
State Water Resources Control Board

January 16, 2025

Terrance Rodgers
Golden State Finance Authority
1215 K Street Suite 1650
Sacramento, CA 95814

COMMENT LETTER ON THE GOLDEN STATE FINANCE AUTHORITY,
ENVIRONMENTAL IMPACT REPORT (ENVIRONMENTAL DOCUMENT) FOR THE
GOLDEN STATE NATURAL RESOURCES FOREST RESILIENCY DEMONSTRATION
PROJECT (PROJECT); STATE CLEARINGHOUSE #2022110466

Dear Terrance Rodgers:

Thank you for the opportunity to review the Environmental Document for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for regulating public water systems and issuing water supply permits pursuant to the Safe Drinking Water Act. This Project is within the jurisdiction of the State Water Board, DDW's Lassen District and DDW's Yosemite District.

A public water system, as defined in the California Health and Safety Code (Health & Saf. Code) § 116275 subd. [h], is "a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year."

If the above noted project results in the formation of a public water system, an application must be submitted, and a permit must be obtained from the appropriate DDW District(s) 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].

Note, 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. Please see the attached What is a Public Water System flyer.

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

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act has the following comments on the Golden State Finance Authority's Environmental Document:

- The Environmental Document states that the Lassen and Tuolumne processing facility sites are not currently served by potable water systems and water would be provided by onsite wells (PDF pages 149 and 156). The Environmental Document also states that the Lassen processing facility would employ up to 60 people and the Tuolumne facility would employ up to 52 people (PDF pages 149 and 155). Each of these facilities appear to meet the definition of a public water system. The State Water Board, DDW prefers projects like this to connect with nearby community water systems where possible, instead of forming new public water systems. If no nearby systems agree to serve the Project, the applicant will need to submit a technical report to the appropriate DDW District(s) pursuant to Health and Saf. Code § 116527 subd. (b).
- If a new public water system will be created by the Project:
 - Under Project Description, Table 2-13 Responsible Agency Project Permits and Approvals- under Lassen Facility and Tuolumne Facility, as appropriate (PDF pages 160-161), please add "The State Water Board, Division of Drinking Water" as the Agency, "water supply permit" as the Permit, "creation of a new public water system" as the Purpose, and "Yes" under Discretionary.
 - Please clarify whether the drinking water wells for potable use will also be used for processing and fire flow water or if there will be separate systems for the different uses.
 - The Lassen facility annual water demand appears to have only looked at "pellet production." Please include other water uses including potable water supply, fire suppression supply, and if the well will continue to supply Sierra Pacific Industries water trucks for dust suppression (Appendix G2, PDF page 13 and Appendix G3, page 25).
 - It does not appear these wells, the Lassen facility well and Tuolumne facility Well 1, will be able to meet Waterworks Standards for construction and Title 22 standards for water quality. Please discuss if rehabilitation of the wells or construction of new wells will be needed and if additional backup wells will be needed. Please consider the impacts of well construction and operation, as needed.
 - Well 2 at the Tuolumne Project site is an inactive non-potable well (PDF page 1196). Abandoned wells can be sources of groundwater contamination. Please discuss whether the well be rehabilitated, repurposed, or properly destroyed.
 - If potable water and/or process water will be stored separately, please discuss other water storage infrastructure, as applicable.
 - Please discuss the Tuolumne facility fire suppression water storage reservoir in the environmental checklist (PDF page 154) and consider stored fire flow water demand when discussing the Project's water demand (PDF page 946).

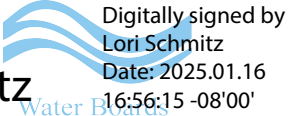
Once the Environmental Document is certified, please forward the following items in support of new water system's permit application to the State Water Board, DDW Lassen District Office at DWPRedding@waterboards.ca.gov and DDW's Yosemite District Office at DWPDIST28@waterboards.ca.gov:

- The Environmental Document, Mitigation Monitoring and Reporting Plan (MMRP), Findings of Fact, and Statement of Overriding Considerations;
- The Resolution or Board Minutes certifying the Environmental Document, adopting the MMRP, and approving the Project; and
- The date stamped 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
Date: 2025.01.16
16:56:15 -08'00'

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

Cc:

State Clearinghouse

Steve Watson
District Engineer
Lassen District

Ofelia Romero-Maraccini
District Engineer
Yosemite District