

## State Water Resources Control Board

September 5, 2023

City of Orland  
Attn: Scott Friend  
815 Fourth Street  
Orland, CA 95963



CITY OF ORLAND (CITY), MITIGATED NEGATIVE DECLARATION (MND) FOR THE QUIET CREEK SUBDIVISION PROJECT (PROJECT); STATE CLEARINGHOUSE #2023080044

Dear Mr. Scott Friend:

Thank you for the opportunity to review the MND 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 Valley District. DDW Valley 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 City will 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 City's Initial Study (IS)/MND:

- The Project includes the construction of a new groundwater well (PDF page 27). Under Section 2.3 "Regulatory Requirements, Permits, and Approvals" in the list of approvals, permits, and entitlements from other public agencies, please include "State Water Resources Control Board, Division of Drinking Water".
- Please describe all of the water system components that will be needed to support this Project (e.g., well, treatment system, connection and distribution piping etc.).
- Please explain what the Orland Fire Department firebreak will involve, how close to Stony Creek will it be implemented, and if it is a requirement of the Project (PDF page 106). If it is needed for this Project, please consider any hydrology and water quality impacts that might be associated with it in this document (PDF page 106).

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

- Under 4.10.2.2 Operational Related Issues, please explain where the well discharge pipeline will discharge and what state, regional, individual permit, or waiver will be obtained. If the Project will be discharging to the storm drain and/or surface water a Statewide General NPDES permit 2014-0194-Division of Water Quality (DWQ) for Drinking Water Discharges may be applicable. For questions about the Statewide General NPDES permit please contact Renan Jauregui of the DWQ at (916) 341-5505 or [Renan.Jauregui@waterboards.ca.gov](mailto:Renan.Jauregui@waterboards.ca.gov). If the discharge line will be discharging to the ground the Statewide Water Quality Order 2003-0003-DWQ, Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality may be applicable. For questions on regional waste discharge permits, individual waste discharge permits, and/or waivers please contact David Durette of the Central Valley Regional Water Quality Control Board (CVRWQCB), Redding District at (530) 224-3208 or [David.Durette@waterboards.ca.gov](mailto:David.Durette@waterboards.ca.gov).
- The Project is within the Colusa Groundwater Basin, a high priority groundwater basin as prioritized under the Sustainable Groundwater Management Act. Please discuss if the Project will have sufficient water available during normal, dry, and multiple dry years.
  - The claim that water that will be used is only a small percent of the available water, does not consider the fact that groundwater levels are already declining in the basin. Please discuss how the Project will compensate for the additional water that would be required through this Project. Consider all water use and replacement and/or recharge in the discussion.
  - Also, discuss if there are any General Plan actions that may apply to this Project to help conserve and recharge the aquifer?
- The IS/MND failed to include the Appendices. Please include the referenced documents. Documents incorporated by reference must be made publicly available (CCR Title 14. Section 15150 [b]).

When the CEQA review process is completed, please forward the following items with your permit application to the State Water Board, DDW Valley District Office at [DWPredding@waterboards.ca.gov](mailto:DWPredding@waterboards.ca.gov):

- Copy of the draft and final MND 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 MND and MMRP; and
- Copy of the date stamped Notice of Determination filed at the Glenn 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](mailto:Lori.Schmitz@waterboards.ca.gov), if you have any questions regarding this comment letter.

Sincerely,

Lori Schmitz

Lori Schmitz  
Environmental Scientist  
Division of Financial Assistance  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Rebecca Tabor  
District Engineer  
Valley District

Renan Jauregui  
Water Resource Control Engineer  
State Water Board, DWQ

David Durette  
Senior Water Resource Control Engineer  
CVRWQCB, Redding District