
State Water Resources Control Board

Division of Drinking Water

September 5, 2025

Water System No. CA2701676

Antonio Ramirez, Secretary
San Lucas County Water District
P.O. BOX 166
San Lucas, CA 93954
sanlucaswater@gmail.com

Dear Antonio Ramirez,

This letter concerns the current and future operations of San Lucas County Water District (San Lucas CWD). As you know, the State Water Resources Control Board's (State Water Board), Division of Drinking Water (Division) has been closely engaged with San Lucas CWD for some time regarding its water system's deficiencies, detailed in Appendix A, which are resulting in unsafe drinking water for its customers. San Lucas CWD has not consistently served compliant drinking water to its customers for several years. In addition to water safety, the State Water Board also has concerns about the ability of San Lucas CWD to sustainably provide a safe and affordable drinking water supply.

The State Water Board welcomes the fact that San Lucas residents and the San Lucas CWD have been engaged in finding a solution that provides sustainable drinking water for the community. Residents have expressed their desire to managerially consolidate as a means to ensure a sustainable supply of safe drinking water, and the San Lucas CWD Board voted in favor of a managerial consolidation with California Water Service Company (Cal Water) King City (Water System No. CA2710009) this past June. The State Water strongly recommends that San Lucas CWD Board move forward with the execution of this decision; the Board may take future steps to order managerial consolidation if it is not voluntarily negotiated in a timely manner.

Six Month Period for Voluntary Managerial Consolidation

Prior to issuing an order directing the Cal Water King City to consolidate with San Lucas CWD, California Health and Safety Code (CHSC) Section 116682, subd. (b)(1) requires the State Water Board to encourage voluntary managerial consolidation. Section 116682, subd. (b)(7)(A) also requires the State Water Board to notify both San Lucas CWD and Cal Water King City and to establish a deadline of no less than six months,

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

unless a shorter period is justified, to negotiate consolidation. **This letter serves as official notification that pursuant to CHSC Section 116682(b), San Lucas CWD is to negotiate with Cal Water King City regarding managerial consolidation of San Lucas CWD with Cal Water King City. The deadline for completion of this negotiation is March 5, 2026.** The State Water Board requests that the parties report the outcome of such negotiations no later than two weeks following the deadline. This reporting shall include the milestones agreed upon to accomplish consolidation and a timeline for completing them. Additionally, the reporting shall include a letter signed by Cal Water King City and San Lucas CWD stating that they intend to consolidate voluntarily in accordance with the agreed upon milestones and timelines. If a timely voluntary managerial consolidation cannot be negotiated, the State Water Board may exercise its authority pursuant to CHSC Section 116682(a) to order consolidation.

The California Health and Safety Code (CHSC) describes the required findings the State Water Board must make in preparation to issue a consolidation order, should it be determined in the future that an order is appropriate. Section 116682 of the CHSC is included below. The State Water Board will work with the receiving system, the subsumed system and stakeholders toward a successful consolidation.

Section 116682 of the California Health and Safety Code states:

(d) Before ordering consolidation or extension of service, the state board shall find all of the following:

- (1) The potentially subsumed water system has consistently failed to provide an adequate supply of safe drinking water or it is at risk of doing so, as determined by the state board.
- (2) Reasonable efforts to negotiate consolidation or extension of service were made.
- (3) Consolidation of the receiving water system and subsumed water system or extension of service is appropriate and technically and economically feasible. In making this finding, the state board shall consider how many owners of dwelling units served by domestic wells in the service area have provided, or are likely to provide, written consent to extension of service. The state board need not find that any specific percentage of the owners of dwelling units served by domestic wells in the service area are likely to consent to the consolidation or extension of service to serve their dwelling unit.
- (4) There is no pending local agency formation commission process that is likely to resolve the problem in a reasonable amount of time.
- (5) Concerns regarding water rights and water contracts of the subsumed and receiving water systems have been adequately addressed.
- (6) Consolidation or extension of service is an effective and cost-effective means to provide an adequate supply of safe drinking water.
- (7) The capacity of the proposed interconnection needed to accomplish the consolidation is limited to serving the current customers of the subsumed water system, infill sites within the community served by the subsumed water system, residents of disadvantaged communities in existence as of the date

of consolidation and that are located along the service line connecting the subsumed water system and the receiving water system, and vacant lots within the community served by the subsumed water system that are zoned to allow residential use and have no more than one other vacant lot between that parcel and an infill parcel, including capacity needed for services such as firefighting.

