

Comment Letter- R7 OWTS Implementation Program



To: Jennine Townsend, Clerk to the Board
From: Claude Short, Resident, Yucca Valley, Ca.

Jennine,

1. I wish to address section 2.1 of the Water Quality Control Plan for the Colorado River Basin Region which was adopted June 19th, 2012.

The section states:

“All new, replaced, or existing OWTS within an area that is subject to a Basin Plan prohibition of discharges from OWTS, must comply with the prohibition. If the prohibition authorizes discharges under specified conditions, the discharge must comply with those conditions and the applicable provisions of this Policy.”

I suggest that the 1st sentence in that section (All new, replaced, or existing OWTS within an area that is subject to a Basin Plan prohibition of discharges from OWTS, must comply with the prohibition) be amended to read “All new, replaced, or existing OWTS within an area that is subject to a Basin Plan prohibition of discharges from OWTS, must comply with the prohibition, *unless the owner can show that the existing system has been brought up to the standards required by the State Water Quality Control Board.*”

Our area (Yucca Valley) has been placed under a discharge ban that begins to take effect in 2016. It is my understanding that the ban was put in place to protect the groundwater in our basin. If the current systems can be upgraded/replaced with newer systems that meet the latest requirements of the State Board, the purpose of the ban would be met. Our groundwater would be protected.

In addition, the recharge of our groundwater from the *upgraded* systems would be allowed to continue. Our area would not be forced to purchase more State Water than we are already buying.

Our local water district (Hi-Desert Water District) is planning a centralized sewer system. The system that is envisioned would not replenish our aquifer. The discharge from the sewer system is meant to add static pressure that would reduce the loss of our water from the aquifer over the Yucca Barrier. While this is a valid method of conserving SOME water, it would not allow for replenishment of our aquifer. In addition, the recycled water from the sewer system would, itself, be flowing over the Yucca Barrier resulting in a net loss of water in or aquifer.

2. I do not know if these comments (or similar ones) were addressed by the Colorado River Basin Regional Water Board.

3. I did not submit these comments to the Regional Water Board in a timely manner. I was unaware that the amendments to the OWTS policy were being considered. However, I am now aware and would like to submit my comments.

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