

Citizens Coalition of Fillmore
P.O. Box 1082
Fillmore, CA 93016

July 10, 2008

Ms. Tracy Egoscue
Executive Officer
California Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200,
Los Angeles, California 90013

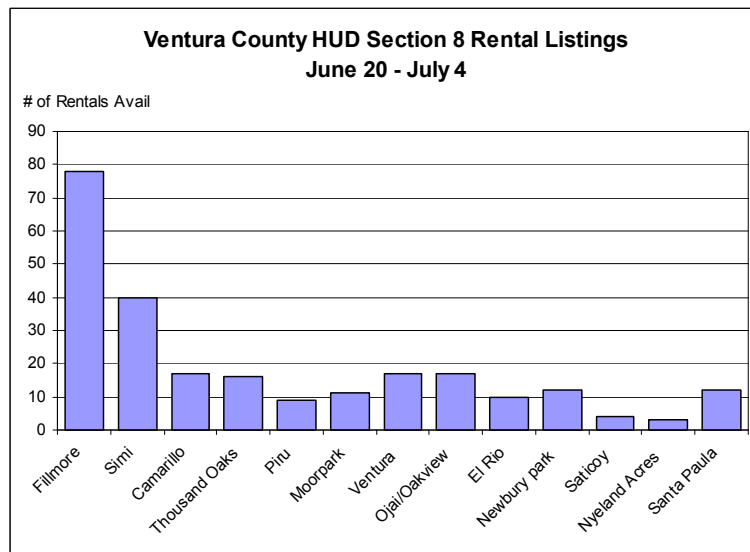
Re: Draft NPDES Permit for Ventura County MS4

Dear Ms. Egoscue,

We represent several citizen groups in Fillmore, California. We are a city of 15,000 in Ventura County.

Our community is very concerned about water quality and we have made efforts to comply with all laws. However, the following issues are a concern.

First, the issue of economics in regards to small communities needs to be addressed. We are currently in the process of building an \$80 million dollar treatment plant and our current sewer rates are \$72 per month. What we have experienced in our community has been a devastating and costly process that has divided the community and will ultimately remove hundreds of millions of discretionary (and not so discretionary) income in the next twenty years.



This chart shows the impact that the sewer bills have had on the City of Fillmore. People are moving away and we now have the highest vacancy rate in Ventura County. This doesn't just reflect the bursting of the housing bubble since other communities are not seeing these vacancy rates.

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Second, the issue of aircraft aerial deposition should be considered. The Fillmore VOR (VHF Omni-directional Radio Range) is the primary navigational aid for air traffic from northern California and the Pacific Northwest heading into Southern California. We are right under and in the path of hundreds of flights daily.

"In highly populated and industrialized regions like Southern California, aerial inputs to terrestrial ecosystems may represent a substantial fraction of the total pollutant loading to watersheds. For example, Stolzenbach et. al, 2001, concluded that for some trace metals, atmospheric deposition is the major contributor to the metal loading in runoff in Southern California."

(http://www.projectcleanwater.org/pdf/aerial_deposition_sum.pdf)

Also, there are about seven lanes of State Highway 126, which, according to Caltrans data, carries 60,000 vehicles, including heavy diesel trucks, per day right through the middle of our city. The exhaust from those vehicles could contribute more metal and grease pollutants than our entire city. Where is the justification for the low income residents to treat this runoff?

In addition, the State's Blue Ribbon panel has concluded that the MAL's are not feasible. Why is the Board pursuing an infeasible permit?

Our small, low income community cannot afford this burden. You can imagine the additional harsh impact that this pending stormwater treatment cost will impose on our citizens.

Due to regulatory burdens the City of Fillmore and its businesses are losing the ability to have a prosperous economic future. Multiply what has happened here to many other small California communities and the entire State's economic future is also diminished.

Where is the environmental justice and where is the funding for these projects? As a country, we are now facing major economic uncertainties and our city's financial existence is already impaired from continuous and unfunded compliance efforts.

Sincere Regards,

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