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## State Water Resources Control Board

Joe Lodigiani  
Manzanita Elementary School District  
55 Hanover Lane  
Chico, CA 95973

Dear Joe Lodigiani:

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR MANZANITA ELEMENTARY SCHOOL DISTRICT (DISTRICT); MANZANITA ELEMENTARY SCHOOL WELL REPLACEMENT (PROJECT); BUTTE COUNTY; STATE CLEARINGHOUSE NO. 2025010817

We understand that the District is pursuing Drinking Water State Revolving Fund (DWSRF) financing for this Project (DWSRF No. C-06-040063-001P). 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 related 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 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](#). 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. In Butte County (County) water supply permits for water systems with 200 or less connections are regulated by the County. As a result, in the IS/MND please update the following:
  - a. On PDF pages 3 and 26, the IS/MND states "The SWRCB approved construction of a new well as a supply source for the Proposed

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

- Project.” Please update this statement to reflect the appropriate regulatory authority or remove the statement, as applicable.
- b. Under Section 2.6 Regulatory Requirements, Permits, and Approvals (PDF page 29), please remove “SWRCB Division of Drinking Water” next to “well operation permit” and replace it with “Butte County, Environmental Health Division.”
  2. The IS/MND refers to the “Clean Water SRF Program” and “CWSRF”, as well as the “Drinking Water State Revolving Fund Program” and “DWSRF” when discussing possible and current funding. Please replace references to the “Clean Water SRF Program” or “CWSRF” with “Drinking Water State Revolving Fund Program” or “DWSRF” (PDF pages 21, 68, 140, et. cetera).
  3. Under Geology and Soils, when discussing soil erosion and loss of topsoil, Section IX of the IS/MND is referenced (PDF page 83). Section IX does not include a description of Stormwater Pollution Prevention Plan best management practices. Please provide the description and/or update the reference to the correct section, as appropriate.
  4. There appears to be a discrepancy in the IS/MND. IS/MND states “The expected concentrations of iron and manganese are close to the MCLs, however the anticipated mixing would result in water quality that is not expected to require treatment” (PDF page 152). However, the Water System doesn’t currently have an alternative water source to mix with. Please further explain this statement or remove it. (In the IS/MND, if treatment is otherwise required, please be sure to include it in the project description, analyze the construction and operational impacts of the treatment, and consider the treatment in the alternatives analysis.)
  5. In Section 6.1.3, when identifying the Project objectives, please further define the measurable characteristics that will make up the “the best implementation process.” For example: Provide the best implementation process through the lowest staff and permitting costs, shortest construction timeline, and least outside coordination.

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 Ms. Abbygayle Guevara at (916) 319-0180, or by email at [Abbygayle.Guevara@waterboards.ca.gov](mailto:Abbygayle.Guevara@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

Abbygayle Guevara, Division of Financial Assistance