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April 10, 2018

VIA: ELECTRONIC MAIL AND OVERNIGHT COURIER

Victor Vasquez, Senior WRCE
State Water Resources Control Board, Division of Water Rights
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Ken Petruzzelli, Attorney III
State Water Resources Control Board, Office of Enforcement
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Re: *NWNA's Third Response to the State Water Resources Control Board's Report of Investigation*

Dear Mr. Vasquez and Mr. Petruzzelli:

Nestlé Waters North America Inc. ("NWNA") is pleased to provide the State Water Resources Control Board ("SWRCB" or "Board") with its Third Response to the SWRCB's Report of Investigation ("ROI") issued on December 21, 2017. This response was prepared by NWNA's consultant, Hayley & Aldrich, Inc., to address the SWRCB's request that NWNA prepare an "investigation and monitoring plan" to determine the allocations of surface water and groundwater in the annual spring water collections by NWNA in Strawberry Canyon.

Pursuant to the Board's approval, NWNA submitted a Preliminary Response to the Board on February 9, 2018 and a Second Response on March 12, 2018. These responses addressed the legal bases for NWNA's surface water and groundwater diversions from Strawberry Canyon and provided an Interim Compliance Plan outlining the steps NWNA will take to ensure that its diversions do not exceed the allowable diversions under any valid basis of right under California law.

As indicated in our Preliminary Response, NWNA believes it has clearly demonstrated sufficient legal grounds to divert at least 271 acre-feet per year ("AFY") of surface water from Strawberry Creek and additional groundwater within Strawberry Canyon. Based upon NWNA's reported diversions in accordance with state law, the average annual spring water collections through the NWNA pipeline since 1947 is 192 AFY, well below the 271 AFY of surface water NWNA believes it is legally entitled to collect.

Although NWNA is prepared to move forward to execute its proposed investigation and monitoring plan immediately, it is unable to do so until the plan has been approved by the SWRCB. It will also be necessary for NWNA to coordinate access to the SBNF with the U.S. Forest Service and obtain any necessary approvals prior to the plan's implementation. We look forward to receiving feedback from the SWRCB regarding the findings and conclusions contained in the Preliminary Response and Interim Compliance Plan, as well as the Board's approval of the attached proposed Investigation and Monitoring Plan. As always, NWNA's staff and consultants are available to the staff of the Board to answer questions about any of the three submissions by NWNA.

Thank you.

Sincerely,

Rita Maguire

Rita P. Maguire, Esq.
Maguire, Pearce & Storey, PLLC

Enclosure
cc (via email): Charles Broll, General Counsel, NWNA
Anna Marciano, Chief Counsel, NWNA
Larry Lawrence, Natural Resources Manager, NWNA
Robert Johnson, Hunton Andrews Kurth LLP
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TECHNICAL MEMORANDUM

10 April 2018

TO: Larry Lawrence, Natural Resource Manager
Nestlé Waters North America

FROM: Haley & Aldrich, Inc.
Mark Nicholls

SUBJECT: Report of Investigation, INV# 8217, December 20, 2017
Arrowhead Springs Investigation and Monitoring Plan

Introduction

The Nestlé Waters North America (NWNA) team appreciates the opportunity to submit this Investigation and Monitoring Plan in response to recommendations made in the Report of Investigation (ROI) INV# 8217, dated 20 December 2017, prepared by the California State Water Resources Control Board (SWRCB or Board). The object of the investigation was to determine the basis of rights for the diversion of water subject to the authority of SWRCB in Strawberry Canyon. The investigation was initiated in response to inquiries made by the San Bernardino National Forest (SBNF) Supervisors Office and members of the public in conjunction with the application process for renewal of Special Use Permit (SUP) No. 7285 for pipeline conveyance of water across SBNF lands.

NWNA looks forward to working with SWRCB during the execution of this Investigation and Monitoring Plan and would like the opportunity to contact SWRCB to discuss preliminary results and observations as the data become available, to help shape the ongoing testing and monitoring programs to ensure they meet SWRCB objectives.

Background

NWNA and its predecessors-in-interest have collected water from a group of springs for more than 100 years for use in the production of bottled spring water products. The group of springs, collectively referred to as the Arrowhead Springs, is located in Strawberry Canyon in the SBNF. Spring water is currently collected for bottling purposes from springs in Strawberry Canyon.

