the project site, which is a black walnut tree with two stems each ranging from approximately 18 to 21 inches diameter at breast height (DBH). This tree is located on the northeast corner of the project site, immediately south of the existing Country Club well, and its exact location is depicted on Sheet D-01 of the project plans included as Appendix A of the Draft IS-MND. In addition, a photograph of this tree is provided in Attachment 2 of the Biological Resources Assessment prepared for the project, which is included as Appendix C to the Draft IS-MND. The age of this tree is not known; however, the determination of whether a tree is a "significant tree" pursuant to Santa Cruz County Code Chapter 16.34 is based on its location and diameter, not on its age. As stated on page 41 in Section 4, *Biological Resources*, of the Draft IS-MND, the project is exempt from applying for a significant tree removal permit under Santa Cruz County Code Section 16.34.090(C) because the tree removal would be authorized pursuant to a valid discretionary permit approved pursuant to Santa Cruz County Code Chapter 13.20. Therefore, removal of the one significant tree on the project site would be permitted as part of the project's coastal development permit. Trees removed from the project site would be replaced by landscaping planted around the perimeter of the site that would include a variety of trees, shrubs, and groundcover including *Prunus ilicifolia* (holly leaf cherry), *Quercus agrifolia* (coast live oak), *Ceanothus* x 'Ray Hartman' (Ray Hartman wild lilac), *Heteromeles arbutifolia* (toyon), *Ceanothus* x 'Concha' (Concha wild lilac), *Achillea millefolium* (common yarrow), *Muhlenbergia rigens* (deer grass), *Bachharis pilularis* 'Twin Peaks' (Twin Peaks coyote brush), and *Arctostaphylos uva-ursi* (kinnikinnick). This landscaping would screen the project site from street view, as shown in Figure 6 on page 10 of the Draft IS-MND.

Response 3.4

The commenter expresses concern about potential project impacts to bats in torpor.

Impacts to special status bat species are discussed on pages 36 through 39 in Section 4, *Biological Resources*, of the Draft IS-MND. As stated therein, Rincon determined there is a moderate potential for two special status bat species (pallid bat [*Antrozous pallidus*] and Townsend's big-eared bat [*Corynorhinus townsendii*]) to roost in trees and the existing well pump enclosure on the project site. Potential impacts to these two bat species were concluded to be potentially significant because direct or indirect effects could occur, including injury or mortality from construction and roost abandonment from construction noise, dust, and other project activities if bat maternity colonies are present on or near the project site during construction. Therefore, implementation of Mitigation Measure BIO-1 is required to reduce project impacts to a less than significant level. Implementation of Mitigation Measure BIO-1 would minimize the potential for project construction activities to disturb active roosts of special-status bat species through tree and structure surveys, implementation of a site-specific roosting bat protection plan if day roosts are found, and schedule limitations on tree removal and structure demolition. The following provision of Mitigation Measure BIO-1 specifically addresses impacts to bat in torpor, which is a synonym for the term "hibernation" used in the Draft IS-MND:

When feasible, removal of trees and structures identified as suitable roosting habitat shall be seasonally timed to avoid disturbance during the hibernation and breeding seasons, including the following:

1. Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.
2. Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.

Therefore, impacts to bats in torpor have been adequately evaluated and addressed in the Draft IS-MND, and additional analysis and mitigation are not required.

Response 3.5

The commenter expresses concern about potential impacts to migratory birds.

Impacts to nesting birds protected by the California Fish and Game Code and the Migratory Bird Treaty Act are discussed on pages 36 through 39 in Section 4, *Biological Resources*, of the Draft IS-MND. As stated therein, the project site contains suitable nesting habitat for resident and migratory birds. If nests are present on or near the project site during construction, direct or indirect effects could occur, including injury or mortality from construction and nest and roost abandonment from construction noise, dust, and other project activities. The loss of active bird nests would be a violation of the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503 and 3513; however, the loss of common avian species does not constitute a significant impact under CEQA. Nevertheless, implementation of Mitigation Measure BIO-2 is required for the project to maintain compliance with federal and State laws related to all avian species. Implementation of Mitigation Measure BIO-2 would reduce the potential for project construction activities to result in the loss of active bird nests through a pre-construction nesting bird survey and establishment of avoidance buffers around active nests, if present, if project activities are conducted during the bird breeding season (February 1 through August 30). Delaying the start of project construction is not necessary to further reduce impacts to nesting birds. As such, no revisions have been made to the IS-MND in response to this comment.

Comment 4

COMMENTER: Phil and Kate Allen

Phil: Hi, I'm here with my wife Kate. So Kate's going to say a few things here, and I might chime in.

Kate: We want to start with echoing Becky's sentiment, and since we're adjacent to the property at 225, as I mentioned at the previous meeting, we would like very specific information on the property line and, as Becky said, the trees that are going to be removed, including the oak saplings, some of which have a significant diameter on our property line. I want more information on that. 1

And also the exact plants - I like that you mentioned native plants, but we're really interested in them being a thick hedge, please. And I have specific ideas, but I couldn't find the – there were some species mentioned but not the location of where they would be. 2

I like also hearing what Becky had to say about the solitary roosting bat. I would like to say that that is important to us as well. 3 And as far as the construction process with the fence, we have specific needs with having pets, and so more information on that as being right next door. 4

Phil: And I would also like to reiterate the issue that Becky raised about the transfer of potentially harmful chemicals. That wasn't really something that I had thought a lot about, and I actually think it is a really important issue, and I would like to understand a bit more about how much chemicals will be coming through and some of the risks and plans to mitigate around that. 5 The other thing is do we really need a door that is a "U" or could it be one big door? And hence, you could cover more of the territory with plants. 6

Comment 4

COMMENTER: Phill and Kate Allen (verbal comments transcribed from the Board of Directors meeting)

DATE: November 16, 2021

Response 4.1

The commenters request specific information on the property line and the trees that would be removed.

The project would not include work that would encroach on properties to the north, east, or south of the project site. As stated on page 12 under *Description of Project* of the Draft IS-MND, construction may require the removal of three pepper trees with multiple stems ranging from four to nine inches diameter at breast height (DBH), one walnut tree with two stems ranging from approximately 18 to 21 inches DBH, four coast live oak saplings with stems less than four inches in diameter, and one non-native ornamental tree. In addition, as stated on page 41 in Section 4, *Biological Resources*, of the Draft IS-MND, the coast live oak saplings on site have stems less than four inches in diameter and are not considered to be significant trees pursuant to Santa Cruz County Code Chapter 16.34.[4]

Because the comment does not address the adequacy of the Draft IS-MND or CEQA process, no further response is required.

Response 4.2

The commenters request the proposed landscaping plans and suggest the installation of a thick hedge along the southern property line of the project site, which abuts the commenters' property.

The proposed landscaping plan, including specific species and locations, is provided as Sheet L-09 in the project plans, which are included as Appendix A to the Draft IS-MND. The SqCWD Board of Directors will consider the commenters' suggestion for a thick hedge as they review the project.

Response 4.3

The commenter expresses concerns about project impacts to roosting bats.

Please refer to Response 3.4 for information on project impacts to roosting bats. As stated therein, impacts to special status bat species are adequately addressed in the Draft IS-MND with Mitigation Measure BIO-1 required to reduce potential impacts to a less than significant level.

Response 4.4

The commenters express concerns about the impacts of project activities on pet safety.

Impacts to domestic animals are not an environmental issue under CEQA. However, the project would not include work that would encroach on properties to the north, east, or south of the project site, and construction fencing would be installed around the perimeter of the site for the duration of construction activities to reduce the potential for pets to unintentionally enter the

[4] A "significant tree" is defined as a tree that is individually equal to or greater than 20 inches DBH; a sprout clump of five or more stems, each of which is greater than 12 inches DBH; or a group consisting of five or more trees on one parcel, each of which is greater than 12 inches DBH.

project site. Furthermore, the project includes installation of a new six-foot-high fence around the entirety of the project site, as indicated on page 11 under *Description of Project* of the Draft IS-MND, which would also reduce the potential for pets to unintentionally enter the project site during project operation.

Response 4.5

The commenters express concerns about the use of potentially harmful chemicals on the project site and requests information on the associated risks and the plans to mitigate any risks.

Please refer to Response 3.1 for information regarding the use of sodium hypochlorite on the project site. As stated therein, SqCWD has specific plans and procedures in place for handling sodium hypochlorite and responding to accidental spills to mitigate any risks. The Consolidated Emergency Response/Contingency Plan for the existing Country Club well on the project site, which would be replaced with a new version for the proposed project prior to its operation, is included as Attachment 1 to this Response to Comments.

Response 4.6

The commenters suggest the inclusion of a single door in the project design rather than a "U"-shaped door so that more of the project site can be covered with plants.

The project does not include a "U"-shaped door; therefore, it is assumed the commenter is referring to the proposed "U"-shaped driveway with dual access gates. The "U"-shaped driveway with dual access gates provides necessary access for operations and maintenance of the facility. This design is consistent with nearby residences that also have "U"-shaped driveways, such as residences at 220 and 225 Baltusrol Drive and 806, 820, and 870 Clubhouse Drive.

Comment 5

From: Becky Steinbruner <[redacted]>
Date: November 16, 2021 at 7:18:08 PM PST
To: bod <bod@soquelcreekwater.org>, Emma Olin <emmao@soquelcreekwater.org>, Mike Wilson <mikew@soquelcreekwater.org>
Cc: Becky Steinbruner <[redacted]>
Subject: Public Comment on 1,2,3-TCP Treatment Project at 251 Baltrusol Drive in Seascape

Dear Board,
Thank you for holding a Public Hearing on this important large treatment plant that will be in the middle of a residential neighborhood in Seascape.

It has always disturbed me that the District chose to keep the Country Club Well in production for so long, knowing that the 1,2,3-TCP levels were high, and simply notifying the County Board of Supervisors by a letter every three years that you were selling the contaminated water.

While I am glad that the Well is now only on emergency stand-by status, I question why the District has not chosen to abandon the well, rather than spend hundreds of thousands of ratepayer dollars to try to treat and rehabilitate the well and the contaminated water it produces.

Rather than abandon the Country Club Well in Seascape, which is polluted with a cacinogen, the Board approved on December 15, 2020, spending $600,000 for environmental analysis and design of the 1.2.3-TCP Treatment Plant at 251 Baltrusol and drill a new well, in the same contaminated location. Engineering Director, Taj Dufour admitted this will be a multi-million project but the District has no money to build anything. See plans on pages 147-148:
https://www.soquelcreekwater.org/AgendaCenter/ViewFile/Agenda/_12152020-205?packet=true

Why not just abandon the Country Club Well and drill in another area not plagued by this carcinogenic contamination and not in the middle of a residential neighborhood? This is the only well contaiminated with the carcinogen.

1

I have the following comments on the Project Mitigated Negative Declaration analysis:
1) There is no Project Alternative considered that would include the actions discussed above.

