State Water Resources Control Board

May 19, 2026

Hayden Beckman
City of Orange
300 East Chapman Avenue
Orange, CA 92866

CITY OF ORANGE (CITY), INITIAL STUDY/NOTICE OF PREPARTION (IS/NOP) OF A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (SEIR) FOR THE REFINED ORANGE HEIGHTS PROJECT (PROJECT), STATE CLEARINGHOUSE # 2000041122

Dear Mr. Beckman:

Thank you for the opportunity to review the IS/NOP for the proposed Project. The State Water Resources Control Board (State Water Board), Division of Drinking Water (Division), issues domestic water supply permits under the Safe Drinking Water Act. This Project falls under the Division's Santa Ana District Office jurisdiction. The Santa Ana District Office issues permit amendments according to the Title 22, California Code of Regulations (Cal. Code Regs.) chapter 16. Public water systems need a permit amendment for modification of the water supply including new sources, new reservoirs with 100,000-gallon capacity or greater, service area expansions of twenty percent or more, and treatment design capacity or process changes as per Cal. Code Regs. § 64556. The Irvine Ranch Water District (District) will need to apply for a domestic water supply permit amendment for the new reservoir and associated reservoir management system (RMS) treatment system (see below).

<u>The State Water Board, as a responsible agency under the California Environmental Quality Act (CEQA), has the following comments on the IS/NOP:</u>

- As part of the Project, the District will construct a Zone 6 2.4-million-gallon reservoir and pump station. In the IS and/or SEIR:
  - Discuss how the District and the City will coordinate to ensure Project mitigations are implemented.
  - Project construction and implementation include the “Project site” and “offsite improvements” locations, as mapped in Figure 12. It is unclear if the mitigation measures and/or permits proposed in the Project analysis apply to the “offsite improvements.” If the “offsite improvements” locations’ impacts, mitigations, and/or permits will be different than the “Project site,” please discuss the impacts, mitigation measures, and/or permits for the

"offsite improvements" locations separately, including how water quality will be protected.

- The Santa Ana District Office received November 2022 preliminary plans for the reservoir that includes a disinfectant residual booster/maintenance treatment system (reservoir management system, or RMS). If a treatment system will be installed as part of the water system infrastructure, please include this in the Project description and evaluate the potential impacts of the treatment.
- The geotechnical report indicates, "The site soils range from moderately to severely corrosive to metals," (Appendix A, PDF pages 19 and 27). The Project's reservoir and piping will be built into the ground. Please discuss what corrosion protection devices will be installed and/or coatings that will be applied to protect the reservoir and the piping.
- Under Section F, Responsible and Trustee Agencies, please add the State Water Resources Control Board, Division of Drinking Water to the list of agencies that may use the CEQA document to issue permits or other approvals (PDF page 28).

Once the CEQA process is completed, please forward the following items in support of the District's permit application to the, Division's Santa Ana District Office at DWPDIST08@waterboards.ca.gov:

- The SEIR and Mitigation Monitoring and Reporting Plan (MMRP);
- The Resolution or Board Minutes certifying/adopting the SEIR, and approving the Project; and
- The Notice of Determination filed at the County Clerk's Office and the State Clearinghouse.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, for questions regarding this comment letter.

Sincerely,

Lori Schmitz

Digitally signed by Lori Schmitz
Date: 2026.05.19 16:36:44 -07'00'

Water Boards

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Environmental Scientist
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Cc:

State Clearinghouse

Oliver Pacifico
District Engineer
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