

State Water Resources Control Board

September 28, 2023

City of Coachella
Attn: Gabriel Perez
53990 Enterprise Way
Coachella, CA 92236



CITY OF COACHELLA (CITY), MITIGATED NEGATIVE DECLARATION (MND) FOR THE SEVILLA II TENTATIVE TRACT MAP NO 38557 PROJECT (PROJECT); STATE CLEARINGHOUSE #2023090027

Dear Mr. Gabriel Perez:

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 pursuant to the Safe Drinking Water Act. The Project is within the jurisdiction of the State Water Board, DDW's Riverside District. DDW Riverside District issues domestic water supply permit amendments 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 water supply permit amendment for changes to a water supply source, storage, or treatment and for the operation of new water system components- as specified in the Waterworks Standards. The Coachella Water Authority (CWA) may need to apply for a water supply amendment for this Project.

The State Water Board, DDW, as a responsible agency under California Environmental Quality Act (CEQA), has the following comments on the City's Initial Study (IS)/MND:

- The IS/MND includes an approximate 0.23-acre dedicated [future] well site as part of the proposed Project (PDF pages 11, 34). Please discuss if the well will be used to provide drinking water to the development. If the well will be used to provide drinking water to the development, please address the following in the document:
 - The environmental impacts of drilling and operating the well, including discussion on:
 - groundwater impacts and surrounding wells,
 - well maintenance and discharge,
 - storage of chemicals for chlorination, and

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- additional water system infrastructure needed (e.g. a backup generator, water main connections prior to well development, etcetera).
- Discuss what is known about the quality of the groundwater and if treatment may be needed. If treatment may be needed include the treatment infrastructure in the project description and discussions.
- Include “Drinking Water Supply Permit Amendment (SWRCB, DDW, Riverside District)” under “2.5 Anticipated Approvals and Permits” [PDF pages 12-13].
- Under Section 10. “Other Public Agencies Whose Approval is Required”, please include “State Water Resources Control Board, Division of Drinking Water, Riverside District” (PDF page 35).
- There are two existing groundwater wells located on the Project site (PDF page 11). Will they be used or destroyed according to City of Coachella standards (Title 13. Public Services, Chapter 13.03 Water Service System, Article VIII Water Wells, 13.03.310 Standards)?
- CWA is a Groundwater Sustainability Agency (GSA) for the Coachella Valley-Indio Subbasin [7-02.01]. Coachella Valley- Indio Subbasin is prioritized as a medium priority basin by the Department of Water Resources (DWR) under the Sustainable Groundwater Management Act (SGMA). The Coachella Valley Regional Urban Water Management Plan (Coachella Valley Regional UWMP) indicates the 2010 Coachella Valley Water Management Plan Update was approved by the DWR as a functionally equivalent alternative to the Groundwater Sustainability Plan on July 17, 2019. The Coachella Valley Regional UWMP also indicates the four water agencies located within the Coachella Valley- Indio Subbasin are developing the Indio Subbasin Alternative Plan Update, which needed to be submitted to the DWR in January 1, 2022. Please indicate if the Indio Subbasin Alternative Plan Update has been submitted and approved by the DWR. Please also indicate if the Project will conflict with or obstruct implementation of the Indio Subbasin Alternative Plan Update, the most current proposed sustainable groundwater management plan for the basin.
- The IS/MND uses Coachella Valley Water District (CVWD)’s Table 4-8 and 4-22 of the 2010 Coachella Valley Regional UWMP to discuss if the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. However, the water system providing the water for this Project is CWA not CVWD (Coachella Valley Regional UWMP, pages 100-101). Please use the appropriate tables from the document (Tables 5-7, Table 5-15, Table 5-16, Table 5-18-Table 5-22) and update the discussion to reflect the CWA information.
- The IS/MND listed but failed to include the Appendices. Please include the referenced documents. Documents incorporated by reference must be made publicly available (CCR Title 14. Section 15150 [b]).

Once the MND is adopted, please forward the following items in support of Coachella Valley Water Agency's permit application to the State Water Board, DDW Riverside District Office at DWPDIST20@waterboards.ca.gov:

- 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 IS/MND and MMRP; and
- Copy of the date stamped Notice of Determination filed at the Riverside 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
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Cc:

Office of Planning and Research, State Clearinghouse

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