

May 4, 2012

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 "P" Street, 24th Floor
Sacramento, California 95814

Submitted via email: commentletters@waterboards.ca.gov

SUBJECT: Comment Letter – OWTS Policy

Attention Ms. Townsend:

On behalf of the Sacramento Area Sewer District (SASD), thank you for the opportunity to provide comments regarding the Onsite Wastewater Treatment System Policy (OWTS) and the Substitute Environmental Document, both dated March 20, 2012. SASD provides wastewater collection service to 1.1 million residents throughout the greater Sacramento area. There are over 10,000 onsite septic systems in Sacramento County, of which approximately 3,800 are within SASD's service area.

SASD takes its mission seriously to protect public health and the environment. To the extent possible, SASD, along with other Sacramento County agencies, continue to facilitate conversion of septic systems to public sewer collection systems. In addition, we encourage and support utilization of the public sewers in urban and infill developments.

SASD's main concern with the OWTS Policy relates to mandating requirements for individual property owners to convert or upgrade their systems without adequate funding sources to assist in these efforts.

GENERAL COMMENT REGARDING THE DRAFT OWTS POLICY

Based on SASD's experience with onsite wastewater treatment systems, financial considerations are the primary factor affecting the ability of a property owner to connect to public sewer. Although SASD is prohibited by law from spending ratepayers money to build new collector pipe, SASD offers low-interest loans to facilitate septic conversions. However, the cost to design, construct, or retrofit a new or existing onsite wastewater treatment system is expensive and connecting to public sewer is often even more expensive. For instance, the costs for removal of a septic system and connection to a public sewer system can range from \$21,000 to \$46,000 or more for each property owner. As a result, the added financial burden affects property owners of most income levels. To compound this problem, many existing septic systems are in

Board of Directors

Representing:

County of Sacramento
City of Citrus Heights
City of Elk Grove
City of Folsom
City of Rancho Cordova
City of Sacramento

Stan Dean
District Engineer

Christoph Dobson
Director of Operations

Prabhakar Somavarapu
Director of Policy & Planning

Karen Stoyanowski
Director of Internal Services

Joseph Maestretti
Chief Financial Officer

Claudia Goss
Public Affairs Manager

10060 Goethe Road
Sacramento, CA 95827-3553

Tel 916.876.6000

Fax 916.876.6160

www.sacsewer.com

low income areas. Without the ability to provide property owners with substantial funding sources, other than the State Revolving Fund Loan Program, the proposed OWTS Policy will be difficult to implement.

SPECIFIC COMMENTS TO THE DRAFT OWTS POLICY

1. **Tier 1 – Low Risk New or Replacement OWTS, Page 19, Section 8.1.1:** Minimum OWTS Design and Construction Standards states “*A qualified professional employed by a local agency, while acting in that capacity, may design or review and approve a design for a proposed OWTS.*”
SASD Comment: The OWTS Policy should clarify that it is not giving a qualified professional who designs an OWTS the authority to also approve that design. It would be a conflict of interest for a qualified professional to approve their own design.
2. **Page 33, Section 9.3.3:** The last sentence references 9.3.8, but there is no such section. The section reference needs to be corrected.
3. **Page 40, Section 10.6.9:** Section 10.8 appears to be Section 10.6.9.8. The section numbering needs to be corrected.

SPECIFIC COMMENTS TO THE DRAFT SUBSTITUTE ENVIRONMENTAL DOCUMENT

4. **Page 115, Table 4-12 OWTS Discharge Prohibition Areas:** Under section “Region 5”, it lists the *Courtland Sanitation District*.
SASD Comment: According to our records, SASD (CSD-1 prior to 2008) became the successor in interest to the Courtland Sanitation District (CSD) in early 1995. Table 4-12 should be revised to delete Courtland Sanitation District and refer to the area as “Courtland Area”.

SASD appreciates the opportunity to provide comments on the draft Onsite Wastewater Treatment System Policy Document, and we encourage the SWRCB to ensure that any additional mandated requirements have an equal corresponding environmental benefit. If you have questions or comments regarding the items above, please feel free to contact Nanette Bailey at (916) 876-4003 or BaileyN@sacsewer.com.

Sincerely,



Terrie Mitchell
Manager, Legislative and Regulatory Affairs

NKB:vjb

cc: Stan Dean, District Engineer
Prabhakar Somavarapu, Director of Policy and Planning
Christoph Dobson, Director of Operations
Lysa Voight, Senior Civil Engineer