Jackie Lancaster

From:	Mikayla Vaba <mikayla.vaba@opr.ca.gov></mikayla.vaba@opr.ca.gov>
Sent:	Monday, October 17, 2022 12:56 PM
То:	Jackie Lancaster; OPR State Clearinghouse
Cc:	Lance Eckhart Pass Agency; Ryan McKelvey; Dena Giacomini; Charity
	Schiller (charity.schiller@bbklaw.com); Megan Kilmer; Dan Flory;
	Christine Asiata; Daunte Arriaga
Subject:	RE: 20-Day Review Period Request

Hello,

Your shortened review request has been approved.

Please make sure to upload your shortened review request form along with the required attachments when you submit your project through CEQA Submit. Thank you for your patience and feel free to reach out with any further questions or concerns.

Thanks,

Mikayla Vaba State Clearinghouse (916) 445-0613 mikayla.vaba@opr.ca.gov

From: Jackie Lancaster <JLancaster@ppeng.com> Sent: Monday, October 17, 2022 12:14 PM To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov> Cc: Lance Eckhart Pass Agency <leckhart@sgpwa.com>; Ryan McKelvey <RMcKelvey@ppeng.com>; Dena Giacomini <DGiacomini@ppeng.com>; Charity Schiller (charity.schiller@bbklaw.com) <Charity.Schiller@bbklaw.com>; Megan Kilmer <Megan.Kilmer@bbklaw.com>; Dan Flory <DFlory@ppeng.com>; Christine Asiata <Christine.Asiata@OPR.CA.GOV>; Mikayla Vaba <mikayla.vaba@opr.ca.gov>; Daunte Arriaga <Daunte.Arriaga@opr.ca.gov> Subject: RE: 20-Day Review Period Request Importance: High

Hello,

Thank you for sending this over. The request form has been updated for the 20-day review period request. The Project is not of areawide, regionwide or statewide significance. This statement, along with your phrase below is reflected in the request form. Please let us know that we are approve to proceed with the 20-day review period request as soon as possible, so that we may proceed and notice accordingly for publication.

Thank you! Jackie Lancaster From: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Sent: Monday, October 17, 2022 11:42 AM
To: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>; OPR State Clearinghouse
<<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>;
Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>)
<<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory
<<u>DFlory@ppeng.com</u>>; Christine Asiata <<u>Christine.Asiata@OPR.CA.GOV</u>>; Mikayla Vaba
<mikayla.vaba@opr.ca.gov>; Daunte Arriaga
Subject: RE: 20-Day Review Period Request

Hello,

Thank you for your patience. Please include the phrase 'exercise the option' in your explanation as follows: "If SGWPA does not exercise the option this water year...."

Also, please **confirm and state** in the request that the project is "not of areawide, regionwide or statewide significance" for further review of your shortened review request.

Thank you,

Alexandra Owens

SCH Student Assistant Governor's Office of Planning and Research <u>alexandra.owens@opr.ca.gov</u>

**Note: No reply, response, or information provided constitutes legal advice.

From: Jackie Lancaster <<u>JLancaster@ppeng.com</u>> Sent: Monday, October 17, 2022 10:58 AM To: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>> Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>; Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>) <<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory <<u>DFlory@ppeng.com</u>>; Christine Asiata <<u>Christine.Asiata@OPR.CA.GOV</u>> Subject: RE: 20-Day Review Period Request Importance: High

Hello Mikayla,

I wanted to follow up with you on this 20-Day Review Period Request for the San Gorgonio Pass Water Agency Multi-Year Water Transfer Project. Just to reiterate, the Project <u>does not</u> meet any of the criteria listed under section 15206. The Project involves a paperwork transaction for water availability that uses existing facilities without the involvement of ground disturbing activities or other environmental impacts. The Project <u>does not</u> involve a general plan, element or amendment thereof. Further, the Negative Declaration for this Project finds that there will be <u>no effects</u> on the

environment whatsoever extending beyond the city or county in which the project would be located. Lastly, the Project <u>does not</u> involve the cancellation of an open space contract and <u>would not</u> impact any of the critical environmental sensitive areas listed in Section 15206. San Gorgonio Water Pass Agency determined that the Project <u>does not</u> meet the criteria under Section 15206 and can therefore apply for this shortened review period.

If you could please let us know of your decision as soon as possible so that we can make any necessary revisions as needed and move forward. Thank you for your review and consideration and hope to move forward with the shortened review period request.

Thank you! Jackie Lancaster Provost & Pritchard Consulting Group Office: (559) 636-1166 Fax: (559) 636-1177 E-mail: jlancaster@ppeng.com Website: http://provostandpritchard.com

From: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Sent: Friday, October 14, 2022 2:21 PM
To: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>; OPR State Clearinghouse
<<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>;
Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>)
<<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory
<<u>DFlory@ppeng.com</u>>; Christine Asiata <<u>Christine.Asiata@OPR.CA.GOV</u>>
Subject: RE: 20-Day Review Period Request

Hello,

Thank you for this information. I'm waiting for some more feedback on this from our legal team and unfortunately there are a few people who are out today. We can get back to you by Monday. Apologies for the delay!

