



April 19, 2022

Governor's Office of Planning & Research

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Lamont Public Utilities District
Attn: Scott Taylor
8624 Segrue Road
Lamont, CA 92341

STATE CLEARINGHOUSE

LAMONT PUBLIC UTILITES DISTRICT (DISTRICT), MITIGATED NEGATIVE DECLARATION (MND) FOR THE WATER SUPPLY IMPROVEMENT DISTRICT PROJECT (PROJECT); SCH # 2022030580

Dear Mr. Scott Taylor:

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

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

- In the "Report on Arsenic and 1,2,3-TCP [1,2,3-Trichloropropane] in Groundwater In and Near the Lamont Public Utility District", Appendix 7, 1,2,3-TCP concentrations were found in some samples below the depth of 467 feet as a result of the influence of one or more well conduits in the vicinity. It was theorized that this was from abandoned wells that were perforated opposite both shallow and deep groundwater and were not properly destroyed (PDF page 449). The CEQA document talks about the abandoning Wells 1 and 2 (PDF page 8) and demolition of the existing wells (page 26). Discuss how the wells will be properly decommissioned to protect water quality, including the spreading of 1,2,3-TCP concentrations.
- The Well 12 and Well 13 property is listed as being in the 100-year flood plain (Figure 1, PDF page 79). Discuss how the wells will be built to protect drinking water quality from contamination.
- "HYD-1. Based on the groundwater quality identified during pre-production testing, the Lamont PUD may install a water treatment unit (such as Ion Exchange or Reverse Osmosis), to reduce concentrations below the MCL for the pertinent pollutant. The selected unit shall be installed, maintained [,] and operated in a manner that will allow the potable water delivered to customers to meet all primary drinking water standards" (PDF page 46). If treatment will be a Project mitigation measure and/or may be implemented based on water quality results and will not to be covered in another CEQA document, please discuss: possible treatment infrastructure, the hazardous and/or

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

recycled waste that will be produced, the waste disposal and/or waste discharge, the waste and/or discharge permits required, and how water quality will be protected.

- The hydrogeologic study involved a review of existing water wells in the area (PDF page 427). The study included existing domestic wells and other water supply well information that was available within the Lamont area. It was recommended that new well sites should be constructed a minimum of 1,760-ft away from existing wells and a casing hammer test well shall be constructed prior to designing and drilling a production water well (pdf page 433). These recommendations were to determine the best water quality locations for the wells. Were agricultural wells, as well as domestic, considered when determining the proposed/best well locations? Please provide the informational sources used in determining nearby wells.
- The Project is located in the San Joaquin Valley-Kern County (5-022.14) basin, a critically over-drafted basin. Possible effects of subsidence on the Project (well infrastructure) were considered and a mitigation measure for these impacts were proposed. Subsidence, however, was not considered as a Project impact, as it assumed that the wells will be replacing existing wells. If the total capacity of the new wells end up exceeding the total capacity of the old wells, the Project groundwater pumping impacts on the critically over-drafted basin and on subsidence should be re-evaluated as part of the Project CEQA document.

When the CEQA review process is completed, please forward the following items with your permit application to the State Water Board, DDW Visalia District Office to DWPDIST12@waterboards.ca.gov:

- Copy of the draft and final MND with the 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
- Copy of the stamped Notice of Determination filed at the Kern County Clerk's Office and the Governor's Office of Planning and Research, State Clearinghouse.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, if you have any questions regarding State Water Board CEQA comments.

Sincerely,

Lori Schmitz

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

Mr. Scott Taylor

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Lauren Pham
Water Resources Control Engineer
Visalia District