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## State Water Resources Control Board

December 18, 2024

Christiana Giedd  
City of Ripon  
259 North Wilma Avenue  
Ripon, CA 93665

Dear Christiana Giedd:

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE CITY OF RIPON (CITY); WATER SUPPLY TRUNK LINE PROJECT (PROJECT); SAN JOAQUIN COUNTY; STATE CLEARINGHOUSE NO. 2024110621

### **DOMESTIC WATER SUPPLY PERMIT AMENDMENT**

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 DDW Stockton District. DDW Stockton 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 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 a new source.

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.

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

- 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.
- 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
- And the City should implement a public education program to inform consumers about potential changes in water quality.

## FUNDING

We understand that the City is also 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 Board is providing the following water quality related comments on the IS/MND.

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 DWSRF 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](#). In addition, because the Program is partially funded by the United States Environmental Protection Agency additional federal environmental documentation (cross-cutters) may be required. 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 City's draft IS/MND:

- Under "Other Public Agencies Whose Approval is Required" (PDF page 8), please include "State Water Resources Control Board (water supply permit approval and possible funding approval)". Under section "2.3 Permits and Approvals" (PDF page 26), please also state that the State Water Board, DDW will be approving a City water supply permit amendment for a new source.
- In the Project Description, please identify the amount of pre-1914 water that will be made available yearly to the City's water system as a new source. Please discuss when the water will be transferred to the City system and when it will be distributed for use.
- Please discuss if new storage, new treatment capacity, or other infrastructure besides the proposed piping will be needed to transfer the water and discuss impacts from developing and/or modifying the infrastructure in the IS/MND.

- Please explain if the South County Surface Water Supply Project Environmental Impact Report (EIR) covered the transfer of treated water to the City of Ripon. If not, please discuss potential environmental impacts, including, but not limited to hydrology, water quality, beneficial use, and operational impacts of the Project- individually and cumulatively- on the Stanislaus River. Be sure to consider the amount being removed and the timing of removal (E.g. summer, winter, high-flow, low flow, et cetera) compared to CEQA defined baseline conditions when considering impacts.
- Please provide a link to the South San Joaquin Irrigation District South County Surface Water Supply Project EIR referenced by the IS/MND or an attachment of the document. Documents incorporated by reference must be made publicly available (Cal. Code Regs. tit. 14 § 15150[b]).
- If the South County Surface Water Supply Project EIR discusses project plans, significance determinations for environmental impacts, and/or mitigations for the Project above, please summarize and cite this information from the EIR to disclose what impacts were already addressed for this individual Project.
- If operational impacts for this Project will be significant, please provide mitigation measures that will be implemented to reduce the significant impact, as applicable. If significant impacts will occur that were not otherwise considered in past documents and/or cannot be mitigated, please develop the applicable required documents under the CEQA Guidelines.

If an application for funding will be submitted, please upload to Financial Assistance Application Submittal Tool the following applicable documents for the proposed Project: (1) one copy of the draft and final IS/MND and Mitigation Monitoring and Reporting Program (MMRP) or subsequent EIR with the MMRP (2) the resolution adopting the IS/MND and MMRP or certifying the subsequent EIR and adopting the MMRP, (3) all comments received during the review period and the City's response to those comments, and (4) the Notice of Determination filed with the San Joaquin County Clerk and the Governor's Office of Land Use and Climate Innovation, State Clearinghouse. If a subsequent EIR is developed and significant impacts will occur, please also include the Findings and Statement of Overriding Consideration. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

If funding will not be pursued, please forward the above requested documents with your permit amendment application to the State Water Board, DDW Stockton District Office at [DWPDIST10@waterboards.ca.gov](mailto:DWPDIST10@waterboards.ca.gov)

Thank you for the opportunity to review the City'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

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