



California Regional Water Quality Control Board Los Angeles Region



Terry Tamminen
Secretary for
Environmental
Protection

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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ENVIRONMENTAL SERVICES
DEPARTMENT

Arnold Schwarzenegger
Governor
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MARCH 23 AM 11:10

March 16, 2004

Adam Keller
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, CA 93063

Dear Adam Keller,

Re: CEQA Documentation for Project in the Calleguas Watershed

Runkle Canyon Specific Plan Project
SCH No. 2002121143

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 Calleguas watershed that was listed as being impaired pursuant to Section 303 (d) of the Clean Water Act. Constituents causing impairment in the Calleguas watershed include pesticides, metals, nitrogen, sedimentation, algae, salts, and coliform. 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.

1

- 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.

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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:
State Clearinghouse
file

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Runkle Canyon Specific Plan Preliminary Final EIR
March 2004

ATTACHMENT A

- ✓ If the proposed project will result in a discharge of dredge or fill into a surface water (including a dry streambed), and is subject to a federal license or permit, the project may require a *Section 401 Water Quality Certification*, or waiver of *Waste Discharge Requirements*. For further information, please contact:

Valerie Carillo, Nonpoint Source Unit at (213) 576-8759.

- ✓ If the project involves inland disposal of nonhazardous contaminated soils and materials, the proposed project may be subject to *Waste Discharge Requirements*. For further information, please contact:

Rodney Nelson, Landfills Unit, at (213) 620-8119

- ✓ If the overall project area is larger than five acres, the proposed project may be subject to the *State Board's General Construction Activity Storm Water Permit*. For further information, please contact:

Tracy Woods, Statewide General Construction Activity Storm Water Permits at (213) 620-2095. -

- ✓ If the project involves a facility that is proposing to discharge storm water associated with industrial activity (e.g., manufacturing, recycling and transportation facilities, etc.), the facility may be subject to the *State Board's General Industrial Activities Storm Water Permit*. For further information, please contact:

Kristie Chung, Statewide General Industrial Storm Water Permits at (213) 620-2283.

- ✓ If the proposed project involves requirements for new development and construction pertaining to municipal storm water programs, please contact:

Dan Radulescu, Municipal Storm Water Permits, Los Angeles County at (213) 620-2038;
Jeff Mack, Municipal Storm Water Permits, Ventura County at (213) 620-2121.

- ✓ The proposed project also shall comply with the local regulations associated with the applicable *Regional Board stormwater permit*:

Los Angeles County and Co-permittees:
NPDES No. CAS814001
Waste Discharge Requirements Order No. 96-054.

Long Beach County and Co-permittees:
NPDES CAS004003
Waste Discharge Requirements Order No. 99-060.

Ventura County and Co-permittees:
NPDES No. CAS964002
Waste Discharge Requirements Order No. 00-108.

- ✓ If the proposed project involves any construction and/or groundwater dewatering to be discharged to surface waters, the project may be subject to *NPDES/Waste Discharge Requirements*. For further information, please contact:

Augustine Anjileo, General Permitting and Special Projects Unit at (213) 576-6657 (All Region 4 Watersheds).

- ✓ If the proposed project involves any construction and/or groundwater dewatering to be discharged to land or groundwater, the project may be subject to *Waste Discharge Requirements*. For further information, please contact:

Kwang-II Lee, Non-Chapter 15 Unit, at (213) 620-2299 (All Region 4 Watersheds).

Revised : March 11, 2004

Letter 15: California Regional Water Quality Control Board, March 16, 2004

Response to Comment 1

The Runkle Canyon project will not result in significant water quality impacts; including any substantial increase in loading of the pollutant constituents of concern for the Calleguas Creek Watershed identified in this letter. Additionally, all appropriate Best Management Practices "BMPs" are incorporated into the project to minimize changes to surface water quality to the fullest extent feasible. Lastly, because the project will contribute a minimal impact on surface water quality and because of the lack of reliable information on which to base any quantified load estimates on, no estimates are provided. The following paragraphs discuss the pollutants of concern in relation to the proposed Runkle Canyon project.

Pesticides

While pesticides are subject to degradation, they vary in how long they maintain their ability to eradicate pests. Some break down almost immediately into nontoxic by products, while others can remain active for longer periods of time. Pesticides in urban runoff are often at concentrations that are below detection limits for most commercial laboratories; and for this reason there are limited statistically reliable data on pesticide concentrations in urban runoff.

