

EAGLE'S NEST OWNERS ASSOCIATION

**W. David Wardall
17069 Lambert Road
Ione, CA 95640**

May 1, 2012

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State Water Quality Control Board
1001 I street
Sacramento, CA 95814

RE:

1. Comments on Proposed Draft Policy for Water Quality Control for Siting, Design, Operation, and Management of Onsite Wastewater Treatment Systems
2. Order No. 97-10-DWQ
3. Order No. 97-10-DWQ-R5039 Eagle's Nest Community Leachfield System
4. Central Valley Region letter dated 18 November 2003

Members of the State Water Quality Control Board and Staff:

My name is David Wardall; I am a retired aerospace engineer with extensive civil engineering experience. Several pilots and I purchased 680 acres and built a common runway and community sewage disposal system. The system was constructed by the property owners to approved plans by both Amador County and the Amador Water Agency. Our community sewage disposal system includes owner maintained septic tanks and a common community leach field. The property owners perform all major maintenance on the field at our expense (this is outside of the monthly fees paid to the Water Agency). Our sewage disposal system serves 14 40-acre parcels with one house per parcel. There are currently eight houses on the 680 acre airport project. During the last few years, the State Water Quality Control Board instituted new regulations pertaining to small sewage disposal systems. **Our monthly billed operating cost from the Amador Water Agency has gone up 300% due to your overbearing and unreasonable regulations. Our monthly sewer rates have increased from \$30/month to \$95/month. I have had many meetings and discussions with the Amador Water Agency inquiring as to why the leach field rates have tripled. Keep in mind, each owner also maintains his/her septic tank and pump system at the homeowner's expense. The Amador Water Agency explained that your recent revised regulations require extensive (weekly or more frequently) monitoring of the leach field and lots of reports that consume excessive staff time. In the past an Amador Water Agency technician would visit the leach field every month. Further, we recently learned that the State Water Quality Control Board initiated charges/taxes/fees for their service. This action amounts to legalized extortion. You do not inspect the site, you do not review the weekly/monthly and annual reports, they are merely filed in case a future problem arises. The only thing we are left with is extreme overbearing rules and regulations that perpetuate an out of control government agency trying to justify its existence. The burden of the costs for inspecting, monitoring and preparing reports has now increased the annual Amador Water Agency labor hours from 86 hours per year to 260.13 hours per year for our leach field. This is a 302% increase in labor. Further, your reporting requirements require a licensed geologist to certify many of the reports - who pays for all these pie in the sky reports? The eight lot owners with connected septic tanks to our leach field pay all these out of control costs plus your annual "fees".**

Please take into account the repercussions to homeowners with your ever expanding rules and regulations. We all want a clean environment and we work hard to keep our project clean. **Your current regulations need to be reviewed and amended to exclude small community leach fields, say less than 25 lots/parcels. The oversight of these small systems should revert to the county and authorized operator/maintainer.**

Our leach field currently only has 8 out of 14 authorized houses using the leach field. The system is well designed and well maintained. **WE ARE ASKING FOR AN EXEMPTION TO THE CURRENT WEEKLY INSPECTIONS AND MONTHLY/SEMIANNUAL AND ANNUAL REPORTS.** This request is justified based on the following facts:

1. There are no perennial streams or creeks within five miles of the property that could/would be contaminated from a spill discharge
2. There are no water supply wells within 2 miles of the leach field
3. All of our domestic water supply is furnished by a 7 mile pipeline from the City of Ione.

BASED ON THE ABOVE FACTS, WE ARE ASKING FOR FAIR AND DUE CONSIDERATION TO IMPLEMENT APPROPRIATE REVISIONS TO EXCLUDE SMALL LEACH FIELDS AT LEAST TWO MILES FROM ANY PERENNIAL STREAM OR CREEK FROM THE CURRENT AND PLANNED EXTREME MONITORING AND REPORTING REQUIREMENTS.

FURTHER, WE ARE ALSO ASKING FOR THE REPEAL OF ANY AND ALL ANNUAL ASSESMENTS/TAXES/FEEES CHARGED TO THE AMADCO WATER AGENCY BY THE STATE WATER QUALITY CONTROL BOARD.



Thank you for the opportunity to comment.

Sincerely,

Handwritten signature of W. David Wardall

W. David Wardall