



November 4, 2011

State Water Resources Control Board
Division of Water Quality
OWTS Policy
Sacramento, CA 95814
Emailed to: owts_commentletters@waterboards.ca.gov

Re: Comment Letter - OWTS Policy Scoping Document

Dear State Water Board Members and Staff:

The Western Manufactured Housing Communities Association (WMA), the statewide trade association representing mobilehome parks in California, is pleased to submit our comments on the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (Policy) dated September 30, 2011. WMA represents over 1700 mobilehome park owners in the State of California. There are over 4600 mobilehome parks in California. Mobilehome parks in California are regulated by the Department of Housing and Community Development.

Many mobilehome parks are located in areas where rent control has existed for over 30 years and many of those ordinances employ full vacancy control, meaning the rent does not increase upon turnover of the space, and do not allow for pass-through of capital improvements. A new septic system would fall under the category of capital improvements. Since the proposed regulations require replacement of septic systems near water bodies that are polluted or impaired, it is going to be very difficult for those smaller, less affluent parks to afford the replacement of a septic system. We respectfully request that the State Water Resources Control Board provide a mechanism whereby qualified mobilehome park owners can apply for grants or financial assistance if it is determined, due to these new policies and requirements, the septic system needs to be replaced.

In addition, we urge the State Water Resources Control Board to provide some incentive for local sewer and water agencies to allow those homeowners, businesses and mobilehome parks who remain on septic tanks to affordably convert to the municipal sewer system. The cost to transition to municipal sewer is prohibitive for many who remain on septic, even though they would like to transition to the sewer systems. In some instances I have heard that it can be more than \$10,000 per space for a mobilehome park to transition to sewer from septic. This is simply not affordable for most park owners who are facing increased vacancies due to the current economy and additional financial outlays due to new state, local governmental requirements or regulations.

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Mobilehome parks provide an excellent, affordable, unsubsidized housing and in order to continue this service, we need the State Water Resources Board to realize that compliance with these new septic regulations will be unaffordable for many park owners currently on septic systems near the waterways that are polluted or impaired.

Thank you for considering our views on this proposed policy.

Very truly yours,



Sheila S. Dey
Executive Director, WMA

cc: WMA Board of Directors