During construction of the project, synthetic organic compounds (such as adhesives, cleaners, sealants and solvents), pesticides, trace metals as well as other waste products (e.g., paint, concrete mix, solid/sanitary wastes) could have the potential to impact surface water quality if contained in runoff from the site. However, with proper implementation of the recommended source-control and structural BMPs, these potential adverse impacts will be prevented. A SWPPP will be developed prior to the construction project and implemented to control construction related impacts from the project. Key elements of the SWPPP will address: source identification, erosion control, stabilization, sediment control, post-construction BMPs and non-storm water management, as well as "good housekeeping"/waste management and control, maintenance, repair training and inspection issues. With the proper implementation of the SWPPPs recommended source control and structural BMPs, no significant impact to surface water quality from construction activities will result.

Minerals, Including Salts, and Nutrients

Minerals, including salts, and nutrients are likely present in runoff in the existing condition due to the fact that soil in the open space areas on the site are currently exposed to the runoff. However these

constituents are most often associated with marine soils and coastal environments, so are not likely to be present in existing runoff from the site in any substantial amount.

Discharge of salts and minerals could increase during construction and dry weather flows. Construction grading and soil disturbance activities could increase sediment, and associated salts and minerals in runoff. However, Implementation of construction BMPs as part of the SWPPP in compliance with the General Construction Activities Permit, including the erosion and sediment control BMPs will mitigate this potential impact to a level of insignificance.

Metals

Over half of the metal load carried in storm water is associated with sediments as metals both absorb to solids, particulate matter (total suspended solids) and become washed off in dissolved form. Galvanized metals, paint or preserved woods may also contain metals that may, if uncontrolled, enter the storm water and impact downstream receiving waters.

Metals typically associated with urban development for residential uses may include heavy metals associated with the design elements and car operations, as well as pesticides used in landscaping operations. During construction of the project, synthetic organic compounds (such as adhesives, cleaners, sealants and solvents), pesticides, trace metals as well as other waste products (e.g., paint, concrete mix, solid/sanitary wastes) could have the potential to create adverse toxic conditions. However with proper implementation of the recommended source-control and structural BMPs, these potential adverse impacts will be prevented.

Sedimentation

During construction activities, pollutant loading in runoff from the site could temporarily increase as a result of soil disturbance and construction operations resulting in sedimentation. Initial clearing and grading operations during construction would expose much of the surface soils and could release these pollutants into site runoff.

During construction of the project, the grading and other soil disturbance activities could, in the absence of appropriate BMPs, potentially cause erosion and sedimentation resulting in a release of suspended or settleable solids. Mitigation measures include BMPs that will prevent a net increase of sediment load in storm water discharge relative to pre-construction levels. Typically, with implementation of project design BMPs, total suspended and dissolved solids are reduced due to the change from open space to

urban use. Sediment control BMPs are recommended at appropriate locations along the site perimeter and at all operational internal inlets to the storm drain system at all times during the rainy season. Sediment control practices may include filtration devices, barriers and/or settling devices.

Nitrogen

Nitrogen is a primary nutrient used for fertilizing new landscape at construction sites. Heavy use of commercial fertilizers can result in discharge of nutrients to water bodies where they may cause excessive algae growth.

In the nitrogen cycle, nitrogen forms in the order of decreasing oxidation state. Nitrates are the most common form of nitrogen in water and are the necessary nutrients for algae and phytoplankton growth. Discharge of nitrates to surface water bodies greatly accelerates the natural process of eutrophication, causing algal blooms, which ultimately lead to depleted oxygen levels and generally poor water quality. With proper implementation of the proposed BMPs, levels of nitrogen would be reduced and controlled.

Human Pathogens (Coliform)

Human pathogens typically are not directly measured in storm water monitoring programs because of the difficulty and expense involved. Unfortunately, most indicators are not very reliable for storm water conditions; in part because storm water tends to mobilize these bacteria from many other non-human sources, many of which include non-pathogenic bacteria.

Typical sources of pathogens in urban storm water runoff include pet wastes, improperly functioning septic tanks, and illicit sewer connections to the storm drain system. Other sources of pathogens are primarily due to non-domestic animal wastes, particularly waterfowl.

