

State Water Resources Control Board

October 25, 2023

Eastern Municipal Water District
Attn: Mr. Joe Broadhead
P.O. Box 8300 / 2270 Trumble Road
Perris, CA 92572



EASTERN MUNICIPAL WATER DISTRICT (EMWD), ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PETTIT WATER STORAGE TANK EXPANSION AND TRANSMISSION PIPELINE PROJECT (PROJECT); STATE CLEARINGHOUSE # 2022110477

Dear Mr. Joe Broadhead:

Thank you for the opportunity to review the EIR 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. The Project is within the jurisdiction of the State Water Board, DDW's Riverside District. DDW Riverside District issues domestic water supply permit amendments to the public water systems serviced with a new or modified source of domestic water supply or new domestic water system components pursuant to Waterworks Standards (Title 22 CCR chapter 16 et. seq.). A public water system requires a water supply permit amendment for changes to a water supply source, storage, or treatment and for the operation of new water system components- as specified in the Waterworks Standards. The EMWD may need to apply for a water supply permit amendment for this Project.

The State Water Board, DDW, as a responsible agency under California Environmental Quality Act (CEQA), has the following comments on the District's EIR:

- Please explain if the new tanks are considered distribution reservoirs as defined under CCR Title 22, chapter 16, article 1. If so, under Section 2.8 "Proposed Project Approvals", Table 2-1 (PDF Page 57), please include "California State Water Resources Control Board, Division of Drinking Water", "Water Supply Permit Amendment" and "Operation of two Water Supply Reservoirs."
- Under Section 2.8 "Proposed Project Approvals", Table 2-1 lists "401 Water Quality Certification" and "Discharge of dredge or fill material into waters of the State". Please list "and/or waste discharge requirements" after "401 Water Quality Certification".
- The EIR under Biological Resources, Issue 3 indicates there would be no impacts to state and federally protected wetlands, but later states impacts are

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

less than significant (PDF page 654.) Please clarify the determination of Project impacts on state and federally protected wetlands.

- The EIR under Biological Resources, Issue 3 indicates 0.02 acres of non-wetland waters of the state may be impacted through direct removal, increased fill, or hydrological interruption (pdf page 654-658). Under the Hydrology and Water Quality, Issue (1), waste discharge requirements discussion, please include that a Santa Ana Regional Water Quality Control Board (Santa Ana Regional Water Board) application for discharges of dredged or fill material to waters of the state (WOTS) will be required. Also, clarify if a permit is needed, how the Project's potential water quality impacts will be addressed. For more information on the waste discharge requirements process please contact Claudia Tenorio of the Santa Ana Regional Water Board at Claudia.Tenorio@waterboards.ca.gov or (951)-782-4963.
- The EIR indicates a sewer line is located within the Moreno Beach Drive right-of-way and intersects the path of the proposed water main (Page 374). California Waterworks Standards contains separation requirements for new water mains crossing a sewer line (Title 22, chapter 16, article 4, section 64572). Please indicate if California Water Works standards can be met for this requirement or if a waiver will be needed. If a waiver is needed, please provide the DDW Riverside District Office with the alternate plans and include a waiver approval as part of the listed DDW approvals above.

When the CEQA review process is completed, please forward the following items with your permit application to the State Water Board, DDW Riverside District Office at DWPDIST20@waterboards.ca.gov:

- Copy of the draft and final EIR and Mitigation Monitoring and Reporting Plan (MMRP);
- Copy of any comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes adopting the EIR and MMRP; and
- Copy of the date stamped Notice of Determination filed at the Riverside County Clerk's Office and the Governor's Office of Planning and Research, State Clearinghouse.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, if you have any questions regarding this comment letter.

Sincerely,

Lori Schmitz

Lori Schmitz
Environmental Scientist
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Special Project Review Unit
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Cc:

Office of Planning and Research, State Clearinghouse

Chun Huang
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Claudia Tenorio
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Santa Ana Regional Water Board, Planning Programs