2

2) Page 20 of the MND: How many trees would be cut down? HOw
*"Although the project would be required to obtain a **significant tree removal** permit, this permit does not specifically relate to scenic quality. Although the removal of trees along Baltusrol Drive would eliminate the current vegetative screening of the project site from the roadway, the project would include landscaping that would prioritize vegetative screening around the perimeter of the site."*

3

3) Impacts of light do not analyze impacts of the plant during operation, only the construction and new well-drilling phase.
page 20:
"In addition, 24-hour well drilling would be temporary and would last for three non-consecutive weeks. Furthermore, the location of the well would be at least 40 feet away from the nearest residences on all sides."

4

4) Because of the noise and intense light of the 24/7 three-week well drilling operation, there should be sound walls on all sides of this site during those times. Residents should be offered alternate housing accommodation for the period of the 24/7 well drilling activity because of the disturbance to the residential neighborhood. **5**

5) Did the District consider alternate sites that do not have a history of agricultural production that could be the source of the 1,2,3-TCP?
page 22
"Although the project site was historically used for agricultural purposes, residential development in the surrounding community was built as early as 1953. By 1958, residential development surrounded the project site, and the greater residential community was fully built-out by 1982 (Appendix D). " **6**

6) Schools within 0.25 mile must be notified in writing 30 days in advance of the Board's consideration of the Final MND and Project approval. **7**

I reserve the right to submit further comment. **8**

Please acknowledge receipt
Becky Steinbruner

Comment 5

COMMENTER: Becky Steinbruner

DATE: November 16, 2021

Response 5.1

The commenter expresses discontent with prior operation of the existing Country Club well and questions the reasoning behind why SqCWD is considering the proposed project rather than abandoning the existing Country Club well and drilling a new well in another area without groundwater contamination.

The Draft IS-MND evaluates the project as proposed. It is not the purpose of the Draft IS-MND to evaluate the merits of the proposed project, including its siting and its fiscal impacts. As such, the comment does not address the adequacy of the Draft IS-MND or CEQA process, and no further response is required. However, the following information is provided to be responsive to the commenter's concerns.

SqCWD currently meets or exceeds the water quality standards established by the State of California Division of Drinking Water, and the proposed project would deliver water that would meet or exceed these requirements. The project site is an existing SqCWD facility with an upgraded 400A 480V electrical service that is suitable for SqCWD's water production needs. The upgraded electrical service was installed in 2006, and the investment in this infrastructure supports the use of the project site as a water production facility. Furthermore, the project site is situated adjacent to SqCWD's existing water distribution system, specifically water mains, which provide the necessary conveyance of extracted groundwater to the community's water storage reservoirs. In addition, the project site has adequate space and access for activities necessary to construct the proposed project and complete future maintenance activities required for municipal water production.

Furthermore, other factors complicate the selection of an alternative site for the existing Country Club well, such as:

- Many areas to the east and north of the project site along with rural areas in the SqCWD service area that have potential well sites cannot be utilized due to their distance from SqCWD's existing distribution system and/or the wide use of septic systems in more rural areas.
- Areas to the west of the project site are equally, if not more densely, inhabited than the project site vicinity.
- The presence of 1,2,3-TCP contamination is likely not confined to just the project site and is likely also present within the immediate surrounding region of the project site because of the prior agricultural history of the project site vicinity.
- Impacts to existing municipal and private wells in other areas must be considered when drilling a well in a new area, whereas drilling the proposed replacement well at the project site would not change the use of the underlying groundwater basin or affect other wells. (See further discussion on pages 73 and 74 in Section 10, *Hydrology and Water Quality*, of the Draft IS-MND.)
- The water quality constraints at the project site are known, which provides certainty to SqCWD in terms of treatment approach and costs. Other sites would require additional discovery work to determine whether these sites would be feasible in terms of water quality considerations.

The project site vicinity is relatively built out, and there appears to be no opportunity to site the proposed replacement well at an alternative location without adding further complexity and costs associated with the aforementioned factors. Furthermore, because SqCWD strives to minimize expenses for rate payers, it has recovered funds through a settlement agreement to help offset the construction and operating costs of the proposed facility.

Response 5.2

The commenter expresses concern that the Draft IS-MND did not consider a project alternative that includes abandoning the existing Country Club well and drilling a new well in another area without groundwater contamination.

Public Resources Code Section 15126.6 states that the inclusion of an analysis of project alternatives is only required for environmental impact reports. Therefore, the Draft IS-MND is not required by CEQA to include an evaluation of project alternatives. No revisions to the Draft IS-MND are warranted in response to this comment.

Response 5.3

The commenter requests information on how many trees would be removed from the project site.

As stated under *Description of Project* on page 12 in the Draft IS-MND, construction may require the removal of three pepper trees, one walnut tree, four coast live oak saplings, and one non-native ornamental tree located on the project site. Therefore, a total of nine trees may be removed as part of the proposed project. One of the trees is considered a "significant tree," pursuant to Santa Cruz County Code Chapter 16.34 (refer to Response 3.3 for more information). Trees removed from the project site would be replaced by landscaping planted around the perimeter of the site that would include a variety of trees, shrubs, and groundcover including *Prunus ilicifolia* (holly leaf cherry), *Quercus agrifolia* (coast live oak), *Ceanothus* x 'Ray Hartman' (Ray Hartman wild lilac), *Heteromeles arbutifolia* (toyon), *Ceanothus* x 'Concha' (Concha wild lilac), *Achillea millefolium* (common yarrow), *Muhlenbergia rigens* (deer grass), *Bachharis pilularis* 'Twin Peaks' (Twin Peaks coyote brush), and *Arctostaphylos uva-ursi* (kinnikinnick).

Response 5.4

The commenter expresses concern that the impacts of light during project operation were not evaluated in the Draft IS-MND.

As noted under *Description of Project* on page 13 of the Draft IS-MND, the only permanent lighting installed on the project site would be motion-sensing security lighting required by the SWRCB Division of Drinking Water. The impacts of this lighting are evaluated on page 20 in Section 1, *Aesthetics*, of the Draft IS-MND, which states:

> Although there would be motion-sensing security lighting for additional nighttime security, the lighting would not be activated unless trespassing or wildlife movement on the fenced site occurred. Wildlife movement and trespassing on site would be unlikely given that the project site would be secured with an approximately six-foot-high wrought-iron perimeter fence. In addition, people walking along Baltusrol Drive would not trigger the motion-sensing lighting given the substantial setback of the water treatment plant from the roadway. Furthermore, Santa Cruz County Code Section 13.11.074(D) requires that all site, building, security, and landscape lighting to be directed onto the site and away from adjacent properties and that light sources must not be visible from adjacent properties. Therefore, the motion-sensing security

lighting would not be a new source of substantial nighttime light. Therefore, the project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views during construction and operational activities at the project site, disturbance footprint of off-site improvements, and the potential construction staging area at Seascape Golf Club. Impacts would be less than significant.

Therefore, the impacts of light during project operation were adequately addressed in the Draft IS-MND, and no revisions to the Draft IS-MND are warranted in response to this comment.

Response 5.5

The commenter suggests installation of sound walls and alternate housing accommodations for residents during periods of 24-hour well drilling activities to address noise and lighting impacts.

As stated on pages 92 and 93 in Section 13, *Noise*, of the Draft IS-MND, Mitigation Measure N-1 has been identified to reduce the project's construction noise impacts to nearby sensitive receivers, including adjacent residences. Mitigation Measure N-1 entails implementation of a Construction Noise Reduction Plan with various noise reduction measures that shall include the installation and maintenance of temporary sound barriers and/or blankets during construction activities around the construction site boundaries as well as hotel accommodations for all residents within 100 feet of the project site for the duration of 24-hour well drilling activities. Because Mitigation Measure N-1 includes the mitigation requested by the commenter, no revisions to the Draft IS-MND are warranted in response to this comment.

Response 5.6

The commenter asks whether SqCWD considered alternate replacement well sites that do not have a history of agricultural production.

The Draft IS-MND evaluates the project as proposed. It is not the purpose of the Draft IS-MND to evaluate the merits of the proposed project, including its siting. In addition, as noted in Response 5.2, alternatives are not required in an IS-MND. Refer also to Response 5.1 for an explanation of the siting of the proposed project, which is provided for informational purposes.

Response 5.7

The commenter states that schools within 0.25 mile must be notified in writing 30 days before the SqCWD Board of Directors considers the Final IS-MND and project approval.

Please refer to Response 3.2. As stated therein, notification of Rio Del Mar Elementary School 30 days prior to consideration of the Final IS-MND and project approval by the SqCWD Board of Directors is not required under CEQA. However, SqCWD chose to voluntarily submit a courtesy email notification of the proposed project to the Principal, Assistant Principal, and two administrative staff members of Rio Del Mar Elementary School on November 17, 2021. This notification is provided as Attachment 2 to this Response to Comments.

Response 5.8

The commenter states that she reserves the right to submit further comment.

Comments from all members of the public and interested agencies on the Draft IS-MND were accepted during the 34-day public review period that began on October 27, 2021 and ended on

November 29, 2021. In addition, public comment will be received during the Board of Directors' meeting to consider adoption of the Final IS-MND and project approval on December 21, 2021.

CALIFORNIA COASTAL COMMISSION
CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV

Comment 6

November 18, 2021

SENT VIA EMAIL

Michael Wilson, P.E., Associate Engineer
Soquel Creek Water District
5180 Soquel Drive
Soquel, CA 95073

Subject: California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration: Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant

Dear Michael Wilson,

Thank you for the opportunity to comment on the California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration for the proposed Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant project. The project proposes construction of a replacement well and water treatment plant at 251 Baltusrol Dr., Aptos (APN 053-221-11).

The proposed project includes discharge of groundwater into Bush Gulch during construction and well-testing activities prior to normal operation of the well and treatment plant. The project's CEQA Initial Study explains that 1) the groundwater is contaminated with 1,2,3-trichloropropane, 2) that groundwater will be discharged into Bush Gulch during development and well testing, and 3) that Bush Gulch has a high potential for presence of Santa Cruz long-toed salamander, a federally and state-listed endangered and protected species. The Initial Study states that, because the proposed discharge of groundwater during well development and testing is regulated by an NPDES permit, there will be no significant impact on the Santa Cruz long-toed salamander. While the Initial Study references NPDES requirements that must be fulfilled for discharge of the groundwater during construction, including sediment, turbidity, and coloration requirements, there is no discussion of the potential effects of 1,2,3-trichloropropane on the Santa Cruz long-toed salamander and whether the requirements of the NPDES permit mitigate any of these potential affects. Accordingly, the potential impacts of 1,2,3-trichloropropane on the Santa Cruz long-toed salamander and whether any requirements of the NPDES permit best management practices mitigate those impacts should be clarified.

Thank you for the ability to comment on the Initial Study/Mitigated Negative Declaration. Please contact me at Robert.Moore@coastal.ca.gov if you have any questions or would like to discuss the project further.

