



February 10, 2014

Ms. Betty Yee
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

Submitted via email: betty.yee@waterboards.ca.gov

SUBJECT: Comment Letter – Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins Regarding the OWTS Implementation Program

Dear Ms. Yee:

On behalf of the Sacramento Area Sewer District (SASD), we are providing comments on the Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins regarding the Onsite Wastewater Treatment System (OWTS) Implementation Program, Draft Staff Report dated December 2013.

SASD provides wastewater collection service to 1.2 million residents throughout the greater Sacramento area. There are approximately 20,000 onsite septic systems in Sacramento County, of which approximately 3,800 are within SASD’s service area. SASD takes its mission seriously in protecting the public health and the environment. To the extent possible, SASD, along with other Sacramento County agencies, continue to facilitate conversion of septic systems to public sewer collection systems when economically and environmentally practicable.

SASD’s primary concern with the proposed amendments is that the draft revised Basin Plan text inadvertently omits reference to “replacement” OWTS. Attachment 1 of the Draft Staff Report, middle of page 1 under the section that begins “Add the following new policy to “Policies and Plans” under the...” indicates that the OWTS Policy only has criteria for new and existing onsite systems.

To correct this omission, SASD’s suggested edits to this section are shown in red underline below:

“The OWTS Policy specifies criteria for existing, replacement, and new onsite systems and establishes a conditional waiver of waste discharge requirements for onsite systems that comply with the policy.”

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10060 Goethe Road
Sacramento, CA 95827-3553

Tel 916.876.6000

Fax 916.876.6160

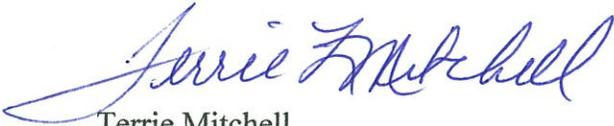
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SASD considers this to be a significant comment that would help clarify the proposed Basin Plan text by correctly identifying the three specific types of septic systems that must comply with the OWTS Policy criteria. This requested change is in accordance with the Draft Staff Report and the OWTS Policy. Both documents, repeatedly refer to onsite septic systems as either existing, replacement, or new.

For example, the OWTS Policy Tier 1 and Tier 2 are specifically for new or replacement OWTS. In addition, several OWTS Policy Sections have specific criteria that only apply to replacement OWTS. One such specific example is Section 9.4.9, which exempts replacement OWTS from connecting to the public sewer if it is within 200 feet, provided that the costs to connect are more than twice the costs to repair the OWTS and the local agency determines that there would be no negative impacts to public health or the environment.

We appreciate the opportunity to provide comments on the proposed amendments to the Sacramento-San Joaquin Basin Plan related to the OWTS Policy. If you have questions or comments regarding the items above, please contact me at (916) 876-6092 or MitchellT@sacsewer.com or Nanette Bailey at (916) 876-4003 or BaileyN@sacsewer.com.

Sincerely,



Terrie Mitchell
Manager, Legislative and Regulatory Affairs

cc: Prabhakar Somavarapu, District Engineer
Christoph Dobson, Director of Policy and Planning
Rosemary Clark, Director of Operations
Roy Carlson, Senior Civil Engineer
Lysa Voight, Senior Civil Engineer
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