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## State Water Resources Control Board

October 7, 2024

Jaylen French  
City of Escalon  
2060 McHenry Avenue  
Escalon, CA 95320

CITY OF ESCALON (CITY), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE CITY OF ESCALON CONNECTION TO NICK DEGROOT WATER TREATMENT PLANT PROJECT (PROJECT); STATE CLEARINGHOUSE #2024090184

Dear Jaylen French:

Thank you for the opportunity to review the IS/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. This Project is within the jurisdiction of the State Water Board, DDW's Stockton District. DDW Stockton District issues domestic water supply permit amendments to public water systems pursuant to Waterworks Standards (Title 22 California Code of Regulations [Cal Code Regs.] chapter 16 et. seq.). A public water system requires a water supply permit amendment when changes are made to a domestic water supply source, storage, or treatment and for the operation of new water system components as specified in the Cal. Code Regs. § 64556. The City will need to apply for a water supply permit amendment for approval of the new source and new storage reservoir.

The State Water Board, DDW has the following technical recommendations regarding the Project planning:

- The City should initiate early communication with the DDW Stockton District during the project design phase to ensure compliance with all necessary permit requirements for the new facilities.
- The City needs to be prepared to meet the increased regulatory requirements associated with water quality monitoring, including disinfection byproducts, lead and copper, corrosion control water quality parameters, and applicable surface water monitoring requirements.
- The City should anticipate potential water quality challenges, such as taste, odor, color, corrosivity, bacteriological, and chemical changes, that may arise from the introduction of a new surface water source into its groundwater-based system.

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

And the City should conduct preliminary studies to evaluate the potential effects of changes in the source water and any issues related to the integration of groundwater and surface water sources within the City's system.

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act (CEQA), also has the following comments on the City's IS/MND:

- The Modified Mitigation Measure UT0-02 Utility Conflicts (UT0-02) needs to be updated to correct inaccuracies (PDF page 167). The first line of the UT0-02 states the City "will observe DHS standards." The California Department of Health Services no longer exists. The referenced standards are the Waterworks Standards found in the Cal. Code Regs. chapter 16 et. seq. and are under the authority of the State Water Resources Control Board, Division of Drinking Water. UT0-02 also states, "the City shall obtain DHS variance through provisions of sewer encasement, or other means deemed suitable by DHS." Please replace "DHS" with "State Water Resources Control Board, Division of Drinking Water", as this statement refers to a variance to Waterworks Standards which State Water Board, DDW would need to approve. Please update Table 6, the Mitigation Monitoring and Reporting Plan, and any other reference to DHS to reflect these corrections.

When the CEQA review process is completed, please forward the following items with the permit application to the State Water Board, DDW Stockton District Office at [DWPDIST10@waterboards.ca.gov](mailto:DWPDIST10@waterboards.ca.gov):

- Copy of the IS/MND and Mitigation Monitoring and Reporting Plan;
- Copy of all comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes adopting the IS/MND and Mitigation Monitoring and Reporting Plan; and
- Copy of the date stamped Notice of Determination filed at the San Joaquin 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

Jaylen French

- 3 -

October 7, 2024

Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Mostafa Khademi  
Water Resources Control Engineer  
Stockton District

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District Engineer  
Stockton District