

July 19, 2022

Governor's Office of Planning & Research

Fresno County
Attn: Ejaz Ahmad
2220 Tulare Street, Sixth Floor,
Fresno, CA 93721

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STATE CLEARINGHOUSE

FRESNO COUNTY (COUNTY), MITIGATED NEGATIVE DECLARATION (MND), FOR THE INITIAL STUDY NO. 7504; GENERAL PLAN AMENDMENT APPLICATION NO. 555; AMENDMENT APPLICATION NO. 3832 PROJECT (PROJECT); SCH #2022060406

Dear Mr. Ejaz Ahmad:

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 drinking water 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 water supply permit.

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

- The project site is located within the San Joaquin Valley- Kings (5-022.08) Groundwater Basin. Department of Water Resources makes available online to stakeholders and the public a Sustainable Groundwater Management Area Basin Prioritization Dashboard ([Dashboard], <https://gis.water.ca.gov/app/bp-dashboard/final/>) with information on the current status of groundwater basins. The Dashboard indicates the San Joaquin Valley-Kings (5-022.08) Groundwater Basin is a critically overdrafted basin and ranked as a High Priority Basin for Groundwater Basin Prioritization. The Dashboard also indicates, "The region faces many water management challenges including groundwater overdraft, surface water shortages in dry years, and groundwater quality problems in certain areas. Groundwater overdraft is generally considered the largest regional problem with the current plan area overdraft estimated to be 100,000 to 150,000 AF/year. The long-term decline in groundwater storage will be significant if current water management strategies are maintained. Correcting the overdraft through regional efforts will help lead to overall maintenance and improvement in the quantity, quality and cost of development of groundwater resources in the region," (accessed June 30, 2022).

Given the current state of the groundwater basin, in the Project's Initial Study discussion:

- Please compare the amount of groundwater that will be used by the Project verses the amount used under existing conditions and discuss any impacts from the Project on the overdrafted basin, including cumulative effects on the

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

sustainable management of the basin (Title 14, Division 6, Chapter 3, Article 5, section 15064 [h])

- Please provide feasible mitigation measures to reduce potential effects, if appropriate (California Public Resources Code, Division 13 Environmental Quality, Chapter 1, section 21002).

If the MND is adopted, please forward the following items in support of the new water system's permit application to the State Water Board, DDW Fresno District Office at DWPDIST23@waterboards.ca.gov:

- Copy of the draft and final MND and Mitigation Monitoring and Reporting Plan (MMRP);
- Copy of the comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes adopting the MND and MMRP; and
- Copy of the stamped Notice of Determination filed at the Fresno 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

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

Jose Robledo
District Engineer
Fresno District