

INTER-CANYON LEAGUE



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

5/3/2012



Channary Leng
Manager, Current & Environmental Planning
OC Planning
300 N. Flower Street, 1st Floor
Santa Ana, CA 92702-4048

This letter is providing comments to the proposed OWTS policies and regulations.

The Inter-Canyon League is a non-profit organization founded in 1969 and located in Silverado, California, the last rural area of Orange County. We are dedicated to disaster relief and preparedness, education, and the preservation and protection of the canyons' unique way of life.

Our membership is alarmed over the impact the new OWTS regulations will have on our canyon communities. A large percentage of our residents are on septic systems, and many are within 600 feet of Silverado Creek, which has been identified as "impaired". We have serious concerns over the following issues:

- 1 → 1. How the determination of "impaired" was decided upon for Silverado Creek, and how it was accurately determined that defective septic systems were the source of any discovered pollutants.
- 2 → 2. How our residents, many of whom are low income and/or impacted by the recent economic downturn, will be able to afford the expensive and continuous testing requirements.
- 3 → 3. How our residents will be able to afford the even more expensive costs of complying with the new regulations, should their systems be found not up to the new standards. Given the high costs, even low interest loans will be unaffordable for many residents.
- 3 → 4. How our county government, also impacted by the recent economic downturn, will be able to enforce these new policies given that the state is not providing the funds to do so (an "unfunded mandate").

Our organization and membership hope you consider these comments and concerns as policies and procedures are being revised.

Sincerely,

Phil McWilliams, President
Inter-Canyon League
PO Box 301
Silverado, CA. 92676