Thanks,

Mikayla Vaba State Clearinghouse (916) 445-0613 mikayla.vaba@opr.ca.gov

From: Jackie Lancaster <<u>JLancaster@ppeng.com</u>> Sent: Friday, October 14, 2022 11:56 AM To: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>> Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>; Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>) <<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory <<u>DFlory@ppeng.com</u>>; Christine Asiata <<u>Christine.Asiata@OPR.CA.GOV</u>> Subject: RE: 20-Day Review Period Request

Hello Mikayla,

I just wanted to further clarify that the Project <u>does not</u> meet any of the criteria listed under section 15206. The Project involves a paperwork transaction for water availability that uses existing facilities without the involvement of ground disturbing activities or other environmental impacts. Per the project description, the Project does not involve a general plan, element or amendment thereof. Further, the Negative Declaration for this Project finds that there will be no effects on the environment whatsoever extending beyond the city or county in which the project would be located. Lastly, the Project does not involve the cancellation of an open space contract nor would it impact any of the critical environmental sensitive areas listed in Section 15206. Accordingly, San Gorgonio Water Pass Agency determined that the Project does not meet the criteria under Section 15206 and can therefore apply for this shortened review period.

Should you have further questions, please do not hesitate to reach out. We look forward to hearing from you.

Thank you! Jackie Lancaster Provost & Pritchard Consulting Group Office: (559) 636-1166 Fax: (559) 636-1177 E-mail: jlancaster@ppeng.com Website: http://provostandpritchard.com

From: Jackie Lancaster
Sent: Friday, October 14, 2022 11:31 AM
To: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>;
Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>)
<<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory
<<u>DFlory@ppeng.com</u>>; Christine Asiata <<u>Christine.Asiata@OPR.CA.GOV</u>>
Subject: RE: 20-Day Review Period Request

Hello,

My apologies, the Project <u>does not</u> meet any of the criteria listed under section 15206, therefore the Project <u>does not</u> fall under "regional significance." It doesn't meet any of the criteria.

Thank you! Jackie Lancaster Provost & Pritchard Consulting Group Office: (559) 636-1166 Fax: (559) 636-1177 E-mail: jlancaster@ppeng.com Website: http://provostandpritchard.com

From: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Sent: Friday, October 14, 2022 11:29 AM
To: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>; OPR State Clearinghouse
<<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>;
Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>)
<<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory

<<u>DFlory@ppeng.com</u>>; Christine Asiata <<u>Christine.Asiata@OPR.CA.GOV</u>> **Subject:** RE: 20-Day Review Period Request

Hello,

Thank you for confirming that **the project has regional significance**. The shortened review form does ask the representative to verify that there is no "statewide, regional, or areawide significance to this project." As stated in Appendix K of the Guidelines, "No shortened review shall be granted for any project which is of statewide, regional, or areawide significance, as defined in Section 15206 of the guidelines."

Thanks,

Mikayla Vaba State Clearinghouse (916) 445-0613 mikayla.vaba@opr.ca.gov

From: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>
Sent: Friday, October 14, 2022 9:59 AM
To: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>;
Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>)
<<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory
<<u>DFlory@ppeng.com</u>>
Subject: RE: 20-Day Review Period Request

Hello,

The Project does meet any of the criteria listed under section 15206, therefore the Project does fall under "regional significance."

Thank you! Jackie Lancaster Provost & Pritchard Consulting Group Office: (559) 636-1166 Fax: (559) 636-1177 E-mail: jlancaster@ppeng.com Website: http://provostandpritchard.com

From: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Sent: Friday, October 14, 2022 9:49 AM
To: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>; OPR State Clearinghouse
<<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>;
Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>)
<<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory

<<u>DFlory@ppeng.com</u>> **Subject:** RE: 20-Day Review Period Request

Hello,

It looks like this project falls under section 15206 of the CEQA Guidelines, as the description indicates that it spans multiple counties. Can you confirm that this project falls under "regional significance" per section 15206?

Mikayla Vaba State Clearinghouse (916) 445-0613 mikayla.vaba@opr.ca.gov

From: Jackie Lancaster <<u>JLancaster@ppeng.com</u>> Sent: Thursday, October 13, 2022 5:02 PM To: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>> Cc: Lance Eckhart Pass Agency <<u>leckhart@sgpwa.com</u>>; Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>; Dena Giacomini <<u>DGiacomini@ppeng.com</u>>; Charity Schiller (<u>charity.schiller@bbklaw.com</u>) <<u>Charity.Schiller@bbklaw.com</u>>; Megan Kilmer <<u>Megan.Kilmer@bbklaw.com</u>>; Dan Flory <<u>DFlory@ppeng.com</u>> Subject: RE: 20-Day Review Period Request

Hello,

Please see the attachments required for requesting a shortened 20-day review period, with the intent of starting circulation on Friday October 21, 2022 through November 10, 2022, for the San Gorgonio Pass Water Agency Multi Year Water Transfer Project – Initial Study/Negative Declaration.

