

**Board of Directors**

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Ron Duncan, *General Manager*

October 18, 2018

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**SUBJECT: Comment Letter – November 6, 2018 Board Meeting – CWSRF Policy Amendment**

Dear Ms. Townsend:

The Soquel Creek Water District (SqCWD) is pleased to submit comments on the proposed amendment to the Policy for Implementing the Clean Water State Revolving Fund. SqCWD was founded in 1961 and is dedicated to providing a safe, high quality, reliable, and sustainable water supply to meet our community's present and future needs in an environmentally sensitive and economically responsible manner. Today, SqCWD serves approximately 40,400 customers through 15,800 connections in four service areas within the Mid-Santa Cruz County area solely with groundwater. Ninety percent of our customers are residential.

For many years, groundwater levels in our area have been dropping and remain too low to protect against further seawater intrusion. Despite extensive conservation efforts by customers, the Santa Cruz Mid-County groundwater basin is in a state of critical overdraft because more water is being pumped out annually than is naturally recharged through rainfall. Overdraft of the groundwater basin is not sustainable and seawater intrusion at the coastline is present in the Aptos, Seascape, and La Selva Beach area.

SqCWD has been working toward sustainable management of the groundwater basin for many years. In September 2014, Governor Brown signed into law a three-bill legislative package collectively known as the Sustainable Groundwater Management Act (SGMA). It requires groundwater basins like ours to become sustainable by 2040. SGMA defines sustainable groundwater management as the "management and use of groundwater in a manner that be maintained during the planning and implementation horizon without causing undesirable results." Undesirable Results as defined in SGMA may include chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply and significant and unreasonable seawater intrusion, as is being experienced in the Santa Cruz Mid-County groundwater basin area. The groundwater basin serves as the sole source of water supplies for the SqCWD service area.

High and medium priority basins must achieve sustainability by 2040; the Santa Cruz Mid-County basin is designated by the state as a high priority basin and in state of critical overdraft. As part of the plan to achieve sustainability, SqCWD is developing a suite of projects and programs including Pure Water Soquel. The Pure Water Soquel project is a groundwater replenishment and seawater intrusion prevention project using advanced water purification methods to purify recycled water for replenishing the groundwater basin and protecting against seawater intrusion, thereby protecting the sole source of drinking water supplies.

We are a small District but we are tasked with the very big responsibility of protecting a critical groundwater basin that is threatened by seawater intrusion. We are prepared to meet that challenge and protect our basin but, as a small District, the burden of such an expensive project falls to a small group of ratepayers. To help minimize the financial burden, we are pursuing grant and low interest loan opportunities and hope to secure Clean Water SRF financing. However, we are concerned that the proposed amendments to the policy, as currently written, will not adequately recognize and prioritize projects and needs like ours. For that reason, SqCWD is recommending consideration of critically overdrafted groundwater basins and the SGMA compliance requirements as a resource or impact category in the Primary Score considerations. If SWRCB does not include this new category, we are requesting that the current descriptions be amended to specify that seawater intrusion is an eligible drinking water source threat and that the treatment and injection of purified water to protect against seawater intrusion is an eligible activity under the Drinking Water Source category.

We appreciate your consideration and attention to this important matter. Should you have any questions, or require additional information, please contact Melanie Mow Schumacher at 831.475.8500 x153 or by email to [melanies@soquelcreekwater.org](mailto:melanies@soquelcreekwater.org).

Sincerely,

A handwritten signature in blue ink that reads "Ron Duncan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ron Duncan  
General Manager  
Soquel Creek Water District