The concentrations of pathogens associated the existing condition are difficult to evaluate for a number of reasons. Measurements of indicator organisms are not necessarily reliable indicators of viable pathogenic viruses, bacteria, or protozoa. Moreover, there are numerous sources of pathogens including birds and other wildlife, as well as domesticated animals and pets. Open space areas can potentially have high levels of coliform associated with this type of land use due to wildlife sources, but are typically lower in pathogen concentration than urban land uses.

Typical sources of pathogens in urban storm water runoff include pet wastes, improperly functioning septic tanks, and illicit sewer connections to the storm drain system. Other sources of pathogens are primarily due to non-domestic animal wastes, particularly waterfowl.

The change in concentrations of pathogens associated with development of the site compared to the existing scenario is difficult to evaluate for a number of reasons. Also, because holding times for bacterial samples are necessarily short, most storm water programs do not collect flow-weighted composite samples that potentially could produce reliable statistical estimates of pathogen concentrations. Measurements of indicator organisms are not necessarily reliable indicators of viable pathogenic viruses, bacteria, or protozoa. Moreover, there are numerous sources of pathogens including birds and other wildlife, as well as domesticated animals and pets. Open space can potentially have high levels of coliform associated with this type of land use due to wildlife sources, but are typically lower in pathogen concentration than urban land uses.

The development of the project site would reduce the natural sources of pathogens by reducing use of these areas by wildlife. However, without source control BMPs, development would increase pet waste sources. Septic tanks would not be used in the project and illicit sewer connections would not be permitted, eliminating these typical major urban sources of pathogens in runoff.

While the conversion of open spaces or agriculture to urban development may result in some increase in pathogens levels, the project will require source control and structural BMPs in compliance with the General MS4 Permit and the General Construction Activity Storm Water Permit, all of which would help control coliform levels. These BMPs would include: availability of pet waste collection bags (mutt mitts), distribution of pet waste educational material, adequate connection and maintenance of sanitary sewer lines, and sediment removal BMPs such as water quality basins, as well as maintenance of BMP features for removal of bacteria and all pollutants associated with sediment in the water quality basins. With proper implementation of the recommended BMPs, the post-development bacteria concentrations will likely be significantly reduced.

Implementation of all the mitigation measures outlined in Section 4.7, Hydrology and Water Quality, of the Draft EIR would reduce these potential water quality impacts to less than significant levels.

With mitigation previously listed in Section 4.7, Hydrology & Water Quality, of the Draft EIR, impacts to water quality would be less than significant.

With regard to runoff and net change in surface water generated, a hydrology report has been prepared for the project by Crosby, Mead and Benton titled "Runkle Canyon Drainage Study" dated January 31, 2003. The Runkle Canyon Drainage Study indicates an increase from the existing conditions in surface flow runoff due to the creation of impervious surfaces associated with the proposed residential development. However, the increase in runoff has been mitigated via on-site detention basins and thus has resulted in an actual decrease of the 100 year and 10 year peak flow rate. In the main Runkle Canyon drainage course, the existing condition 100 year peak flow rate (corresponding to a wet season) peak flow rate is calculated to be 1,397 cfs, where as the developed condition peak flow rate is calculated to be 1,309 cfs, thus resulting in a decrease of 88 cfs. The existing condition 10-year peak flow rate (corresponding to a dry season) peak flow rate and the developed condition peak flow rate are calculated to be approximately 874 cfs, thus resulting in no net increase.

With regards to changes in runoff generated during summer months, it can be assumed that an increase in urban nuisance flows will occur due to a source of water being created that is associated with the proposed residential development of the project. It is anticipated that nuisance flows will be present in the developed condition in the form of irrigation runoff as well as hosing activities associated with car washing, cleaning of driveways/walkways, etc. The project would comply with regulations set forth in the applicable MS4 that may or may not allow washing activities as well as meeting potential MS4 criteria applicable to irrigation systems.

The proposed project has been designed to located streets and lots outside of the primary Runkle Canyon drainage course, which contains older alluvium soils that promote storm runoff infiltration and percolation. Instead, the proposed development is located in the moderately-sloping hillside regions of the site that under existing conditions promotes storm runoff to travel down the existing hillsides, limiting opportunities for percolation. Project development will continue to direct storm runoff to the main watercourse, resulting in a no net change to existing groundwater conditions.

Please refer to **Section III, Revised Draft EIR**, of this document to view the revised text.