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## State Water Resources Control Board

June 24, 2025

Jeremy Shaw  
Fresno County  
2220 Tulare Street, 6<sup>th</sup> Floor  
Fresno, CA 93721

COMMENT LETTER ON THE FRESNO COUNTY (COUNTY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT) FOR THE INITIAL STUDY NO 8022 AND CLASSIFIED CONDITIONAL USE PERMIT APPLICATION NO 3700 (PROJECT); STATE CLEARINGHOUSE # 2025051274

Dear Jeremy Shaw:

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 Visalia District.

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 a new public water system will be formed by the Project (Water System), an application must be submitted, and a permit must be obtained from the DDW Visalia District 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].

The State Water Board, DDW has the following recommendations for Project planning:

- The Environmental Document mentioned a preliminary technical report must be submitted to the State Water Board, DDW (PDF page 12). The technical report must be submitted 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 [Health & Saf. Code § 116527 subd. (b)].

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

- If it is determined through the preliminary technical report process that a new water system will be developed for the Project, the Water System shall provide the following information to the State Board as part of its permit application (Cal. Code of Regs. § 64560 and § 64658[a]):
  - A source water assessment for the proposed site, as defined in Cal. Code of Regs. § 64401.57;
  - Documentation that a 50-foot control zone can be established to protect the well source from vandalism, tampering, and other threats;
  - Design plans, specifications, and as-built plans for the well and treatment (as needed);
  - The Department of Water Resources well completion report;
  - Water quality analyses and pump test results;
  - A copy of the well construction permit, if required by the county or local agency;
  - and California Environmental Quality Act (CEQA) compliance documentation.

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

- The Environmental Document states the water system will be categorized as a transient non-community public water system, subject to permitting and regulation by the State Water Resources Control Board, Division of Drinking Water (PDF page 12). If connecting to California Water Service-Selma is feasible, discuss the possibility in the Environmental Document.
- Under Section 9 Other Public Agencies Whose Approval is Required, please add the State Water Board, Division of Drinking Water and the domestic water supply permit (Ca. Code Regs. tit. 22, chapter 16).
- Does the water quality of the existing well currently meet the Waterworks Standards (Ca. Code Regs. tit. 22, chapter 16)? If upgrades or treatment is needed to meet the standards, please discuss.
- Provide a description of the new and existing system components. Besides the existing well, please consider water storage, treatment, and fire flow. Please, also discuss the staff needed to operate the system.
- Please explain how much groundwater the existing well currently or formerly pumps in acre-feet/year and how this compares to what will be pumped annually by the Project. If water use will increase, discuss potential impacts to the critically overdrafted basin, and support the claims that:
  - The Project will comply with the current DWR-approved Sustainable Groundwater Management Plan and
  - The Project will have sufficient water to serve the Project now and in the future during normal, dry, and multiple dry years (E.g. summarizing and attaching the referenced water supply evaluation [PDF page 11].)

Once the Environmental Document is adopted, please forward the following items in support of water system's permit application to the State Water Board, DDW Visalia District Office at [DWPDIST12@waterboards.ca.gov](mailto:DWPDIST12@waterboards.ca.gov):

- The Environmental Document and Mitigation Monitoring and Reporting Plan (MMRP),
- All 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 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

Adam Forbes  
District Engineer  
Visalia District

Lauren Pham  
Water Resources Control Engineer  
Visalia District