



Attention Jeannine Townsend, Clerk to the State Water Board:

Originally submitted to Sanitation District Directors, Alternate Directors, and staff on July 23, 2013

RE: Comments: "Santa Clarita Valley Sanitation District Chloride Compliance Facilities Plan and EIR"
(SCH#2012011010)

Dear Directors and Staff,

The Castaic Area Town Council voted unanimously (7-0) on July 17, 2013, to request that certification of the above mentioned EIR be withheld and that the Santa Clarita Valley Sanitation District pursue administrative options to avoid the "chloride tax" costs being passed on to SCV residents and businesses. We also ask that the Sanitation District petition the L.A. Regional Water Quality Control Board to modify deadlines and cancel fines while new information and alternative solutions to the chloride problem are submitted and considered.

In their graphic entitled "Our Choices", only "Adopt a Plan to Comply" was considered by the SCVSD to be a feasible and low risk alternative. We disagree with this limited view, and with the SCV footing the bill (both financially and with our ground water) for upstream sources and downstream "beneficial" users. We find the 100 mg/L legal limit set by the State onerous, and harmful to the future of Santa Clarita growth and prosperity.

Simi Valley sends water on for agriculture uses (often the same crops) at 150 mg/L. Calleguas in Ventura County has a 150 mg/L limit. We recommend the SCV Sanitation District aggressively pursue a higher limit through the following six administrative avenues.

File a lawsuit. There are many such lawsuits in the California Courts today involving the nine California Regional Water Boards. This 100 mg limit is too low, and unfair. Seek relief in the Courts. Pursue "special legislation". Put our representatives to work. This is not even mentioned in the EIR as an alternative.

Create new, accurate chloride TMDL's at the upcoming Tri-Annual Basin Review. Revisit the background/ambient levels collected over the last 50 years. Consider all data sources to set an accurate threshold.

Try this same approach when new permits are obtained during the National Pollution Discharge Elimination System (NPDES) process next year.

Submit a new Sight Specific Objective (SSO) to the LARWQCB. Include technical studies and all data sources. Give it teeth. Model it after successful SSOs (Newhall Land filed one for ammonia, and won!). The previously submitted SSO was ineffective for a reason. Learn from that experience by seeing what works, and model a new SSO accordingly.

And finally (although this might not eliminate the unrealistic strict 100 mg/L level), pursue the Commission on State Mandates Test Claim No.10-TC-09. Let the State pay for the chloride fix they are demanding.

There is time. The temporary limits expire May 4, 2015. Let's find a way to lift this burden from the backs of Santa Clarita taxpayers, and stop the potential harm to new business in the SCV (through exorbitant connection fees) before it's too late.

Please accept these comments. Thanks for your consideration.

Please contact me directly with any questions at (310) 592-4705.

Sincerely,

Flo Lawrence
President
Castaic Area Town Council