Robert Moore

Coastal Planner
Central Coast District Office
California Coastal Commission

Comment 6

COMMENTER: Robert Moore, Coastal Planner, California Coastal Commission

DATE: November 18, 2021

The commenter provides a summary of the proposed project and requests the IS-MND include a discussion of the potential effects of 1,2,3-TCP on the Santa Cruz long-toed salamander and whether the requirements of SqCWD's existing National Pollutant Discharge Elimination System (NPDES) permit would mitigate those potential effects.

SqCWD's existing NPDES permit (Order WQ 2014-0194-DWQ, General Order No. CAG14001, Waste Discharge Identification Number 4DW0118) only allows discharges if they do "not cause or contribute to exceedance of a water quality objective or standard in the receiving water, other than water quality objectives or standards for parameters that have been granted an exception under the State Water Board Resolution 2014-0067 and are not part of a TMDL [Total Daily Maximum Load], and at minimum shall not cause or contribute to an occurrence of the following in the receiving water…..Toxic substances to be present, individually or in combination, in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life."[5]

In addition, according to the federal Agency of Toxic Substances and Disease Registry (a division of the Centers for Disease Control and Prevention), 1,2,3-TCP breaks down when exposed to sunlight, evaporates from surface water, and "is not expected to build up in fish or plants."[6] Furthermore, the United States Environmental Protection Agency (U.S. EPA) states that 1,2,3-TCP "is unlikely to become concentrated in plants, fish or other aquatic organisms because it has a low estimated bioconcentration factor range."[7, 8] Moreover, in a separate toxicological review, the U.S. EPA indicated that previous studies showed 1,2,3-TCP became adversely toxic to guppies (*Poecilia reticulate*) and medaka (*Oryzias latipes*) at concentrations ranging from 4.5 to 18 milligrams per liter, or approximately 4,500,000,000 to 18,000,000,000 parts per trillion, during continuous exposure periods ranging from 6 to 16 months.[9] As stated under *Description of Project* on page 5 of the Draft IS-MND, concentrations of 1,2,3-TCP at the Country Club Well have been detected as high as 15 parts per trillion, which is substantially below the level of aquatic toxicity observed for guppies and medaka. Also, groundwater discharge would only occur over three non-consecutive weeks during well development and testing in the construction phase. As a result, even if 1,2,3-TCP does not break down and evaporate from the extracted groundwater once it is discharged to Bush Gulch, concentrations would not likely reach a level that could significantly harm aquatic species such as the Santa Cruz long-toed salamander. Therefore, due to the SqCWD's compliance with its existing NPDES permit, the properties of 1,2,3-TCP, and the temporary nature of the groundwater discharge to Bush Gulch, the 1,2,3-TCP contained in groundwater discharged to Bush Gulch during well

[5] 1,2,3-TCP has not been granted an exception under the State Water Board Resolution 2014-0067; therefore, this performance standard is applicable to the proposed discharge to Bush Gulch.

[6] Agency for Toxic Substances and Disease Registry. 2021. "1,2,3-Trichloropropane." August 2021. https://www.atsdr.cdc.gov/toxfaqs/tfacts57.pdf (accessed November 2021).

[7] United States Environmental Protection Agency. 2017. "Technical Fact Sheet – 1,2,3-Trichloropropane (TCP)." November 2017. https://www.epa.gov/sites/default/files/2017-10/documents/ffrrofactsheet_contaminants_tcp_9-15-17_508.pdf (accessed November 2021).

[8] The bioconcentration factor is the ratio of the concentration of a given substance in an organism to the concentration of that same substance in water and is used as a measure of a chemical substance's tendency to accumulate in a living organism (ScienceDirect. 2021. "Bioconcentration Factor." Available at: https://www.sciencedirect.com/topics/chemistry/bioconcentration-factor.).

[9] United States Environmental Protection Agency. 2009. "Toxicological Review of 1,2,3-Trichloropropane." September 2009. https://iris.epa.gov/static/pdfs/0200tr.pdf (accessed November 2021).

development and testing would not result in significant adverse impacts to Santa Cruz long-toed salamander. Impacts to Santa Cruz long-toed salamander would remain less than significant as concluded in Section 4, *Biological Resources*, of the Draft IS-MND.

In response to this comment, the following text has been added to Section 4, *Biological Resources*, of the IS-MND. The corresponding references have been added in the *References* section as well.

Section 4, Biological Resources

Bush Gulch, located approximately 400 feet to the east of the project site, has a high potential for Santa Cruz long toed salamander. During well development and startup/testing, groundwater would be produced, which would be placed in baker tanks to settle out solids. Groundwater would then be disposed of via SqCWD's existing pump-to-waste pipeline that discharges to Bush Gulch. All water discharged to Bush Gulch would be required to comply with SqCWD's existing NPDES permit (Order WQ 2014-0194-DWQ, General Order No. CAG14001, Waste Discharge Identification Number 4DW0118), which includes requirements for effluent and receiving water limitations and implementation of BMPs to minimize sediment discharge, turbidity, and color impacts. In addition, SqCWD's existing NPDES permit only allows discharges if they do "not cause or contribute to exceedance of a water quality objective or standard in the receiving water, other than water quality objectives or standards for parameters that have been granted an exception under the State Water Board Resolution 2014-0067 and are not part of a TMDL [Total Daily Maximum Load], and at minimum shall not cause or contribute to an occurrence of the following in the receiving water…..Toxic substances to be present, individually or in combination, in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life."[10] In addition, according to the federal Agency of Toxic Substances and Disease Registry (a division of the Centers for Disease Control and Prevention), 1,2,3-TCP breaks down when exposed to sunlight, evaporates from surface water, and "is not expected to build up in fish or plants" (Agency of Toxic Substances and Disease Registry 2021). Furthermore, the United States Environmental Protection Agency states that that 1,2,3-TCP is "unlikely to become concentrated in plants, fish or other aquatic organisms because it has a low estimated bioconcentration factor range" (U.S. EPA 2017).[11] Moreover, in a separate toxicological review, the U.S. EPA indicated that previous studies showed 1,2,3-TCP became adversely toxic to guppies (*Poecilia reticulate*) and medaka (*Oryzias latipes*) at concentrations ranging from 4.5 to 18 milligrams per liter, or approximately 4,500,000,000 to 18,000,000,000 parts per trillion, during continuous exposure periods ranging from 6 to 16 months (U.S. EPA 2009). As stated under *Description of Project*, concentrations of 1,2,3-TCP at the Country Club Well have been detected as high as 15 parts per trillion, which is substantially below the level of aquatic toxicity observed for guppies and medaka. Also, groundwater discharge would only occur over three non-consecutive weeks during well development and testing in the construction phase. As a result, even if 1,2,3-TCP did not evaporate from the groundwater discharged to Bush Gulch, concentrations would not likely reach a level that could significantly harm aquatic species such as the Santa Cruz long-toed salamander. Therefore, due to the SqCWD's compliance with its existing NPDES permit, the properties of 1,2,3-TCP, and the temporary nature of the groundwater discharge to Bush Gulch, the 1,2,3-TCP contained in groundwater discharged to Bush Gulch during well development and testing would not result in

[10] 1,2,3-TCP has not been granted an exception under the State Water Board Resolution 2014-0067; therefore, this performance standard is applicable to the proposed discharge to Bush Gulch.

[11] The bioconcentration factor is the ratio of the concentration of a substance in an organism to the concentration in water and is used as a measure of a chemical substance's tendency to accumulate in a living organism (ScienceDirect 2021).

significant adverse impacts to Santa Cruz long-toed salamander. Therefore, this groundwater discharge would not result in a significant impact to the Santa Cruz long-toed salamander.

References

Agency for Toxic Substances and Disease Registry. 2021. "1,2,3-Trichloropropane." August 2021. https://www.atsdr.cdc.gov/toxfaqs/tfacts57.pdf (accessed November 2021).

ScienceDirect. 2021. "Bioconcentration Factor." https://www.sciencedirect.com/topics/chemistry/bioconcentration-factor (accessed November 2021).

United States Environmental Protection Agency (USEPA). 2009. "Toxicological Review of 1,2,3-Trichloropropane." September 2009. https://iris.epa.gov/static/pdfs/0200tr.pdf (accessed November 2021).

____. 2017. "Technical Fact Sheet – 1,2,3-Trichloropropane (TCP)." November 2017. https://www.epa.gov/sites/default/files/2017-10/documents/ffrrofactsheet_contaminants_tcp_9-15-17_508.pdf (accessed November 2021).

The changes reflected above would not result in alterations to the degree of impact or significance conclusions presented in the Draft IS-MND and do not constitute significant new information. Rather, the changes serve to clarify and strengthen the content of the Draft IS-MND, and as a result, recirculation is not required pursuant to CEQA Guidelines Section 15073.5.

Comment 7

From: Michael Wilson
Sent: Monday, November 29, 2021 1:20 PM
To: john@aptoschamber.com
Cc: Ron Duncan <RonD@soquelcreekwater.org>; Customer Service Distribution List <custserv@soquelcreekwater.org>; bod <bod@soquelcreekwater.org>
Subject: RE: Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant Initial Study

Thanks for your input John. And I get it; I think you're right on the money concerning the economics. But it does come back to finding a place that works for us as well as the seller of a property and their neighbors, not to mention any other private well owners that might be in the vicinity of such a lot. It gets more complicated for us with all of those other factors.

I will send your comments to our consultant for response. I believe we will try to combine comments such as yours into one comprehensive response.

Thanks,
Michael J. Wilson, P.E. | Associate Engineer
Soquel Creek Water District | 5180 Soquel Dr., Soquel CA 95073 | www.soquelcreekwater.org
direct 831-475-8501 x122 | main 831-475-8500 | cell 831-706-6216

Please consider the environment before printing this e-mail.

From: John Hibble <john@aptoschamber.com>
Sent: Monday, November 29, 2021 12:15 PM
To: Michael Wilson <michaelw@soquelcreekwater.org>
Cc: Ron Duncan <RonD@soquelcreekwater.org>; Customer Service Distribution List <custserv@soquelcreekwater.org>; bod <bod@soquelcreekwater.org>
Subject: RE: Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant Initial Study

Hi Michael,

I can appreciate how difficult it is to find appropriate well locations. Have you calculated the long term expenses associated with the treatment of the country club well. The income from the sale of the Baltusrol property and the expense of purchasing a new property would probably be a push. The cost to drill a new well at either property would be similar. The expense associated with building the treatment plant and the long term expenses associated with treating the Baltusrol well should be key toward the decision to go ahead with this project or not. With the expenses associated with the Pure Water Soquel project, long term expenses such as the Baltusrol well should be carefully considered on behalf of the rate paying customers of the district. Thanks for listening.

