State Water Resources Control Board

March 16, 2026

Mr. Abraham Prado
San Benito County
2301 Technology Parkway
Hollister, CA, 95023-2513

COMMENT LETTER ON THE SAN BENITO COUNTY (COUNTY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT) FOR THE HIPPO HARVEST PUBLIC- FILE NO. PLN250009 (PROJECT); STATE CLEARINGHOUSE # 2026030251

Dear Mr. Abraham Prado:

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 Monterey 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 an average of 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 Monterey 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 to the Monterey District 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.

Cal. Code. Regs. § 64572 and Cal. Code. Regs. § 64560 requires separation of drinking water service lines from sources of potential contamination. The Project includes a

septic and stormwater system. If these regulations cannot be met and a waiver or alternative to Waterworks Standards (Cal. Code. Regs. § 64551.100) may be needed, the water system must provide the DDW Monterey District with alternate plans for approval.

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 final buildout of the Project will have 120 employees onsite per day (PDF page 25) and will use an existing groundwater well (PDF page 106). If the domestic water system will serve the employees, it will meet the definition of a public water system.
    - If a new public water system will be created by the Project:
        - Add "The State Water Resources Control Board, Division of Drinking Water" under "Other Public Agencies Whose Approval is Required" (PDF page 25).
        - Discuss the water quality of the existing well and if treatment is needed.
        - Provide a description of the new and existing public water system components that will serve the Project. Consider water storage, treatment, and fire flow in addition to the existing well. Also, discuss the staff required to operate the system and if a separate water system will be used or developed for non-potable water uses.
        - The Geotechnical Engineering Report mentions a series of proposed water tanks (Appendix F, PDF page 8). Please discuss these if they are part of the public water system.
        - Discuss if 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.
            - If the well cannot meet the standards, discuss possible construction and operation of an alternative well and/or infrastructure needed for a new source.
        - Groundwater was used in the past for a single-family dwelling and 68-acres of row crops (PDF page 91). For each source in Table 5, please disclose the aquifer sources used (perched or regional). If the groundwater sources vary, please edit the discussion to reflect the differences and consider impacts and mitigations, as needed, on each aquifer separately.
        - Discuss if there are other wells on the property and if these wells will be used or destroyed to protect water quality.

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 Monterey District Office at DWPDIST05@waterboards.ca.gov:

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

Digitally signed by Lori Schmitz
Date: 2026.03.16 08:04:43 -07'00'

Water Boards

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Cc:

State Clearinghouse

Jonathan Weininger
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Monterey District