

From: Anne Norment <mex2011@yahoo.com>
To: Roger Briggs <rbriggs@waterboards.ca.gov>, <smarks@waterboards.ca.gov>
Date: 4/4/2008 5:53:40 PM
Subject: Basin Plan Amendments R3-2008-0005 and -0006-- please confirm email received

Dear Mr. Briggs and Ms. Marks,

Please consider the following comments regarding proposed Basin Plan Amendment R3-2008-0005, R3-2008-0006 and associated attachments. I understand that these comments will be considered by staff in drafting the proposed amendment that would be presented to the RWQCB in San Luis Obispo on May 9, 2008 as they have been received by the April 7 deadline for written comments. Please confirm that you have received this email.

I appreciate your work to amend the basin plan, adding clarifying language as well as encouraging the implementation of onsite wastewater management plans. Please consider the following as constructive input for R3-2008-0005.

1) Adoption of onsite plans will have a significant impact on large numbers of citizens in the central coast area. Although notices were posted in the newspaper, this is inadequate for such an important and complex document- many people, myself included, do not receive the local paper, getting news online. I strongly encourage you to delay finalizing your draft until citizens are more widely noticed so as to allow proper opportunity for public comment. I have not had time to fully digest changes proposed in your draft document but need to get these to you by the April 7 deadline. A lay synopsis of implications of these proposed changes for individual citizens should also be drafted, noticed and made available. I do not understand the implications of many of your proposed changes. ①

2) I very much appreciate that you have included language emphasizing the role of on site wastewater districts in water conservation. This is of particular importance in Los Osos, which as you know has a level III water severity shortage with little coordinated government action to encourage substantive water conservation measures. I applaud recommendations in section VIII.D.2.F, especially the use of metering and water use costs to encourage conservation. I would like to see language to encourage water conservation strengthened. ②

3) It is unclear which government entity (county, community services districts etc.) is responsible for development of the onsite wastewater management plans. Perhaps this has contributed to delay in implementing such plans thus far. I encourage you to add further clarification to insure timely implementation. It would be optimal for this to occur at the County level to achieve more consistency within a region, and allow for greater staff resources to be dedicated to implement such important programs, including emphasis on water conservation. Time/budget resources of the Los Osos CSD are particularly tight. Since SLO County is presently responsible for developing the wastewater project in Los Osos, it seems logical to have the county take on this responsibility as well. This would also add consistency with R3-2008-0006 in that county government would serve as the local permitting agency. ③

4) The evaluation of environmental impacts check list needs to be adjusted as follows: The amendment has potentially significant impact on 8b- potential to substantially deplete groundwater supplies or interfere with groundwater recharge. Septic tanks allow for groundwater recharge in Los Osos. This has clearly been stated by SLO county staff as a consideration for recharge plans with the LOWWP. Septic maintenance plans will affect tank pumping, in some cases resulting in construction of new leach fields etc. and in this way will impact local recharge. This amendment may also significantly impact 12b displacement of housing, 12c, displacement of people should repairs be mandated for a given system. ④

5) I encourage amendment of section VIII.D.2.g.3 onsite wastewater system prohibition areas to delete the section regarding the Prohibition Zone boundary in Los Osos. Areas of discharge prohibition in Los Osos/Baywood Park should be based on updated scientific information. This is of particular significance given the recent understanding that the town of Morro Bay has 3X higher nitrate levels in groundwater likely due to leakage of raw sewage from sewer pipes. I realize this is a controversial request, but important given swift movement of SLO county to develop the LOWWP. It would be best to develop a system that is based on updated information, not the outdated prohibition zone boundary, which also creates environmental justice issues. NA

6) Please adjust language regarding prohibited discharge in VIII.D.2.g. It does not make sense to prohibit discharge of clean water, if this were the effluent of onsite system or community disposal systems NA

that could achieve very high purification standards. This may clarify matters for the LOWWP, as groundwater recharge by treated effluent must be part of the project.

7) Consider adding language to clarify goals for onsite wastewater management plans in wastewater system prohibition areas while wastewater systems are in development. (5)

For R3-20058-0006

- 1) Comments above on noticing of citizens with a lay explanation of this document apply.
- 2) Points 7 and 22 appear to be identical.
- 3) If possible, include language so that agencies receiving MOUs are the same agencies that would implement waste water management plans as per -0005 above.

If you have questions/comments please do not hesitate to contact me. I would also appreciate your input if you believe I have misread the document. If you plan to integrate some of my comments, this would also be helpful. I plan to attend the May 9 hearing.

Sincerely,
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