
State Water Resources Control Board

July 30, 2024

Chuck Beatty
Amador County
810 Court Street
Jackson, CA 95642

AMADOR COUNTY (COUNTY), ENVIRONMENTAL IMPACT REPORT (EIR) FOR
THE WICKLOW WAY SPECIFIC PLAN PROJECT (PROJECT); STATE
CLEARINGHOUSE # 2023010563

Dear Chuck:

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. This Project is within the jurisdiction of the State Water Board, DDW's Stockton District. DDW Stockton District issues domestic water supply permit amendments to the public water systems serviced with a new or modified sources of domestic water supply or new domestic water system components pursuant to Waterworks Standards (Title 22 California Code of Regulations 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, system expansion, and for the operation of new water system components- as specified in the Cal. Code Regs. Tit. 22, § 64556. The Amador Water Agency-Tanner (AWA-Tanner) and/or the City of Jackson (City) will need to apply for a water supply permit amendment for the proposed changes to the domestic water supply resulting from this Project.

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

- The EIR states "The proposed Project would connect to the existing AWA Tanner Water System" (PDF page 409), but Appendix D, the Water, Wastewater, and Stormwater Study, indicates the Project will connect to the existing City water system (Appendix D, PDF page 397). The City's comment letter also states the Project site is within the City's service area (Appendix A, PDF page 102). Please clarify which public water system will serve the Plan Area. If the Project will be directly served by the AWA-Tanner water system, discuss distribution system infrastructure upgrades, as needed, to connect the well to the AWA-Tanner water system and where that connection will be made. Provide a figure equivalent to

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

Figure 2, Appendix D, that shows where the proposed Project would connect to the AWA-Tanner system. If the City will serve the Project instead of AWA-Tanner water system, please discuss any commitments and/or agreements that will be needed by the County to provide the City with water to serve the Project.

- An onsite groundwater well is proposed for the Project to provide a contingency water supply during dry years or emergency conditions (PDF page 413). Please:
 - State if the well would belong to AWA-Tanner or the City's water system.
 - Specify and/or provide a map of where the groundwater well may be located.
 - Discuss the quality of the groundwater and if wellhead treatment may be needed. If so, discuss possible water treatment system components and operational impacts, as needed.
 - State the estimated well capacity.
 - Describe the requirements that will trigger groundwater pumping. Also discuss how often and for how long will groundwater pumping occur.
 - Please identify nearby wells and discuss potential impacts of operation of the proposed well on the nearby wells.
 - Discuss what the threshold is for sustainable pumping of the aquifer and if the new well will pump beyond the sustainable pumping thresholds and/or have significant impacts on the groundwater aquifer.
- The EIR is a programmatic EIR but includes project level details where available (PDF page 37). AWA-Tanner includes in their comment letter additional public water system infrastructure that may be needed for the Project (E.g. water treatment upgrades, storage tanks, et. cetera) [Appendices, PDF page 86]. If this infrastructure will not be analyzed in a future tiered document:
 - Please include a map and/or discussion of the potential locations of the water system infrastructure;
 - Discuss construction timing and/or phasing of this water system infrastructure in the Project description;
 - Also, please discuss any additional hydrology, surface water quality, and groundwater quality environmental impacts, as needed, that would occur from the construction and operation of this water system infrastructure.
- The EIR referenced the Amador County UWMP but failed to provide a link or attach the document. Please make this document available as documents incorporated by reference must be made publicly available (Cal. Code Regs., tit 14, § 15150 [b]).

Once the EIR is certified, please forward the following items in support of the water system's permit amendment application to the State Water Board, DDW Stockton District Office at DWPDIST10@waterboards.ca.gov:

- Copy of the EIR 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 EIR and MMRP; and
- Copy of the date stamped Notice of Determination filed at the Amador 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, for 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

Bhupinder Sahota
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