



State Water Resources Control Board

March 10, 2026

Ms. Dianna Mann
Clearlake Oaks County Water District
12952 California Highway 20
Clearlake Oaks, CA 95423

CLEARLAKE OAKS COUNTY WATER DISTRICT (WATER SYSTEM), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE WATER INFRASTRUCTURE REHABILITATION (PROJECT), STATE CLEARINGHOUSE (SCH) # 2026020555

Dear Ms. Dianna Mann:

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 Mendocino District jurisdiction. The Mendocino District issues permit amendments according to 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 Water System will need to apply for a water supply permit amendment for the new reservoir and treatment changes.

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

- Under Table 1.1-1, Other Public Agencies Whose Approval is Required, instead of listing "State of California Regional Water Quality Control Board" please list "State Water Resources Control Board, Division of Drinking Water" and also "Central Valley Water Quality Control Board," as applicable.
- The Initial Study incorporated by reference the Clearlake Oaks County Water District, Water Infrastructure Rehabilitation Project (2014) and the Revised Water Infrastructure Rehabilitation Project (2017), State Clearinghouse # 2014042074 (PDF page 8).
 - Please discuss how the 2014 and 2017 Initial Study / Mitigated Negative Declarations relate to the Project and Cal. Code of Regs. § 15073.5. Is

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- the current IS/MND a recirculation of the same project? Are mitigations in the previous documents applicable?
- Cal Code Regs §15150(b) requires that documents incorporated by reference shall be made available to the public for inspection. Please discuss where these documents are available.
 - If the Project is part of a common plan of development that disturbs more than one acre of land surface, including linear pipeline projects, the Project will need a National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit, PDF pages 5 and 14). In Section 4.10(a) when discussing water quality standards, please indicate the Project's total estimated ground disturbance area. Based on the total ground disturbance area identified, indicate if a General Permit will be required to protect water quality. Please then update the current discussion based on the total ground disturbance area, as necessary.
 - The Project includes plans to recoat interior and exterior tank surfaces for the Konocti Tank and Pluth Tank (PDF page 19). The Project also includes plans to make upgrades to the interior and exterior Shady Lane Tank (PDF page 16). Please discuss the Water System's operational plans during the above identified tanks maintenance work, and how the Water System will ensure potable water will continue to be provided to customers with minimal disruption and at adequate pressure. Please also indicate if temporary tanks will be needed as part of the Project.
 - The Water Master Plan indicates that the majority of the Water System's pipelines are asbestos concrete pipe that was installed in the 1960's (PDF page 178). The Project involves the repair of tanks and replacement of piping that may contaminate water quality. The IS/MND identifies specifically that the Highway 20 water pipeline and High Valley Water Tank piping will be removed (PDF pages 16 and 79). Please discuss:
 - What infrastructure, besides the piping noted above, will be removed.
 - What hazardous materials (e.g. chromium, lead, etc.) are expected in the infrastructure that will be removed.
 - And the disposal process that will occur to protect water quality.
 - The Project proposes to install a 180,000-gallon tank at the High Valley Tank site to replace two previous storage tanks which were removed. The IS/MND indicates the Project does not warrant stormwater infrastructure, because the surface of the Project's improvements areas would be mostly returned to their original condition and would not add meaningful impervious area (PDF pages 121-122.) Please discuss the existing stormwater infrastructure on the High Valley Tank site and further explain if the infrastructure is adequate for emergency and maintenance discharges of the tank and runoff of the site.

When the CEQA process is completed, please forward the following items with the permit application to the State Water Board, DDW Mendocino District at DWPDIST03@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 adopting the IS/MND 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

Zachary Rounds
District Engineer
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