

Joe Serrano

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**From:** jarickersc@gmail.com  
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**To:** LAFCO Info  
**Cc:** Sierra Ryan  
**Subject:** Comments on LAFCO Water Service Review

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As a former County Water Resources Division Director, I am offering some comments on the Water Service Review. LAFCO staff should be commended for producing a very thorough and comprehensive report. I have comments on a few issues:

p. 17,18, 42, 44, and other places: Several clarifications with regard to the discussion of “private water systems”. These would be better identified consistently as “Small Water Systems” as you have done in many parts of the report. The Health and Safety Code defines a “public water system” as any system which serves 15 or more connections or serves at least 25 people daily at least 60 days a year. A “State Small Water System” is defined as a system that has between 5 and 14 connections. It should be noted that many systems with fewer than 15 connections are still considered public water systems because they serve more than 25 people daily. Public water systems are regulated by both the State Water Resources Control Board Division of Drinking Water and the County of Santa Cruz. At least one of the public water systems in the County that is privately owned is also regulated by the California Public Utilities Commission. The Regional Water Quality Control Board has no direct role in regulating water systems and the Department of Public Health has had no role since the Drinking Water Program was transferred to the State Board in 2015. The State has delegated authority to regulate most small public water systems with less than 200 connections to the County of Santa Cruz Environmental Health Division under a Local Primacy Agreement. Your mapping and listing of “private water systems” includes both small public water systems with less than 200 connections and State Small Systems with 5-14 connections.

p. 66, 71, 75: It is unclear why you recommend that the City of Santa Cruz develop a plan on when to annex parcels that it serves that are outside its boundaries. In your narrative, you indicate that there is no plan and no demand by the residents for annexation. These areas also receive many other services not provided by the City, such as sewer and garbage service. Some of that area is also within the City of Capitola. It is not clear why annexation should even be considered, particularly in light of the other jurisdictional and service issues.

p. 91: There are similar concerns for annexation of the City of Watsonville Service area.

p. 125: PVWMA recently completed an update of their basin management plan, with the adoption of the Groundwater Sustainability Update 2022 on November 17, 2021.

p. 160: For SLVWD, it would be helpful to include a map of parcels actually served, since its service area is considerably smaller than its district boundary. The service area is available on the County GIS.

p. 217, 218: It should probably be noted that SqCWD is not providing full service to Pure Source Water Company or Trout Gulch Mutual Water Company, but maintains a emergency interties, with only occasional transfer of water.

Thank you for the opportunity to comment.

John Ricker  
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