

## Summary of Public Comments and Staff Proposed Responses

### Comments of Support

**James Bruvold**, a consulting engineer in Veneta reviewed the GWMA Action Plan draft and wishes to commend the work for being inclusive and comprehensive. He believes this is the type of planning that needs to occur in the context of the Region 2050 Study recently conducted by LCOG to forecast growth over the next 50 years in the Southern Willamette Valley.

**William D Hartford**, of Sherwood, indicated his pleasure that DEQ was going forward with this plan. He worked for DEQ in the 1980s, when nitrate was first being studied. He is sorry that it took so long, but glad it is now happening.

**Catherine Howells**, of Wise Water in Portland, offered several specific comments (see below) but in general, she commented this is a very thorough and thoughtful document and commends the committee for their great work.

*Staff Recommended Response: The GWMA Committee expresses their appreciation for the support offered by these individuals, and for their thoughtful comments.*

### Clarifications, Typos, etc

**Chris Bailey**, Water Quality Control Supervisor for the City of Albany believes the maps in the Action Plan have mislabeled the location of Millersburg.

**Darrin Lane**, RoadMaster for Linn County believes the sentence in the beginning of Chapter 4 should be changed from “The ultimate goal of the Action Plan is to reduce the overall groundwater quality to less than 7 mg/L” to something that reflects improving the overall groundwater quality by reducing the nitrate level to less than 7.0 mg/L.

*Staff Recommended Response: The GWMA Committee thanks Chris Bailey and Darrin Lane for their sharp eyes while reviewing the Action Plan. All maps in the Action Plan that include Millersburg will indicate the correct location for Millersburg. In addition, the first sentence on page 65 (chapter 4) should be changed to read: “The ultimate goal of the Action Plan is to improve the overall groundwater quality, by obtaining a nitrate value of less than 7.0 mg/L.”*

### Specific Comments for Inclusion/Consideration

**Jason Churchill** of Orenco Systems, Inc. in Sutherlin, has asked that any Technical Committee that is formed to make recommendations to the State with

regards to nitrate limits on septic system effluents, understands the importance of a cost-benefit analysis. He emphasized his understanding that nitrate toxicity is not well understood.

*Staff Recommended Response: The GWMA Committee understands that even though there is no strategy that consists of recommending septic system effluent limits to the State, there are actions in the plan that include forming a technical committee to assess the need for changes in the On-Site Rules, and if deemed worthy, to recommend that DEQ amend the Geographic Area Special Standards Consideration rule. The cost-benefit analysis should be considered for inclusion into the goals of the Technical Committee Strategy 4.1 of the Residential Section in Chapter 3.*

*The last sentence of the first action in Strategy 4.1 (on page 41) would be amended to read: ...if the research shows that the proposal is needed and a general assessment of the cost-benefit indicates the additional long and short-term protection of public health and welfare is worth the potential investment.*

**Catherine Howells**, of Wise Water in Portland, recommends that there be an identification of five, small, easily attainable actions for the first year, the last of which would be to plan for the next successes.

Ms. Howells also recommended:

- ◆ Consolidating some Action Plan activities (i.e., community outreach and grant writing)
- ◆ Find local champions to be spokespeople, and involve the community in a dialogue
- ◆ Find agricultural speakers and advocates from those who have implemented Best Management Practices
- ◆ Focus on Coburg
- ◆ Don't focus on new technologies for septic systems, instead try to enhance current management protocols
- ◆ Oregon should consider a mandate that all septic tanks be pumped and inspected at the time of sale
- ◆ Reorganization of some of the plan (without affecting any action)

*Staff Recommended Response: The GWMA Committee is impressed with Ms. Howells apparent understanding of the complexity of addressing the groundwater protection issue, and the challenges of implementing a voluntary plan. A vast number of her suggestions appear to be extremely logical and applicable. Some of these suggestions, such as consolidating certain activities, focusing actions on Coburg and finding local champions will be included in the implementation of the Action Plan. The recommendation for identifying a small number of easily obtainable actions for the first year should be evaluated during the first annual*

*assessment of the Action Plan, especially if the Plan proves to have been too optimistic as written.*

*We do acknowledge the importance of regular maintenance of septic systems. Regular pumping of a septic tank is a very essential activity to assure a long-lived system, but lack of this maintenance does not significantly change the amount of nitrate output. However, the homeowner does benefit by understanding the need for routine care of their system. GWMA Committee also believes the additional reduction of nitrate loading to the groundwater that Alternate Treatment Technologies for septic systems offers is still a viable option for groundwater protection.*

*While the GWMA Committee cannot speak for the State of Oregon, during the last revision of the On-site rules there was a consideration of requiring septic system inspection at the time of real estate sale. This particular item was not a part of the final rule. There is a strategy in the GWMA Action plan that consists of forming a technical committee to assess the need for changes in the On-Site Rules. This option for the pumping of and an inspection of the septic system at time of transfer should be considered by this technical committee when assessing the GWMA needs for a revision of the On-Site Rules.*