

Santa Ana Regional Water Quality Control Board

RESPONSE TO COMMENTS

for

**DRAFT CLEANUP AND ABATEMENT AND WATER CODE SECTION 13267 INVESTIGATIVE ORDER
NO. R8-2025-0023**

for

**RAUL AYALA SILVA AND FELIPE DE JESUS ROSALES HERRERA ASSESSOR PARCEL NUMBER
390-290-011, AND RENE AND GAUDENCIA CARDONA ASSESSOR PARCEL NUMBER 390-290-012,
RIVERSIDE COUNTY**

Table 1: Index of Comment Letters Received

Comment Letter Number	Date	Commenter(s)	Affiliation
RA	3/26/2025	Raul Ayala	APN 390-290-011
AC	3/26/2025	Gaudencia Cardona Aldo Cardona Jr.	APN 390-290-012
GGG	3/28/2025	Gabriela Gorgeña Galván	Unaffiliated member of the public

Table 2: Responses to Comments

Comment Number	Comment	Response
RA-1	Action Plan, item 1: Seeing the violations on my property, I am committed to working with Mr. Gonzalez and his supervisor for the benefit of both parties and in compliance with county laws.	The Santa Ana Regional Water Quality Control Board (Santa Ana Water Board) acknowledges the comment and does not have a response.

Comment Number	Comment	Response
RA-2	<p>Action Plan, item 2: Mr. Martinez is cordially assisting me and has contacted one of the engineers on the list provided by Mr. Gonzalez. Engineer Travis J. McGill Director/Biologist ELMT Consulting 2201 N. Grand Avenue #10098 Santa Ana, CA 92711 The intention is for the engineer to provide us with a proposal regarding costs and instructions, and then attach it to my proposal.</p>	<p>The Santa Ana Water Board acknowledges the comment and does not have a response.</p>
RA-3	<p>Action Plan, item 3: The cleanup and abatement. We ask the board of directors, if they can consider me hiring a cleaning company to do this, thus minimizing costs and overall expenses.</p>	<p>The Required Actions section of Draft Cleanup and Abatement and Water Code Section 13267 Investigative Order No. R8-2025-0023 (CAO), outlines the minimum items to be included in the proposed scope of a Restoration and Monitoring Plan. Within the proposed Restoration and Monitoring Plan, the roles and responsibilities may be defined for consideration by the Santa Ana Water Board or its delegated officer.</p>
AC-1	<p>Action Plan, item 1: Seeing the violations on our property, we are committed to working with Mr. Gonzalez and his supervisors for our benefit and complying with the laws of the county, city, etc.</p>	<p>The Santa Ana Water Board acknowledges the comment and does not have a response.</p>

Comment Number	Comment	Response
AC-2	<p>Action Plan, item 2: Mr. Martinez is cordially assisting us and has contacted one of the engineers on the list provided by Mr. Gonzalez. Engineer Travis J. McGill Director/Biologist ELMT Consulting 2201 N. Grand Avenue #10098 Santa Ana, CA 92711 The intention is for the engineer to provide us with a proposal regarding costs and instructions, and then attach it to ours.</p>	<p>The Santa Ana Water Board acknowledges the comment and does not have a response.</p>
AC-3	<p>Action Plan, item 3: The cleanup and abatement. We ask the board of directors, if they can consider hiring a cleaning company to do this, thus minimizing costs and overall expenses.</p>	<p>The Santa Ana Water Boards has received and archived emails and photos of work done on the property documenting trash and debris removal in March 2024. There may be additional debris or deleterious materials to be removed. The Required Actions section of Draft Cleanup and Abatement and Water Code Section 13267 Investigative Order No. R8-2025-0023 (CAO), outlines the minimum items to be included in the proposed scope of a Restoration and Monitoring Plan. Within the proposed Restoration and Monitoring Plan, the roles and responsibilities may be defined for consideration by the Santa Ana Water Board or its delegated officer.</p>
AC-4	<p>Action Plan, item 4: Eventually, we will hire an engineer to survey and mark the exact boundaries of our property to prevent any violations by an owner or a future neighboring owner.</p>	<p>The Santa Ana Water Board acknowledges the comment and does not have a response.</p>

Comment Number	Comment	Response
GGG-1	<p>I have been considering purchasing a property near the affected parcels because I deeply value the natural beauty and tranquility of this area. The untouched landscape, fresh air, and peaceful environment make it an ideal place to live in harmony with nature. However, after learning about the environmental concerns and violations on the neighboring properties, I am concerned about the potential long-term impacts on the land, water quality, and overall ecosystem. I fully support efforts to remediate any damage caused by unpermitted activities, especially those that may have led to pollution or habitat destruction.</p> <p>It is crucial that steps are taken to restore and protect the land so that responsible landowners, like myself and others who cherish nature, can continue to enjoy and preserve this beautiful area.</p>	<p>The Santa Ana Water Board acknowledges the comment. The scope of the Required Actions section in the CAO addresses the concerns of the commentator.</p>

Comment Number	Comment	Response
GGG-2	<p>I recently discovered that my prospective property contains an easement recorded under #88154 (July 5, 1973) for public road purposes, public utility, and public services. Given that this easement is adjacent to the three lots cited in this order, I am particularly concerned about any potential contamination, environmental hazards, or regulatory implications that may affect its use. I would like to understand whether the enforcement of this order will involve remediation efforts extending to the easement and how any related impacts will be addressed.</p>	<p>The environmental impacts addressed in the CAO are contained within the affected parcels. The public road along the easement to the north of the parcels will likely be used for access to the properties by parties associated with the Required Actions contained within the CAO throughout implementation of an approved RMP. The Santa Ana Water Board does not anticipate any restrictions of access or impacts to the easement as a result of implementation of the Required Action contained within the CAO.</p>
GGG-3	<p>Given the proximity of the property I am interested in to the affected parcels, I would like to receive all updates regarding this case, including any enforcement actions, cleanup progress, and ongoing monitoring efforts. Additionally, I would appreciate any information on how future property owners can contribute to maintaining environmental integrity in this region.</p>	<p>Final documents associated with the CAO, including letters from the Santa Ana Water Board to the responsible parties, proposed RMP submittals, an approved RMP, and other technical reports as required by the Required Action section of the CAO, are part of the public record and can be accessed via a Public Records Request. Given the commentor's request to receive these documents, the Santa Ana Water Boards will provide copies of these documents at the request of the interested party.</p>