



January 3, 2024

George Flack, CFO  
Santa Clara Waste Water Co.  
18439 Victoria Bay Drive  
Cornelius, NC 28031

C3 Capital Partners II, L.P.  
1511 Baltimore Avenue, Suite 500  
Kansas City, MO 64108

P.O. Box 5386  
Oxnard, CA 93036

Also Sent by Email to: George Flack; [gflack@epwaste.com](mailto:gflack@epwaste.com)

**Subject: Pending Revocation of Conditional Use Permit**

Santa Clara Waste Water Company  
Conditional Use Permit (CUP) No. 960 and modified by Modification  
No. LU06-0011  
Wastewater Treatment Facility  
815 Mission Rock Road, unincorporated area of Santa Paula  
Assessor's Parcel No.: 099-0-060-565

Dear Mr. Flack and C3 Capital Partners:

This letter follows up on the virtual meeting I had with you and Santa Clara Waste Water's (SCWW) legal counsel, Tom Cohen and Greer Lang, on November 8, 2023, during which I provided notice that, as Planning Director, I intend to request that the Ventura County Board of Supervisors ("Board") formally revoke CUP 960, as modified by Modification No. LU06-0011 (collectively, "CUP LU06-0011"), at an upcoming public hearing. Revocation is proper pursuant to Non-Coastal Zoning Ordinance section 8111-6.2 due to the SCWW's non-use and abandonment of the permit, for being out of compliance with the terms and conditions of the permit, and for the permitted site being used or maintained in violation of various laws and regulations.

During our November 8, 2023, meeting, you and SCWW's other representatives stated that SCWW wished to proactively relinquish the CUP LU06-0011, which would not require a Board action. In response to this information, on November 9, 2023, Planning staff provided Mr. Cohen the necessary form for the permittee-initiated voluntary relinquishment of the CUP. To date, this form has not been returned to the Planning Division. Multiple attempts by the Planning Division to follow up with Mr. Cohen have been unsuccessful, including but not limited to, voice messages left on December 14, 2023, and December 19, 2023. For this reason, the Planning Division will proceed with requesting revocation of the CUP by the Board. This hearing is scheduled to be heard on March 12, 2024.

As a reminder, the SCWW facility is not currently authorized to conduct any further operations under CUP LU06-0011 pursuant to the Planning Director's December 4, 2014 Permit Suspension letter (attached). Furthermore, prior to removing or demolishing any structures or materials from the SCWW facility, a Zoning Clearance from the Planning Division and a Building Permit from the Building and Safety Division are required.

If you have any questions, or if you would like to meet to discuss this letter, please contact me at (805) 654-2481.

Sincerely,

A handwritten signature in blue ink that reads "Dave Ward".

Dave Ward, AICP, Director  
Ventura County Planning Division

Attachments: December 4, 2014 Permit Suspension Letter

C: Tom Cohen, Cohen Land Use Law, LLP via email  
Greer Lang, Lewis Brisbois LLP, via email  
Kim Prillhart, Resource Management Agency (RMA) Director, via email  
Winston Wright, Manager, RMA Planning Division, via email  
Franca Rosengren, Senior Planner, RMA Planning Division, via email

# county of ventura

December 4, 2014

Charles Mundy, General Manager  
Santa Clara Waste Water  
P.O. Box 3239  
Ventura, CA 932006-3239

(Also delivered via e-mail to [scwwgm@dslextreme.com](mailto:scwwgm@dslextreme.com) and fax (805) 525-1756)

**SUBJECT: Santa Clara Waste Water (SCWW) Permit Suspension:**  
Conditional Use Permit (CUP) No. LU06-0011  
815 Mission Rock Rd, Santa Paula, APN: 090-0-060-165

Dear Mr. Mundy:

As part of the investigation of the November 18, 2014 emergency incident at the Santa Clara Waste Water (SCWW) facility, the County of Ventura Planning Division has obtained information that pertains to the feasibility of continued operations under your land use entitlement Conditional Use Permit LU06-0011. The SCWW facility (when in operation) discharges waste fluids through a pipeline connected to the municipal sewage treatment plant operated by the City of Oxnard. The Planning Division was informed this week that SCWW does not possess a current agreement or contract with the City of Oxnard to discharge waste to the City-operated treatment plant. The Planning Division has also been informed that electrical service and water service are not currently available at the site. Further, it is our understanding that the only activities currently taking place at the SCWW facility are related to the incident investigation and site remediation.

Given the above circumstances, the authorization to operate a waste disposal facility pursuant to Conditional Use Permit LU06-0011 is hereby suspended. The facility is not authorized to conduct any further operations under CUP LU06-0011 without express written authorization from the County of Ventura Planning Director.

Reinstatement of CUP LU06-0011 can be considered upon a determination by the Environmental Protection Agency, Regional Water Quality Control Board, County Environmental Health Division, the Air Pollution Control District, the Agricultural Commissioners Office, the City of Oxnard and other applicable agencies that the SCWW facility can be safely operated and that an agreement with the City of Oxnard is in effect that would allow discharge to the City-operated municipal treatment plant.



If you have any questions, or if you would like to meet to discuss this letter in detail, please contact me at (805) 654-2481 or [Kim.Prillhart@ventura.org](mailto:Kim.Prillhart@ventura.org) and I'll arrange a meeting with the appropriate staff.

Sincerely,



Kim L. Prillhart, Director  
Ventura County Planning Division

Cc: Office of Supervisor Kathy Long  
Daniel R. Rydberg - Interim Utilities Director, City of Oxnard  
Chris Stephens - Director, Ventura County Resource Management Agency  
Bill Stratton - Director, Ventura County Environmental Health  
Mark Lorenzen - Fire Chief, Ventura County Fire Department  
Michael Villegas - Air Pollution Control Officer, APCD  
Henry S. Gonzales - Agricultural Commissioner