



State Water Resources Control Board

July 17, 2025

Alexander Pretzer
Fresno County
Department of Public Works and Planning
2220 Tulare Street, Suite A
Fresno, CA 93721

COMMENT LETTER ON THE COUNTY OF FRESNO (COUNTY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT) FOR THE INITIAL STUDY NO. 8565, CLASSIFIED CONDITIONAL USE PERMIT 3787, VARIANCE APPLICATION NO 4177 (PROJECT); STATE CLEARINGHOUSE # 2025061013

Dear Alexander Pretzer:

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 Fresno 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, an application must be submitted, and a permit must be obtained from the DDW Fresno 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].

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. Please see the attached What is a Public Water System flyer.

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

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 Environmental Document indicates the project meets the definition of a transient non-community public water system (PDF page 13). If no nearby systems agree to serve the Project, the applicant will need to submit a technical report to DDW Fresno District (Health and Saf. Code § 116527 subd. [b]). If connecting to Tract 1199 Water System is feasible, discuss the possibility in the Environmental Document.
- If a new public water system will be created by the Project:
 - Add the State Water Resources Control Board, Division of Drinking Water as an approving agency for a water supply permit (Ca. Code Regs. tit. 22, chapter 16) under Section 10 Other Public Agencies Whose Approval is Required.
 - Discuss the water quality of the existing well and whether the well can currently meet the Waterworks Standards (Ca. Code Regs. tit. 22, chapter 16). If upgrades are needed to meet the standards, discuss what upgrades will be made.
 - Provide a description of the new and existing system components. Please discuss water storage, treatment, and fire flow in addition to considering the existing well. Also, discuss the staff required to operate the system.
 - Please remove or modify the statement that says the subject proposal will have no impact on water resources (PDF page 14). The Project includes pumping groundwater, which has an impact on water resources (PDF page 12).
 - Discuss potential impacts to the critically overdrafted basin, including:
 - If the Project will have sufficient water to serve the Project now and in the future during normal, dry, and multiple dry years.
 - And if mitigation or minimization measures are needed to reduce/eliminate the Project potential impacts to the groundwater.
 - 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 individual sewage disposal systems (septic systems). The existing property is served by an onsite septic system, and a new septic system will be installed (PDF page 10). Please indicate if separation requirements 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 Fresno District approval.

Once the Environmental Document is adopted, please forward the following items in support of new water system's permit application to the State Water Board, DDW Fresno District Office at DWPDIST23@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, for questions regarding this comment letter.

Sincerely,

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

Cc:

State Clearinghouse

Sudarshan Poudyal
District Engineer
Fresno District