John Hibble

From: Michael Wilson <michaelw@soquelcreekwater.org>
Sent: Thursday, November 18, 2021 4:36 PM
To: john@aptoschamber.com
Subject: RE: Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant Initial Study

Hi John,

I will add this comment to our project. But we've found that finding an adequate lot to put a well on that will fit the hydraulics of our water system is a lot harder than people think. I don't know if you remember Laura Brown, but we worked with her to find locations for wells for our well replacement master plan and it was slim pickings. She would get so frustrated. One problem is there are many places where septic systems are predominate, which eliminates a lot of locations.

Anyway, thanks for your comment and have a good day.

Best Regards,

Michael J. Wilson, P.E. | Associate Engineer
Soquel Creek Water District | 5180 Soquel Dr., Soquel CA 95073 | www.soquelcreekwater.org
direct 831-475-8501 x122 | main 831-475-8500| cell 831-706-6216
Please consider the environment before printing this e-mail.

From: John Hibble <john@aptoschamber.com>
Sent: Thursday, November 18, 2021 4:02 PM
To: Michael Wilson <michaelw@soquelcreekwater.org>
Subject: Country Club Replacement Well and 1,2,3-Trichloropropane Removal Water Treatment Plant Initial Study

Regarding the proposed Country Club Replacement Well located at 251 Baltusrol Drive.

Since the existing well is polluted with 1,2,3-Trichloropropane and is anticipated to need replacement in the future, It would make more sense financially to cap the polluted well, sell the parcel for residential construction and drill a new well in an area that is not polluted. A new well in an unpolluted location would not require infinite treatment expenses associated with a new well in the same location as the existing polluted well. Also, the proposed installation is not in keeping with the existing residential neighborhood.

John Hibble
200 Baltusrol Drive
Aptos, Ca
(831) 688-5210

Comment 7

COMMENTER: John Hibble

DATE: November 18 and 29, 2021

The commenter expresses an opinion that it would be more financially prudent to cap the existing Country Club well, sell the project site for residential development, and drill the replacement well in a location that does not experience groundwater contamination. The comment questions whether the long-term costs associated with the proposed project were considered when determining whether to drill a replacement well on the project site as compared to an alternative location. The commenter also expresses a concern that the proposed project is not consistent with the existing residential neighborhood.

The Draft IS-MND evaluates the project as proposed. It is not the purpose of the Draft IS-MND to evaluate the merits of the proposed project, including its siting and its fiscal impacts. However, for informational purposes, please refer to Response 5.1 for an explanation of the siting and fiscal impacts of the proposed project.

As stated on page 77 in Section 11, *Land Use and Planning*, of the Draft IS-MND, community facilities, including public structures and facilities, are allowed in the R-1 district with a Level 5 coastal development permit, pursuant to Santa Cruz County Code Section 13.10.322(B). In addition, as stated on pages 18 through 20 in Section 1, *Aesthetics*, of the Draft IS-MND, the project has been designed to be visually similar to the surrounding residences and is consistent with the height, setback, and lot coverage requirements for R-1 districts in Santa Cruz County Code Section 13.10.323. Therefore, the project is consistent with the existing residential neighborhood.

Comment 8

From: Teresa Delfino <[redacted]>
Sent: Monday, November 29, 2021 4:20 PM
To: Michael Wilson <michaelw@soquelcreekwater.org>; [redacted]
Subject: Proposed Country Club Well and Treatment Plant

We are very surprised to hear about this proposed project so close to the coastline considering the threat of sea water intrusion in our water supply. Active seawater intrusion is occurring with data confirming its presence along the entire coastline in our area. Furthermore the EPA and the State of California has classified TCP as a carcinogen. Even short term exposure through inhalation of air can have effects to our health. This project makes no sense. 1 2

In addition, the proposed site is in a residential area. This will affect our property values. Our backyard has a common chain link fence and the idea of a 28' high water treatment plant in our backyard is very upsetting. 3 4

Three weeks of 24 hour well drilling sounds like a nightmare. We lived on a farm in Moss Landing before moving here and have drilled wells; we were not able to stay in our home during drilling. I work remotely from home, this would be terrible. Please reconsider moving this project to a different location, farther from the coast. We need to keep seawater from creeping further inland and ruining our aquifer. 5 6

Sincerely,

Peter and Teresa Delfino

Comment 8

COMMENTER: Peter and Teresa Delfino

DATE: November 29, 2021

Response 8.1

The commenters express concern about the proposed project's location near the coastline and its relationship to seawater intrusion.

SqCWD is a participant in the Santa Cruz Mid-County Groundwater Agency, the purpose of which is to protect the underlying groundwater basin. In addition, SqCWD has been investigating, monitoring and strategizing with other entities to mitigate seawater intrusion for 55 years. SqCWD monitors coastal wells for seawater intrusion and has accounted for continued groundwater extraction from the Country Club well as it has taken steps to protecting the aquifer from seawater intrusion. One such step, SqCWD's Well Master Plan and Well Master Plan Environmental Impact Report (released in 2010 and finalized in 2011) includes a strategy to move groundwater extraction away from the coastline. The Well Master Plan analyzed the pumping of SqCWD's current wells, including the Country Club well, and identified alternative well sites for future wells. As part of the Well Master Plan Environmental Impact Report, SqCWD's Hydrogeologist determined that the Country Club well could continue to serve SqCWD in tandem with the identified groundwater pumping redistribution strategy without contributing to seawater intrusion.[12] Since that study, SqCWD has planned and is constructing a seawater intrusion prevention project (Pure Water Soquel) to replenish the groundwater basin and create a barrier against seawater intrusion, providing additional protection against seawater intrusion. Therefore, as stated on page 72 in Section 10, *Hydrology and water Quality*, of the Draft IS-MND, the project would not result in an adverse change in groundwater quality related to seawater intrusion as compared to baseline conditions (i.e., conditions at the time the existing well was online in 2017) because groundwater pumping characteristics at this location would remain the same.[13]

Response 8.2

The commenters note that 1,2,3-TCP is a carcinogen and express a concern that short-term exposure through inhalation can have health effects.

As acknowledged on page 5 under *Description of Project* in the Draft IS-MND, "the chemical compound 1,2,3-TCP is a probable human carcinogen found in industrial areas due to its use as an industrial solvent and agricultural areas due to its presence as an impurity in pesticides and nematicides." The objective of the proposed water treatment plant is to remove 1,2,3-TCP to levels below the maximum contaminant level of 0.005 micrograms per liter (equivalent to 5 parts per trillion) established by the SWRCB to be protective of public health. Groundwater extracted and treated by the proposed project would not result in the off-gassing of 1,2,3-TCP into the air because water would be contained within pipelines and treatment vessels and the 1,2,3-TCP removed from the groundwater would be contained within the granular activated carbon media inside treatment vessels, which would only be removed and replaced once every two-and-half years. As stated on

[12] SqCWD. 2011. *Final Environmental Impact Report for the Soquel Creek Water District Well Master Plan (SCH#2006072018)*. February 2011.

[13] For additional information related to seawater intrusion, please refer to the *Final Environmental Impact Report for Pure Water Soquel: Groundwater Replenishment and Seawater Intrusion Prevention Project* (SqCWD 2018).

page 68 in Section 9, *Hazards and Hazardous Materials*, of the Draft IS-MND, the granular activated carbon media is not considered a hazardous material or hazardous waste. A minor quantity of 1,2,3-TCP may evaporate from groundwater discharged to Bush Gulch during well development and testing. The U.S. EPA Technical Fact Sheet states that the residential air screening level for 1,2,3-TCP is 0.31 micrograms per cubic meter, or 310 parts per trillion.[14] As stated under *Description of Project* on page 5 of the Draft IS-MND, concentrations of 1,2,3-TCP at the Country Club Well have been detected as high as 15 parts per trillion. Assuming a fraction of 1,2,3-TCP contained in water discharged to Bush Gulch during well development evaporates and mixes with ambient air, the concentration of 1,2,3-TCP in ambient air would likely be orders of magnitude below the residential air screening level and pose negligible health risk to nearby residents. Also, groundwater discharge would only occur over three non-consecutive weeks during well development and testing in the construction phase; therefore, any incidental exposure to very low concentrations of 1,2,3-TCP in ambient air would be short-term and transient. Therefore, the project would not release hazardous quantities of 1,2,3-TCP into the air or otherwise expose nearby residents to hazardous materials.

Response 8.3

The commenters express concern that the project will affect their property value.

It is not the purpose of the Draft IS-MND to determine whether or not the proposed project would affect property values. As noted in CEQA Guidelines Section 15131(a), economic issues are not within the scope of CEQA, and thus are not included in the Draft IS-MND. Nevertheless, the SqCWD Board of Directors will consider the commenters' concern as they review the project.

Response 8.4

The commenters express discontent with the height and location of the proposed water treatment plant.

As stated on pages 18 through 20 in Section 1, *Aesthetics*, of the Draft IS-MND, the project has been designed to aesthetically match the neighboring residences (as shown in Figure 7 on page 19 of the Draft IS-MND) and is consistent with the height, setback, and lot coverage requirements for R-1 districts in Santa Cruz County Code Section 13.10.323. In addition, as stated on page 77 in Section 11, *Land Use and Planning*, of the Draft IS-MND, community facilities, including public structures and facilities, are allowed in the R-1 district with a Level 5 coastal development permit, pursuant to Santa Cruz County Code Section 13.10.322(B). Because of its compliance with these requirements and the design of the outer building façade, the proposed water treatment plant would have similar visual effects as if a single-family residence was built on the property. As stated on page 20 in Section 1, *Aesthetics*, of the Draft IS-MND, the project would not conflict with applicable zoning and other regulations governing scenic quality; therefore, impacts would be less than significant.

Response 8.5

The commenters express concern about the noise impacts of the well drilling required for construction of the proposed project.

The noise impacts of well drilling are evaluated on pages 89 to 90 in Section 13, *Noise*, of the Draft IS-MND. As stated therein, construction of the replacement well would exceed the County's daytime

[14] United States Environmental Protection Agency. 2017. "Technical Fact Sheet – 1,2,3-Trichloropropane (TCP)." November 2017. https://www.epa.gov/sites/default/files/2017-10/documents/ffrrofactsheet_contaminants_tcp_9-15-17_508.pdf (accessed November 2021).

threshold of 75 dBA L_{eq} during the demolition, site preparation/grading, and well drilling phases as well as the County's nighttime threshold of 60 dBA L_{eq} during the well drilling phase at the nearest sensitive receivers. Therefore, Mitigation Measure N-1 (outlined on pages 92 and 93 of the Draft IS-MND) has been identified to reduce the project's construction noise impacts to nearby sensitive receivers, including adjacent residences. Mitigation Measure N-1 entails implementation of a Construction Noise Reduction Plan with various noise reduction measures that shall include the installation and maintenance of temporary sound barriers and/or blankets during construction activities around the construction site boundaries as well as hotel accommodations for all residents within 100 feet of the project site for the duration of 24-hour well drilling activities. With implementation of Mitigation Measure N-1, construction-phase noise impacts would be reduced to a less than significant level.

