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SECRETARY FOR
ENVIRONMENTAL PROTECTION

Lahontan Regional Water Quality Control Board

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Comments on the Initial Study and Proposed Mitigated Negative Declaration - Huston Creek Wastewater Treatment Plant Dewatering Building and Primary Clarifier Project, State Clearinghouse No. 2019109023

The Lahontan Regional Water Quality Control Board (Water Board) staff reviewed the Initial Study and Proposed Mitigated Negative Declaration (IS/MND) for the Huston Creek Wastewater Treatment Plant (WWTP) Dewatering Building and Primary Clarifier Project (Project). The IS/MND was prepared by Jericho Systems, Inc. and submitted by Crestline Sanitation District (District) to comply with provisions of California Environmental Quality Act (CEQA) and solicits input on the potential impacts of the Project on the environment and ways in which those significant effects are proposed to be avoided or mitigated. This letter provides Water Board staff comments on the Project. We appreciate that the District agreed to accept these comments after the State Clearinghouse comment due date of November 6, 2019. In general, Water Board staff support development and implementation of an erosion control plan, inclusion of basin plan beneficial uses and water quality objectives in the CEQA document, and that this Project upgrade consists of the replacement and of existing wastewater treatment processes and does not represent a substantive change in the manner or method of wastewater treatment and disposal.

Project Summary

The Project will upgrade the District's existing wastewater treatment plant by adding a primary clarifier, backup generator, trickling filter recirculation pumps, and a sludge dewatering building with associated sludge dewatering and conveyance equipment. Construction is estimated to occur in 2020 and last approximately 24 months. The existing facilities in the proposed project area were constructed in 1952 (e.g. primary

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clarifiers) and 1984 (e.g. sludge handling facility). These facilities are near the end of their serviceable life and are not designed to meet current engineering standards and community wastewater treatment demands. The IS/MND proposes some Mitigation Measures as follows.

- Biological Resources - Nesting bird avoidance
- Cultural Resources - Unanticipated finds
- Geology and Soils - Soil management and unanticipated finds of paleo-resources
- Hazards and Hazardous Materials - Asphalt disposal, spill prevention, and requirement for spark arresters on welding equipment
- Tribal and Cultural Resources - Unanticipated discovery
- Wildfire - Welding, working around dried vegetation and in Red Flag Warnings

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 IS/MND

1. Page 59, Mitigation Measure GEO-1 – Water Board staff concurs that if Project area disturbance is less than one acre, coverage is not required under State Water Board General Order No. 2009-0009-DWQ for construction-related storm water discharges. However, we do support the identified mitigation measure stating that an Erosion Control Plan will be prepared and implemented to prevent erosion from construction activities.
2. Page 73, Hydrology and Water Quality – Subsection (a) asks if the Project will violate any water quality standards. The IS-MND must identify the relevant water quality standards for affected waters and describe how the Project will alter or affect both groundwater and surface waters. Water quality standards include both Beneficial Uses and Water Quality Objectives.

- a. Beneficial Uses – The Basin Plan, page 2-3, states “...groundwaters which are not a part of the named basins are recognized as potential or existing “municipal or domestic water supply (MUN).” The Basin Plan, Table 2-1, identifies the Beneficial Uses of Huston Creek as: Municipal (MUN), Agricultural (AGR), Recreational Contact (REC-1), Recreational Non-contact (REC-2), Commercial Fishing (COMM), Cold Fishery (COLD), and Wildlife Habitat (WILD).
 - b. Water Quality Objectives – The Basin Plan, page 3-13, lists the water quality objectives that apply to all groundwaters. The Basin Plan, pages 3-3 to 3-6, lists the water quality objectives that apply to all surface waters.
3. The Project consists of the replacement and upgrade of existing wastewater treatment processes. There is no substantial change in the manner or method of wastewater treatment and disposal. As such, Water Board staff believes that changes to the existing waste discharge requirements contained in Board Order No. 6-94-57 may not be necessary as a result of this Project. When waste discharge requirements are updated, the description of replaced treatment plant processes should be added to the findings of the updated board order.

Thank you for the opportunity to comment on the IS/MND. If you have any questions regarding this letter, please contact me at (760) 241-2434 jeziel.cass@waterboards.ca.gov. Please upload all future correspondence regarding this Project to the GeoTracker database (Global Identification No. WDR100029738) and provide an email copy to Water Board staff. Be sure to include the State Clearinghouse No. and Project name in the subject line.



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California Department of Fish and Wildlife (AskRegion6@wildlife.ca.gov)