

11/25/2018



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**San Joaquin River Club Inc**  
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Tracy Ca 95304

System 3910018

State Water Resource Control Board  
P O Box 100  
Sacramento Ca. 95812

Subject: Proposed revised POU/POE Regulations.

To whom it may concern,

San Joaquin River Club is a small DAC water system consisting of 423 service connections we would like to offer the following comments on the proposed revised regulations.

**Ownership:**

Our water system is member owned, we are trying with slow progress to apply for grant funding it replace and aged distribution system. We have no employees to monitor systems inside private homes. After reviewing 20% of our member hip and our Board of Directors, the general comment is "That is a potential invasion of personal property an they do not want anything to do with that system. Our boards concern is where is the money going to come from and how much liability is associated with a representative of our community entering some one's private residence.

A common question is "Do the people that wrote this proposal want someone monitoring inside their home?"

**Mechanical Warning:**

On some research we are not finding technology available to perform this task.

**Disconnection of Service:**

On discussion with attorney this is not feasible without the State or some other governing body assuming liabilities. Couple this with the fact that up to 30% of our residences do not have shut off valves.(Hence the application to rebuild our aging distribution system.

**Schedule of centralized system:**

When the MCL for Chrome 6 was lowered to 10PPB San Joaquin River Club Inc was forced via a compliance order to apply for grant funding. Part of that application required us to engage an engineer to complete required application. This was done at a cost of \$23,000. Which we understood would be paid from funding. To date we are having to pay engineering fee's and ar waiting on State funding which is proceeding at a less than acceptable time frame.

**12 Month Evaluation & Annual Testing:**

Without Human resources and available cash flow we are not currently able to comply with these revised POU/POE regulations. And feel in there entirety they are unsound and unreasonable and put unreasonable demands on our already overburdened water system.

We understand and are committed to the need for reasonable and attainable regulations to support the water safety of our 744 citizens. It appears after reading the proposed revision there has been little or no input from small water systems.

Concerns,



Sam Hedge  
Water & Wells Chair (Water Distribution Operator)  
San Joaquin River Club Inc

CC: BOD