
North Coast Regional Water Quality Control Board

May 12, 2020

Mr. Jared Hendricks
3121 Michelson Drive, Ste 150
Irvine, CA 92612
jhendricks@cityventures.com

Dear Mr. Hendricks:

Subject: Response to March 23, 2020 Request for Monitoring and Reporting Amendment(s) to Water Code Section 13267 Investigative Order R1-2019-0056 (Order)

File: Fox Hollow, 1615 Fulton Road, City of Santa Rosa, Sonoma County (Site) WDID Nos. 1 49C377076 and 1B16026WNSO

The North Coast Regional Water Quality Control Board (Regional Water Board) received your e-mail dated March 23, 2020 addressed to Joshua Luders, Water Resources Control Engineer for the Regional Water Board. Your message requested three amendments to Directive C Monitoring and one amendment to Directive D Reporting as follows:

1. *"In regards to Directive C Monitoring - "The Discharger shall perform precipitation-based receiving water monitoring for all rain events of 0.1 inches or more"; we would like this amended to 0.5 inches in accordance to what is in the General Construction NPDES permit. To date, we have abided by the 0.1 inch testing requirement and our results or turbidity have been substantially below 250 NTU, which have also been uploaded to SMARTS for review."*
2. *"In regards to Directive C Monitoring - the person that performs the testing being a Qualified Industrial Storm Water Practitioner (QISP); we would ask that this be amended to a Qualified Storm Water Practitioner (QSP) as we are a residential project, not industrial or commercial."*
3. *"In regards to Directive C Monitoring - "The Discharger shall monitor daily during daylight hours seven days a week"; we would like this amended to "The Discharger shall monitor daily during daylight hours five days a week", any soil disturbance work on the site is done Monday through Friday from 7am-5pm. At*

VALERIE L. QUINTO, CHAIR | MATTHIAS ST. JOHN, EXECUTIVE OFFICER

those time we are proactively preparing the site for any predicted rainfall so as to prevent any runoff – our testing has confirmed this. Thus, 7 days/week seems unnecessary.”

4. *“In regards to Directive D Reporting – (1) “Discharger shall submit weekly reports; we would ask that this be amended to reflect that reports shall be submitted every other week. And (2) “Weekly reports are due by 5pm Friday of each week”: we would ask that this be amended to reflect that the reports are due every 2 weeks.”*

The above four requests have been reviewed and we have determined that requests one (1) and four (4) are denied, but requests numbered two (2) and three (3) have been made and are now amended in the Order as follows:

2. It is acceptable that the person performing the testing be either a QISP or a QSP, as long as that person is properly certified, trained, and capable to collect all sample constituents.
3. The Order is revised to reduce monitoring to five days a week during daylight hours. However, monitoring is also required on any weekend day that work occurs on the site.

All other directives, due dates, and provisions in Investigative Order R1-2019-0056 remain the same. As stated in Notifications 1 and 2 in the Order, the Regional Board reserves its rights to take any enforcement action authorized by law. Pursuant to Water Code section 13268, failure to submit the required technical reports as required by the Order or falsifying any information provided therein may result in the imposition of administrative civil liability of up to \$1,000 per violation per day. Should you have any questions, please contact attorney Laura Drabandt at Laura.Drabandt@waterboards.ca.gov.

For technical questions, City Ventures may contact Josh Luders of my staff at Josh.Luders@waterboards.ca.gov or at (707) 576-2551.

Sincerely,

Claudia E. Villacorta, P.E.
Assistant Executive Officer

200512_JAL_er_Fox Hollow 13267 2nd Amendment

cc: Matthew Jansen, matt@cityventures.com
Gary Grimm, ggrimm@garygrimmlaw.com
Phillip Kerr, phil@cityventures.com
Bob Oller, roller@srcity.org
Nick Sudano, NSudano@srcity.org
Josh Luders, Josh.Luders@waterboards.ca.gov
Laura Drabandt, Laura.Drabandt@waterboards.ca.gov
Matthias St. John, Matt.St.John@waterboards.ca.gov
Nathan Jacobsen, Nathan.Jacobsen@waterboards.ca.gov
Diana Henriouille, Diana.Henriouille@waterboards.ca.gov
Heaven Moore, Heaven.Moore@Waterboards.ca.gov
Claudia Villacorta, Claudia.Villacorta@waterboards.ca.gov
Charles Reed, Charles.Reed@waterboards.ca.gov