Response 8.6

The commenters request SqCWD consider siting the project at a different location and express a concern about preventing further seawater intrusion.

The Draft IS-MND evaluates the project as proposed. It is not the purpose of the Draft IS-MND to evaluate the merits of the proposed project, including its siting. However, please refer to Response 5.1 for an explanation of the siting of the proposed project, which is provided for informational purposes. Please also refer to Response 8.1 for a discussion of the project's relationship to seawater intrusion. The SqCWD Board of Directors will consider the commenters' request as they review the project.

Comment 9

From: Becky Steinbruner <[redacted]>
Sent: Tuesday, November 30, 2021 1:09 AM
To: Michael Wilson <michaelw@soquelcreekwater.org>
Cc: Becky Steinbruner <[redacted]>
Subject: Public Comment on Country Club Well Project MND

Dear Mr. Wilson,
I am submitting the following comment on the Draft Country Club Well Project MND. Thank you for considering the following:

1) Hazardous chlorine chemicals will be transported to, used and stored on the site, which is near the School. What is the emergency plan for handling this and any other possible hazardous chemicals in the school and residential zone? By law, the District must notify the School in writing 30 days in advance of adopting the Project's CEQA final action. Has the District done this? Please notify all local schools and residents of this hazardous chemical use, storage and transport. **1**

2) There is no announcement of this CEQA action and the 15-day Public Comment Period on the District's main website home page: News Flash **2**

News Flash

News Flash

3) Soquel Creek Water District will use dynamite to demolish an existing well at 251 Baltrusol Drive in Seascape, but did not disclose this to residents or other public members in the environmental analysis for the new Water Treatment Plant and new well planned for the site. **3**

What will be the seismic impacts to homes immediately adjacent?

How will this affect the nearby residents who have swimming pools? Will the District be liable for cracks that cause the pools to leak and require expensive repairs?

4) Drilling the new well will require 24/7 equipment operation, with bright lights and LOTS of noise that will exceed the County's noise limits day and night. The District should construct sound walls to help block off the very loud noise for the residents directly adjacent.

The District did this at the insistence of residents on Willowbrook Avenue, and also Monterey Avenue when similar work was done. How will the District buffer construction noise for the Baltrusol Drive neighborhood.?

Please construct sound walls on all four sides of the site.

4

5) The District also offered off-site accommodations for the Monterey Avenue residents, and are offering it (as a hard-to-find mitigation) in the environmental analysis. How will the people actually affected be made aware of this mitigation available?

5

6) Why not abandon the contaminated well site, and develop a new well in a different location NOT PLAGUED by contamination? The Draft MND should discuss this alternative.

6

7) Aesthetics of the project:

Pages 15 and 26 show a six-foot high metal wrought iron fence all around the perimeter. This is not in keeping with the neighborhood aesthetics and must be shielded by fast-growing evergreen shrubs or vines.

7

8) The massive structure shown on page 26, will block the winter sunlight for the residents immediately adjacent. Santa Cruz County Code requires a December 21 shade study be conducted for all multi-story developments, and that winter sunlight for existing residences cannot be blocked by no more than 10% between the hours of 10am and 2pm. (Santa Cruz County Code 12.28.050 (B)(4). However, this analysis was not done in the Project MND.

Chapter 12.28 SOLAR ACCESS PROTECTION

8

Chapter 12.28 SOLAR ACCESS PROTECTION

Chapter 12.28 SOLAR ACCESS PROTECTION

9) The 10-year tree screen shown on page 17 is not the oak tree that is planned for the landscape and may not provide that level of screening in 10 years, depending on what size trees are planted.

9

10) Page 35 includes discussion that there are two solitary bat species of concern that very likely would be roosting in the heritage trees the District plans to chop down. If the District begins construction at the time of year proposed, these bats will be in winter torpor, so if disturbed, they will die.

The District needs to do find an alternative site that would not require removal of large heritage trees, and cause lethal disturbance to the bats and nesting song birds that rely on the trees for shelter.

10

11) Page 92 includes a curious measurement of noise impact. The two noise measurement sites need to be taken from next to the property lines of the neighbor's houses and backyards, and not use the theoretical readings taken from the street.

11

12) Page 97: The well drilling that must occur 24/7 and will last for three weeks exceeds both day and night time noise limits. How will the District notify the Baltrusol neighborhood of the mitigation to relocate them to alternate housing for the duration of the drilling work? This mitigation is listed on page 100.

12

13) Page 98: Five large exhaust fans would operate intermittently 7am to 7pm with an individual exhaust fan producing a sound power level of 66 dBA (that is near the County's noise limit). How will the noise of these large fans be shielded so that they are not a source of noise pollution and prevent the area residents from the peaceful enjoyment of their property, especially their backyards?

13

Sincerely,

Becky Steinbruner

[redacted]

[redacted]

Comment 9

COMMENTER: Becky Steinbruner

DATE: November 30, 2021

Response 9.1

The commenter expresses concerns about the transportation, use, and storage of hazardous materials at the project site and requests information on the emergency plan for handling these materials. The commenter also states that SqCWD must notify the nearby school in writing 30 days before the Board of Directors adopts the Final IS-MND, inquires as to whether SqCWD has completed this notification, and requests notification of all local schools and residents of the proposed use, storage, and transport of hazardous materials.

Please refer to Response 3.1 for information regarding the transportation, use, and storage of hazardous materials at the project site and the Hazardous Materials Handling and Spill Response Program and Consolidated Emergency Response/Contingency Plan maintained by SqCWD. Please refer to Response 3.2 for information on notification of local schools. In addition, SqCWD held a neighborhood meeting about the proposed project with interested neighbors on September 13, 2021, during which the use of hazardous materials was disclosed. Neighbors were notified of this meeting via mailed letters sent to owners and occupants within a 300-foot radius of the project site two-and-a-half weeks prior to the meeting and door hangers placed at residences within a 300-foot radius of the project site one week prior to the meeting.

Response 9.2

The comment expresses a concern that the SqCWD's "News Flash" webpage does not include an announcement of the Draft IS-MND and public comment period. The commenter provides a screenshot of the News Flash webpage.

The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (including information on the 34-day public comment period) and the Draft IS-MND were posted on the SqCWD's "Projects in Your Neighborhood" website, available at the following link, on October 27, 2021: https://www.soquelcreekwater.org/284/Projects-in-Your-Neighborhood. In addition, SqCWD filed the NOI with the Santa Cruz County Clerk and published the NOI in the Santa Cruz Sentinel on October 27, 2021. Furthermore, SqCWD held a public hearing on the Draft IS-MND during the Board of Directors meeting on November 16, 2021. Therefore, SqCWD has complied with the noticing requirements in CEQA Guidelines Section 15072.

Response 9.3

The commenter expresses concern about the potential impacts to residences and swimming pools related to the use of dynamite to demolish the existing Country Club well.

SqCWD proposes to destroy the existing Country Club well using the fine pressure grouting method, which involves ripping the well casing and filling the well in with slurry, rather than using the blast destruction method. As a result, the Draft IS-MND does not evaluate vibration impacts associated with blast destruction of the existing well because blast destruction is not proposed. As stated on page 96 in Section 13, *Noise*, of the Draft IS-MND, "Project construction would not involve activities typically associated with excessive groundborne vibration such as pile driving or blasting." The

District will follow the requirements of California Well Standards Bulletin 74-90 Section 23 and Bulletin 74-81 Section 23, which require the well casing to be perforated or punctured before filling with grout. Ripping the casing with blades is the intended method to destroy the existing Country Club well, which is an acceptable method and one that SqCWD has used in the past.

In response to this comment, the following text has been added to the *Description of Project* section of the IS-MND to clarify the proposed well destruction method.

Country Club Replacement Well

The proposed replacement well would be a replacement for the existing Country Club well. The target pumping capacity for the replacement well is 500 gallons per minute; however, SqCWD plans to pump at an average of 400 gallons per minute, similar to how the existing well would be operated once the water treatment plant is brought online. The well would be located on the western portion of the project site and would be drilled to a depth of approximately 530 to 540 feet. Similar to the existing Country Club well, the replacement well would be screened in both the Aromas Red Sands aquifer and the Purisima Formation (specifically Unit F).[15] The well would have an approximately four-foot-tall aboveground discharge manifold and be surrounded by removable bollards. The well would connect to the water treatment plant via piping under the on-site driveway. The existing Country Club well would remain in place and operational until it fails, at which time the replacement well would be brought online and the existing well would be destroyed. With regard to well destruction, SqCWD would follow the requirements of California Well Standards Bulletin 74-90 Section 23 and Bulletin 74-81 Section 23, which require the well casing to be perforated or punctured before filling with grout. Until ~~then~~ destruction of the existing Country Club well occurs, the replacement well would be capped. SqCWD may also bring the replacement well online sooner if it is found to have better performance and/or water quality than the existing well during well development. In either scenario, the existing and replacement wells would not simultaneously operate as groundwater extraction wells, although SqCWD may use the replacement well as a monitoring well while using the existing well as a groundwater extraction well.

In addition, the following text has been added to *Other Public Agencies Whose Approval is Required* in the Draft IS/MND:

[15] The Purisima Formation is a collection of distinct geologic units that have been assigned identification letters AA through F with Unit AA being the deepest and oldest unit and Unit F being the shallowest and youngest unit.

10. Other Public Agencies Whose Approval is Required

Other public agencies whose approval may be required include:

- **Central Coast Regional Water Quality Control Board/SWRCB Division of Drinking Water**: amendment of Domestic Water Supply Permit
- **County of Santa Cruz**: coastal development permit, significant tree removal permit, site access and encroachment permit, well drilling permit, well destruction permit
- **Santa Cruz County Sanitation District**: sewer connection and discharge permits

The changes reflected above would not result in alterations to the degree of impact or significance conclusions presented in the Draft IS-MND and do not constitute significant new information. Rather, the changes serve to clarify and strengthen the content of the Draft IS-MND.

Response 9.4

The commenter expresses a concern about the lighting and noise that would be generated during construction activities, recommends the installation of sound walls on all four sides of the project site, and asks how SqCWD will buffer construction noise.

As discussed on page 20 in Section 1, *Aesthetics*, of the Draft IS-MND, nighttime construction lighting would be required during the 24-hour well drilling activities but would not face toward adjacent uses and would be directed down towards construction activities. Therefore, construction lighting impacts would be less than significant. In addition, as stated on pages 92 and 93 in Section 13, *Noise*, of the Draft IS-MND, Mitigation Measure N-1 is required to reduce the project's construction noise impacts to nearby sensitive receivers, including adjacent residences. Mitigation Measure N-1 entails implementation of a Construction Noise Reduction Plan with various noise reduction measures that shall include the installation and maintenance of temporary sound barriers and/or blankets during construction activities around the construction site boundaries as well as hotel accommodations for all residents within 100 feet of the project site for the duration of 24-hour well drilling activities. With implementation of Mitigation Measure N-1, construction-phase noise impacts would be reduced to a less than significant level.