The San Gorgonio Water Pass Agency ("SGWPA") respectfully requests a shortened review period based on the severe time constraints placed on the project applicant with regard to financing. The Project involves a paperwork transaction for water availability that uses existing facilities without the involvement of ground disturbing activities or other environmental impacts. However, the Project requires implementation before the expiration of the California Water Year. If SGPWA does not meet this rapidly approaching deadline, SGPWA will not receive the full benefit of the long-term water transfer agreement, causing delays and unplanned costs to SGPWA. In times of severe drought and dwindling resources, SGWPA cannot afford to incur these delays nor their costly consequences. Accordingly, a 20-day review period is requested to avoid this possible outcome.

California Department of Water Resources and the City of Ventura, as responsible agencies, have already given their approval and support of the shortened 20-day review period request and documentation can be provided in the form of approval emails if needed. In addition, these responsible agencies have reviewed and provided comments on the draft document, with revisions being incorporated prior to this request. No other state agencies have been requested to circulate the document to for review as there is no ground disturbance taking place and no mitigation measures involved. Please review the attached documents and let us know of your decision for approval or denial of the request as soon as you possibly can. If you need any additional information, please contact me at

your earliest convenience. Thank you for your time and attention to this matter, it is greatly appreciated.

Thank you! Jackie Lancaster Provost & Pritchard Consulting Group Office: (559) 636-1166 Fax: (559) 636-1177 E-mail: jlancaster@ppeng.com Website: http://provostandpritchard.com

From: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Sent: Tuesday, October 11, 2022 1:47 PM
To: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>
Subject: RE: 20-Day Review Period Request

If you can get everything in before 1pm, it would most likely be reviewed and approved/denied the same day.

Mikayla Vaba State Clearinghouse (916) 445-0613 mikayla.vaba@opr.ca.gov

From: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>
Sent: Tuesday, October 11, 2022 1:43 PM
To: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Subject: RE: 20-Day Review Period Request

Hello Mikayla,

Approximately how long does the SCH review and approval process for the shortened period take, given that we are able to get you everything you need and all the requirements when we send in the request for the shortened review period?

Thank you! Jackie Lancaster Provost & Pritchard Consulting Group Office: (559) 636-1166 Fax: (559) 636-1177 E-mail: jlancaster@ppeng.com Website: http://provostandpritchard.com

From: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Sent: Tuesday, October 11, 2022 9:52 AM
To: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>; OPR State Clearinghouse
<<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>; Dena Giacomini <<u>DGiacomini@ppeng.com</u>>
Subject: RE: 20-Day Review Period Request

Hello,

If you are requesting a 20-day State review, please send over a completed <u>Shortened Review Request</u> <u>Form</u>, the Draft Environmental Document, and a completed Notice of Completion (NOC) Form prior to submission of the Draft document. The request form must identify which of the five criteria in Appendix K of the CEQA Guidelines are met for this project (CEQA Guidelines Section 15205(d)) and explain why the shortened review is necessary and identify prior approval from Responsible and Trustee state agencies (Public Resources Code Section 21091(e)).

You can file the Draft Environmental Document – accompanied by the completed Shortened Review Request Form and NOC form via CEQA Submit – after the SCH approves the email request.

This information can be found on our website under "Review Process of Draft Environmental Documents: <u>https://opr.ca.gov/sch/document-submission.html</u>

Thanks,

Mikayla Vaba State Clearinghouse (916) 445-0613 mikayla.vaba@opr.ca.gov

From: Jackie Lancaster <<u>JLancaster@ppeng.com</u>>
Sent: Tuesday, October 11, 2022 9:35 AM
To: OPR State Clearinghouse <<u>State.Clearinghouse@opr.ca.gov</u>>
Cc: Ryan McKelvey <<u>RMcKelvey@ppeng.com</u>>; Dena Giacomini <<u>DGiacomini@ppeng.com</u>>
Subject: 20-Day Review Period Request

Good morning,

I am in the process of trying to submit Negative Declaration for a 20 day circulation instead of 30 days in order to meet the end of the year deadline. We have given the document to DWR to review/comment on and as DWR is a responsible agency we obtained their permission to contact you for the 20-day review period permission. I wanted to make sure we had everything in order and to ask if there were any necessary steps before we send the Notice of Intent to be published in the newspaper. Any help/direction you can give me is very much appreciated. You can reach me via email or office phone (559) 636-1166.

Thank you! Jackie Lancaster Provost & Pritchard Consulting Group 400 E. Main Street, Suite 300 Visalia, CA 93291-6337 Office: (559) 636-1166 Fax: (559) 636-1177 E-mail: jlancaster@ppeng.com Website: http://provostandpritchard.com

CONFIDENTIALITY NOTE

This communication and any accompanying attachment(s) are privileged and confidential. The information is intended for the use of the individual or entity so named. If you are not the intended recipient, then be aware that any disclosure, copying, distribution or use of this communication and any accompanying attachments (or the information contained in it) is prohibited. If you have received this

communication in error, please immediately delete it and notify the sender at the return e-mail address or by telephone at (559) 636-1166