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## State Water Resources Control Board

January 10, 2025

Shawna Scott  
City of San Luis Obispo  
879 Morro Street  
San Luis Obispo, CA 93401

SAN LUIS OBISPO (CITY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND), FOR THE GROUNDWATER CONTAMINATION CHARACTERIZATION PROJECT (PROJECT); STATE CLEARINGHOUSE #2024120528

Dear Shawna Scott:

Thank you for the opportunity to review the IS/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. This Project is within the jurisdiction of the State Water Board, DDW's Santa Barbara District. DDW Santa Barbara District issues domestic water supply permit amendments to public water systems pursuant to Waterworks Standards (Title 22 California Code of Regulations [Cal Code Regs.] chapter 16 et. seq.). A public water system requires a water supply permit amendment when changes are made to a domestic water supply source, storage, or treatment and for the operation of new water system components- as specified in the Cal. Code Regs. § 64556. The City will need to apply for a water supply permit amendment for approval of a new source and operation of new treatment.

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

- In the IS/MND, under section 6 Description of the Project, please discuss the operation of the wells and treatment system and implementation of the monitoring program.
- When discussing the Project's operational impacts for possible hazardous materials, please discuss the granulated activated carbon replacement timeline, testing, transportation, and disposal (PDF page 58).
- According to the Department of Water Resources (DWR), Sustainable Groundwater Management Act Prioritization dashboard, the Project falls within the San Luis Valley Groundwater Basin, which has been designated by the DWR as a high priority basin under the Sustainable Groundwater Management Act.
  - DWR's April 27, 2023, approval letter for the 2022 Groundwater Sustainability Plan talks about "a goal to maintain groundwater levels at

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

historical low conditions minus a small margin of operational flexibility designed to account for future drought conditions.” Please discuss the City’s historical use of groundwater, how it compares to the two new wells, and if this continued use has been considered as part of the long-term sustainable management of the basin.

- Please discuss the amount of water that will be pumped per year and if pumping will be seasonal and/or strategic. Please also discuss the City’s requirement to monitor (PDF page 63). If changes will be made to pumping based on monitoring results, please discuss the thresholds that will trigger them and what actions will be taken.

When the CEQA review process is completed, please forward the following items with the permit application to the State Water Board, DDW Santa Barbara District Office at [DWPDIST06@waterboards.ca.gov](mailto:DWPDIST06@waterboards.ca.gov):

- Copy of the IS/MND and Mitigation Monitoring and Reporting Plan (MMRP);
- Copy of all 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 San Luis Obispo County Clerk’s Office and the Governor’s Office of Land Use and Climate Innovation, State Clearinghouse.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or [Lori.Schmitz@waterboards.ca.gov](mailto:Lori.Schmitz@waterboards.ca.gov), for questions regarding this comment letter.

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:

Governor’s Office of Land Use and Climate Innovation, State Clearinghouse

Jason Cunningham  
District Engineer  
Santa Barbara District