Response 9.5

The commenter requests information on how neighboring residents will be notified of the offer of hotel accommodations during 24-hour well drilling activities, which is included in Mitigation Measure N-1 in Section 13, *Noise*, of the Draft IS-MND.

SqCWD would provide written notification of the schedule of 24-hour well drilling activities for local residents within a 500-foot radius of the project site within a month of such activities or as soon as SqCWD receives the contractor's construction schedule. The notification would either be via mailed notices or hand-delivered door hangers. SqCWD would also post the notification on its website. In addition, SqCWD would develop a contact method for offering hotel accommodations for all residents within 100 feet of the project site for the duration of 24-hour well drilling activities, which would likely consist of requesting contact information and the preferred method of contact for each resident within a 100-foot radius via the aforementioned written notification. SqCWD would then contact each resident within 100 feet of the project site prior to each extended construction/drilling event to offer hotel accommodations.

Response 9.6

The commenter inquires as to why SqCWD is not choosing to abandon the existing Country Club well and develop a new well in a different location. The commenter requests discussion of this alternative in the Draft IS-MND.

Public Resources Code Section 15126.6 states that the inclusion of an analysis of project alternatives is only required for environmental impact reports. Therefore, the Draft IS-MND is not required by CEQA to include an evaluation of project alternatives. No revisions to the Draft IS-MND are warranted in response to this comment. Please also refer to Response 5.1 for an explanation of the siting of the proposed project, which is provided for informational purposes.

Response 9.7

The commenter expresses an opinion that the proposed six-foot-high wrought iron perimeter fence is not consistent with the aesthetics of the surrounding neighborhood and requests that the fence be shielded by fast-growing evergreen shrubs or vines.

Fencing is required to deter trespassing and vandalism of the proposed facilities. As public water facilities, the project would require additional protection beyond that typically required for a residential home, and the fencing specifications are dictated in part by the requirements of the SWRCB Division of Drinking Water. Although most SqCWD facilities are secured with chain link fencing with barbed wire on top, decorative wrought iron fencing was selected for the proposed project to provide a more aesthetically appealing design than SqCWD's typical fence materials. In addition, as shown in Figures 5 and 6 on pages 9 and 10 of the Draft IS-MND, the proposed fence would be partially shielded from street view by shrubs and evergreen trees. In addition, the proposed fence is consistent with the fence requirements for residential districts included in Santa Cruz County Code Section 13.10.525.

Response 9.8

The commenter expresses a concern that the Draft IS-MND does not include a shade study pursuant to the requirements of Santa Cruz County Code Chapter 12.28, specifically Santa Cruz County Code Section 12.28.050(B)(4).

Santa Cruz County Code Chapter 12.28 contains the County's provisions for protecting solar access for registered solar energy systems. Section 12.28.040 states, "any obstructions of solar access to a registered solar energy system shall be mitigated to the maximum extent feasible during the review of any permit to construct a building, wall, fence or other structure, or part of a structure on a solar impacting property." In order to receive protection under Santa Cruz County Code Chapter 12.28, a solar system must be a "registered solar energy system," which is defined by Section 12.28.030 as "any solar energy system registered with the County as requesting solar access protection, and in compliance with the conditions for that registration." For registered solar energy systems, Santa Cruz County Code Section 12.28.050(B)(4) provides standards to balance the protection of solar access with the protection of development potential on properties whose buildings, fences, other structures, or vegetation interfere with, or are likely in the future to interfere with, the solar access of any registered solar energy system. Thus, the provisions of this chapter are not intended to broadly preserve winter sunlight for adjacent residences, as the commenter suggests.

The only nearby residence with a solar system is located immediately south of the project site at 261 Baltusrol Drive. This solar system is located approximately 45 feet away from the project site boundary on the second-story south-facing rooftop, which faces away from the project site.

Therefore, any shading resulting from the proposed water treatment plant on this solar system would be minimal due to its orientation, location, and height. In addition, this solar system is not a "registered solar energy system" protected by the provisions of this code chapter.[16] Furthermore, in its comments on the project's CDP application, the County of Santa Cruz did not indicate that compliance with the provisions of this chapter is required for the proposed project. Therefore, a shade study is not required for the project, and no revisions to the Draft IS-MND are warranted.

Response 9.9

The commenter expresses a concern that the 10-year tree screen shown in the Draft IS-MND does not show the correct tree included in the landscaping plan.

As shown on Sheet L-09 of the project plans, which are included as Appendix A to the Draft IS-MND, the proposed landscaping plan includes a new evergreen tree on the western frontage of the project site, which is proposed to be either a coast live oak (*Quercus agrifolia*) or a California pepper tree (*Schinus molle*), in addition to the two existing California pepper trees located along the project site frontage. The street view rendering provided as Figure 6 on page 10 of the Draft IS-MND includes three California pepper trees, which is consistent with the proposed landscaping plan, and displays the level of screening anticipated based on the size of tree currently proposed for planting at that location.

Response 9.10

The commenter expresses a concern about potential project construction impacts to bats in winter torpor and nesting birds that may be located in heritage trees on the project site. The commenter requests selection of an alternative site for the proposed project to avoid these impacts.

There are no heritage trees located on the project site; the Santa Cruz County Code does not include a definition of or protection for heritage trees. Please refer to Response 3.4 for information on project impacts to special status bat species and Response 3.5 for information on project impacts to nesting birds. Please also refer to Response 3.3 for an explanation of project impacts to the one significant tree located on the project site. The SqCWD Board of Directors will consider the commenter's request for an alternative site as they review the project.

Response 9.11

The commenter states an opinion that noise measurements should be taken next to the neighboring property lines rather than using theoretical readings taken at the street.

The noise measurements conducted at the project site during preparation of the Draft IS-MND (summarized on pages 84 to 86 in Section 13, *Noise*, of the Draft IS-MND) characterize ambient sound levels at and near the project site. These noise measurements are not theoretical readings, but rather actual measurements conducted at the locations shown on Figure 9 on page 85 of the Draft IS-MND. These measurements measured sound levels associated with the primary source of noise in the project site vicinity, which is vehicular traffic on local roadways. Therefore, these measurements are appropriate to use to estimate ambient noise levels at the project site and at neighboring residences using the physical attenuation properties of noise (i.e., an attenuation [or drop-off] rate of 6 dBA per doubling of distance for point sources and 3 dBA per doubling of distance for line sources). It is not necessary to conduct noise measurements adjacent to neighboring

[16] Ditmars, Evan. 2021. Project Planner, County of Santa Cruz. Personal communication via phone call regarding registered solar energy systems in the project site vicinity with Annaliese Miller, Environmental Planner, Rincon Consultants, Inc. on December 8, 2021.

property lines for the purposes of the CEQA analysis because the noise measurements taken at the locations shown on Figure 9 on page 85 of the Draft IS-MND are adequate to characterize baseline conditions and to approximate ambient noise levels at neighboring properties. Therefore, no revisions to the Draft IS-MND are warranted.

Response 9.12

The commenter requests information on how neighboring residents will be notified of the offer of hotel accommodations during 24-hour well drilling activities, which is included in Mitigation Measure N-1 in Section 13, *Noise*, of the Draft IS-MND.

Please refer to Response 9.5 for information on how neighboring residents will be notified of the offer of hotel accommodations during 24-hour well drilling activities.

Response 9.13

The commenter expresses a concern about operational noise impacts associated with the proposed exhaust fans and requests information on how noise generated by these fans would be shielded to prevent noise pollution.

As stated on page 91 in Section 13, *Noise*, of the Draft IS-MND, the primary source of noise associated with the proposed water treatment plant would be five wall-mounted exhaust fans that would provide ventilation to the building. The fans would normally operate intermittently between 7:00 a.m. and 7:00 p.m. An individual exhaust fan would produce a sound power level of 66 dBA, which equates to a sound pressure level of approximately 54 dBA L_{eq} at five feet. The combined noise level of five proposed exhaust fans would be 61 dBA L_{eq} at five feet. Conservatively assuming that all five exhaust fans would be located at the point of the proposed water treatment plant closest to the property line (which is the southern elevation located approximately 15 feet from the property line), exhaust fan noise would be approximately 42 dBA L_{eq} at the nearest property line. This noise level would not exceed the County's general noise level standard of 75 dBA during daytime and evening hours (8:00 a.m. to 10:00 p.m.; Santa Cruz County Code Section 8.30.010[C][1][a]), general noise level standard of 60 dBA during nighttime hours (10:00 p.m. to 7:00 a.m.; Santa Cruz County Code Section 8.30.010[C][1][b]), or the County's noise level standard for stationary noise sources of 45 dBA L_{eq} for nighttime hours pursuant to Policy 9.2.4 and Table 9-3 in the Santa Cruz County General Plan and LCP (2020). Furthermore, even if the exhaust fans operated continuously during all hours (which would only occur on the rare occasion that other water infrastructure in the service area is offline or during an emergency), 24-hour noise levels at the property line would be approximately 49 CNEL, which would not exceed the community noise exposure standard of 60 CNEL for single-family residential land uses pursuant to Policy 9.2.4 and Table 9-2 in the Santa Cruz County General Plan and LCP (2020). Therefore, as concluded on page 91 in Section 13, *Noise*, of the Draft IS-MND, the project's operational noise impacts would be less than significant, and no shielding or other mitigation is necessary to achieve compliance with the County's noise ordinance.

Staff-Initiated Changes to the Draft IS-MND

This section includes changes to the Draft IS-MND initiated by SqCWD staff.

The checkbox for item (d) in the checklist in Section 3, *Air Quality*, has been updated from "No Impact" to "Less than Significant Impact" to match the conclusion of the impact analysis in the subsequent text. This is a typographical error and does not change the conclusions of the Draft IS-MND in relation to its evaluation of project impacts.

The checkbox for item (g) in the checklist in Section 9, *Hazards and Hazardous Materials*, has been updated from "Less than Significant Impact" to "No Impact" to match the conclusion of the impact analysis in the subsequent text. This is a typographical error and does not change the conclusions of the Draft IS-MND in relation to its evaluation of project impacts.

The estimate of existing daily traffic on the segment of Baltusrol Drive north of Baltusrol Way has been updated to use data from the recently released Institute of Transportation Engineers (2021) *Trip Generation Handbook, 11th Edition*, in Section 3, *Air Quality* (page 31 of the Draft IS-MND) and Section 13, *Noise* (page 92 of the Draft IS-MND) as follows. The corresponding reference has been added in the *References* section as well.

