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Chuck Curtis - Request to participate in hearing as a designated party June 13 - 14, 2012

From: Julie Kyle <gitrdunkyle@msn.com>
To: <lkemper@waterboards.ca.gov>, <kneimeyer@waterboards.ca.gov>
Date: 4/30/2012 1:33 PM
Subject: Request to participate in hearing as a designated party June 13 - 14, 2012

April 30, 2012

Lauri Kemper, Assistant Executive Officer
Regional Water Quality Control Board,
Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Dear Ms. Kemper,

I request to be a participant in the hearings June 13 - June 14, 2012 in regards to the consideration of cleanup and abatement order for County San District 20. Our family farms in the Palmdale and Lancaster areas. For many years we have expressed concerns in regards to the L.A. County San. District 20's water discharge practices from their Palmdale Reclamation plant. Our belief is that the current clean-up practices have not been sufficient to contain the ominous plume lurking in the underground water table. Current maps/pictures show the San. Districts contaminated plume is spreading in a north/west direction, which is in the direction of our farm property. We are gravely concerned the plume is spreading under our property and will continue on to neighboring properties.

We understand the San. District has monitoring wells in place and has pumped in an attempt to rectify their contaminated plume, but the cleanup has not been entirely successful. The maximum allowable contaminated levels have been reached at many of their monitoring wells. However, we are seeing an expansion of said plume. The more appropriate cleanup method would have been to pump and treat the contaminated area and recharge the underground with that treated water. More stringent levels of treatment are necessary to contain the plume, to insure that the underground water table is kept from further damage. The current background nitrate levels that are allowed are at 7 milograms per liter, but we request the background nitrate levels be 2 to 3 milograms per liter, as they are in many other parts of our state. This would be much more in line with the State Water Resource Control Boards Resolution 68-16 which states the "Highest water quality consistent with maximum benefit to the people of the state" should be provided. At some point, public safety and the insurability of clean, uncontaminated water has to become the priority, not just taking the easiest and cheapest cleanup method available.

I also have expressed opposition to sprinkler irrigation of secondary treated water. The airborne pathogens and virus's remain in secondary water. We are not at all secure with windbreaks of trees being used to contain the airborne matter or keeping the off-site migration of effluent drift. We have strong, unforgiving winds in our valley that definitely circulate the spread of pathogens contained in the effluent water applied by sprinkler irrigation.

Our valley has long been entangled in a water adjudication. During this time, the San. District has developed new farmland and is also requesting water rights in the adjudication process. To remedy their contaminated plume, the San. District developed much more farmland than they have ever historically done. This created a new consumptive use of water in a basin that was involved in the adjudication process and also put the county in direct competition with the private sector with their product. The San. District should have, as I said earlier, pumped, treated, and recharged with the water they had available, which would have been a benefit to

the valley. The San. District developed new farm land and now have requested water rights at a time when private citizens are having their historical water rights taken from them.

We want the San. District to be required to appropriately cleanup their contaminated plume. Monitoring wells have to be in place with measurements of the plume depths being measured. We also desire the Sanitation District to provide us with indemnification now and in the future, from the effects of the contaminated plume that was created by mishandling of waste water (ie land spreading of secondary water) by the Sanitation District.

Sincerely,
Julie Kyle
Kyle & Kyle Ranches, Inc.