

## State Water Resources Control Board

Mr. Javier Cavazos  
San Maria-Bonita School District  
708 South Miller Street  
Santa Maria, California 93454



Dear Mr. Cavazos:

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND) FOR SANTA MARIA-BONITA SCHOOL DISTRICT (DISTRICT); BONITA SCHOOL DRINKING WATER IMPROVEMENTS PROJECT (PROJECT); COUNTY; STATE CLEARINGHOUSE NO. 2024010761

We understand that the District is pursuing Drinking Water State Revolving Fund (DWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Resources Control Board (State Water Board) is providing the following water quality comments on the IS/MND circulating for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the DWSRF Program (Program). The primary purpose for the Program is to implement the Safe Drinking Water Act and various state laws by providing financial assistance for drinking facilities improvements to provide clean potable drinking water, and thereby protect and promote health, safety and welfare of the inhabitants of the state.

All applicants seeking funding must comply with the California Environmental Quality Act (CEQA) and provide appropriate documents to the State Water Board so that it can fulfill its CEQA responsibilities, see [CEQA Requirements](#). For additional Program information, the complete environmental application package and instructions, please visit: [Drinking Water State Revolving Fund Forms and Instructions](#).

Following are specific comments on the District's draft IS/MND:

1. The District will receive water from the City's water system through a metered connection. The Project cannot repurpose the District's existing wells for drinking water, if the water source is regulated under the City's water system (PDF page 8). Please remove mention of the wells being repurposed or explain how they will be repurposed as part of a non-potable water system.
2. Please indicate if a temporary source of water will be needed between the time when the District's private system will be disconnected from the District wells (and the new hydropneumatic tank is installed) and the time when the District's

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

- system will be connected to the City's water source. If an interim source of water needed, please discuss how it will be provided.
3. Please discuss discharges regarding the preparation of the infrastructure for use. How will flushing of the new hydropneumatic tank and new water lines be handled? (Please note that if the discharge is a discharge to land with a low threat to water quality the discharge may fall under the State Water Resources Control Board Water Quality Order No 2003-0003-DWQ.)
  4. The IS/MND indicates that because the project disturbance area would be less than one acre in size the Project would not be subject to the requirements of the NPDES Construction General Permit (PDF page 41), however the submitted technical specifications of the Project included template language requirements for the contractor to obtain the NPDES Construction General permit. Please clarify in the IS/MND if a permit will be obtained and a Stormwater Pollution Prevention Plan will be developed for this Project or if the technical specifications language will not be needed.
  5. The IS/MND indicates periodic maintenance to the system will occur like exercising isolation valves and blowoffs, recoating of tanks to prevent corrosion, and monitoring of water quality, and flushing of the pipelines (PDF page 9). The IS/MND indicated no new city or school employees would be required to operate the project (PDF Page 9). Please discuss if employees who currently maintain the Bonita School public water system will continue to maintain and monitor the private system or clarify the position that will cover such maintenance.
  6. Please discuss how the lead-based piping in the school's Building K will be disposed of to protect water quality.

Thank you for the opportunity to review the District's draft IS/MND. If you have any questions or concerns, please feel free to contact me at (916) 449-5285, or by email at [Lori.Schmitz@waterboards.ca.gov](mailto:Lori.Schmitz@waterboards.ca.gov) or contact Mrs. Bridget Binning at (916) 449-5641, or by email at [Bridget.Binning@waterboards.ca.gov](mailto:Bridget.Binning@waterboards.ca.gov).

Sincerely,

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

cc: State Clearinghouse

Bridget Binning, Division of Financial Assistance

Joel Greathouse, Division of Financial Assistance