
State Water Resources Control Board

October 12, 2026

Ms. Julie Newton
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814

Dear Ms. Newton:

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND) FOR
SACRAMENTO COUNTY (COUNTY); PLER2025-00142 AQUIFER STORAGE AND
RECOVERY PROJECT VINEYARDS SURFACE WATER TREATMENT PLANT
(PROJECT); SACRAMENTO COUNTY; STATE CLEARINGHOUSE NO. 2026090610

DOMESTIC WATER SUPPLY PERMIT AMENDMENT

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 DDW Sacramento District. DDW Sacramento District issues domestic water supply permit amendments to the public water systems serviced with a new or modified source of domestic water or new domestic water system components pursuant to Waterworks Standards (Title 22 California Code of Regulations [Cal. Code Regs.] chapter 16 et. seq.). If a project proposes to create a new public water system, that system requires a domestic water supply permit to operate. If a project involves certain changes to an existing permitted water system, a water supply permit amendment is required for changes 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 Sacramento County Water Agency (SCWA) will need to apply for a water supply permit amendment for new domestic water sources and possibly for treatment changes.

FUNDING

We understand that SCWA may be pursuing Drinking Water State Revolving Fund (DWSRF) financing for this Project. The State Water Resources Control Board, Division of Financial Assistance, is responsible for administering the DWSRF Program (Program). The primary purpose for the Program is to implement the Safe Drinking Water Act and various state laws by providing financial assistance for drinking facilities improvements to provide clean potable drinking water, and thereby protect and promote health, safety and welfare of the inhabitants of the state.

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

All applicants seeking financing must comply with the California Environmental Quality Act (CEQA) and provide the appropriate environmental documents to the State Water Board so that it can fulfill its CEQA responsibilities, see [CEQA Requirements](#). In addition, because the Program is partially funded by the United States Environmental Protection Agency additional federal environmental documentation (cross-cutters) may be required. For additional Program information, environmental package and instructions, please visit: [Drinking Water State Revolving Fund Forms and Instructions](#).

Following are the State Water Resources Control Board's specific comments on the County's draft IS/MND:

- Some of the comments below may best be addressed through development of an Aquifer Storage and Recovery Strategic Plan, prior to finalization of the IS/MND.
 - In the Project Description, Under Section 2.6.2 Operation please consider the expected amount of water that will be recharged during wet years and how long the water will be retained in the aquifer.
 - The pilot project retained the injected water in the aquifer for short retention times (less than two months) and extracted all the injection water, resulting in little or no mixing of the injected and native water. However, full-scale implementation of the Project may result in more chlorine being added to the aquifer through larger recharge injection amounts, longer aquifer retention times, and incomplete extraction of all chlorinated water in the recovery process. Please consider if the Project's extraction amounts and aquifer retention time will impact the levels of disinfection byproducts created in the aquifer.
 - Please note that injecting water into the aquifer may cause mobilization of arsenic in the aquifer and consider if the impacts may be significant enough to affect groundwater quality at nearby wells.
 - Given arsenic treatment may be needed, please consider the possible types of treatment that may be used as part of the Project description, the possible location(s) within the Project area, and evaluate the possible impacts associated with construction and operation of the treatment systems in the analysis.
 - Potable water from the Vineyard surface water treatment plant clearwell will be discharged into the aquifer and storage recovery wells (ASR wells) during periods of high surplus and returned through the same pipeline to the clearwell during periods of below normal water years (PDF pages 32 and 34). When groundwater is withdrawn from the aquifer, the IS/MND also implies, that chlorine disinfection will be added (PDF page 34). Please consider when, where, and how chlorination will be added and the infrastructure needed. Will chlorination be added prior to injection of the recharge water into the aquifer? Will chlorination be added at the well

- sites once it is withdrawn from the aquifer or at the treatment site before entry back into the clearwell?
- Consider how the Project's backflush water will be discharged if it is anticipated that pH levels may intermittently be too high to discharge to Gerber Creek (PDF page 85).
 - Recharge water will be treated prior to injection (PDF page 85). Please consider if increased water treatment at the vineyard surface water treatment plant during wet periods and/or reduced water treatment during dry periods will impact the vineyard surface water treatment plant capacity, operations, and/or treatment plant discharges. If so, please also consider any permit changes that may be needed.
 - The Project site location includes the Vineyard surface water treatment plant and the Excelsior well sites (PDF page 5). Please consider the Project impacts to stormwater runoff at the Excelsior well sites.

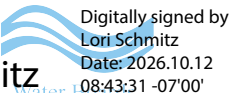
If an application for funding will be submitted, please upload to Financial Assistance Application Submittal Tool the following applicable documents for the proposed Project: (1) one copy of the draft and final IS/MND with the Mitigation Monitoring and Reporting Program (MMRP), (2) the resolution adopting the IS/MND and the MMRP, (3) all comments received during the review period and the County's response to those comments, and (4) the Notice of Determination filed with the Sacramento County Clerk and the Governor's Office of Land Use and Climate Innovation, State Clearinghouse. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

If funding will not be pursued, please forward the above requested documents with your permit amendment application to the State Water Board, DDW Sacramento District Office at DWPDIST09@waterboards.ca.gov

Thank you for the opportunity to review the County's draft IS/MND. If you have any questions or concerns, please feel free to contact me at (916) 449-5285, or by email at Lori.Schmitz@waterboards.ca.gov or contact Mrs. Bridget Binning at (916) 449-5641, or by email at Bridget.Binning@waterboards.ca.gov.

Sincerely,

Lori Schmitz



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

cc: State Clearinghouse

Bridget Binning, Division of Financial Assistance

Austin Peterson, Division of Drinking Water

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