

February 7, 2022

Governor's Office of Planning & Research

Feb 07 2022

STATE CLEARINGHOUSE

Cobb Area County Water District
Attn: Benjamin Murphy
PO Box 284
Cobb, CA 95426

COBB AREA COUNTY WATER DISTRICT(CACWD), MITIGATED NEGATIVE DECLARATION (MND), FOR THE CACWD CONSOLIDATION PHASE 2 IMPROVEMENTS PROJECT (PROJECT); SCH # 2020059041

Dear Mr. Benjamin:

Thank you for the opportunity to review the Mitigated Negative Declaration for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act. A project requires a permit if it includes water system consolidation or changes to a water supply source, storage, or treatment or a waiver or alternative from Waterworks Standards (California Code of Regulations (CCR) title 22, chapter 16 et. seq). The above referenced Project will require a new or amended water supply permit.

The State Water Board, DDW, as a responsible agency under CEQA, has the following comments on the CACWD's draft MND:

- The resources analysis assumes the new tanks would be refurbished, but under the Project Description the Starview water system tank included the statement that "Improvements could range from seismic upgrades and recoating to tank replacement and would likely be conducted as a discrete project, (PDF page 35)." If it is determined through the inspection that a new replacement tank is needed, the new tank construction environmental impacts would need to be analyzed through an amendment or new CEQA document unless the impacts are considered in the final checklist.
- Other than the tank rehabilitation and water main replacements, it is unclear what components are analyzed in the document as part of the phase II project. Several Project components do not seem to be accounted for in the impacts assessment. If the following components are part of the Project, please discuss their impacts or lack of impacts in the resource analysis sections:
 - The addition of multiple pumps at various existing stations. The project description states, "The booster station at the Lassen tank will be upgraded to include a second booster pump" (PDF page 29), the Boggs booster station should "be reconstructed to have two booster pumps that are operated in a lead/lag configuration", and two chlorine injection pumps are proposed to be installed (PDF page 26). However, the analysis in the Energy Section states, "No pumping facilities or treatment facilities that would increase electricity and no expansion of water service that would require additional water pumping or treatment at existing facilities are proposed by the Phase 2 Projects" (PDF page

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- 107). It is also not discussed whether the Cobb Mountain Water Company intertie would require additional pumping to move the water between the systems? If so, this should also be considered in the analysis. If not, please explain how the intertie would work between the systems.
- The Starview backup well or connection to the Cobb Area. The document stated the Starview system either needs a backup well or a connection to the Cobb Area booster pump station. The document later states that a new well is proposed (PDF page 33), In addition to addressing the well in the other resource analysis sections, please discuss if there are any potential impacts to groundwater in the Hydrology and Water Quality section (PDF page 141).
 - Possible Water Treatment. The document states on PDF page 26, “Since the operations staff has indicated that the water from Well 1 and the Boggs Spring may be causing copper to leach from private service piping, further analysis of the water should be performed to confirm if additional treatment is required or not. Two common methods to mitigate this problem include adjusting the water chemistry or introducing a corrosion inhibitor.” Please further discuss the type of treatment that may be needed, what may be installed at the site, what construction may occur, and the potential environmental impacts if any in the analysis sections.
 - Pine Grove Tank Abandonment. The document states the Pine Grove tank will be abandoned (PDF page 27). Will the tank be removed? If so, please specify any environmental impacts related to this in the various analysis sections.
 - Other Accessory Additions. Other accessory additions like backup power generators, SCADA upgrades, fire hydrants, metering, and retrofitting of pumps with variable frequency drives, are absent from the analysis sections as well. Their impacts or lack of impacts should be discussed if they are part of the Project.
- If a new well or treatment will be added to the system, please list this as part of the need for a DDW permit on PDF page 41.
 - The document indicates “The Phase 2 tank rehabilitation project would similarly fall under the threshold of the Construction General Permit but would have only minimal opportunity for soil erosion due to very limited scale of excavation occurring (PDF page 141). The project description and resources analysis sections lack the details of what excavation would be required for rehabilitation of the tanks that would help to understand the associated impacts that may occur. Please further explain any limited excavation that would occur because of the rehabilitation of the tanks. Would this excavation require any modifications to the site to account for any long-term runoff changes, as a result?
 - “Operation of state-permitted public water system generally does not result in violation of water quality standards and such systems are not associated with the need for waste discharge requirements,” (PDF page 140). Please note that this statement is incorrect. Water systems may require waste discharge permits for discharges associated with the construction of wells, tanks, and newly installed piping, as well as the operation of wells, tanks, and certain treatment systems. Please find the contact information for the appropriate regional board staff for further information on drinking water waste

discharge requirements here:

https://www.waterboards.ca.gov/water_issues/programs/waste_discharge_requirements/waste_discharge_requirements_statewide_contacts.html

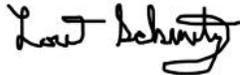
Please also note that CACWD is a community water system with more than 1,000 connections, and if the system discharges to waters of the United States, the system is required to have a permit under the State Wide General NPDES Permit 2014-0194-DWQ for Drinking Water System Discharges or a Notice of Non-Applicability. Please contact Renan Jauregui at (916) 341-5505 or Renan.Jauregui@waterboards.ca.gov for more information on these requirements.

When the CEQA review process is completed, please forward the following items with your permit application to the Mendocino District Office:

- Copy of the draft and final MND, that includes the Mitigation Monitoring and Reporting Plan, with any comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes adopting the MND;
- Copy of the stamped Notice of Determination filed at the Lake County Clerk's Office and the Governor's Office of Planning and Research, State Clearinghouse.

Please contact Matt Foster of the Mendocino District Office, at (707) 576-2108 or Matt.Foster@waterboards.ca.gov if you have any questions regarding drinking water permitting requirements.

Sincerely,



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

Cc:

Office of Planning and Research, State Clearinghouse

Matt Foster
Sanitary Engineer
Mendocino District

Renan Jauregui
Division of Water Quality
Water Resources Control Engineer

Mr. Benjamin Murphy

- 4 -

February 7, 2022

Jeremiah Puget
North Coast Regional Board
Environmental Scientist