Section 3, Air Quality

> According to the Institute of Transportation Engineers (~~2017~~ 2021) *Trip Generation Handbook, ~~10th Edition~~ 11th Edition*, single-family residences generate approximately ~~9.44~~ 9.43 average daily trips; therefore, existing daily traffic volumes on this segment of Baltusrol Drive are approximately 94 average daily trips for local residents, in addition to a minor number of daily vehicle trips that may travel through from other areas of the neighborhood and ancillary vehicles such as mail delivery and garbage collection trucks. The project would require a daily visit from an SqCWD operator on weekdays, weekly deliveries of sodium hypochlorite, weekly or monthly water quality visits by SqCWD staff, weekly or bi-monthly visits for site maintenance, and infrequent visits to replace the GAC media every two-and-a-half to three years. This level of additional vehicular traffic would not be sufficient to cause traffic volumes on Baltusrol Drive and other area roadways to exceed the 44,000 vehicles-per-hour threshold set by BAAQMD (2017). Therefore, the project would not expose sensitive receptors to substantial carbon monoxide concentrations, and impacts would be less than significant.

Section 13, *Noise*

> Baltusrol Drive north of Baltusrol Way serves as the primary local access roadway for approximately 10 single-family residences. According to the Institute of Transportation Engineers (~~2017~~ 2021) *Trip Generation Handbook, ~~10th Edition~~ 11th Edition*, single-family residences generate approximately ~~9.44~~ 9.43 average daily trips; therefore, existing daily traffic volumes on this segment of Baltusrol Drive are approximately 94 average daily trips for local trips, conservatively not including vehicle trips that may travel through from other areas of the neighborhood and ancillary vehicles such as mail delivery and garbage collection trucks. During normal operations, an SqCWD operator would travel to the project site daily on weekdays, which would result in two additional one-way vehicle trips on Baltusrol Drive and other area roadways. Maximum daily vehicle trips would be generated on a day during which the daily SqCWD operator visit, weekly water quality visit, weekly sodium hypochlorite delivery,

weekly/bi-monthly site maintenance visit, semi-annual hexavalent chromium resin replacement visit, and GAC media replacement visit (two staff) occur on the same day, which would equate to 14 one-way vehicle trips. In addition, a small number of other existing SqCWD staff (anticipated to be no more than one to five staff daily) may visit the project site to use the restroom in the proposed water treatment plant over the course of their regular duties in the SqCWD service area, which would incrementally increase vehicle trips on Baltusrol Drive by another two to 10 one-way trips for a maximum total of 24 one-way vehicle trips. Even in this scenario of maximum daily trips, the project would not double existing traffic volumes on Baltusrol Drive north of Baltusrol Way, which are currently approximately 94 average daily trips, such that a perceptible increase in traffic noise levels would occur. Therefore, impacts related to off-site traffic noise would be less than significant.

References

Institute of Transportation Engineers. 2021. *Trip Generation Handbook, 11th Edition*.

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Attachment 1

Consolidated Emergency Response/Contingency Plan

CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS)

CONSOLIDATED EMERGENCY RESPONSE / CONTINGENCY PLAN

Prior to completing this Plan, please refer to the INSTRUCTIONS FOR COMPLETING A CONSOLIDATED CONTINGENCY PLAN

A. FACILITY IDENTIFICATION AND OPERATIONS OVERVIEW

FACILITY ID #	1. CERS ID	A1. DATE OF PLAN PREPARATION/REVISION A2.
FA0001590	10658347	2/16/2016

BUSINESS NAME *(Same as Facility Name or DBA - Doing Business As)* 3.
Soquel Creek Water District's Country Club Well

BUSINESS SITE ADDRESS 103.
235 Baltusrol Drive

BUSINESS SITE CITY 104.		ZIP CODE 105.
Aptos	CA	95003

TYPE OF BUSINESS (e.g., Painting Contractor) A3.	INCIDENTAL OPERATIONS (e.g., Fleet Maintenance) A4.
Drinking water utility supply well	Drinking water disinfection

THIS PLAN COVERS CHEMICAL SPILLS, FIRES, AND EARTHQUAKES INVOLVING: (Check all that apply) A5.

☒ 1. HAZARDOUS MATERIALS; ☐ 2. HAZARDOUS WASTES

B. INTERNAL RESPONSE

INTERNAL FACILITY EMERGENCY RESPONSE WILL OCCUR VIA: (Check all that apply) B1.

☒ 1. CALLING PUBLIC EMERGENCY RESPONDERS (i.e., 9-1-1)
☒ 2. CALLING HAZARDOUS WASTE CONTRACTOR
☐ 3. ACTIVATING IN-HOUSE EMERGENCY RESPONSE TEAM

C. EMERGENCY COMMUNICATIONS, PHONE NUMBERS AND NOTIFICATIONS

Whenever there is an imminent or actual emergency situation such as an explosion, fire, or release, the Emergency Coordinator (or his/her designee when the Emergency Coordinator is on call) shall:

1. Activate internal facility alarms or communications systems, where applicable, to notify all facility personnel.
2. Notify appropriate local authorities (i.e., call 9-1-1).
3. Notify the California Emergency Management Agency at (800) 852-7550.

Before facility operations are resumed in areas of the facility affected by the incident, the emergency coordinator shall notify the California Department of Toxic Substances Control (DTSC), the local Unified Program Agency (UPA), and the local fire department's hazardous materials program that the facility is in compliance with requirements to:

1. Provide for proper storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from an explosion, fire, or release at the facility; and
2. Ensure that no material that is incompatible with the released material is transferred, stored, or disposed of in areas of the facility affected by the incident until cleanup procedures are completed.

INTERNAL FACILITY EMERGENCY COMMUNICATIONS OR ALARM NOTIFICATION WILL OCCUR VIA: (Check all that apply) C1.

☒ 1. VERBAL WARNINGS;	☐ 2. PUBLIC ADDRESS OR INTERCOM SYSTEM;	☒ 3. TELEPHONE;
☒ 4. PAGERS;	☐ 5. ALARM SYSTEM;	☒ 6. PORTABLE RADIO

NOTIFICATIONS TO NEIGHBORING FACILITIES THAT MAY BE AFFECTED BY AN OFF-SITE RELEASE WILL OCCUR BY: (Check all that apply) C2.

☒ 1. VERBAL WARNINGS;	☐ 2. PUBLIC ADDRESS OR INTERCOM SYSTEM;	☒ 3. TELEPHONE;
☐ 4. PAGERS;	☐ 5. ALARM SYSTEM;	☐ 6. PORTABLE RADIO

EMERGENCY RESPONSE PHONE NUMBERS:		
	AMBULANCE, FIRE, POLICE AND CHP	9-1-1
	CALIFORNIA EMERGENCY MANAGEMENT AGENCY (CAL/EMA)	(800) 852-7550
	NATIONAL RESPONSE CENTER (NRC)	(800) 424-8802
	POISON CONTROL CENTER	(800) 222-1222
	LOCAL UNIFIED PROGRAM AGENCY (UPA/CUPA)	(831) 454-2022 C3.
	OTHER (Specify): Santa Cruz Regional 9-1-1 (aka Netcom)	(831) 471-1180 C5.
NEAREST MEDICAL FACILITY / HOSPITAL NAME:	Dominican Hospital, 1555 Soquel Dr., Santa Cruz	(831) 462-7700 C7.
AGENCY NOTIFICATION PHONE NUMBERS:	CALIFORNIA DEPT. OF TOXIC SUBSTANCES CONTROL (DTSC)	(916) 255-3545
	REGIONAL WATER QUALITY CONTROL BOARD	(805) 549-3147 C8.
	U.S. ENVIRONMENTAL PROTECTION AGENCY (US EPA)	(800) 300-2193
	CALIFORNIA DEPT OF FISH AND GAME (DFG)	(916) 358-2900
	U.S. COAST GUARD	(202) 267-2180
	CAL/OSHA	(916) 263-2800
	STATE FIRE MARSHAL	(916) 445-8200
	OTHER (Specify): Aptos/La Selva Fire District	(831) 685-6690 C10.
	OTHER (Specify): C11.	C12.

D. EMERGENCY CONTAINMENT AND CLEANUP PROCEDURES

SPILL PREVENTION, CONTAINMENT, AND CLEANUP PROCEDURES: (Check all boxes that apply to indicate your procedures for containing spills, releases, fires or explosions; and. preventing and mitigating associated harm to persons, property, and the environment.)

D1.

- [x] 1. MONITOR FOR LEAKS, RUPTURES, PRESSURE BUILD-UP, ETC.;
- [ ] 2. PROVIDE STRUCTURAL PHYSICAL BARRIERS (e.g., Portable spill containment walls);
- [x] 3. PROVIDE ABSORBENT PHYSICAL BARRIERS (e.g., Pads, pigs, pillows);
- [x] 4. COVER OR BLOCK FLOOR AND/ OR STORM DRAINS;
- [ ] 5. BUILT-IN BERM IN WORK / STORAGE AREA;
- [ ] 6. AUTOMATIC FIRE SUPPRESSION SYSTEM;
- [ ] 7. ELIMINATE SOURCES OF IGNITION FOR FLAMMABLE HAZARDS (e.g. Flammable liquids, Propane);
- [x] 8. STOP PROCESSES AND/OR OPERATIONS;
- [x] 9. AUTOMATIC / ELECTRONIC EQUIPMENT SHUT-OFF SYSTEM;
- [x] 10. SHUT-OFF WATER, GAS, ELECTRICAL UTILITIES AS APPROPRIATE;
- [x] 11. CALL 9-1-1 FOR PUBLIC EMERGENCY RESPONDER ASSISTANCE / MEDICAL AID;
- [x] 12. NOTIFY AND EVACUATE PERSONS IN ALL THREATENED AREAS;
- [x] 13. ACCOUNT FOR EVACUATED PERSONS IMMEDIATELY AFTER EVACUATION CALL;
- [ ] 14. PROVIDE PROTECTIVE EQUIPMENT FOR ON-SITE RESPONSE TEAM;
- [ ] 15. REMOVE OR ISOLATE CONTAINERS / AREA AS APPROPRIATE;
- [x] 16. HIRE LICENSED HAZARDOUS WASTE CONTRACTOR;
- [ ] 17. USE ABSORBENT MATERIAL FOR SPILLS WITH SUBSEQUENT PROPER LABELING, STORAGE, AND HAZARDOUS WASTE DISPOSAL AS APPROPRIATE;
- [ ] 18. SUCTION USING SHOP VACUUM WITH SUBSEQUENT PROPER LABELING, STORAGE, AND HAZARDOUS WASTE DISPOSAL AS APPROPRIATE;
- [ ] 19. WASH / DECONTAMINATE EQUIPMENT W/ CONTAINMENT and DISPOSAL OF EFFLUENT / RINSATE AS HAZARDOUS WASTE;
- [ ] 20. PROVIDE SAFE TEMPORARY STORAGE OF EMERGENCY-GENERATED WASTES;
- [ ] 21. OTHER (Specify):

D2.

E. FACILITY EVACUATION

THE FOLLOWING ALARM SIGNAL(S) WILL BE USED TO BEGIN EVACUATION OF THE FACILITY (CHECK ALL THAT APPLY): E1.

- [ ] 1. BELLS;
- [ ] 2. HORNS/SIRENS;
- [x] 3. VERBAL (I.E., SHOUTING);
- [ ] 4. OTHER (Specify):

E2.

