California Regional Water Quality Control Board
North Coast Region
William R. Massey, Chairman

aston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

Internet Address: http://www.swrcb.ca.gov/rwqcb1/
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
Phone: 1 (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

September 3, 2002

Gordon Logan
City of Willits
111 East Commercial Street
Willits, CA 95490

Dear Mr. Logan:

Subject: Wastewater Treatment/Water Reclamation Project Environmental Impact Report; SCH No. 2001032016

File: City of Willits Wastewater Treatment Facility, WDID No. 1B80078OMEN

We have reviewed the subject *Wastewater Treatment/Water Reclamation Project draft Environmental Impact Report* (EIR), dated July, 2002. The EIR is a step toward implementation of the *Long Term Wastewater Management Plan for the City of Willits*, dated July 2000. We previously commented on the proposed project by letters dated November 16, 2000 and February 8, 2001. We also submitted a response, dated April 20, 2001, to the Notice of Preparation for the subject document.

The EIR is fairly thorough in its evaluation of potential impacts to water quality in Outlet Creek/Eel River and groundwater in the Little Lake Valley. None of the alternatives appears to have significant impacts to water quality, other than the fact that each alternative would have varying degrees of compliance with the maximum allowable effluent discharge rate set forth in the Water Quality Control Plan for the North Coast Region (Basin Plan). Waste Discharge Requirements (WDRs), which also serve as a NPDES permit pursuant to the federal Clean Water Act, implement provisions of the Basin Plan and limit the maximum effluent discharge rate into Outlet Creek to 1% of the flow of the creek.

Each alternative, including the "No Project" alternative (existing wastewater treatment facility with no additional improvements) would produce excellent quality effluent in compliance with Waste Discharge Requirements. Regional Water Board staff would support any alternative that increases compliance with Waste Discharge Requirements. Alternatives that have wastewater storage capabilities, water conservation, wastewater recycling, and infiltration/inflow reduction

provide a greater degree of compliance with the Basin Plan discharge rate limitation. Simply adding storage, however, may not be a highly favorable alternative. As the EIR points out, the high quality effluent from the existing wastewater treatment facility (WWTF) will degrade somewhat to a lower quality at the point of discharge while it is sitting in storage. Storage at the end of the allowable discharge period is favorable because the stored effluent would be irrigated on land and would not be discharged into Outlet Creek/Eel River. Storage can be designed into treatment wetlands and enhancement wetlands.

Some specific comments:

1. The No Project and Alternatives 1 and 2 would provide treatment for up to 1.3 million gallons per day (mgd) average dry weather flow ADWF. Alternative 3 and the Proposed Project would provide treatment for up to 1.7 mgd ADWF. Current (ADWF) is 0.79 mgd, and projected ADWF for the year 2020 is 1.07 mgd. It is unclear to me why such an increase in ADWF is proposed for Alternative 3 and the Proposed Project. Downsizing these alternatives to provide for 20 to 30 years growth would result in a smaller project (perhaps 1.07 to 1.25 mgd instead of 1.7 mgd), which would have less impact on the environment.

2. Page 1-3 states that the existing treatment facility was constructed in 1976 and the major components have exceeded their useful lifespan. It should be noted that the treatment facility had a major overhaul in 1991. The existing facility does not have to be completely rebuilt.

3. Page D-13 summarizes quality of effluent at the existing wastewater treatment facility. It states that BOD and TSS concentrations are approximately 15 mg/l most of the year and generally less than 20 mg/l during winter flows. The 1998, 1999, and 2000 annual reports submitted by the City show that the annual average BOD and TSS is 7 mg/l and 6 mg/l respectively and the three-year maximum for BOD and TSS is 24 mg/l and 21 mg/l respectively. I would like to have included the 2001 annual report, but could not put my hands on it at short notice. I am sure it confirms that effluent quality at the existing facility was exceptional last year, too.

4. Public access to the oxidation ponds and treatment wetlands should not be permitted. They will contain undisinfected wastewater and could pose a public health threat. Mitigation 3.12.1c will be required. The term "low fencing" is not defined. Actual construction may be what many would call "high fencing". Its purpose will be to prevent public access.

5. Alternatives 2 and 3 and the Proposed Project will have ultraviolet disinfection before the enhancement wetlands. Be advised that the Regional Water Board may require disinfection again after the enhancement wetlands, which will be the actual discharge into Outlet Creek.

6. It was unclear what flood frequency will inundate the treatment wetlands and the enhancement wetlands.

7. The EIR evaluates alternatives with the assumption that the Regional Water Board will grant a variance to the discharge rate limit and allow up to a 4% discharge rate.

Alternatives 2 and 3 and the Proposed Project will meet the 4% discharge rate an estimated 95% of the time. Instead of proposing to be in compliance 95% of the time with a new project, the City should consider what is necessary to build a project that is in complete compliance. Perhaps this means fine-tuning the storage and discharge periods/rates. Perhaps it means that the City should consider requesting certain periods of 5% discharge rate.

8. The Expected Average Enhancement Wetland Quality of the proposed project omits data for pH and Bacteria (Total Coliform). Additionally, we have concerns with the listed expected high levels of ammonia and low dissolved oxygen.

All in all, the EIR is fairly well done, at least as far as water quality issues are concerned. After the City completes the EIR process and has a proposed project that has a likelihood of being built, we will schedule a public hearing before the Regional Water Board for consideration of a variance to the 1% discharge rate limitation. Prior to the hearing, the City must submit the additional information that Regional Water Board staff has requested during the past two years that is set forth in the Basin Plan to support a request for a variance.

Thank you for the opportunity to comment on the EIR. If you have any questions or wish to discuss these comments, please contact me at (707) 576-2701.

Sincerely,

Thomas B. Dunbar

Thomas B. Dunbar
Senior Water Resources Control Engineer

TBD:ja/Willits EIR

cc: Robert Gearheart, Hydro Resources International, P.O. Box 4409, Arcata, CA 95518-4409

Bob Witney, Brooktrails CSD, 24860 Birch Street, Willits, CA 95490

Karen Fowler, State Clearinghouse, 1400 Tenth Street, P.O. Box 3044, Sacramento, CA 95812-3044