The existing water collection system in Strawberry Canyon was supplemented in 1930 when tunnels 2, 3, and infiltration gallery 7 were constructed to collect water directly from the springs in Strawberry Canyon. Later, beginning in approximately 1950, ten boreholes were constructed to collect spring water and infiltration gallery 7 was decommissioned. Each of the tunnels and horizontal boreholes were constructed at or adjacent to naturally occurring spring sites for the purposes of capturing spring water and developing additional water from the same underground strata feeding the springs. The tunnels and horizontal boreholes successfully achieved these purposes. Current water collection infrastructure includes two tunnels and ten horizontal boreholes constructed at five separate sites, referred to as Spring Areas throughout this plan.

Because each of the tunnels and horizontal boreholes were constructed at or adjacent to naturally occurring spring sites, a fraction of the water collected from each may reasonably be assumed to have been intercepted before discharging at the spring site. In addition, a fraction of the water collected may be groundwater percolating through the same strata feeding the spring and may be considered "developed water" (see ROI at p. 21). At the time of construction of each of the tunnels and boreholes, no consideration was given to differentiating the fraction of surface water or other water that was collected because the predecessors-in-interest to NWNA had adjudicated water rights within Strawberry Canyon. Consequently, few data presently exist that may be used to determine the fraction of surface water flowing from water at each tunnel and borehole.

The ROI included a description of analyses performed by SWRCB to determine the portion of surface water at two of the Spring Areas (Spring 7 and Spring 10, 11, and 12). At Spring 7, the SWRCB compared reported flow volumes from the original infiltration gallery to those reported from the horizontal boreholes constructed after the tunnel was decommissioned. The Board reasonably concluded that the difference in flow between the infiltration gallery and horizontal boreholes may represent the volume of "developed water". At Spring 10, 11, and 12, SWRCB reviewed the report prepared by Dames & Moore (1999) describing the results of a shut-in test at this spring site and reasonably concluded that the test reflected the amount of surface water flow.

The approach taken by the Board to determine the portion of surface water at Spring 7 and Spring 10, 11, and 12 sites is reasonable based on available data. No analyses were performed by SWRCB for Spring Areas 1, 1A, and 8, Spring Area 2, or Spring Area 3 due to the lack of available data for these sites.

The ROI included a recommendation that NWNA submit an Investigation and Monitoring Plan for Division review and approval within 90 days of receipt of the ROI. The stated purposes of the investigation and monitoring plan are to:

1. Determine the portion of developed water, if any, that is not tributary to flow in any natural channel and can therefore be diverted without authorization from the SWRCB; and
2. Monitor diurnal, seasonal, and other flow variations using industry standard equipment and methods for measuring flow.

The Investigation and Monitoring Plan is intended to generate sufficient data to complete analyses similar to those performed by SWRCB at Spring 7 and Spring 10, 11, and 12 to facilitate estimation of the fraction of potential surface water.

This document serves as NWNA's Investigation and Monitoring Plan submittal referenced in the ROI (see pgs. 3 and 34). This document describes the proposed hydrologic testing methods that will be used to determine the proportion of surface water, and the monitoring program that will be used to monitor diurnal, seasonal, and other flow variations in accordance with recommendations made in the ROI. The proposed testing and monitoring methods described below are based in part on analyses performed by, and observations reported by, SWRCB in the ROI (see ROI at pgs. 28-30).

NWNA is currently working with SBNF to renew SUP No. 7285, which authorizes conveyance of water across SBNF lands. During the permit renewal process, NWNA has been actively collecting hydrologic data within Strawberry Canyon that may be used to help understand the results of previous testing reported by Dames & Moore (1999) and may be used to help plan future testing and monitoring programs.

The proposed testing procedures and proposed monitoring to be conducted at each of the five Spring Areas is described in detail below.

Proposed Testing

The five Spring Areas are named using a numerical system based on the development history, a system which has been in use since the early 20th century. The five Spring Areas are: (1) Spring 1, 1A and 8, (2) Spring 2, (3) Spring 3, (4) Spring 7, and (5) Spring 10, 11, and 12. The type, configuration, and layout of the infrastructure constructed at each Spring Area was designed based on the individual characteristics of each Spring, and each was designed and constructed with the objective of facilitating sanitary and efficient collection of water from each Spring. The water collection infrastructure, its relation to each spring, and proposed testing and monitoring to be conducted by NWNA at each Spring Area is described below.

