

# JUBILEE MUTUAL WATER COMPANY, INC.

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April 25, 2012

To:

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

## “Comment Letter – OWTS Policy”

The Board of Directors has reviewed the “Final Draft Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems” of March 20, 2012 and wish to submit the following comments regarding this policy.

The first and foremost problem that this water agency has is with section 7.8 regarding the minimum parcel size of 2.5 acres for one single-family dwelling unit. Currently, in San Bernardino County, the minimum parcel size for this is 0.5 acre. The town of Apple Valley and the City of Hesperia were developed long before they became incorporated based on this county policy, which was reinforced with a MOU by Lahontan Regional Water Quality Control Board. This 0.5 acre policy has worked for many decades and we haven't seen evidence that the groundwater in the Mojave Desert has been compromised by this policy to date.

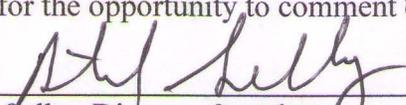
The biggest problem we have with this parcel size is that in our water district we have many 1.25 acre parcels and it would appear that these size parcels would not be allowed to install a OWTS. If this were the case, these property owners would then feel that their parcels could not be buildable and would most likely stop paying the yearly assessments of \$50 per 1.25 acres. This loss of income would have to be passed on to the built-out parcels in a form of higher water rates. This is unfair to the current water users.

Our tract (Russell Tract) is one square mile of 5-acre, 2.5-acre and 1.25 acre parcels and is zoned Single Residential – 1.25-acre minimum. The ability to subdivide a 5-acre parcel to 4-1.25-acre parcels would then be eliminated further bringing the land value down.

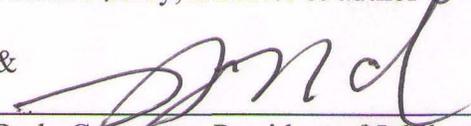
Additionally, the county has had a management program in place for decades that has addressed how and where to install OWTS for any use, especially residential, that has always seemed to work to date. We understand the issue of protecting the groundwater but we feel that the current policies by the county address this issue.

Let it be known that not only do we oppose section 7.8 of the Final Draft Policy but oppose the new policy in general and defer this issue to current county policies.

Thanks for the opportunity to comment on this issue.

  
Richard Selby, Director & author

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Rudy Cervantes, President of Jubilee Mutual Water Company, Inc.