
State Water Resources Control Board

March 30, 2026

Mr. Joseph Alameda
Monterey County
1441 Schilling Pl. South 2nd Floor
Salinas, CA, 93901

COMMENT LETTER ON THE MONTEREY COUNTY (COUNTY), INITIAL
STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT)
FOR THE CARMEL RIO ROAD, LLC (PROJECT); STATE CLEARINGHOUSE
#2026020910

Dear Mr. Joseph Alameda:

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 Monterey 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 an average of 25 individuals daily at least 60 days out of the year.” If a new public water system will be formed by the Project, an application must be submitted, and a permit must be obtained from the DDW Monterey 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].

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 to State Water Board, DDW 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.

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

- Rincon Consultants, Inc (personal communication March 18, 2026) indicated the applicant has been working with the State Water Resources Control Board, Division of Water Rights on “wheeling” the riparian rights to California American Water Company-Monterey (Cal Am -Monterey) and will commit to decommissioning the wells. If plans change and this will not occur, please address the following comments:
 - The Environmental Document proposes three options for providing domestic water:
 - Option A- Domestic water would be provided by Cal Am -Monterey and onsite wells would be abandoned. Under this option, the State Water Board, DDW would not be a responsible agency and no water supply permit or permit amendment would be required.
 - Option B *Project Riparian Rights (Wells) Option 1* The property owner would “wheel” its riparian water rights from three existing on-site wells, the Gamboa Replacement well, Travers well, and the Carmel Presbyterian Church well, to Cal Am -Monterey. Cal Am -Monterey in exchange will provide domestic water through the exiting water main on Val Verde Drive, which would be conveyed to the residences through a system of 8-inch pipelines located within the street right-of-way. If water from the Gamboa Replacement well, Travers well, and the Carmel Presbyterian well is provided to the Cal Am -Monterey system, Cal Am-Monterey would need to apply for a water supply permit amendment from the State Water Board, DDW for the addition of new drinking water sources.
 - Option C *Project Riparian Rights (Wells) Option 2* Water would be provided from the Gamboa and Carmel Presbyterian wells and treatment would be installed at the site. This option would create a new public water system. During a previous discussion between the developer and the DDW Monterey District, the developer agreed to not create a new public water system. If the developer plans to create a new water system, they will need to submit a technical report to DDW Monterey District (Health and Saf. Code § 116527 subd. [b]) six months prior to going to construction and obtain approval from the DDW Monterey District for the new water system.
 - Under Section 2.3 Required Approvals, when discussing the State Water Board approvals, please list that a water supply permit amendment may be needed for Option B and a new domestic water supply permit will be needed for Option C.
 - For Options B and C, please discuss the water quality of the existing wells.

- For Option B consider if the water provided can be treated by Cal Am -Monterey at an existing water treatment facility.
 - For Option C please consider if the wells can currently meet the Waterworks Standards for domestic wells (Ca. Code Regs. tit. 22, chapter 16). If upgrades are needed to meet the standards, discuss what upgrades will be made.
- For Option C, the water treatment system will include a hydroneumatic tank, water filters, and a water tank (PDF page 15). Please discuss what contaminant will be treated, the operation of the system, and staff needed.
- For Options B and C, please provide a description of the new and existing system components. Consider water storage and fire flow in addition to the existing wells and treatment.
- A stormwater basin is proposed near the Carmel Presbyterian Church well in a 100-year special flood hazard area. Cal. Code. Regs. § 64572 and Cal. Code. Regs. § 64560 requires separation of drinking water service lines and domestic supply wells from sources of potential contamination such as stormwater basins. Please discuss how the well will be protected from contamination and indicate if the regulations can be met or if a waiver or alternative to Waterworks Standards (Cal. Code. Regs. § 64551.100) will be needed. If an alternative is needed, the water system will need to submit an application to the DDW Monterey District office.
- It does not appear that all proposed infrastructure is included on the project maps. Please add the Travers well to the map and expand the Project site location to include the water main extensions from the end of the existing raw water main to the Gamboa, Carmel Presbyterian, and Rancho Canada Subdivision wells and the Rancho Cañada Subdivision well site. Consider the analysis of these areas, as needed in the checklist.
- In Figure 2-3, the plans indicate the Gamboa replacement well will be placed inside a watertight vault. Please discuss plans for the well based on the different B and C options. (Please note vaulted wells are not allowable as new public water sources – see California Code of Regulations, title 22, section 64560 (c)(3)(D).)

Once the Environmental Document is adopted, please forward the following items in support of new water system's permit application or Cal American Water Company-

Monterey amendment to the State Water Board, DDW Monterey District Office at DWPDIST05@waterboards.ca.gov:

- The Environmental Document, Mitigation Monitoring and Reporting Plan (MMRP), comment letters received, and the lead agency responses as appropriate.
- The Resolution or Board Minutes adopting the Environmental Document and MMRP 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,

 Digitally signed by Lori Schmitz
Date: 2026.03.30 15:32:30 -07'00'
Water Boards

Lori Schmitz
Environmental Scientist
Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th floor
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Cc:

State Clearinghouse

Jonathan Weininger
District Engineer
Monterey District

Nicholas Garibaldi
Water Resource Control Engineer
Monterey District