Thompson, Brendan@Waterboards

From: Thompson, Brendan@Waterboards
Sent: Thursday, February 11, 2021 4:50 PM
To: lshorey@ci.fortuna.ca.us
Cc: Moore, Heaven@Waterboards; State Clearinghouse; Travis Clohessy; Filak, Jordan@Waterboards; Bey, Ryan A.@Waterboards; Stevens, Brandon D.@Waterboards
Subject: Rohnerville Road Fire Station MND Comments from Regional Water Board: SCH No. 2021010148

Dear Ms. Shorey,

Thank you providing staff of the North Coast Regional Water Quality Control Board (Regional Board) the opportunity to comment on the Rohnerville Road Fire Station Mitigated Negative Declaration (MND). The MND describes a proposal to build an approximately 66,000 square foot fire station complex on an undeveloped parcel in Fortuna (Project). The City of Fortuna is a permittee under State Water Resources Control Board Water Quality Order No. 2013-0001-DWQ, Waste Discharge Requirements for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4) (Stormwater Permit). The Project is considered a Regulated Project under the Stormwater Permit. We offer the following comments to help the City and Project proponent evaluate the proposed Project design as it relates to concerns of the Regional Water Board.

Equipment Washing

Section 1.6 of the MND notes "washing of apparatus would occur in the parking area" and that "[r]unoff from washing would drain to the LID detention area, where soaps and other potential contaminants would infiltrate, avoiding any release of hazardous substances into the storm water system or on-site wetlands."

This wash water is considered a "waste" under the California Water Code and its discharge through the MS4 is prohibited under the Statewide Permit (Provisions B1-B3, pages 17-18). Because the LID detention area would be hydraulically connected to the MS4 system and waters of the United States via an overflow bypass, the proposed discharge of soap and other potential contaminants from washing activities is possible and must be avoided under all possible conditions. Depending upon the distance between the bottom of the basin and groundwater, infiltration of contaminants could result in discharge of waste to groundwater, which would require Waste Discharge Requirements issued by the Regional Board. Moreover, Humboldt County's own Low Impact Development Stormwater Manual provides that "[w]ashing areas for cars, vehicles, and equipment shall be paved, designed to prevent run-on to or runoff from the area, and plumbed to drain to the sanitary sewer (see PDF page 101/115)." **The Project should be redesigned to incorporate a designated equipment/apparatus/vehicle washing area, as appropriate, that is covered and plumbed to the sanitary sewer** in a manner that ensures contaminants are not mobilized and discharged to the LID basin, the MS4, and waters of the State.

LID Basin Performance

The MND describes a proposal to construct an approximately 4,800 square foot Low Impact Development post-construction stormwater control area that is referred to in the MND as both a retention and detention Basin (LID Basin). The LID Basin is sized to control the 25-year, 24-hour storm, which is a City of Fortuna flood control design standard. The water quality design storm required by the Stormwater Permit is much smaller (85th percentile 24-hour storm runoff event). City of Fortuna staff informed Regional Board staff in a recent meeting that they expect the water quality design volume to always

infiltrate the water quality design storm because the basin would only discharge during the 25-year 24-hour event, giving ample time for the water quality design storm to infiltrate before the LID Basin discharges to the MS4. **The Project proponent must ensure that the LID Basin will consistently provide infiltration at a rate to retain the 25-year 24-hour storm, which necessitates proper characterizing of underlying soils and depth to groundwater**, both of which are important factors that inform the LID Basin's ability to infiltrate the water quality design volume under all conditions.

LID Basin Maintenance

There are some maintenance considerations particularly relevant to very large basins, including the proposed LID Basin. **The Project proponent should evaluate the following maintenance considerations and whether they may affect the ultimate LID Basin design**:

a. Depending upon the drawdown time of the basin, there may be vector concerns with standing water. This should be evaluated to ensure the design would be compliant with requirements of the local Vector Control District.
b. The basin may have relatively steep side slopes. Based upon Regional Water Board staff's prior experience with detention basins in the 90s and early 2000's (when these types of basins were more common), the side slopes and standing water may necessitate fencing around the entire basin perimeter for public safety reasons. The proponent and Lead Agency should evaluate whether such fencing will be necessary.
c. The LID Basin will need regular maintenance to ensure it continues to function as designed. This includes designing adequate maintenance access locations to allow heavy equipment to access the LID basin, as appropriate.
d. The Lead Agency must ensure that there is an appropriate long-term maintenance strategy that guarantees appropriate maintenance and operation of the LID Basin. Proper maintenance includes ensuring that proper vegetation cover is maintained, to maximize the LID Basin's stormwater treatment performance.

Hydrology Impacts

We commend the Project proponent for designing the Project to avoid direct impacts to the existing wetlands. The scope and characteristics of the existing wetlands are supported by direct rainfall as well as upgradient overland and subsurface flow. If any of these supporting hydrologic sources are cut-off from the wetland area, the wetland will necessarily be affected. Similar to cutting-off of hydrologic inputs, there is the possibility that leakage of wetland-supporting groundwater into the adjacent LID Basin could negatively impact wetland hydrology—the applicant must ensure that wetland/LID Basin elevation differentials do not result in loss of wetland hydrology. **The Project proponent must evaluate how and to what degree the proposed development will affect wetland hydrology, including to what degree the proposed Project may diminish the scope or function of the existing wetlands**. The Regional Water Board may require mitigation for any loss of quality or quantity of the existing wetlands as a result of Project implementation.

If the City and Project proponent would like to meet with Regional Board staff to discuss any of these issues, we welcome that opportunity and will make ourselves available.

Thank you,

Brendan Thompson
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The governor of California has issued a statewide shelter in place order due to the COVID-19 emergency. The Water Boards are continuing day-to-day work protecting public health, safety, and the environment. However, most staff are working remotely and we continue to check email and voicemail regularly. Thank you and stay healthy and safe.