



September 21, 2021

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

City of Willits
Attn: Andrea Trincado
111 East Commercial Street
Willits, CA 95490

CITY OF WILLITS (CITY), MITIGATED NEGATIVE DECLARATION (MND) FOR THE GROUNDWATER RESILIENCY IMPROVEMENTS PROJECT (PROJECT); SCH #2020120527

Dear Ms. Andrea Trincado

Thank you for the opportunity to review the Mitigated Negative Declaration for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits administered under the Safe Drinking Water Act and will require a new or amended water supply permit for the above referenced Project. A project requires a permit if it includes water system consolidation or changes to a water supply source, storage, or treatment or a waiver or alternative from Waterworks Standards (California Code of Regulations title 22, chapter 16 et. seq).

Phase I of the Project will include installation of 3,600-feet of 10-inch piping to upgrade the Elias replacement well connection to the Willits Groundwater System to accommodate increased flows and increase transfer capacity. The original piping would be abandoned in place. One hundred fifty feet of 10-inch piping would also be installed to connect the Long 20 well to the Willits Groundwater System.

Phase II will include installing a 20-horsepower pump within the Long 20 well, a supervisory control and data acquisition (SCADA) facility to manage the Long 20 well, and establishment of power to the Long 20 well pump and SCADA facility through a new Pacific Gas and Electric company (PG&E) connection. Phase II will also include arsenic pilot testing of the Long 20 well raw water to determine if the existing groundwater treatment plant would be able to reduce arsenic levels to a level that meets California Drinking Water Standards. If the pilot testing determines the levels cannot meet the requirements, the Long 20 well water would be mixed with other water to meet the standards. Currently there is only one well connected to the City's groundwater treatment plant. The proposed Project will improve water supply reliability through the second well in the event surface water cannot be obtained.

Phase III would include the installation of a 250,000-gallon bolted or welded clear well (chlorine contact tank) to the west of the groundwater treatment plant to improve the treatment of the system. The clearwell would store the treated and potable water prior to sending it to the water system.

Once the Project is installed, these improvements would be maintained by existing City staff as part of ongoing maintenance and operation of the Willits Groundwater System.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

The State Water Board, DDW, as a responsible agency under CEQA, has the following comments on the City's draft MND.

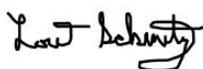
- Title 22, Division 4, Chapter 16, Article 2, 64556 states, an application for an amended domestic water supply permit shall be submitted to the State Board prior to any of the following: (1) Addition of a new distribution reservoir (100,000 gallon capacity or greater) to the distribution system; modification of the water supply by A. Adding a new source; and (4) any addition or change in treatment, including: design capacity or process. In the Revised September 2021 Initial Study, I. Project Summary. The document lists anticipated permits and approvals but does not list the water supply permit amendment from the State Water Board, DDW. If your Project will trigger a permit amendment, please add the water supply permit through the State Water Resources Control Board, DDW to the list of permits and approvals needed.
- The project talks about establishing power to the Long 20 well pump and SCADA facility through a new PG&E connection. Please discuss what components will be installed by PG&E and the city to facilitate this and where the infrastructure will be located.
- Please discuss what will be done with the water treated for arsenic during the pilot testing. Will it be used or discharged? Will there be waste from the arsenic treatment process? If so will it be tested to determine if it is hazardous waste and how will the waste will be disposed?
- Discharges resulting from disinfection and operation of water system components will be required. Low threat discharges that will be discharged to surface water or to the ground for beneficial reuse may qualify under the City's Statewide General NPDES Permit 2014-0194-DWQ for Drinking Water System Discharges permit, (4DW0066). If you have questions about this permit contact Renan Jauregui, at (916) 341-5505 or renan.jauregui@waterboards.ca.gov. Please otherwise coordinate with the North Coast Regional Water Quality Control Board (North Coast Regional Board) staff listed here on any discharges that do not qualify under this permit:
https://www.waterboards.ca.gov/water_issues/programs/waste_discharge_requirements/waste_discharge_requirements_statewide_contacts.html

When the CEQA review process has ended, please forward the following items with your permit application to the Mendocino District Office:

- Copy of the draft and final MND, including the Mitigation Monitoring and Reporting Plan, with any comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes adopting the MND;
- Copy of the stamped Notice of Determination (NOD) filed at the Mendocino County Clerk's Office and the Governor's Office of Planning and Research, State Clearinghouse.

Please contact Matt Foster of the Mendocino District Office, at (707) 576-2108 or Matt.Foster@waterboards.ca.gov if you have any questions regarding water supply permitting requirements.

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

Matt Foster
Sanitary Engineer
Mendocino District

Renan Jauregui
Water Resources Control Engineer
State Water Board, Division of Water Quality

Jeremiah Puget
Senior Environmental Scientist
North Coast Regional Water Board