State Water Resources Control Board

January 27, 2026

Julie Newton
Sacramento County
827 7th Street, Room 225
Sacramento, CA95814

SACRAMENTO COUNTY (COUNTY), PARTIALLY RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (PRDEIR), FOR THE UPPER WESTSIDE SPECIFIC PLAN (PROJECT), STATE CLEARINGHOUSE #2020100069

Dear Ms. Julie Newton:

Thank you for the opportunity to review the PRDEIR for the proposed Project. The State Water Resources Control Board (State Water Board), Division of Drinking Water (DDW), issues domestic water supply permits under the Safe Drinking Water Act. This Project falls under DDW's Sacramento District jurisdiction. The Sacramento District issues permit amendments according to the Title 22, California Code of Regulations (Cal. Code Regs.) chapter 16. Public water systems need a permit amendment for modification of the water supply including new sources, new reservoirs with 100,000-gallon capacity or greater, service area expansions of twenty percent or more, and treatment design capacity or process changes as per Cal. Code Regs. § 64556.

Please note: The existing County public water system that would oversee the proposed infrastructure for the Project is still unclear (e.g. Laguna / Vineyard [3410029], Mather-Sunrise [3410704], Arden Park Vista [3410002], Metro Air Park [3400473], Northgate 880 [3400173], Southwest Tract [3400156], Hood Water Maintenance District [3400101], or East Walnut Grove [3400106]).

If the County will instead create a new public water system, an application must be submitted, and a permit must be obtained from the DDW Sacramento District before water can be provided for human consumption. “Human consumption” means the use of water for drinking, bathing or showering, hand washing, oral hygiene, or cooking, including, but not limited to, preparing food and washing dishes.” Health & Saf. Code § 116275 subd. (e).

Health & Saf. Code § 116527 subd. (b) requires that any person submitting a permit application for a proposed new public water system must first submit a technical report at least six months before initiating construction of any drinking water-related

improvements. The technical report must include an examination of the possibility of connecting to or being annexed by an existing adjacent community water system.

If Alternative 5 is implemented, the County will need to apply for a new public water system permit or water supply permit amendment for treatment changes and new storage reservoirs.

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

- The August 2024 DEIR presented a Project water demand of 4,313 AFY, based on a 2022 City of Sacramento Water Supply Assessment (PDF page 837). The PRDEIR presents a Project water demand of 3,139 AFY based on a 2025 County Water Supply Assessment (PDF pages 102-103). What are the differences in these demand calculations?
- Alternative 5 allows for an optional domestic water supply wholesale source from Natomas Central Mutual Water Company (NCMWC) in the event the treated water from the City of Sacramento (City) is not available (PDF page 10). Explain the criteria that will be used to determine if the City water is available or not. Does the proposal allow for a combination of both City water and NCMWC water or, if needed, just MCMWC water?
- The Sacramento Valley-North American groundwater basin is designated as a high priority groundwater basin by the Department of Water Resources (Sustainable Groundwater Management Act Basin Prioritization Dashboard). The PRDEIR indicates that municipal and industrial demand will have priority in critical years and Drought Protection Program (DPP) years and that the NCMWC could experience a potential shortfall of 1,0007 AFY in DPP years (pdf pages 54-56). NCMWC has five wells (PDF page 254). The PRDEIR indicates Alternative 5 will not use NCMWC groundwater to serve the Project (PDF page 92). Please discuss:
    - If NCMWC will extract groundwater over their current baseline to serve existing non-priority users (e.g. agricultural users) in critical years and DPP years, to make up for NCMWC surface water supply shortfall.
    - If it is anticipated that nonpriority water users may use private or other non-NCMWC groundwater wells to fulfill lost supply for their existing demand.
    - Based on the discussions above, what direct or indirect impacts (positive or negative) Alternative 5 would have on the North American groundwater basin compared to the Project.

When the CEQA process is completed, please forward the following items with the permit application to the State Water Board, DDW Sacramento District at DWPDIST09@waterboards.ca.gov:

- The PRDEIR;
- The Resolution or Board Minutes certifying the PREIR, and approving the Project; and

- The Notice of Determination filed at the County Clerk's Office and the 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

Digitally signed by Lori Schmitz
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Water Boards

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