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## State Water Resources Control Board

March 5, 2025

Sandrine Ganry  
City of San Bruno  
567 El Camino Real  
San Bruno, CA 94066

CITY OF SAN BRUNO (CITY), INITIAL STUDY/NEGATIVE DECLARATION (IS/ND), FOR THE WATER TANK 1 (CUNNINGHAM TANK) REPLACEMENT PROJECT (PROJECT); STATE CLEARINGHOUSE #2025020008

Dear Sandrin Ganry:

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 Santa Clara District. DDW Santa Clara 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 the operation of a new storage reservoir.

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

- The IS/MND mentions the new tank will be built over the same footprint as the existing tank (PDF page 21). In the Project Description, please discuss if water will be stored on-site in temporary tanks or if there are other plans for the transition of the tank water, how service will be maintained, and how the water in the old tank be transferred, used, or discharged. Please then discuss impacts associated with these plans in the checklist, as needed.
- Please remove the statement “No responsible or trustee agencies have been identified” (PDF page 21). The State Water Board, DDW, will need to approve a water supply permit amendment for the addition of a new distribution reservoir, 100,000-gallon capacity or greater, to the distribution system (Cal. Code. Regs. §64556). As a result, the State Water Board, DDW is a responsible agency for the Project.

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

- Please remove the statement “The proposed project does not require permit approval from other regulatory agencies” (PDF page 59). As mentioned above, the State Water Resources Control Board, DDW will need to approve a water supply permit amendment for the Project.
- The IS/MND states “The Project would have a beneficial impact on water supplies available during dry years” (PDF page 181). Please explain how this is the case, or remove, as needed.

When the CEQA review process is completed, please forward the following items with the permit application to the State Water Board, DDW Santa Clara District Office at [DWPDIST17@waterboards.ca.gov](mailto:DWPDIST17@waterboards.ca.gov):

- The IS/MND and Mitigation Monitoring and Reporting Plan (MMRP);
- All comment letters received and the lead agency responses as appropriate;
- The Resolution or Board Minutes adopting the IS/MND and MMRP, and approving the Project; and
- The date stamped Notice of Determination filed at the San Mateo County Clerk’s Office and the 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:

State Clearinghouse

Van Tsang  
District Engineer  
Santa Clara District

Joshua Widjaja  
Water Resources Control Engineer  
Santa Clara District