



State Water Resources Control Board  
ATTN: Jeanine Townsend, Clerk to the State Water Board  
PO Box 100  
Sacramento, CA 95812-2000  
(Sent via email)

**RE: Comment Letter – Yucca Valley Septic Prohibition  
Basin Plan Amendment May 2011**

I am hereby submitting written comments regarding the proposed amendment to the Water Quality Plan for the Colorado River Basin Region to prohibit septic tank discharges in the Town of Yucca Valley. I have not submitted comments previously to the Colorado River Basin Board as I was not able to study all of the “reports” prepared by the Regional Water Board Staff, nor was I available to attend any meetings held by the Colorado River Basin Board.

I will start my comments with a simple, yet flawed, syllogism that summarizes the Colorado River Basin Board and staff findings and conclusions regarding septic discharge in Yucca Valley:

**Septic tank effluent discharge has been found to contain nitrates (NO<sub>3</sub>), TDS, and pathogens;**

**The USGS found groundwater in certain areas of the Town of Yucca Valley to be contaminated with nitrate and other salts that presumably came from septic system discharges;**

**Therefore, all effluent discharges from all septic systems in the Town of Yucca Valley, including those adequately designed, installed, maintained, and functioning septic systems in Phase 3, located miles away from the contaminated groundwater sites, must be prohibited and replaced with an outrageously expensive and unnecessary wastewater collection and treatment system.**

As a homeowner on Piedmont Drive in the Sky Harbor area, just a few hundred feet from the boundaries of Joshua Tree National Park, I find it completely unreasonable and absurd that the Regional Water Board and the all too eager Hi-Desert Water District are proposing to drag the homeowners in Phase 3, especially those in the southern area of Yucca Valley, into this wasteful and unnecessary endeavor.

I have no reason to doubt that the 2003 USGS report did find NO<sub>3</sub> contamination in the ground water beneath the Town in the area corresponding to Phase 1. I am also quite certain that those contaminants came from septic systems near and along the HWY 62 corridor. One only has to drive through this area to see the very high-density housing and commercial activities. It does not take much too reasonably conclude that many of these septic systems were not properly designed, installed, or maintained...for various reasons.

However, an objective and reasonable person would conclude that there is no shred of credible evidence in the staff reports to find that the septic systems in Phase 3 have contributed, are contributing, or will contribute to this contamination. The effluent discharged from my septic systems and those in southern Phase 3 area are simply too small and too far away from the contaminated areas. My home is more than 3.5 miles from the Phase 1 area and Hwy 62.

One only has to drive through the south-east area of Yucca Valley (Joshua Lane, south of San Andreas, south to Black Rock Campground, and south-east to the Carmelita area) to see low-density housing on large lots (most of the lots exceed one acre in area, many are 2 acres or more). In this community, the predominantly owner-occupied household sizes are generally very small. There are many undeveloped lots, and there are thousands of acres of National Park and BLM land that will never be developed. This area is not the source of contamination.

To put an appropriate spin on language used in the staff report summary: septic system failures are not likely to occur if systems are properly designed, installed, and maintained; hydrological conditions are suitable; and/or septic system density is low. That describes the southern area of Phase 3.

What is the logical conclusion? Simply stated, the NO<sub>3</sub> contamination found in the USGS report below the Town of Yucca Valley is the result of failed septic systems in the area corresponding to Phase 1. Therefore, that is where the sewer collection system and treatment facility need to be constructed, not Phase 3.

This is where the justification for this large regional waste water system, by the Colorado River Basin Board and the empire-building HDWD, just does not hold water. We all know why Phase 3 is being dragged into this – to subsidize the cost of Phase 1 and Phase II. This is especially relevant given the ever increasing cost estimates being reported by the HDWD for the project during a time of declining government assistance for such projects. It is clear that this ridiculous and unnecessary regional waste water system proposal is being fully-supported by the greedy developers, land owners, realtors, and contractors in the area, as well as unscrupulous civil engineering firms that stand to make millions of dollars for planning, design, and construction management.

**Let the record show that I want safe drinking water, and I support all valid and cost-effective measures to improve water quality in the Yucca Valley area. But I do not and will not support a wasteful and unnecessary project to be subsidized by those that have neither caused the problem nor will benefit from the proposed solution.**

Sincerely,

John Thurman  
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