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From: Thompson, Brendan@Waterboards <Brendan.Thompson@waterboards.ca.gov>
Sent: Tuesday, August 2, 2022 3:55 PM
To: jlucchesi@ci.yreka.ca.us
Cc: Moore, Heaven@Waterboards; OPR State Clearinghouse
Subject: Yreka Travel Center and Hotel Development--SCH#2022070047

Categories: Purple Category

Governor's Office of Planning & Research

AUG 02 2022

Dear Mr. Lucchesi,

STATE CLEARINGHOUSE

Thank you for providing North Coast Regional Water Quality Control Board (Regional Water Board) staff the opportunity to comment on the City of Yreka's [Draft Initial Study](#) (IS) for the Yreka Travel Center and Hotel Project (Project), which involves construction of an approximately 12,300 square foot building with retail shops, a fuel center, and a 99-space parking lot. The total new impervious surface added would be approximately 29,000 square feet, not counting the unknown square footage associated with the new parking lot. We offer the following IS comments so that appropriate changes may be made to the project early in the planning process.

The City of Yreka 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 Stormwater Permit includes post-construction stormwater management program requirements to control stormwater from new and redeveloped projects within the City's MS4 boundary. Because the Project would create more than 5,000 square feet of impervious surface, the Project must implement Low Impact Development stormwater control measures to control the quality and volume of stormwater runoff from the Project site, as detailed in Stormwater Permit section E.12 (starting page 48).

As noted above, stormwater quality and volume must be controlled using Low Impact Development control measures. To meet the *Maximum Extent Practicable* treatment standard and to comply with the Stormwater Permit Low Impact Development criteria, vegetated, infiltration-based features must be used. The IS notes that "all Project stormwater runoff will be directed to an existing stormwater detention basin located southwest of the site." Detention basins are generally an older stormwater control technology designed to slowly meter water out through a small orifice to meet stormwater volume control goals—they are not designed to meet stormwater treatment goals via infiltration and plant uptake like bioretention basins are—additionally, detention basins are vulnerable to failure because the small orifices are prone to clogging. Bioretention units will meet the City's Low Impact Development stormwater permit requirements, but a detention basin will not.

We recommend the City require either the existing basin be replaced/retrofitted with a bioretention basin or a new bioretention basin be constructed to receive runoff from the Project area. If the City wishes to permit this project using the existing detention basin, then we recommend a meeting with Regional Water Board staff to discuss the proposed BMP design and ensure the City is meeting its MS4 Stormwater Permit requirements.

Thanks again for the opportunity to comment. Feel free to contact me if you wish to discuss.

Brendan Thompson
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