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## State Water Resources Control Board

July 25, 2024

Jennifer Faso  
Sonoma County  
2550 Ventura Ave,  
Santa Rosa, CA 95403

COMMENT LETTER ON THE SONOMA COUNTY(COUNTY), INITIAL STUDY/NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT) FOR THE GARDEN VALLEY RANCH USE PERMIT PROJECT (PROJECT); STATE CLEARINGHOUSE # 2024070226

Dear Jennifer Faso:

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's Marin 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 at least 25 individuals daily at least 60 days out of the year."

If the above noted project results in the formation of a public water system, an application must be submitted, and a permit must be obtained from the Marin 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 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.

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

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act, has the following comments on the County's Environmental Document:

- The Environmental Document mentions the use permit will allow up to 24 event days per year with a maximum of 150 people (PDF page 4). The Project will also allow for retail space and educational farm tours by appointment (PDF page 4). The site includes a main residence and a gazebo with kitchen and bathrooms (PDF page 4). The site contains one or more wells with capacity to support the Project (PDF page 8 and page 33). This Project may meet the definition of a public water system. If so, the State Water Board, DDW encourages projects like this to connect with nearby community water systems, where possible, instead of forming a new public water system. If a new public water system will be created and no nearby system will agree to serve the Project, the applicant will need to submit a technical report to DDW pursuant to Health and Saf. Code § 116527 subd. (b). If applicable, it may be beneficial to discuss connecting to a nearby community water system in the Environmental Document.
- If a new public water system will be created by the Project:
  - Within "Table 2.", column "Agency" please add to the document "The State Water Resources Control Board, Division of Drinking Water" as an approving agency. Under "Activity" include "water supply permit" and under "Authorization" include "California Code of Regulations, Title 17 Public Health" (PDF page 2).
  - Describe the existing and any new water system components that would be needed to become a new public water system and discuss impacts associated with construction and operation of the system, including but not limited to the following, as applicable:
    - Will the existing well need to be rehabilitated?
    - Does existing storage exist as part of the system? Will new water storage be needed? If so, include the tank dimensions and capacities.
    - Is water for fire protection provided by the domestic water system or will there be a separate non-potable supply for fire flow?
    - Please discuss the current quality of the water and if any treatment may be required. If treatment is required, please consider the treatment infrastructure in the document.
  - Please include a map of existing and proposed water system components or discuss where the components are or will be sited within the Project area, as applicable.
  - The Zero Net Use Increase Report was listed as attachment 3 (PDF page 35). Please attach the report. Documents incorporated by reference must be made publicly available (Cal. Code Regs., tit 14, § 15150 [b]).

Once the Environmental Document is adopted, please forward the following items in support of water system's permit application to the State Water Board, DDW Marin District Office at [DWPDISTRICT25@waterboards.ca.gov](mailto:DWPDISTRICT25@waterboards.ca.gov):

- A copy of the Environmental Document, comment letters received, and the lead agency responses as appropriate.
- A copy of the Resolution or Board Minutes adopting the Environmental Document; and
- A copy of the date stamped Notice of Determination filed at the 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), for questions regarding this comment letter.

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:

Office of Planning and Research, State Clearinghouse

Elena Joy M. Pelen  
District Engineer  
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Jaux Wildflower  
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