
Subject: Southern Humboldt Community Park Response to DEIR Comments & FEIR
Attachments: 1 DDW Comments on DEIR-9-20-2016.pdf

From: Ed Voice
Sent: Monday, December 12, 2016 3:36 AM
To: Administrator; Execofficer
Subject: Southern Humboldt Community Park Response to DEIR Comments & FEIR

Dear Humboldt LAFCo Commissioners & Staff,

Here is the Final EIR and response to the DEIR comments for the Southern Humboldt Community Park GPA/CUP proposed project: <http://www.humboldt.gov.org/DocumentCenter/View/57014>

LETTER B3

Humboldt Local Agency Formation Commission

B3-1 The commenter correctly describes much of the history of the potential annexation of the project site into the Garberville Sanitary District (GSD). However, since the site was excluded from the 2014 annexation process by GSD, the project applicant has moved on to address the park's water needs. The applicant completed a water supply and demand analysis, which showed there are adequate water supplies within the control of the applicant to develop the project. Further, the project includes a proposal for the use of an upland well as part of the overall water supply strategy. Water withdrawn from this well would not affect flows on the South Fork Eel River, which would be the case for water supplied from GSD. Thus, the proposed system of providing water from a range of sources available to the applicant is more environmentally beneficial, and annexation to GSD is not necessary.

I have also included comments made by the State Division of Drinking Water, since they were not included in the response to DEIR comments,

Thank you,
Ed Voice

State Water Resources Control Board

Division of Drinking Water

September 20, 2016

Planning Commission Clerk
County of Humboldt Planning and Building Department
3015 H Street
Eureka, CA 95501

Re: Southern Humboldt Community Park Draft Environmental Impact Report
To whom it may concern:

Staff from our office have reviewed the Southern Humboldt Community Park Draft Environmental Impact Report (DEIR), and it appears that this project will ultimately result in water being served to the public and either the formation of a new *public water system* or the need for expansion of an existing *public water system*. In order to demonstrate that all intended future development can be adequately served with potable water, our office highly recommends that the following conditions be met prior to approval of this project:

A determination should be made as to whether a new *public water system* will need to be formed or whether potable water will come from Garberville Sanitary District (GSD), for any intended development that this project is meant to accommodate.

If it is determined that a new *public water system* will need to be formed in order to supply potable water to future development, the following list of items should occur, at a minimum:

- 1) An application will need to be submitted to our office for formation of a new *public water system*.
- 2) Technical, managerial, and financial capacity for the proposed new *public water system* will need to be demonstrated, along with proof of water rights.
- 3) Source water assessments will need to be completed on any proposed water sources.

If it is determined that GSD will supply potable water to future development on the property, then the following list of items should occur, at a minimum:

- 1) The property will need to be annexed into GSD's service area boundary.
- 2) GSD will need to show that it has adequate source and treatment capacity to serve the intended development.
- 3) GSD's current Domestic Water Supply Permit has the following condition:

"Garberville Sanitary District shall not allow new service connections to the 8-inch transmission main, constructed as part of Kimtu Meadows Mutual Water Company's Proposition 50 project, that will reduce the design fire-flow at the Kimtu Meadows subdivision hydrants to below 750 gallons per minute at adequate pressure."

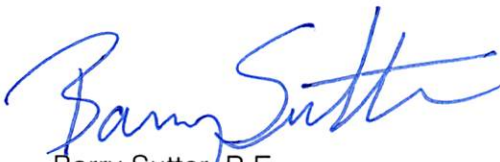
This means the applicant will need to provide our office with engineering calculations showing that GSD will not be in violation of this permit condition, even if water will not be taken directly off the 8-inch main.

We also have concerns regarding the following items that are identified in the DEIR:

- 1) The DEIR states on Page 4.17-2, "According to the California Department of Public Health (CDPH), the water system at the project site is classified as "Transient Non-Community Water System," **meaning that it is not a public water system.** (See Appendix A of the "Water Supply and Demand Analysis Memorandum" {Appendix G of this ERIF} for the CDPH "Decision Tree for Classification of Water Systems.")" The bolded portion of the quote is not true. Transient Non-Community Water Systems are *public water systems* regulated by this office, and the intended development for which this project is supporting will require that water be obtained from a *public water system*.
- 2) There are many references in the document to "potable" water sources. This is presumptive, and it should not be assumed that any of the existing water sources on the property meet the regulatory criteria for use by a *public water system* as is. For example: Any existing wells would require a 3-inch thick annular seal extending to a depth of 50 feet, in order to be used as is. It is unlikely that the existing well(s) meet these requirements. Also, if a spring is determined to be under the direct influence of surface water, its water will need to meet surface water treatment requirements before being served to the public.
- 3) There are references in the document to potable and non-potable water lines being placed in the same trench during construction. This scenario does not meet the separation requirement found in the California Waterworks Standards.
- 4) Runoff and discharge from future development on the site caused by possible contaminating activities (PCA) could adversely affect downstream *public water systems*, especially GSD and Redway CSD.
- 5) Any cumulative reduction in surface water flow in South Fork Eel River could adversely affect any downstream *public water systems*, whose water rights require they not take water from the river once certain low flow conditions are reached
- 6) Please note that our office is no longer part of California Department of Public Health. We are now with the State Water Resources Control Board-Division of Drinking Water.

If you have any questions, please contact me at (530) 224-4875 or Ronnean Lund at (530) 224-6505.

Sincerely,



Barry Sutter, P.E.
Klamath District Engineer

Cc: Humboldt County Environmental Health
Garberville Community Services District