
State Water Resources Control Board

March 30, 2026

Mr. Ryan Gross
Lake Arrowhead Community Services District
P.O. Box 700
Lake Arrowhead, CA 92352

LAKE ARROWHEAD COMMUNITY SERVICES DISTRICT (WATER SYSTEM),
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE TWO -
MILE GROUNDWATER WELLS PROJECT (PROJECT), STATE CLEARINGHOUSE #
2026021040

Dear Mr. Ryan Gross:

Thank you for the opportunity to review the IS/MND for the proposed Project. The State Water Resources Control Board (State Water Board), Division of Drinking Water (DDW), issues domestic water supply permits under the Safe Drinking Water Act. This Project falls under DDW's Mojave District jurisdiction. The Mojave District issues permit amendments according to the Title 22, California Code of Regulations (Cal. Code Regs.) chapter 16. Public water systems need a permit amendment for modification of the water supply including new sources, new reservoirs with 100,000-gallon capacity or greater, service area expansions of twenty percent or more, and treatment design capacity or process changes as per Cal. Code Regs. § 64556. The Water System will need to apply for a water supply permit amendment for new drinking water sources and treatment changes.

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

- Please discuss the anticipated water quality of the wells and contaminants that will be treated at the new 396 square-foot treatment plant and wellhead sites, additional staff needed, and environmental impacts of the operation of the water treatment systems.
- Under Table 2-1 Discretionary Approvals (PDF page 15), Purpose, it says the DDW water supply permit is to "Allow for well construction for public drinking water systems." This is incorrect. The domestic water supply permit amendment approves the operation of new drinking water sources and changes to treatment methods for public water systems. Please update this to reflect.
- The Water Supply Assessment (Appendix E, PDF page 4) and IS/MND (PDF page 77) state it is unlikely that all three wells will be continuously operational

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

throughout any given year. However, the IS/MND also states the Project's wells would be operational 24 hours per day to supply potable water (PDF page 14). Please clarify if the Moller Well is the well that would not be continuously operational throughout any given year or if this assumption cannot be made.

- Cal. Code. Regs. § 64572 and Cal. Code. Regs. § 64560 requires separation of drinking water service lines and domestic supply wells from sources of potential contamination such as sewer lines. As part of the Project, a sewer line will be abandoned near the proposed well locations (PDF page 16). Please discuss the abandonment process that will occur to ensure water quality will be protected and indicate if the regulations can be met or if a waiver or alternative to Waterworks Standards (Cal. Code. Regs. § 64551.100) will be needed. If a waiver is needed, the water system will need to provide the DDW Mojave District with alternate plans.

When the CEQA process is completed, please forward the following items with the permit application to the State Water Board, DDW Mojave District at DWPDIST27@waterboards.ca.gov:

- The IS/MND, Mitigation Monitoring and Reporting Plan (MMRP), and comments received and the lead agency responses as appropriate;
- The Resolution or Board Minutes certifying/adopting the IS/MND, and approving the Project; and
- The Notice of Determination filed at the 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, for questions regarding this comment letter.

Sincerely,

Lori Schmitz
Environmental Scientist
Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th floor
Sacramento, CA 95814

Cc:

State Clearinghouse

Hector Cazares
District Engineer
Mojave District

Sheila Cervantes
Water Resource Control Engineer
Mojave District