
State Water Resources Control Board

August 27, 2026

Ms. Shelby Miller
County of Mendocino
860 North Bush Street
Ukiah, CA 95482

COMMENT LETTER ON THE COUNTY OF MENDOCINO (LEAD AGENCY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT) FOR THE CDP 2021-0031 [RITTIMAN] (PROJECT); STATE CLEARINGHOUSE #2026071053

Dear Ms. Shelby Miller:

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 Mendocino 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 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 Mendocino 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 DDW 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 (CEQA), has the following comments on the Environmental Document:

- The Environmental Document indicates the Project will construct a single-family residence and connect to offsite utilities (PDF page 5). The offsite utilities include development of a water storage tank and the use of spring water as a source (PDF page 5). Through discussions with the Lead Agency representative on July 30, 2026, it was determined that if all three of the parcels served by the system were fully developed by right, the water system may meet the definition of a public water system. If a new public water system may be formed and no nearby municipal water systems agree to serve the Project, the applicant must submit a technical report to DDW Mendocino District (Health and Saf. Code § 116527 subd. [b]) and apply to the DDW Mendocino for a water supply permit. In the event a new public water system will be created by the Project, the State Water Resources Control Board would be a CEQA responsible agency for the domestic water supply permit. Please consider:
 - Whether the water meets domestic water quality regulations (Ca. Code Regs. tit. 22, chapter 15) and/or if treatment is needed. If treatment is needed, consider the infrastructure needed for treatment.
 - If qualified staff can be retained to operate the water system.
 - How water quality will be protected during the demolition process, if the existing structure may include toxic contaminants, such as lead, asbestos, or other historic contaminants.
 - If the septic system that will be sited within the 50-foot buffer of the environmentally sensitive habitat area will be far enough away from Waters of the State to avoid a significant impact on water quality.
 - Cal. Code Regs. § 64572 requires separation of drinking water service lines from sources of potential contamination. Please consider how the pipelines and spring will be protected from contamination and indicate if the pipeline regulation can be met or if a waiver or alternative to Waterworks Standards (Cal. Code Regs. § 64551.100) will be needed. If an alternative is needed, the water system will need to apply to the DDW Mendocino District office.
 - Please coordinate with the State Water Board, Division of Water Rights to ensure compliance with water right laws and regulations. The State Water Board, Division of Water Rights may be contacted at dwr@waterboards.ca.gov or (916) 341-5300.

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 Mendocino District Office at ddwsantarosa@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: 2026.08.27 07:58:21 -07'00'
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

Zach Rounds
District Engineer
Mendocino District