SPRING 1, 1A, AND 8

Spring Area 1, 1A, and 8 has been developed using horizontal boreholes drilled at a location that is up gradient of a naturally occurring spring, referred to as Spring 4. Each of the horizontal boreholes consist of a 2-inch diameter boring drilled to depths of 120 to 290 feet, with a 1-inch perforated steel liner and a 2-inch surface casing cemented to provide a sanitary seal. Borehole 1 is approximately 290 feet long, oriented N25°E. Borehole 1A is approximately 130 feet long, oriented N 15°W. Borehole 8 is approximately 120 feet long, oriented N44°W. Each of these horizontal boreholes was constructed to intersect water-bearing fractures in the same underground strata feeding the spring. Spring water from each of these boreholes is piped into a common vault that is approximately 160 feet above Spring 4. From the vault, water is directed into the main pipeline that conveys water from all of the Spring Areas down Strawberry Canyon.

As described in the ROI, Dames & Moore (1999) conducted a short duration hydraulic connection test between boreholes 1, 1A, and 8 and Spring 4 (see ROI at p. 19). The objective of the test was to identify the magnitude of hydraulic influence on Spring 4 based on manipulation of hydraulic pressure at boreholes 1, 1A, and 8. The test included shutting in boreholes 1, 1A, and 8, and allowing piezometric pressure to build in the aquifer with the expectation the spring flow would change accordingly. The observed changes in flow were too small to be conclusively associated with the induced pressure change. The duration of the test was approximately 24 hours and was deemed inconclusive. The test did not appear to include sufficient pre-test or post-test monitoring to fully characterize potential diurnal changes in flow or other conditions that may affect measured flow at Spring 4.

Since 2015, monitoring conducted by NWNA at Spring 4 has shown that diurnal effects, seasonal effects, and weather have the potential to significantly affect flow at Spring 4 and may have masked any hydraulic influence induced during the 24-hour Dames & Moore (1999) test.

Spring 1, 1A, and 8 Proposed Testing

The following proposed testing procedure has been developed based on experience reported by Dames & Moore (1999), and observations made during monitoring conducted by NWNA since 2015.

Pre-Test Monitoring

1. Install and program transducer and stilling well in the pool at Spring 4.
2. Establish a surface water flow measurement station for hand measurement of flow at Spring 4.
3. Collect water level data using the transducer for a period of 30 days prior to test.
4. Record flow using existing borehole flow meters daily for 30 days prior to test.
5. Record hand measurement of flow once per week during 30 days prior to test:
    a. Measurements should be timed as close as possible to the same time each day.
6. Compare water level and flow values to precipitation totals and other meteorological observations from two appropriate weather stations.

Test Procedure

1. Install and program transducer on borehole 1A (this borehole is located between boreholes 1 and 8 and will serve to record the increase in piezometric pressure in the fractured rock aquifer induced by shut-in).
2. Before starting test, record early morning flow measurements at Spring 4.
3. Close valves (shut-in) on boreholes 1, 1A, and 8.
4. Continue data collection using:
    a. Transducer at Spring 4;
    b. Hand flow measurements at Spring 4, twice weekly; and
    c. Transducer at borehole 1A.
5. Leave valves closed for a period of 2 weeks.
6. Open valves at boreholes 1, 1A, and 8, with flow directed into the pipeline.

7. Continue data collection using:
    a. Transducer at Spring 4;
    b. Hand flow measurements at Spring 4, twice weekly; and
    c. Transducer at borehole 1A.
8. Testing may be repeated with different durations and hydraulic inputs based on observed responses.
9. Remove monitoring equipment and return to normal borehole operation.

The testing period will be 1 year, to be followed by a period of 6 months to complete analysis and reporting (see ROI at pgs. 3 and 34). Testing at Spring 1, 1A, and 8 will be repeated twice during the 1-year period, once during high flow conditions (spring time) and once during low flow conditions (late summer) if access conditions are suitable.

Data Analysis

Data generated from the testing procedure to be conducted at Spring 1, 1A, and 8 may be used to characterize and quantify the relationship between hydraulic head at the boreholes and flow at Spring 4. Data generated from this test may be evaluated using analytical hydraulic analysis methods, numerical modeling methods, statistical methods, and/or other appropriate methods.

