



Terry Tamminen
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

Over 51 Years Serving Coastal Los Angeles and Ventura Counties
Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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Arnold Schwarzenegger
Governor

December 30, 2004

Rene Salas
City of Santa Paula
970 Ventura Street
Santa Paula, CA 93060

RECEIVED
JAN 03 2005
CITY OF SANTA PAULA

Dear Rene Salas,

Re: CEQA Documentation for Project in the Santa Clara Watershed

Santa Paula Water Recycling Facility
SCH No. 2004071038

We appreciate the opportunity to comment on the CEQA documentation for the above-mentioned project. For your information a list of permitting requirements and Regional Board Contacts is provided in Attachment A hereto.

The project site lies in the Santa Clara watershed that was listed as being impaired pursuant to Section 303 (d) of the Clean Water Act. Impairments listed in reaches downstream from the proposed project include nutrients and their effects, salts, coliform bacteria, and historic pesticides. The Los Angeles Regional Water Quality Control Board will be developing Total Maximum Daily Loads (TMDLs) for the watershed, but the proposed project is expected to proceed before applicable TMDLs are adopted. In the interim, the Regional Board must carefully evaluate the potential impacts of new projects that may discharge to impaired waterbodies.

Our review of your documentation shows that it does not include information on how this project will change the loading of these pollutants into the watershed. Please provide the following additional information for both the construction and operational phases of the project.

- For each constituent listed above, please provide an estimate of the concentration (ppb) and load (lbs/day) from non-point and point source discharges.
- Estimates of the amount of additional runoff generated by the project during wet and dry seasons.
- Estimate of the amount of increased or decreased percolation due to the project.

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- Estimates of the net change in cubic feet per second of groundwater and surface water contributions under historic drought conditions (as compiled by local water purveyors, the Department of Water Resources, and others), and 10-year 50-year, and 100-year flood conditions.

The Upper Santa Clara River has been subjected to significant urban development during the past 10 years. Unfortunately very little water quality data has been collected in this area, especially in comparison with data collected in the Lower Santa Clara River.

Additional water quality data are necessary to evaluate the cumulative impacts of past development and predict potential impacts of the subject project. Pollutants of concern include sediment, dissolved oxygen, pesticides, metals, and bioassessment.

If you have any questions please call me at (213) 576 6683.

Sincerely,



Elizabeth Erickson
Associate Geologist, TMDL Unit
Los Angeles Regional Water Quality Control Board

EE

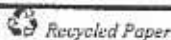
Attachments (1)

cc:

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File

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Revised : March 11, 2004