

**From:** [Thompson, Brendan@Waterboards](mailto:Thompson, Brendan@Waterboards)  
**Subject:** Water Board April 2 Willits Bypass Inspection Report  
**Date:** Tuesday, April 15, 2014 5:41:00 PM  
**Attachments:** [140415 Inspection Photo Summary Willits Bypass ReducedFileSize.pdf](#)

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Dear Mr. Wright,

Kason Grady and myself, Brendan Thompson, inspected the California Department of Transportation (Caltrans) State Route 101 Willits Bypass Project on April 2, 2014, on behalf of the North Coast Regional Water Quality Control Board. The site visit was conducted on the first day of clear weather after a 6.23-inch rain event that started on 3/25/14 and ended on 4/1/2014.

Inspection participants were: Jayne Nordstrom, and Walt Dragaloski (Caltrans); Philip Lappe (Flatiron); and James Montgomery (Montgomery and Associates).

The site inspection was performed as a routine construction storm water inspection as well as a follow-up to our February 26, 2014, Notice of Violation for turbidity and pH water quality objective exceedences in South Haehl Creek.

Please refer to the attached photo summary. The end of this inspection report includes action items and a deadline for reporting of corrective actions.

The majority of observed pollution prevention measures and operations at the site appeared to be in reaction to failed and or inadequate BMPs, indicating that the initial BMPs established in preparation for the rainy season were inadequate. The magnitude of these "quick-fix" BMPs would likely have been significantly reduced had an appropriate level of pollution prevention measures been in place at the outset of the rainy season (e.g., rolled erosion control products on slopes and disturbed areas, successfully established vegetation on disturbed soil areas, active treatment system(s)). According to Caltrans and Flatiron staff, appropriate erosion controls had not been placed to address site deficiencies by the time we visited because the saturated soil conditions present during the previous months would not allow for the grading and access needed to improve erosion control BMPs.

Observed quick-fix pollution prevention measures included:

- The work site included pervasive, large areas of plastic sheeting covering disturbed soil areas where erosion controls had failed. Plastic sheeting is not a desirable erosion control BMP because it can cause scour along its edges and act like impervious surface by restricting infiltration, and decreasing the hydrograph lag time, and increasing the receiving water erosion potential (for example, see Photos 3 and 14);
- The continuous operation of water trucks to haul turbid storm water to the Willits

Waste Water Treatment facility indicated that existing erosion and sediment controls were not adequate to protect receiving waters from turbid storm water. This use of water trucks is an inefficient and unsustainable pollution prevention strategy and not considered a replacement for effective erosion and sediment controls. This strategy cannot prevent discharges to a significant degree during rain events. Moreover, runoff from the watershed should be delivered to support the beneficial uses of Haehl Creek and not removed from the watershed (for example, see Photo 18);

- There were numerous areas where straw and/or bonded fiber matrix had been applied as an erosion control measure, but those areas had been inundated with water, resulting in a soggy mix of dirt and media, susceptible to erosion and sediment transport (for examples, see Photos 24, 34, 62); and
- Loose gravel was placed around perforated drainage outlet pipes or in paths of concentrated flow immediately upstream of drainage inlets (for example, see photos 32 and 56).

New, "upgraded" pollution prevention measures (as opposed to measures that had been placed subsequent to the early February 2014 rain event) included rock slope protection on the creek bank at the inlet of the South Haehl Creek temporary culvert (see Photo 38) and rock placed as a linear sediment control along the northbound 101 shoulder by the U1 line (see Photo 16).

The following corrective action items were communicated to Flatiron and Caltrans staff at the end of the inspection:

- Install erosion and sediment controls in area immediately south of the Area 2 main access driveway (see Photos 20-23);
- Stabilize various areas that have ineffective, worn, or non-existent erosion controls, such as various areas around Basin 1 (see Photos 33 and 34);
- Clean up and appropriately dispose of hydraulic fluid leak waste, including the perimeter gravel bags (see Photos 69-71);
- Fix erosion and sediment control deficiencies at Pier 4 above Baechtel Creek (see Photo 72);
- Provide perimeter/sediment control at Rutledge Pond (See Photo 68);
- Remove debris from wet area near Rutledge Pond (see Photo 67);
- Provide stabilization and sediment control BMPs in the vicinity of Drainage System 24 (see Photos 40-43);
- Move sampling point for the catchment draining south of abutment 1 to a location upstream of the confluence with water virtually unaffected by construction activities (see Photo 63); and
- Overflow drainage from the "H" line basin appeared to flow uncontrolled to South Haehl Creek. We requested this be addressed. Also, the silt fence just upstream of

where this water would run into South Haehl Creek was worn and in need of replacement (sees Photos 54-55).

Also, additional corrective action items are included in the attached Inspection Photo Summary in Photos 31, 35, 45 and 70.

Please provide a corrective action report, with photographs, not later than Friday, April 25, 2014.

Thank you. Please contact me if you have any questions.

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