SPRING 2

Spring 2 was developed by means of tunneling into the natural spring orifice which was excavated during tunnel construction. Tunnel 2 is an engineered water collection facility consisting of a tunnel, approximately 37 feet long, hand dug into the fractured bedrock aquifer. The tunnel has concrete-lined walls and crown, with a layer of gravel on the floor to allow spring water to enter the collection system from water-bearing fractures in the tunnel walls and floor. Data collection during hydraulic testing at Tunnel 2 is limited to data which may be collected inside the tunnel during adjustment of the water level within the tunnel.

Tunnel 2 is equipped with a low concrete dam that serves to impound water flowing from bedrock fractures in the tunnel walls and floor. The dam is equipped with a weir and ultrasonic level sensor to record total flow out of the tunnel. Water level adjustment within the tunnel is limited to draining and refilling the water impounded behind the dam.

Spring 2 Proposed Testing

Pre-Test Monitoring

1. Install and program transducer and stilling well at the dam in Tunnel 2.
2. Install temporary flow meter and flow valve on tunnel drain pipe.
3. Collect water level data using the transducer for a period of 30 days prior to test.

4. Record flow using existing ultrasonic flow meter and weir system daily for 30 days prior to test.
5. Compare water level and flow values to precipitation totals and other meteorological observations from two appropriate weather stations.

Test Procedure

1. Open tunnel drain valve:
    a. Continue draining tunnel until flow from the drain pipe reaches equilibrium flow.
    b. Monitor equilibrium flow from the tunnel drain pipe for a period of 2 weeks.
2. Continue data collection using:
    a. Transducer installed at the concrete dam; and
    b. Flow meter installed on the tunnel drain pipe.
3. Close tunnel drain valve after 2 weeks of equilibrium flow from the tunnel drain.
4. Continue data collection using:
    a. Transducer installed at the concrete dam; and
    b. Existing ultrasonic flow meter and weir system.
5. Continue data collection for a period of 2 weeks after tunnel flow has recovered to pre-test or equilibrium levels measured through the weir.
6. Testing may be repeated with different durations and hydraulic inputs based on observed responses.
7. Remove monitoring equipment and return to normal borehole operation.

In the ROI, SWRCB provides for a 1-year testing period to be followed by a period of 6 months to complete analysis and reporting (see ROI at pgs. 3 and 34). Testing at Spring 2 will be repeated twice during the 1-year period, once during high flow conditions (spring time) and once during low flow conditions (late summer) if access conditions are suitable.

Data Analysis

Data generated from the testing procedure to be conducted at Tunnel 2 may be used to develop a rating curve for the tunnel and to estimate the relationship between the change in aquifer storage and spring flow, and to estimate the relative increased water flow efficiency based on these factors. Data generated from this test may be evaluated using analytical hydraulic analysis methods, numerical modeling methods, statistical methods, and/or other appropriate methods.

SPRING 3

Similar to Spring 2, Spring 3 was developed by means of tunneling into the natural spring orifice which was excavated during tunnel construction. Tunnel 3 is an engineered water collection facility consisting of a hand dug tunnel, approximately 91 feet long, advanced into the fractured bedrock aquifer at the location of the spring orifice. The tunnel has concrete-lined walls and crown, with a layer of gravel on the floor to allow spring water to enter the collection system from bedrock fractures. Data collection during hydraulic testing at Tunnel 3 is limited to data which may be collected inside the tunnel during adjustment of the water level within the tunnel.

Tunnel 3 is equipped with a low concrete dam that serves to impound water flowing from bedrock fractures in the tunnel walls and floor. The dam is equipped with a weir and ultrasonic level sensor to record total flow out of the tunnel. Water level adjustment within the tunnel is limited to draining and refilling the water impounded behind the dam.

Spring 3 Proposed Testing

Pre-Test Monitoring

1. Install and program transducer and stilling well in dam in Tunnel 3.
2. Install temporary flow meter and flow valve on tunnel drain pipe.
3. Collect water level data using the transducer for a period of 30 days prior to test.
4. Record flow using existing ultrasonic flow meter and weir system daily for 30 days prior to test.
5. Compare water level and flow values to precipitation totals, and other meteorological observations from two appropriate weather stations.

