

March 6, 2019

VIA EMAIL

Brandon Bushnell, EIT
Water Resource Control Engineer
California Regional Water Quality Control Board, San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108

RE: Submission of Written Comments for
Tentative Order No. R9-2019-0013, An Order Rescinding Order No. 94-14
Thousand Trails Operations Holding Company, L. P.
Oakzanita Springs Park

Dear Mr. Bushnell:

On behalf of Thousand Trails Operations Holding Company, L. P. Oakzanita Springs Park ("Oakzanita Springs"), please accept the following comments to the proposed Tentative Order No. R9-2019-0013:

Oakzanita Springs is a small RV park with a total of 148 RV sites: 65 RV sites connected to the Onsite Wastewater Treatment System (OWTS) and 83 RV sites with no sewer service. Annual maximum average daily sewer flow rate is 7,400 gallons per day (gpd), assuming 100% occupancy year-round. 2018 annual average daily sewer flow rate was 4,440 gpd.

As evident by the historical performance of the Oakzanita OWTS (septic tanks and drainfields), there is no adverse impact to the local groundwater and surface water systems. As a result, we propose to continue operating the OWTS under Order No. 94-14 requirements. If the Board wishes to evaluate the impacts to the water resources, it could consider requiring installation of monitoring wells to evaluate the level of groundwater and surface water contamination over a specific period.

Please feel free to contact me with any questions or comments you may have on these issues. I can be reached on my cell phone at (602)388-2347 or email at PengFei_Chao@equitylifestyle.com.

Sincerely,

PengFei Chao, PhD, PE
Principal Engineer
Equity LifeStyle Properties, Inc.

Cc: sandiego@waterboards.ca.gov
Brandon.Bushnell@Waterboards.ca.gov

	Comment	Response
<p>General Comment No. 1 Mr. PengFei Chao P.E., Principle Engineer, Equity LifeStyle Properties, Inc.</p>	<p>Oakzanita Springs is a small RV park with a total of 148 RV sites: 65 RV sites connected to the Onsite Wastewater Treatment System (OWTS) and 83 RV sites with no sewer service. Annual maximum average daily sewer flow rate is 7,400 gallons per day (gpd), assuming 100% occupancy year-round. 2018 annual average daily sewer flow rate was 4,440 gpd.</p> <p>As evident by the historical performance of the Oakzanita OWTS (septic tanks and drain fields), there is no adverse impact to the local groundwater and surface water systems. As a result, we propose to continue operating the OWTS under Order No. 94-14 requirements. If the Board wishes to evaluate the impacts to the water resources, it could consider requiring installation of monitoring wells to evaluate the level of groundwater and surface water contamination over a specific period.</p>	<p>While Mr. Chao is correct there has been no discernable adverse effects to water quality from the OWTS at Oakzanita Springs, Order No. 94-14 is out of date and is not consistent with current regulations and monitoring requirements. The statewide Order WQ 2014-0153-DWQ, <i>General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems</i>, meets the current regulations and monitoring requirements and is being utilized across the state for similar facilities. If Equity LifeStyle Properties (the Discharger) were to install monitoring wells and sample for 8 quarters, they could have the option of requesting reduced monitoring, or reduced monitoring frequency, depending on the results of samples taken from the monitoring wells.</p>