

Palmer, Joshua@Waterboards

From: Ronald Otto <rottoophir@gmail.com>
Sent: Monday, June 20, 2016 11:23 AM
To: WB-RB5S-NPDES-Comments
Cc: Richard McHenry CSPA; Thayer, Beth@Waterboards
Subject: Comments to City of Auburn NPDES Permit Renewal, CA0077712

Members of the Central Valley Regional Water Quality Control Board:

Please accept these comments on behalf of the Ophir Area Property Owners Association, Inc., and the Auburn Ravine Preservation Committee.

We are concerned that adequate analyses have not been done related to water-effect ratios for aluminum and hardness dependent metals' reasonable potential analyses, and with use of Effluent Limitations less stringent than in the existing permit (e.g. aluminum, lead, manganese), etc.. For detailed explanations, further discussion and expertise, please refer to comments of this date submitted by the California Sportfishing Protection Alliance.

As the Regional Board is well aware, much of the flow of the Auburn Ravine is at times provided by the discharger's effluent. For Auburn Ravine, as an effluent dominated stream with protected Central Valley steelhead, it was not readily apparent how adoption of less stringent Effluent Limitations is consistent with Endangered Species Act(s) requirements, as well as anti-backsliding and anti-degradation provisions, beneficial uses, etc.. (e.g. Findings: P, O, N, et al.)

In addition, we also ask that you seriously consider directing staff to routinely prepare for lay participants a concise, understandable summary of proposed Permit changes accompanied by explanations as to why this is recommended and justifiable. We trust that you share the goal of allowing the public to make informed decisions in the Permit Renewal process, a process that can profoundly affect their health and well being, as well as vital resources.

Thank you for considering our comments.

Sincerely,

Ronald Otto
Ophir Area Property Owners Association, Inc., and Auburn Ravine Preservation Committee-Chair
PO Box 752
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