Test Procedure

1. Open tunnel drain valve:
    a. Continue draining tunnel until flow from the drain pipe reaches equilibrium flow; and
    b. Monitor equilibrium flow from the tunnel drain pipe for a period of 2 weeks.
2. Continue data collection using:
    a. Transducer installed at the concrete dam; and
    b. Flow meter installed on the tunnel drain pipe.
3. Close tunnel drain valve after 2 weeks of equilibrium flow from the tunnel drain.
4. Continue data collection using:
    a. Transducer installed at the concrete dam; and
    b. Existing ultrasonic flow meter and weir system.
5. Continue data collection for a period of 2 weeks after tunnel flow has recovered to pre-test or equilibrium levels measured through the weir.
6. Testing may be repeated with different durations and hydraulic inputs based on observed responses.
7. Remove monitoring equipment and return to normal borehole operation.

In the ROI, SWRCB provides for a 1-year testing period to be followed by a period of 6 months to complete analysis and reporting (see ROI at pgs. 3 and 34). Testing at Spring 3 will be repeated twice during the 1-year period, once during high flow conditions (spring time) and once during low flow conditions (late summer) if access conditions are suitable.

Data Analysis

Data generated from the testing procedure to be conducted at Tunnel 3 may be used to develop a rating curve for the tunnel and to estimate the relationship between the change in aquifer storage and spring flow, and to estimate the relative increased water flow efficiency based on these factors. Data generated from this test may be evaluated using analytical hydraulic analysis methods, numerical modeling methods, statistical methods, and/or other appropriate methods.

SPRING 7

The Spring 7 complex was originally developed by construction of a tunnel at the location of the natural spring orifice in the same time period as Tunnels 2 and 3. This development was later decommissioned and replaced by a series of horizontal boreholes constructed to intersect water-bearing fractures in the same underground strata feeding the spring. Each of the boreholes consist of a 2-inch diameter boring drilled to depths of 230 to 397 feet, with a 1-inch perforated steel liner, and a 2-inch surface casing cemented to provide a sanitary seal. Borehole 7 is approximately 290 feet long, oriented N23°E. Borehole 7A is approximately 230 feet long, oriented N19°W. Borehole 7B is approximately 397 feet long, oriented N37°E. Borehole 7C is approximately 300 feet long, oriented N50°W.

In the ROI, SWRCB compared reported flow volumes from the original infiltration gallery to those reported from the horizontal boreholes constructed after the tunnel was decommissioned. The Board concluded that the difference in flow between the tunnel and horizontal boreholes may represent the volume of developed water (see ROI at p. 29). No further testing has been conducted to characterize the relationship between the Spring 7 boreholes and the decommissioned tunnel.

Spring 7 Proposed Testing

NWNA agrees that the analysis performed by SWRCB as reported in the ROI was well reasoned and provides a defensible approximation of the proportion of surface water to developed water flowing from the Spring 7 boreholes. Consequently, NWNA does not propose to conduct further testing at Spring 7 at this time but will include Spring 7 in the planned monitoring described below. If analysis of the monitoring data suggests that additional testing may be warranted, NWNA will prepare a supplemental testing proposal for consideration by SWRCB.

Data Analysis

Monitoring data collected at Spring 7 may be used to characterize the relationship between diurnal, seasonal, and climatic inputs to flow at Spring 7. These monitoring data may be evaluated using analytical hydraulic analysis methods, numerical modeling methods, statistical methods, and/or other appropriate methods.

SPRING 10, 11, AND 12

Spring Area 10, 11 and 12 has been developed using horizontal boreholes drilled at a location that is up gradient of a naturally occurring spring, referred to as the Lower Spring Complex. Each of the horizontal boreholes consist of a 2-inch diameter boring drilled to depths of 120 to 290 feet, with a 1.5-inch perforated steel liner, and a 2-inch surface casing cemented to provide a sanitary seal. Borehole 10 is approximately 305 feet long, oriented N60°W. Borehole 11 is approximately 310 feet long, oriented N50°W. Borehole 12 is approximately 320 feet long, oriented N27°W. Each of these horizontal boreholes was constructed to intersect water-bearing fractures in the same underground strata feeding the spring. Spring water from each of these boreholes are piped into a common vault that is approximately 30 feet above the Spring Area.

Dames & Moore (1999) conducted a shut-in test at Spring Area 10, 11, and 12 that included shutting in all the horizontal boreholes and measuring flow in the creek channel below the Spring Area. They were not able to observe a measurable difference in flow in the creek channel below the Spring Area. SWRCB reviewed the report prepared by Dames & Moore (1999) describing the results of the shut-in test conducted at Spring Area 10, 11, and 12 and concluded that the test reasonably reflected the amount of surface water flow, and that the water collected by NWNA at Spring Area 10, 11, and 12 was groundwater rather than surface water (see ROI at p. 30).

