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**To:** Roger Briggs <rbriggs@waterboards.ca.gov>, <smarks@waterboards.ca.gov>  
**Date:** 4/7/2008 5:02:34 PM  
**Subject:** Basin Plan amendments - comments

Please include these comments in considering your amendments to the basin plan.

From a practical standpoint I highly encourage the RWQCB to gather and include input from field professionals who install, maintain and repair on site systems. No doubt trained engineers within the government and those in private industry bring a great deal to the table. However, having those individuals with years of experience (especially in unique watersheds, soil conditions etc.) whom run the pumps, excavators etc. who have seen reoccurring problems with leach fields/pits etc. can bring valuable, practical problem solving knowledge to the process. Perhaps you have already surveyed this group. (1)

The need for a single government entity to have authority in the on site management plan is important. Please consider which entities are most qualified and equipped. In my limited observations I feel the county (SLO) would be better than a local CSD. It appears that some of the CSD's may be underfunded, understaffed and in general lack the resources to oversee any significant quantities of on site systems. Please clarify or provide some guidelines or qualifications needed by a government entity to qualify for management responsibility. (2)

Point 4 in the Resolution R3-2008-0005, to be signed by Roger Briggs, states that "Due to limited nature of the proposed revisions... additional external scientific review of these proposed revisions is not required." Some items in the Basin Plan are controversial. For example the prohibition zone in Los Osos is highly controversial. Many feel it is based upon outdated and perhaps flawed data. Having external scientific review and confirmation, it seems, would in the long run help streamline much of the Boards actions. (3)

In Chapter 4, VIII.D., page 1, paragraph on Subsurface disposal 'developments are subject to criteria in this section...' are deleted. Perhaps leaving this language would allow more flexibility for the board to enforce and allow waivers. I am puzzled by its deletion. (4)

Chapter 4, VIII.D.1, last paragraph related to hydraulic load and failure of system is deleted. Any suggestions and options presented to help on site systems perform better is needed. Any language that encourages and leads to water conservation is needed. Why eliminate corrective actions? (4)

It appears some information is deleted that would be helpful, such as Chapter 4, page 4. Periodically mailing homeowners brochures reminding them how to maintain their on site system seems like a good idea. The staff reports table on justifications (p.4) of proposed revisions states.. ' Revised format will provide for easily identifiable criteria for existing on site systems.' This does not seem to be the case. (4)

Chapter 4, page 12, VIII.D.2.g.3 As stated above... The prohibition zone in Los Osos is a very controversial "zone". There are many issues surrounding this controversial zone. Deleting or updating the boundary line based upon recent objective science is needed. (5)

Also, perhaps a clearer definition, or some guidelines on different types of discharges. It seems a discharge of drinking quality water should be allowed where as high nitrate discharge of course should not be allowed. Clearer definition delineating discharge standards may be helpful. (5)

There may come a time in the near future when we all want clean discharge in order to recharge aquifers. Homes that have systems of collecting rainwater off of roofs to discharge into a basin (as opposed to storm runoff) may be needed. (5)

Who is responsible for protecting the adequate recharge of a basin in order to stop saltwater intrusion? Is saltwater not as damaging or perhaps more harmful to our clean drinking waters than other low level contaminants? (6)

In the document in different locations some prohibitions and exceptions are required to have the Water Board Executive Officers approval. Perhaps a board approval or a committee approval would be more appropriate. (7)

I do like and encourage as much language as possible to encourage water conservation. The public needs to hear this message from every agency dealing with water.

Certainly you are aware that many of the people providing comments are not engineers and are likely not familiar with water codes and/or on site systems. Perhaps a page or two explaining in non technical language why these changes are being pursued would be helpful. Addressing every line item or paragraph may be unnecessary or an inefficient use of staffs time but a page highlighting in simple complete language the most important points would be helpful and perhaps eliminate some un-educated comments. I did read the seven page staff report following Mr. Briggs' letter. It was helpful. Perhaps a clearer expansion of the 'proposed revisions' section/table is needed. (8)

You may want to consider delaying any final decisions and offering an opportunity of some sort for the general public to become more educated and/or up to speed on the most important issues and thereby receive more valuable public input. (9)

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