
State Water Resources Control Board

January 7, 2025

Brenda Magana
City of Palmdale
38250 Sierra Highway
Palmdale, CA, 93550

CITY OF PALMDALE (CITY), ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE QUAIL VALLEY PROJECT- TENATIVE PARCEL MAP 65813 AND PLANNED DEVELOPMENT 18-001 PROJECT (PROJECT); STATE CLEARINGHOUSE #2024100065

Dear Brenda Magana:

Thank you for the opportunity to review the EIR for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (Division) is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act. This Project is within the service area of the water system number 1910102, Palmdale Water District (PWD), under the jurisdiction of the Division's Hollywood District. The Division 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 Division, as a responsible agency under the California Environmental Quality Act (CEQA), has the following comments on the City's EIR:

- The Palmdale Water District (PWD) will need to apply for a water supply permit amendment from the State Water Board, Hollywood District, to operate proposed storage reservoirs of 100,000-gallons or more as part of their public water system.
- If any of the proposed water tanks are 100,000-gallons or more in size:
 - Add "State Water Resources Control Board, Division of Drinking Water, Hollywood District" under 1.3 Responsible and Trustee Agencies, (PDF page 154).
 - Identify the water supply permit amendment in the EIR's discretionary approval lists (PDF pages 442 and 616).
- The City/Project developer will enter into an agreement with the PWD for the design and construction of water system improvements necessary to provide

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

water service to the Project. PWD and Antelope Valley East Kern Water District (AVEK) will implement a water supply exchange agreement (PDF pages 561 and 562). Please explain if other water system infrastructure will be required for the Project that is not yet analyzed in this EIR. If so, please consider the construction and operation of this additional infrastructure in the plans and environmental analysis or clarify if a future CEQA document will include this information.

- Please identify the AVEK's source of water that will be used as part of the water exchange, discuss the reliability of this source, and discuss how the imported water exchange between PWD and AVEK will occur.
- The Water Supply Assessment (WSA) approval correspondence was included in the technical studies document posted on the City's website, but the WSA was not. Please include the WSA in the EIR attachments.
- The City/Project developer must coordinate the project construction with PWD to ensure that new water mains and service laterals are in compliance with the Water Main Separation requirements of Chapter 16, California Waterworks Standards, Title 22 of the California Code of Regulations (CCR). The City must submit project construction plans to PWD for review and concurrence.
- The City/Project developer must ensure that adequate backflow protection is provided to any structure that may pose any possible cross-connection risks to the potable water distribution mains. Please contact PWD for these cross-connection control requirements.
- PWD has extended the validation of the water supply assessment until December 20, 2024 (PDF page 424); however, the EIR circulation ends in January 2025. Please discuss the process PWD and the City will take to ensure the water assessment is valid. Will the validation of the water supply assessment be extended again prior to Project approval?

Once the EIR is certified, please forward the following items in support of the PWD's permit application to the State Water Board, Hollywood District Office at DWPDIST07@waterboards.ca.gov:

- Copy of the EIR and Mitigation Monitoring and Reporting Plan (MMRP);
- Copy of all comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes certifying the EIR and adopting the MMRP; and
- Copy of the date stamped Notice of Determination filed at the Los Angeles County Clerk's Office and the Governor's Office of Planning and Research, 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:

Office of Planning and Research, State Clearinghouse

Dmitriy Ginzburg
District Engineer
Hollywood District

Milagros Alora
Sanitary Engineer
Hollywood District

Dennis Lamoreaux
General Manager
Palmdale Water District

Joseph Marcinko
Operations Manager
Palmdale Water District

Dan Bacani
Cross-Connection and Water Pollution Control Program
County of Los Angeles Department of Public Health
Environmental Protection Branch