Spring 10, 11, and 12 Proposed Testing

NWNA agrees that the analysis performed by Dames & Moore (1999) and reviewed by SWRCB as reported in the ROI provides a reasonable evaluation of the surface water flowing from the boreholes 10, 11, and 12. Consequently, NWNA does not propose to conduct further testing at Spring Area 10, 11, and 12 at this time but will include the Spring Area in the planned monitoring described below. If analysis of the monitoring data suggests that additional testing may be warranted, NWNA will prepare a supplemental testing proposal for consideration by SWRCB.

Data Analysis

Monitoring data collected at Spring 10, 11, and 12 may be used to characterize the relationship between diurnal, seasonal, and climatic inputs to flow at the Spring Area. These monitoring data may be evaluated using analytical hydraulic analysis methods, numerical modeling methods, statistical methods, and/or other appropriate methods.

Proposed Monitoring

In the ROI, SWRCB recommends that the Investigation and Monitoring Plan include a monitoring program for diurnal, seasonal, and other flow variations using industry standard equipment and methods for measuring flow. Since 2016, NWNA has been collecting hydrologic data in Strawberry

Canyon in support of an application to renew SUP No. 7285. The hydrologic data collected during this timeframe provide a valuable short-term background dataset for use in identifying appropriate monitoring locations. These data include periodic surface water surveys describing the occurrence and extent of surface water flow, surface water flow measurements at selected locations, and daily flow from each of the boreholes and tunnels. Based on review of these data, NWNA proposes a monitoring program that will characterize diurnal, seasonal, and other flow variations at the Arrowhead Springs during the 1-year study period. The proposed monitoring program will be conducted for a period of 1 year as contemplated in the ROI and will incorporate industry standard equipment and methods for data collection. The proposed monitoring program includes the following elements:

MONITORING SEASONAL FLOW VARIATION

1. Daily flow monitoring from each of the boreholes and tunnels.
2. Publicly available meteorological data.
3. Publicly available stream flow data

MONITORING DIURNAL FLOW VARIATION

1. Conduct hourly flow monitoring from selected boreholes and tunnels. NWNA proposes one borehole from each of the three Spring Areas (three total) developed with boreholes, and one tunnel.
2. Hourly water level data at three piezometer locations; one piezometer installed adjacent to Spring 4, one piezometer installed adjacent to Spring 10, 11, and 12, and one piezometer installed up gradient of the fault at Spring 10, 11, and 12. These piezometers will be installed at locations sufficiently close to the springs to record piezometric pressure adjacent to the spring, as an analog for spring flow. Springs 2, 3, and 7 are located in steep rocky terrain where it is not possible to install piezometers.

MONITORING OTHER FLOW VARIATIONS

Additional flow variation may occur as a result of storm systems moving through the Canyon or other extreme seasonal meteorological events. The equipment installed to monitor diurnal flow variation will also record flow variation caused by other events. To identify other influences on flow, the diurnal monitoring dataset will be evaluated against local meteorological data to correlate extreme weather events with observed changes in flow.

Reporting

The timeline provided in the ROI includes a 1-year study period followed by a 6-month period for data analysis and reporting. The testing will be completed within a period of 1 year after SWRCB's approval of this Investigation and Monitoring Plan and installation of monitoring equipment. The monitoring described above will continue for a period of 1 year after monitoring equipment is installed and will be concluded in time to provide for analysis and reporting at the 18-month reporting date established by the ROI. The report will include data collected during testing and monitoring, a description of the analyses performed using those data, graphical representations of key finding and observations, and a summary of findings. NWNA is committed to conduct the testing and monitoring described in this Investigation and Monitoring Plan and reporting the results within a period of 18 months after SWRCB's approval of this Investigation and Monitoring Plan and installation of monitoring equipment.

References

Dames & Moore, 1999. *Assessment of History and Nature of Arrowhead Springs, San Bernardino Mountains.*

State Water Resources Control Board, 2017. Report of Investigation (ROI), INV 8217, Nestle Water North America, Arrowhead Facility, San Bernardino Nation Forest. December 20, 2017.