Central Valley Regional Water Quality Control Board

11 August 2025

Tia Klumpp
City of Auburn
1225 Lincoln Way
Auburn, CA 95603

Comments to Request for Review for the Initial Study/Mitigated Negative Declaration (IS/MND) for the Auburn Industrial Park Project, SCH# 2025070501, Placer County

Dear Tia Klumpp:

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is a responsible agency under the California Environmental Quality Act for projects that could affect the quality and beneficial uses of waters of the State, including the project area for the proposed Auburn Industrial Park. We have reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) and offer the following comments regarding potential impacts to water quality, hydrology, and associated biological resources.

Our comments are provided pursuant to our responsibilities under the federal Clean Water Act and the Porter-Cologne Water Quality Control Act.

1. Direct Impacts to Waters of the State

The IS/MND correctly identifies a 0.08-acre seasonal wetland within the project's grading footprint. The proposed filling of this feature constitutes a discharge of dredged or fill material to waters of the State.

- **Permitting Requirement:** Please be advised that this activity will require regulatory approval from the Central Valley Water Board. The project proponent must apply for and receive a Clean Water Act Section 401 Water Quality Certification. In the event that federal jurisdiction is not asserted, the project will require Waste Discharge Requirements (WDRs) under the Porter-Cologne Act. We concur that mitigation for the permanent loss of this wetland through an approved in-lieu fee program or mitigation bank is an appropriate mitigation strategy.

2. Construction-Related Impacts to Water Quality
The IS/MND identifies potential water quality impacts from erosion and sedimentation during the construction phase. The project site drains to an unnamed tributary of Auburn Ravine.

- **Permitting Requirement:** As the project will disturb more than one acre of land, the project proponent will be required to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002, the "Construction General Permit"). A crucial component of this permit is the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP), which must detail the Best Management Practices (BMPs) to be used.

3. Post-Construction Stormwater Management and Geotechnical Concerns
The proposed project will create approximately 213,000 square feet of new impervious surfaces and proposes the use of bio-swales and a detention basin to manage post-construction stormwater. We have specific concerns regarding the location and design of this basin.

- **Proximity to Tributary and Potential for Failure:** The proposed location of the detention basin appears to be in close proximity to the unnamed tributary of Auburn Ravine. Given the site's varied topography, a failure of the basin's berm or structure during an extreme storm event could result in a catastrophic release of sediment and urban pollutants directly into this sensitive waterway, causing significant, unmitigated impacts to water quality.

- **Recommendations:** To ensure the protection of water quality as required by the Porter-Cologne Act, we strongly recommend that the final project design and any subsequent permits include the following:

    - **Geotechnical Stability Analysis:** A detailed geotechnical analysis of the proposed basin location to ensure long-term slope and structural stability.

    - **Establishment of a Buffer Zone:** A clearly defined and adequate buffer zone should be established and maintained between the detention basin and the unnamed tributary to provide a measure of protection in the event of a partial failure.

    - **Robust Emergency Overflow Design:** The basin's design must include a well-engineered emergency overflow spillway to safely convey flows from storms that exceed the basin's design capacity, preventing catastrophic failure.

4. Indirect Impacts to Water Quality from Loss of Tree Canopy
The IS/MND notes the removal of a significant number of native oak trees. The beneficial uses for Auburn Ravine and its tributaries include supporting cold freshwater

habitat. The loss of tree canopy adjacent to or upstream of these waterbodies can lead to thermal pollution, a significant water quality impact.

- **Thermal Impacts:** The removal of mature oak trees, including potential legacy oaks that provide significant shade, can reduce the canopy cover over the downstream tributary. This can lead to increased solar radiation reaching the water, raising water temperatures and potentially degrading the cold freshwater habitat necessary for sensitive aquatic species.

- **Recommendations:** We recommend that the CEQA analysis be expanded to include a more detailed discussion of these potential indirect thermal impacts to water quality. Appropriate mitigation could include, but is not limited to:

    - A requirement for the planting of new, strategically placed riparian trees to replace the lost shade canopy.

    - The preservation of significant existing trees that are critical for shading the downstream tributary.

We appreciate the opportunity to provide comments on this project. We are prepared to work with the lead agency and the project proponent to ensure the project complies with all applicable water quality regulations. If you have any questions, please do not hesitate to contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.

Sincerely,



Stephanie Tadlock
Senior Environmental Scientist
Central Valley Regional Water Quality Control Board

cc: State Clearinghouse unit, Governor's Office of Planning and Research
City of Auburn, tklumpp@auburn.ca.gov