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## State Water Resources Control Board

May 30, 2025

Adam Sharron  
Sonoma County  
2550 Ventura Avenue  
Santa Rosa, CA 95403

COMMENT LETTER ON THE SONOMA COUNTY (COUNTY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT) FOR THE AZARI WINERY; FILE NO UPE19-0072 (PROJECT); STATE CLEARINGHOUSE #2025050378

Dear Adam Sharron:

Thank you for the opportunity to review the Environmental Document for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for regulating public water systems and issuing water supply permits pursuant to the Safe Drinking Water Act. This Project is within the jurisdiction of the State Water Board, DDW's Marin District 25.

A public water system, as defined in the California Health and Safety Code (Health & Saf. Code) § 116275 subd. [h], is "a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year." If based on the above information formation of a new public water system is needed, an application must be submitted, and a permit must be obtained from the DDW Marin District 25 before water can be provided for human consumption. "Human consumption" means the use of water for drinking, bathing or showering, hand washing, oral hygiene, or cooking, including, but not limited to, preparing food and washing dishes." Health & Saf. Code § 116275 subd. [e].

Note, Health & Saf. Code § 116527 subd. (b) requires that any person submitting a permit application for a proposed new public water system must first submit a technical report at least six months before initiating construction of any drinking water-related improvements. The technical report must include an examination of the possibility of connecting to or being annexed by an existing adjacent community water system. The following website has more information for the Project applicant (Applicant) and guidance document for the initial Preliminary Technical Report: [Permits for Water Systems | California State Water Resources Control Board](#).

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

The State Water Board, DDW has the following technical recommendations regarding the Project planning to be shared with the Applicant:

- The Applicant should initiate communication with the DDW Marin District 25 early in the project design phase to ensure compliance with all necessary drinking water permit regulations for the proposed facilities.
- The Applicant should provide project design drawings (30%, 60%, 90%, and 100% for-construction) and as-built plans to Marin District 25 via the email below for all existing and proposed infrastructure, including main and water line connections to buildings, prior to the start of construction to ensure compliance with pipe separation standards as outlined in Cal. Code Regs. tit., 22, § 64572. The plans should detail all pipes and conveyances from the proposed groundwater source well(s), mains, and connections to any structures, covering both potable and wastewater conveyances.
- The Applicant should reach out to Marin District 25 at (707) 576-2145 and/or by email at [DWPDIST25@Waterboards.ca.gov](mailto:DWPDIST25@Waterboards.ca.gov).

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act has the following comments on the County's Environmental Document:

- The proposed Project appears to create a new public water system. If connecting to a nearby community system is not feasible, the Applicant will need to submit a technical report to DDW Marin District 25 (Health and Saf. Code § 116527 subd. [b]).
- If a new public water system will be created by the Project:
  - Please add, "The State Water Board, Division of Drinking Water will be a responsible agency and need to approve a domestic water supply permit (Ca. Code Regs. tit. 22, chapter 16)." under "Responsible and Trustee Agencies".
  - Discuss the water quality of the existing well and if the well can currently meet the Waterworks Standards (CA Code Regs. Tit. 22, chapter 16) for a domestic public water system well. If well upgrades are needed to meet the standards, discuss what upgrades will be made.
  - Describe the new and existing domestic water system components and impacts associated with construction and operation of the system. Besides the existing well, please discuss if water storage or treatment is needed, and if fire flow will be provided by the potable water system.
  - The document indicates that no "waters of California habitat exist on the project site" (PDF page 26), however an "unnamed intermittent drainage runs through the project site" (PDF pages 6 and 7) "that drains to San Antonio Creek to the south" (PDF page 7). Please discuss:
    - If this unnamed drainage is a Water of the US and/or Water of the State.
    - Impacts the Project will have on this drainage.
    - The area of soil the Project will disturb, and if an NPDES general construction permit will be required.
  - Documents incorporated by reference must be made publicly available (Cal. Code Regs., tit.14., § 15150 [b]). Please provide the attachments listed on PDF Page 58 of the IS/MND, including but not limited to:

- The Attachment 3 Biological Assessment Report and Attachment 4 Addendum to Biological Assessment Report, to support “Waters of the United States” and “Waters of the State” environmental impact determinations.
- And the Attachment 6 Hydrogeologic Report for General Plan Policy WR-2E, to support the determination that the Project will not substantially decrease groundwater supplies and will have sufficient supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- Cal. Code. Regs. § 64572 and Cal. Code. Regs. § 64560 requires separation of drinking water service lines and domestic supply wells from sources of potential contamination such as leach fields. The Project proposes a septic system for wastewater from the tasting room and bathrooms (PDF page 9). Please indicate if Cal. Code. Regs. can be met or if an alternative to Waterworks Standards (Cal. Code. Regs. § 64551.100) will be needed. If an alternative to Waterworks Standards is needed, the Applicant will need to provide the alternate plans for DDW Marin District 25 approval.

Once the Environmental Document is adopted, please forward the following items in support of the Applicant's permit application to the State Water Board, DDW Marin District 25 Office at [DWPDIST25@Waterboards.ca.gov](mailto:DWPDIST25@Waterboards.ca.gov):

- The Environmental Document and Mitigation Monitoring and Reporting Plan (MMRP);
- Comment letters received and the lead agency responses as appropriate;
- The Resolution or Board Minutes adopting the Environmental Document and MMRP and approving the Project; and
- The date stamped 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](mailto:Lori.Schmitz@waterboards.ca.gov), for questions regarding this comment letter.

Sincerely,

Lori Schmitz  
Environmental Scientist  
Division of Financial Assistance  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> floor  
Sacramento, CA 95814

Cc:

State Clearinghouse

Elena Joy Pelen  
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