



State Water Resources Control Board

June 5, 2023

Attn: Mr. Scott Johnson
City of Sacramento Community Development Department
300 Richards Blvd., Third Floor
Sacramento, CA 95811



CITY OF SACRAMENTO (CITY), ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE GROUNDWATER MASTER PLAN WELL REPLACEMENT PROGRAM PROJECT (PROJECT); STATE CLEARINGHOUSE # 2022030709

Dear Mr. Scott Johnson:

Thank you for the opportunity to review the EIR 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. The Project is within the jurisdiction of the State Water Board, DDW's Sacramento District (District). DDW Sacramento District issues a domestic water supply permit amendment to the public water systems serviced with a new or modified source of domestic water supply or new domestic water system components pursuant to Waterworks Standards (Title 22 CCR chapter 16 et. seq.). A public water system requires a new water supply permit amendment for changes to a water supply source, storage, or treatment and for the operation of new water system components including new distribution tanks equal to or over 100,000 gallons, new wells, and treatment systems. The City will need to apply for water supply permit amendments resulting from the implementation of this Project.

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

- Table 2.5.1 Existing Municipal Production Well Inventory (PDF page 38-41) includes some discrepancies from the DDW Sacramento District record. Please work with the District to include the most updated information on the following:
 - The District has no record of use and permitting of Well 146. This well also appears to be listed for replacement as Well 5 (Well 146B) in Table 2.6-1. Please update the well to be replaced to reflect a well that was once used and permitted; provide information to the District office to show this well was once permitted for use and so may be used as a well to be replaced; or if Well 146 was used for other purposes besides domestic water supply, please indicate for what purpose.

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

- The current number of wells stated in the document does not match the District's record (PDF page 10-IS,77-IS, 36-EIR, 265-EIR). DDW records indicate the City's current domestic water system is listed as having a total of 28 active wells, 17 inactive wells, and two pending wells. Please work with the District to come to agreement on the current number of domestic wells. Update the document to reflect, as needed. If the wells are used for other purposes besides domestic water supply wells, please indicate this.
- The City's current well status and DDW's current well status are not the same for some wells. DDW District records indicate no domestic water supply well's status has changed since January 2023:
 - The following domestic water supply wells are considered to be active by DDW: 83, 123, 127, 144, 154
 - The following domestic water supply wells, not listed in the document, are not considered to be active by DDW and are not considered a ground water source: 117, 119, 132, 136, 150.
 - Please come to an agreement with the District on the current numbers and update the document, as needed, to reflect the current status.
 - Please also indicate any future plans to apply for or complete an application process for a change in the current well status of any of these wells, as needed.
- The EIR states "Destruction of up to 38 existing active and inactive groundwater extraction wells nearing the end of their useful life is not tied to the construction of proposed replacement wells, except where replacement wells are located at the same site (PDF page 58). Will the associated wells continue to be used? Will other older wells (117, 119, 132, 136, and 150) be decommissioned as part of the 4 per year target over the next 25 years (PDF page 58)? Will some of the wells be turned into monitoring wells? How will the well decommissioning be tracked to ensure wells are decommissioned within a reasonable time to ensure water quality protection?
- Update the Project description and relevant sections of the EIR, as needed based on discussions with DDW.

When the CEQA review process is completed, please forward the following items with your permit application to the State Water Board, DDW Sacramento District Office at DWPDIST09@waterboards.ca.gov:

- Copy of the draft and final EIR 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 EIR and MMRP; and
- Copy of the date stamped Notice of Determination filed at the Sacramento 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 this comment letter.

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

Ali Rezvani
District Engineer
Sacramento District