



SAN JOAQUIN FARM BUREAU FEDERATION

MEETING TODAY'S CHALLENGES / PLANNING FOR TOMORROW

Mr. Charlie Hoppin
Chairman
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Submitted Via Email: owts_commentletters@waterboards.ca.gov

RE: Comments on the OWTS Policy Development

Mr. Hoppin:

The new draft OWTS policy reflects much of the public concerns expressed in your initial draft. We previously commented on the initial selection of sites for the public workshops and never received word from our October 3 letter requesting, at the very least, a webcast of one of these workshops. While we do appreciate the efforts your staff has made to include a more realistic and more locally controlled perspective, we are still frustrated with the level of communication that has occurred with this new policy approach.

The intent behind most provisions seems reasonable; however, we are not confident in the language as written, should it be adopted without further clarification. In fact, many confusing sentences in the draft policy make it difficult for us to comment. This is most pronounced in the Tier 3 provisions.

For example, Sec.10.0 authorizes local agencies to implement Advanced Protection Management Programs without requiring them to enforce it upon existing OWTS. Yet, Sec. 10.2 requires existing OWTS to comply with certain enhanced requirements. Another minor example is Table 1 of Tier 1. Tier 1, as we understand, can exist where there is no Tier 2 local program. But the Table 1 shows as the minimum depth to groundwater for the two extreme percolation rates, "only as authorized in a Tier 2 program." A larger issue is that the Tier 3 presupposes that TMDL will be completed in five years, or the local authorities will prepare and implement Advanced Protection Management Programs. What happens if neither of the two is completed due to budgetary constraints and prolonged public dialogues?

Another major problem is the implied dependence on hookups to sewer systems as the ultimate solution (cf. Sec. 10.5 and Attachment 1). Many owners of OWTS, would welcome an opportunity to hook up to a sewer system. However, the reality is that it is impractical at best. Unless the Board exerts an extraordinary influence on the local political priorities, this option may remain remote.

In conclusion, we would request a written response to our concerns in addition to a more inclusive dialogue between the Board on this policy as it continues to be developed. Should you have any questions, please contact our staff member Katie Patterson at: 209-931-4931 or kpatterson@sjfb.org.

Sincerely,

A handwritten signature in black ink, appearing to be 'BF' with a large flourish underneath.

Bruce Fry
President