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## State Water Resources Control Board

September 5, 2024

Emmett Campbell  
San Geronio Pass Water Agency  
1210 Beaumont Avenue  
Beaumont, Riverside CA 92223

Dear Emmett Campbell:

INITIAL STUDY MITIGATED NEGATIVE DECLARATION (IS/MND) FOR SAN GORGONIO PASS WATER AGENCY (AGENCY); COUNTY LINE ROAD RECHARGE BASIN AND TURNOUT PROJECT (PROJECT); TULARE COUNTY; STATE CLEARINGHOUSE NO. 2024080294

We understand that the Water System may be pursuing Drinking Water State Revolving Fund (DWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Board is providing the following water quality related comments on the IS/MND.

The State Water Board, Division of Financial Assistance, is responsible for administering the DWSRF Program (Program). The primary purpose for the Program is to implement the Safe Drinking Water Act and various state laws by providing financial assistance for drinking facilities improvements to provide clean potable drinking water, and thereby protect and promote health, safety and welfare of the inhabitants of the state.

All applicants seeking DWSRF funding must comply with the California Environmental Quality Act (CEQA) and provide appropriate environmental documents to the State Water Board so that it can fulfill its CEQA responsibilities, see [CEQA Requirements](#). In addition, because the Program is partially funded by the United States Environmental Protection Agency additional federal environmental documentation (cross-cutters) may be required. For additional Program information, the complete environmental application package and instructions, please visit:

[Drinking Water State Revolving Fund Forms and Instructions](#).

Following are specific comments on the Agency's draft IS/MND:

- Under section "10 Other Public Agencies Whose Approval is Required" "California Department of Drinking Water" is listed for an Encroachment Permit

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

for access to the East Branch Extension and turnout approval. Please indicate if this should state “Department of Water Resources” or further clarify who the “California Department of Drinking Water” is.

- The IS/MND mentions that the Calimesa Creek channel is potentially jurisdictional. Please explain if the Calimesa Creek Channel is considered a navigable Water of the United States. [Please note: “For purposes of the Rivers and Harbors Act, Section 10 permit, a tunnel or other structure or work under or over a navigable water of the United States is considered to have an impact on the navigable capacity of the waterbody.” (Corps of Engineers, Department of the Army, 33 Code of Federal Regulations § 322.3).]
- The IS/MND covers the impacts of constructing water system infrastructure to recharge the State Water Project water into the Yucaipa Groundwater Subbasin. However, the document does not go into the specifics of what State Water Project water will be recharged and when or the direct and indirect impacts to possible Waters of the United States and Waters of the State.
  - Will the future environmental documents consider each contracted diversion, the amount of the diversion, the water rights involved, and the impacts the diversions would have based on where the State Water Project water is coming from?
    - If not, please discuss the water rights involved. Please also discuss the potential impacts to: Waters of the State and Waters of the United States; and potential impacts to fish, aquatic species, wetland and riparian habitats that depend on the surface water body or bodies that the State Water Project water will be diverted from.

Thank you for the opportunity to review the Agency’s draft IS/MND. If you have any questions or concerns, please feel free to contact me at (916) 449-5285, or by email at [Lori.Schmitz@waterboards.ca.gov](mailto:Lori.Schmitz@waterboards.ca.gov) or contact Mrs. Bridget Binning at (916) 449-5641, or by email at [Bridget.Binning@waterboards.ca.gov](mailto:Bridget.Binning@waterboards.ca.gov).

Sincerely,

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

cc: State Clearinghouse

Bridget Binning, Division of Financial Assistance