THE FOLLOWING LOCATION(S) IS/ARE EVACUEE EMERGENCY ASSEMBLY AREA(S) (i.e., Front parking lot, specific street corner, etc.) E3.

Outside the gate next to Baltusrol Drive.

Note: The Emergency Coordinator must account for all on site employees and/or site visitors after evacuation.

- [ ] EVACUATION ROUTE MAP(S) POSTED AS REQUIRED E4.

Note: The map(s) must show primary and alternate evacuation routes, emergency exits, and primary and alternate staging areas, and must be prominently posted throughout the facility in locations where it will be visible to employees and visitors.

F. ARRANGEMENTS FOR EMERGENCY SERVICES

Explanation of Requirement: Advance arrangements with local fire and police departments, hospitals, and/or emergency services contractors should be made as appropriate for your facility. You may determine that such arrangements are not necessary.

ADVANCE ARRANGEMENTS FOR LOCAL EMERGENCY SERVICES (Check one of the following) F1.

- [ ] 1. HAVE BEEN DETERMINED NOT NECESSARY; *or*
- [x] 2. THE FOLLOWING ARRANGEMENTS HAVE BEEN MADE (Specify):

F2.

The District has a Standby Emergency Response Agreement executed with Clean Harbors of San Jose. Clean Harbors will be on-call to provide emergency hazardous materials response services to the District. Clean Harbors' emergency number is 800-OIL-TANK (800-645-8265).

In addition, the Santa Cruz Hazardous Materials Interagency Team (SCHMIT) is based at Scotts Valley Fire Department with about 30 members from various fire departments throughout the County. These hazardous materials technicians and specialists rotate shift coverage 24 hours per day. They can be mobilzed by calling 911.

G. EMERGENCY EQUIPMENT

Check all boxes that apply to list emergency response equipment available at the facility and identify the location(s) where the equipment is kept and the equipment's capability, if applicable. [e.g., ☒ CHEMICAL PROTECTIVE GLOVES | Spill response kit | One time use, Oil & solvent resistant only.]

TYPE	EQUIPMENT AVAILABLE G1.	LOCATION	CAPABILITY *(If applicable)*
Safety and First Aid	1. ☒ CHEMICAL PROTECTIVE SUITS, APRONS, OR VESTS	G2. In hypochorite room	G3.
	2. ☒ CHEMICAL PROTECTIVE GLOVES	G4. In hypochlorite room	G5.
	3. ☐ CHEMICAL PROTECTIVE BOOTS	G6.	G7.
	4. ☒ SAFETY GLASSES / GOGGLES / SHIELDS	G8. In hypochlorite room	G9.
	5. ☐ HARD HATS	G10.	G11.
	6. ☐ CARTRIDGE RESPIRATORS	G12.	G13.
	7. ☐ SELF-CONTAINED BREATHING APPARATUS (SCBA)	G14.	G15.
	8. ☐ FIRST AID KITS / STATIONS	G16.	G17.
	9. ☒ PLUMBED EYEWASH FOUNTAIN / SHOWER	G18. In hypochlorite room	G19.
	10. ☐ PORTABLE EYEWASH KITS	G20.	G21.
	11. ☐ OTHER	G22.	G23.
	12. ☐ OTHER	G24.	G25.
Fire Fighting	13. ☒ PORTABLE FIRE EXTINGUISHERS	G26.	G27.
	14. ☐ FIXED FIRE SYSTEMS / SPRINKLERS / FIRE HOSES	G28.	G29.
	15. ☐ FIRE ALARM BOXES OR STATIONS	G30.	G31.
	16. ☐ OTHER	G32.	G33.
Spill Control and Clean-Up	17. ☒ ALL-IN-ONE SPILL KIT	G34. In hypochlorite room	G35.
	18. ☐ ABSORBENT MATERIAL	G36.	G37.
	19. ☐ CONTAINER FOR USED ABSORBENT	G38.	G39.
	20. ☐ BERMING / DIKING EQUIPMENT	G40.	G41.
	21. ☐ BROOM	G42.	G43.
	22. ☐ SHOVEL	G44.	G45.
	23. ☐ SHOP VAC	G46.	G47.
	24. ☐ EXHAUST HOOD	G48.	G49.
	25. ☐ EMERGENCY SUMP / HOLDING TANK	G50.	G51.
	26. ☐ CHEMICAL NEUTRALIZERS	G52.	G53.
	27. ☐ GAS CYLINDER LEAK REPAIR KIT	G54.	G55.
	28. ☐ SPILL OVERPACK DRUMS	G56.	G57.
	29. ☒ OTHER	G58.	G59. Storage tank is secondarily contained
Communi-cations and Alarm Systems	30. ☒ TELEPHONES (Includes cellular)	G60.	G61.
	31. ☐ INTERCOM / PA SYSTEM	G62.	G63.
	32. ☒ PORTABLE RADIOS	G64.	G65.
	33. ☐ AUTOMATIC ALARM CHEMICAL MONITORING EQUIPMENT	G66.	G67.
Other	34. ☐ OTHER	G68.	G69.
	35. ☐ OTHER	G70.	G71.

H. EARTHQUAKE VULNERABILITY

Identify areas of the facility that are vulnerable to hazardous materials releases / spills due to earthquake-related motion. These areas require immediate isolation and inspection.

VULNERABLE AREAS: (Check all that apply)	H1.	LOCATIONS (e.g., shop, outdoor shed, forensic lab)	
☒ 1. HAZARDOUS MATERIALS / WASTE STORAGE AREA		In hypochlorite room	H2.
☐ 2. PROCESS LINES / PIPING			H3.
☐ 3. LABORATORY			H4.
☐ 4. WASTE TREATMENT AREA			H5.

Identify mechanical systems vulnerable to releases / spills due to earthquake-related motion. These systems require immediate isolation and inspection.

VULNERABLE SYSTEMS: (Check all that apply)	H6.	LOCATIONS	
☐ 1. SHELVES, CABINETS AND RACKS			H7.
☒ 2. TANKS (EMERGENCY SHUTOFF)		Hypochlorite tank	H8.
☐ 3. PORTABLE GAS CYLINDERS			H9.
☒ 4. EMERGENCY SHUTOFF AND/OR UTILITY VALVES		Treated water distribution valve leading to street	H10.
☐ 5. SPRINKLER SYSTEMS			H11.
☐ 6. STATIONARY PRESSURIZED CONTAINERS (e.g., Propane dispensing tank)			H12.

I. EMPLOYEE TRAINING

Explanation of Requirement: Employee training is required for all employees handling hazardous materials and hazardous wastes in day-to-day or clean-up operations including volunteers and/or contractors. Training must be:

- Provided within 6 months for new hires;
- Amended as necessary prior to change in process or work assignment;
- Given upon modification to the Emergency Response / Contingency Plan, and updated/refreshed annually for all employees.

Required content includes all of the following:

- Material Safety Data Sheets;
- Hazard communication related to health and safety;
- Methods for safe handling of hazardous substances;
- Fire hazards of materials / processes;
- Conditions likely to worsen emergencies;
- Coordination of emergency response;
- Notification procedures;
- Applicable laws and regulations;
- Communication and alarm systems;
- Personal protective equipment;
- Use of emergency response equipment (e.g. Fire extinguishers, respirators, etc.);
- Decontamination procedures;
- Evacuation procedures;
- Control and containment procedures;
- UST monitoring system equipment and procedures (if applicable).

INDICATE HOW EMPLOYEE TRAINING PROGRAM IS ADMINISTERED (Check all that apply) I1.

☒ 1. FORMAL CLASSROOM; ☒ 2. VIDEOS; ☒ 3. SAFETY / TAILGATE MEETINGS;

☒ 4. STUDY GUIDES / MANUALS (Specify): District procedures I2.

☒ 5. OTHER (Specify): On-line training, Safety Data Sheets I3.

☐ 6. NOT APPLICABLE BECAUSE FACILITY HAS NO EMPLOYEES

Large Quantity Generator (LQG) Training Records: Large quantity hazardous waste generators (i.e., who generate more than 270 gallons/1,000 kilograms of hazardous waste per month) must retain written documentation of employee hazardous waste management training sessions which includes:

- A written outline/agenda of the type and amount of both introductory and continuing training that will be given to persons filling each job position having responsibility for the management of hazardous waste (e.g., labeling, manifesting, compliance with accumulation time limits, etc.).
- The name, job title, and date of training for each hazardous waste management training session given to an employee filling such a job position; and
- A written job description for each of the above job positions that describes job duties and the skills, education, or other qualifications required of personnel assigned to the position.
- Current employee training records must be retained until closure of the facility.
- Former employee training records must be retained at least three years after termination of employment.

J. LIST OF ATTACHMENTS

(Check one of the following) J1.

☐ 1. NO ATTACHMENTS ARE REQUIRED; *or*

☒ 2. THE FOLLOWING DOCUMENTS ARE ATTACHED: J2.

Site Maps

K. SIGNATURE / CERTIFICATION

Certification: Based on my inquiry of those individuals responsible for obtaining the information, I certify under penalty of law that I have personally examined and am familiar with the information submitted and believe the information is true, accurate, and complete, and that a copy is available on site.

SIGNATURE OF OWNER/OPERATOR	DATE SIGNED K1.
Ron Duncan	2/20/16
NAME OF SIGNER (print) K2.	TITLE OF SIGNER K3.
Ron Duncan	General Manager

Attachment 2

Notification of Rio del Mar Elementary School

From: Michael Wilson
Sent: Wednesday, November 17, 2021 9:56 AM
To: jennifer_albores@pvusd.net; 'cynthia_valdez@pvusd.net'; alyssa_avey@pvusd.net; meghan_green@pvusd.net
Cc: Annaliese Miller; Megan Jones; Taj Dufour
Subject: [EXT] Soquel Creek Water District Notification of Water Project in the Baltusrol Neighborhood
Attachments: SqCWD Country Club Well Notice of Intent.pdf

Dear Faculty of Rio Del Mar Elementary School,

The Soquel Creek Water District is planning to construct a new well and a water treatment plant to remove a contaminate from the water at our current well site at 251 Baltusrol Dr. The attached notice of intent, which was also published in the Santa Cruz Sentinel provides more detail of the project and provide our Notice of Intent to Adopt a Mitigated Negative Declaration (IS-MND) for the project. It is not a requirement to notify the school or school district because the project should not have any impact on Rio Del Mar Elementary School.

Nevertheless, it was brought up at last night's Board of Director's meeting for the water district. So we are sending you this courtesy notice and letting you know our plan is to request our Board of Directors adopt the final IS-MND for the project at our December 21, 2021 Board meeting.

Thank you for your time and Best Regards,

Michael J. Wilson, P.E. | Associate Engineer
Soquel Creek Water District | 5180 Soquel Dr., Soquel CA 95073 | www.soquelcreekwater.org
direct 831-475-8501 x122 | main 831-475-8500 | cell 831-706-6216