



Lahontan Regional Water Quality Control Board

December 11, 2020

File: Environmental Doc Review
San Bernardino County

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Governor's Office of Planning & Research

DEC 10 2020

STATE CLEARINGHOUSE

Comments on the Initial Study and Mitigated Negative Declaration for Lake Arrowhead Community Services District's Blue Jay Well Site Project No. 187, Lake Arrowhead Community Services District, San Bernardino County, State Clearinghouse Number 2020110131

Lahontan Regional Water Quality Control Board (Water Board) staff reviewed the Initial Study and Negative Declaration (IS/MND) for the Lake Arrowhead Community Services District's (District) Blue Jay Well Site Project (Project). The IS/MND, prepared by the District, was submitted in compliance with provisions of the California Environmental Quality Act (CEQA) soliciting input on the potential impacts on the environment and ways to avoid or mitigate those significant impacts.

The Water Board, acting as a CEQA responsible agency, provides these comments related to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), Title 14, section 15096. We thank the County and District for providing Water Board staff the opportunity to review and comment on the IS/MND and for taking the initiative to identify potential effects on water quality.

Water Board staff comments are summarized below with specific comments following.

- 1) The District must describe the impacts of uranium waste disposed to the sewer collection system and its effect on receiving groundwater at the disposal area.
- 2) The District must describe the types of treatment systems that may be implemented at the production well.
- 3) The District must identify the sediment and erosion control best management practices (BMPs) that will be implemented for construction phases until vegetation is restored to pre-project conditions or permanent post-construction BMPs are in place and functioning.
- 4) The District must conduct a complete analysis of water quality following the well construction to establish baseline conditions.

PETER C. PUMPHREY, CHAIR | MIKE PLAZIAK, ACTING EXECUTIVE OFFICER

- 5) The District must include in the IS/MND the water quality standards relative to this Project and identify associated impacts.

Project Description

The District is proposing to develop a domestic water production well in the Blue Jay community. The well will extract groundwater to supply potable water to the Lake Arrowhead community. The Project will be constructed in an undeveloped strip of land less than one acre in size that is owned by the District and is adjacent to the District's administration building. The Project will include the drilling, installation, sampling, development, and testing of a new production well in accordance with federal, state, and local requirements.

Water Board Authority

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The Water Quality Control Plan for the Lahontan Region (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

Comments on the Environmental Review

1. The site plan illustrates that a water treatment system may be installed at the wellhead to remove uranium if the resulting water quality indicates the uranium drinking standards are not met. Although the discharge of uranium waste to the sewer collection system is not within the scope of this Project, the District must evaluate the effect of discharging water treatment system waste into the sewer collection system from a future discharge, related to this well and any other existing wells discharging water treatment waste to the sewer collection system. The District should perform a degradation analysis to evaluate the effect of water treatment system waste discharged to the sewer collection system and evaluate the effect of that waste stream on receiving groundwater at the Hesperia disposal site.
2. The IS/MND states that a permanent wellhead water treatment system during groundwater production activities is not anticipated but may be required depending

on groundwater testing results. The site plan for the Project includes the installation of a potential future uranium treatment station. The District has stated that a uranium treatment system may be needed to remove naturally occurring uranium in the groundwater prior to potable water use. The District should clarify what constituents in addition to uranium, if any, found in groundwater would cause a treatment system to be installed after the production well is constructed.

3. The IS/MND states that the disturbed area of the site is 0.26 acres. Therefore, the Project would not need coverage under the general statewide construction stormwater permit. However, post-construction storm water management must be addressed for this Project. Storm water runoff must be managed to prevent concentration of discharge flows that exacerbate erosion in downstream channels. Design alternatives that are compatible with low impact development (LID) should be considered and must be addressed in the IS/MND. LID components include, but are not limited to, maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge, managing runoff as close to the source as possible, and maintaining vegetated areas for storm water management and onsite infiltration.

The IS/MND states that BMPs will be in place to reduce erosion and runoff from the construction process. Please include in the IS/MDN a detailed description of the site-specific construction and post-construction BMPs that will be installed for establishing effective stormwater treatment. Water Board staff recommends that a site-specific Stormwater Pollution Prevention Plan be developed and implemented.

4. The IS/MND narrative related to Section IX – Hydrology and Water Quality, does not sufficiently describe the existing groundwater quality or the Project's impact on groundwater quality.
 - a. The Project states that the well will be drilled down to 500 feet below ground surface (bgs) but does not describe the anticipated depth to groundwater. The IS/MND must describe the anticipated depth to groundwater in the Project vicinity.
 - b. The IS/MND must describe any analysis of existing groundwater quality in the Project's vicinity that will assist in establishing anticipated groundwater quality from this well.
 - c. The IS/MND must describe the immediate post-construction well sampling plan to provide initial groundwater quality. The initial post-construction sampling event should include as a minimum adequate analysis for general minerals (nitrate and total dissolved solids) and bacteria concentrations.
5. The IS/MND states that the project is not expected to violate any water quality standards. The statement is not valid unless the IS/MND includes an assessment as to whether the Project will affect or violate those standards. The IS/MND must reference the applicable water quality standards for the Project site prior to making this conclusion. The IS/MND must provide a detailed description of the water quality

standards related to affected surface and groundwaters. Water quality standards include both applicable beneficial uses and narrative or numeric water quality objectives.

a. Beneficial Uses

- i. Surface water beneficial uses for the Upper Mojave Hydrologic Area (Department of Water Resources Basin No. 628.20) are found in Table 2-1, page 2-38 of the *Water Quality Control Plan for the Lahontan Region* (Basin Plan).
- ii. Groundwater beneficial uses for the Project site are undefined in the Basin Plan, except that a Municipal Use would apply pursuant to State Water Resources Control Board Resolution 88-63, *Sources of Drinking Water Policy*.

b. Water Quality Objectives

- i. Surface water quality objectives for all surface waters are found on page 3-3 of the Basin Plan. Specific surface water quality objectives for Lake Arrowhead applicable to the Project site are found in Table 3-21 of the Basin Plan.
- ii. Groundwater quality objectives for all groundwaters are found on page 3-13 of the Basin Plan.

Permitting Requirements

Several activities associated with the proposed Project have potential to impact waters of the State and, therefore, may require permits issued by the State Water Resources Control Board (State Water Board) or the Lahontan Regional Water Board. The required permits may include the following:

1. Land disturbance of more than 1 acre requires federal Clean Water Act (CWA), section 402(p) storm water permits, including coverage under a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board.
2. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.
3. Disposal of drill cutting material and/or drilling fluid along with well development water may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049, or General Waste Discharge Requirements for

Discharges to Land with a Low Threat To Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board.

Please be advised of the permits that may be required for the proposed Project, as outlined above. Should Project implementation result in activities that trigger these permitting actions, the Project proponent must consult with Water Board staff. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahontan/>.

Thank you for the opportunity to comment on the Project. If you have any questions regarding this letter, please contact me sergio.alonso@waterboards.ca.gov (760) 243-7324 or Jehiel Cass P.E., Senior Engineering Geologist jehiel.cass@waterboards.ca.gov (760) 241-2434. Please send all future correspondence regarding this Project to the Water Board's email address at lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse No. (2020110131) and Project name (Lake Arrowhead CSD – Blue Jay Well Site Project) in the subject line.



Sergio Alonso
Water Resource Control Engineer

cc: State Clearinghouse (state.clearinghouse@opr.ca.gov) (SCH 2020110131)