



#23

May 2, 2012

DELIVER VIA EMAIL: commentletters@waterboards.ca.gov

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

Subject: Comments Letter – OWTS Policy

Dear Sir/Madam:

The Hi-Desert Water District respectfully requests you delay the adoption the OWTS Policy until the District can get all the necessary answers to evaluate the impact to the community. Until such time as the District can ensure that there is no significant impact, the District is in opposition to the Policy. The District understands the position that the State Water Resources is in. We understand the impact that septic systems pose on the water quality. Our comments/questions on the draft policy are as follows:

- 1 → 1. How was the minimum lot size of 2.5 acres for a septic system developed?
- 2 → 2. We are currently subject to a septic discharge prohibition to be effective in 2016. How does this impact the current prohibitions?
- 3 → 3. Will resources/grants be available to help communities develop the Local Agency OWTS Management Programs?
 4. Is the State Revolving Fund adequately funded to be able to provide financial assistance for the impact of this provision, in addition to projects currently under application?
 5. The Hi-Desert Water District serves a very disadvantaged community. Additional regulations create a burden on already thin resources.
 6. This policy affects the remaining portions of our community, not subject to the septic discharge prohibitions, that are not located on top of our groundwater basin.
- 4 → 7. There is potential for the elimination of Regional Board (Colorado River Region). We are greatly concerned how reduced access to our Regional Board and their staff would impact the adoption of a Local Agency OWTS Management Program. Due to the potential elimination of the Colorado Regional Board, the District is concerned how and who would implement this in our community.
- 5 → 8. How much is the development and adoption of a Local Agency OWTS Management Program going to cost?
 9. Are there examples of what a typical plan would look like?



5

→ 10. Would the plan need to be supported by scientific studies, groundwater modeling, etc.?

11. What are the criteria for an acceptable plan?

Until we can get satisfactory answers to our questions/concerns that give us assurance that we can mitigate the impact on our community, we ask the State Water Board to not approve the Policy as presented.

Thank you for your consideration. Please feel free to contact me at (760) 228-6267 or email SarannG@hdwd.com.

Sincerely yours,



Sarann Graham
President of the Board of Directors
Hi-Desert Water District

