

commentletters - Comment Letter–OWTS Policy due 5.4.2012 Noon

From: Joyce Dillard <dillardjoyce@yahoo.com>
To: SWRCB <commentletters@waterboards.ca.gov>
Date: 5/4/2012 11:56 AM
Subject: Comment Letter–OWTS Policy due 5.4.2012 Noon

#62

The SED Substitute Environmental Document uses old information such as 1990 census figures when 2010 census figures are available. That is a 20 year differential. ← 1

You also have projected numbers in:

Table 4-6: Projected Housing Units with OWTS in 2008 and 2013

These numbers are based on old census data also. ← 2

You do not incorporate Metropolitan Planning Organizations MPO projections derived from Sustainable Communities Strategies. Many of these new policies are concentrated on Multi-Family Unit Dwellings which would drive projections downward. Regional Housing Needs Assessments would also reflect this change. ← 3

Has the Integrated Approach for Sustainable Development on Alluvial Fans (Integrated Approach) been incorporated into this policy. Changes in Land Use based on this approach would also drive projections downward. ← 4

Omitted is reference to AB 162 Wolk and the 200 year floodplain consideration for the Land Use, Conservation, Safety, and Housing Elements of General Plans. ← 5

You do not reflect the USEPA current TMDLs in the SED. ← 6

Did you take into consideration the changes in the Building Code. ← 7

This policy assumes an increase of unit. Without a current approach to actual use or consideration of a potential decrease of use because of new laws and regulations, does this policy contribute to the solution of a pollutant problem. ← 8

This policy fulfills a state mandate but how will it be funded. ← 9

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031