State Water Resources Control Board

December 15, 2025

Giuseppe Sanfilippo
San Joaquin County
1810 East Hazelton Ave.
Stockton, CA 95205

SAN JOAQUIN COUNTY (COUNTY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE ZONE RECLASSIFICATION AND MAJOR SUBDIVISION NO PA-2200124, -125 (PROJECT), STATE CLEARINGHOUSE #2025110595

Dear Mr. Giuseppe Sanfilippo:

Thank you for the opportunity to review the IS/MND for the proposed Project. The State Water Resources Control Board (State Water Board), Division of Drinking Water (DDW), issues domestic water supply permits under the Safe Drinking Water Act. This Project falls under DDW's Stockton District jurisdiction. The Stockton District 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 Lockeford Community Services District (Water System) will need to apply for a water supply permit amendment for a new drinking water source.

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

- Under Section 2.3 Permit and Approvals (PDF page 33), please discuss the Division of Drinking Water Stockton District permit amendment approval needed for a new source. Please also discuss approvals for discharge permits, as needed by the State Water Resource Control Board and/or the Central Valley Regional Water Quality Control Board.
- Discuss the new well's anticipated water quality and if treatment may be needed. If treatment may be required, please discuss the treatment components and analyze the environmental impacts in the checklist, as needed.
- Under 3.10, Hydrology and Water Quality, when discussing flood flows, the IS/MND referred to mitigation measure BIO-3 (PDF page 102). However, there is no BIO-3 measure in the Biological Resources section or in the Mitigation

Monitoring and Reporting Plan. Please clarify if this mitigation measure should be included in the document. Please also discuss: if the pipeline is attached to the Bear Creek Bridge, what designs and/or management practices would be implemented to protect against leaks.

- When addressing if the Project will substantially decrease groundwater supplies, the IS/MND refers to a 2020 NEXGEN engineering study (PDF page 102). Please attach or provide a link to the study. Documents incorporated by reference must be made publicly available (Cal. Code Regs., tit.14., § 15150 [b]).
- Under Section 2.2 Project Details, the IS/MND indicates the water detention basin will provide short-term storage of runoff, and the runoff will then be pumped through a new storm drain pipeline to a new Bear Creek outfall (PDF pages 32-33); but in the Hydrology and Water Quality section, when discussing drainage patterns and runoff, the IS/MND mentions the runoff will percolate into the soil (PDF page 102). Please clarify what will happen to the stormwater. If the stormwater will be sent to Bear Creek for discharge, please discuss if recharge of the overdrafted groundwater basin will be impacted and discuss the applicable permit that will be obtained for the discharge.

Once the CEQA process is completed, please forward the following items in support of Water System's permit application to the State Water Board, DDW Stockton District at DWPDIST10@waterboards.ca.gov:

- The IS/MND, Mitigation Monitoring and Reporting Plan (MMRP), and comments received and the lead agency responses as appropriate;
- The Resolution or Board Minutes certifying/adopting the IS/MND, 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: 2025.12.15 08:23:04 -08'00'

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

Bhupinder Sahota
District Engineer
Stockton District

Mostafa Khademi
Water Resource Control Engineer
Stockton District