Consolidation Assistance

The State Water Board acknowledges that managerial consolidation is a complex process and stands ready to assist Cal Water King City and San Lucas CWD. Pursuant to CHSC Section 116682, subdivision (b)(7)(B), and in order to assist with the negotiation process, the State Water Board will provide technical assistance and work with both Cal Water King City and San Lucas CWD to develop a financing package that benefits both parties. This assistance will be provided by both the Division and the State Water Board's Division of Financial Assistance and Division of Drinking Water. Funding will align with the adopted Intended Use Plan and Funding Policies. More information available at [Financial Assistance Funding - Grants and Loans | California State Water Resources Control Board](#)

If you have any question regarding this letter, please contact me or Ileana Wald of my staff by email at ileana.wald@waterboards.ca.gov.

Sincerely,

David Zensius, P.E.,
Senior Water Resource Control Engineer, Rural Solutions Unit, SAFER Section
State Water Resources Control Board, Division of Drinking Water

Appendix:

A. Background Information

Cc (Via email)

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Appendix A. Background Information

San Lucas County Water District (San Lucas CWD)

San Lucas CWD is classified as a community public water system with a population of 315 residents, served through 94 service connections. San Lucas CWD provides groundwater using a single groundwater source, Well 03, to its customers. The groundwater is treated at an iron and manganese filtration plant to supply potable water to the distribution system. As documented in the following findings, San Lucas CWD consistently fails to provide adequate supply of safe drinking water.

1. To date, San Lucas CWD has failed to submit an acceptable Corrective Action Plan to the Division. Compliance Order No. 02_05_23R_003 established a deadline of January 2, 2025. On October 28, 2024, the Division issued a request for San Lucas CWD to submit an updated Corrective Action Plan. A Corrective Action Plan has not been submitted to the Division. However, the *Water System Improvements* engineering report, dated February 25, 2025, and prepared by technical assistance provider MKN, evaluated alternatives for providing safe and reliable water to San Lucas CWD customers. On June 10, 2025, the San Lucas CWD board voted to adopt Alternative No. 4 (well head treatment – new well drilling) with Sub-Alternative B (managerial consolidation with Cal Water).
2. On December 19, 2024, the Division issued Citation No. 03_05_24C_021 failure to monitor for disinfection byproducts for August 2024.
3. On October 11, 2024, the Division issued an enforcement action for violation of the secondary maximum contaminant level (MCL) for iron.
4. On October 19, 2023, the Division issued Citation No. 02_05_23C_036 failure to submit operational evaluation level report for first quarter 2023.
5. On June 8, 2023, the Division issued Compliance Order No. 02_05_23R_003 for violation of the nitrate MCL and failure to reliably operate the iron and manganese treatment plant for 202 to 2023. Regulatory jurisdiction of San Lucas CWD was transferred from the Monterey County Environmental Health Bureau Department of Health (Monterey County) to the State Water Board on November 1, 2022. The State Water Board is issuing this Order to replace Monterey County's Compliance Order No. 17-009, issued on May 10, 2017, for violation of the nitrate MCL.
6. On May 10, 2017, Monterey County issued Compliance Order No. 17-009 for failure to reliably meet the nitrate MCL in Well 03.
7. Between 2016 and 2021, monitoring results from Well 03 have shown periodic spikes of nitrate exceeding the nitrate MCL during irrigation seasons.

8. On May 23, 2011, Monterey County issued Compliance Order No. 11-006 for nitrate MCL violation. The water source was Well 01.