

State Water Resources Control Board

November 17, 2025

Gary Mills
Environmental Planning Division
Tulare County
5961 South Mooney Boulevard
Visalia, CA, 93277-9394

COMMENT LETTER ON THE TULARE COUNTY (COUNTY), INITIAL
STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT)
FOR THE PIXLEY TRAVEL CENTER (PROJECT); STATE CLEARINGHOUSE #
2025100833

Dear Mr. Gary Mills:

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, 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].

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.

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 states that water will be provided by a new groundwater well that will require permitting through the state as a public water system (PDF pages 3 and 62). If no nearby systems agree to serve the Project, the applicant will need to submit a technical report to DDW Visalia District (Health and Saf. Code § 116527 subd. [b]).
- If a new public water system will be created by the Project:
 - Under Section 11. Other public agencies whose approval is required, please add "The State Water Board, Division of Drinking Water" as an approving agency.
 - Provide a description of the new and existing system components and map or description of the system component locations. Consider water storage, treatment, and fire flow in addition to the existing well. Also, discuss the staff required to operate the system.
 - The Project will be built on an agricultural field (PDF page 16)
 - Please 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).
 - Agricultural practices may impact water quality and leave contaminants within the soil. Please discuss previous and/or future testing of the water and soil that will be done to understand if legacy contaminants are in the soil and groundwater and if so, how they will be addressed.
 - A cotton-ginning facility on the southern portion of the property will be demolished prior to construction (PDF page 46). Please discuss if lead or asbestos is of concern, and if so, how the removal of the facility will be implemented to protect water quality.
 - Please remove the statement "The Project will obtain potable water from existing municipal or private service connections [not onsite wells]" (PDF page 48) if this is not the case.
- The Project falls within the San Joaquin Valley- Tule Basin, a high priority and critically overdrafted basin according to the Department of Water Resources, Sustainable Groundwater Management Act (SGMA) prioritization dashboard (DWR, SGMA Prioritization Dashboard). The Project creates a new demand that will increase pumping in the overdrafted groundwater basin by approximately 10 acre-feet per year (PDF page 218). The Sustainable Groundwater Management Plan has yet to be approved by Department of Water Resources (SGMA Portal). Please explain:
 - How the addition of 10 acre-feet-per year will be balanced as part of the water budget, including through mitigation or minimization measures, as needed.
 - How the Project will have sufficient water now and in the future 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 onsite wastewater treatment systems and stormwater basins. The Project site will include an onsite wastewater treatment system (PDF page 48) and two stormwater basins (PDF page 2). Please indicate if Cal. Code. Regs. can be met or if a waiver or alternative to Waterworks Standards (Cal. Code. Regs. § 64551.100) will be needed. If a waiver is needed, the water system will need to provide the DDW Visalia District with alternative plans.

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:

- The Environmental Document, comment letters received, and the lead agency responses as appropriate.
- The Resolution or Board Minutes adopting the Environmental Document 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

Water Boards

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

Cc:

State Clearinghouse

Adam Forbes
District Engineer
Visalia District