

LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION

To: Clerk of the Bd. - SWRCB - commentletters@waterboards.ca.gov

From: Chuck Bell, Pres.
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#21

Date: 5/2/12

Re: Opposition to SWRCB's Final Draft Septic Tank Policy (OWTS)

1 → There is no scientific basis to limit new or replacement septic systems to a minimum of 2 1/2 acre parcels - especially with the great majority of rural parcels neither overlying "impaired" groundwater nor adjacent to "impaired" surface water bodies. USGS and WRQCB criteria/requirements for functional - non-polluting septic systems allow them on 1/2 acre parcels.

This policy - with no documented environmental benefit - would have a devastating land-use/economic effect on rural areas (ie: Lucerne Valley) where centralized sewage treatment systems don't exist and would never be economically viable. It is nothing more than just another State "backdoor" mandate to force California's population into "politically correct" urban settings. It's the rural areas that produce the food/fiber/minerals that urbanites demand. Bottom-line: It constitutes a property right "taking" for no legitimate reason - denying residential, etc. land-uses on non-sewered parcels for those who own property zoned for less than 2 1/2 acres - not yet subdivided - but purchased for that purpose.

"Local Agency Management Programs" - to provide exemptions from said Policy - would just result in more unnecessary bureaucracies (assuming they would ever get implemented - let alone approved by the SWRCB) - just another unfunded imposition on already stressed local governments.

We also strongly support Mojave Water Agency's Resolution # 949-12 in opposition to this Policy.