

**From:** Oasis Design <oasis@oasisdesign.net>  
**To:** <smarks@waterboards.ca.gov>  
**Date:** 4/7/2008 4:57:51 PM  
**Subject:** Comment: R3-2008-00005

Re: Proposed Amendment to the Water Quality Control Plan, Central Coast Basin, Resolution No. R3-2008-00005, Revising Criteria for Onsite Wastewater Systems

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Please include a policy supporting decriminalized sustainability research, development, testing, and information exchange of innovative/ alternative wastewater/ nutrient management systems

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Here is sample language:

Experimental Permits for research, development, and testing of alternative/ Innovative systems

To build an official knowledge base for the performance of alternative/ experimental wastewater/ nutrient management systems under local conditions, and to encourage innovation in the development and refinement of future superior best management practice options for the management of wastewater and excreta, the Administrative Authority is encouraged (required?) to grant experimental permits for alternative/ experimental systems.

The permits shall be distributed among the various technological options, soil types, climate zones, etc. in such a way that a wide official knowledge base can be populated with data at minimal risk and maximum reward (for example, a diversity of systems and contexts, followed by more installations of systems that perform well that perform well in a given context).

To receive such a permit, the permittee must:

+submit a credible accounting of how the proposed system promises substantially lower ecological life-cycle impacts than conventional practice for the context

+submit detailed as-built drawings, construction details, use information and photographs sufficient for a knowledgeable person to understand the function of the system and a knowledgeable builder to replicate it.

+describe an acceptable back up plan for installation of conventional treatment should the alternative system fail.

(+sign a release assuming all liability associated with the system, recorded on the deed of the property)

+submit annual performance assessments of the systems for ten years (it is understood that failure is part of progress. Reporting of minor failures will not be prejudicial against the continued use of

the system, provided the failures do not represent a greater danger to public health than the failure of conventional systems, and/or are limited and repairable in nature.)

If the proposed design presents a clear and present danger to public health greater than conventional practice, the permit shall be refused or rescinded.

Thanks for the opportunity to have input.

Yours,

Art Ludwig

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