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April 30, 2012

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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear State Water Resources Control Board,

Please accept this correspondence on behalf of the Homestead Valley Community Council as written comments to the draft State Policy for Water Quality Control for Siting, Design, Operation, and Management of Onsite Wastewater Treatment Systems (OWTS Policy) and a draft Substitute Environmental Document (SED). We understand these are being considered for adoption by the SWRCB at the May 2nd 2012 hearing and June 19th 2012 Adoption Meeting.

Homestead Valley Community Council, also known as HVCC, was formed in 1997 by the four southern California Homestead Valley communities of Yucca Mesa, Flamingo Heights, Landers, and Johnson Valley in the high desert of San Bernardino County. HVCC is comprised of delegates from each of the four Community Associations in a collaborative effort to address larger matters of mutual interest to our county, state, and federal lawmakers. Homestead Valley is primarily zoned as Rural Living, and every property eligible for development in Homestead Valley would rely on OWTS systems, or "septic systems" in our case.

On March 20th 2012, SWRCB issued its final draft "*Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems*". Section 7.8 of the policy recommends revising OWTS system regulations. New policy recommendations would change the current minimum **.5 acres per dwelling** requiring septic system waste water disposal to an astounding **2.5 acres per dwelling**.

1 → HVCC strongly opposes any policy revision that would further restrict the rights of property owners to develop their properties in Homestead Valley. The current policy of .5 acres per dwelling has posed no risk to the ground water resources in our area to date. Furthermore there is no data scientific or otherwise that suggests increased septic system use in our area that follows current policy regulations would jeopardize current

1

→ ground water conditions. Therefore it is our view that this policy will impose unnecessary restrictions and hardships upon property owners wishing to develop parcels that would otherwise qualify for septic tank use under current policy.

It is bad enough that rural property owners have recently faced other new restrictions on developing their properties, such as costly hauled water moratoriums that force on-site wells, and requirements to maintain minimum fire protection water reserves. This would simply be one more unnecessary restriction that threatens the rights of those wishing to enjoy the benefits of rural living in California.

We urge the State Water Resources Control Board to reject the new OWTS system regulations being proposed in the policy draft release.

Sincerely,

A handwritten signature in cursive script that reads "Jim Harvey".

Jim Harvey
President, Homestead Valley Community Council