

Public Comments Received for the Proposed Revised Resolution and Policy for Permitting Requirements for the Indian Hills - Parmalee Area

*Grammatical errors and misspelling were intentionally left in the comments to not change the comments submitted.

	Date received	Public Comment
1	8/19/2021 1 10:22	Concerning the draft policy proposal for the Indian Hills Area. Failure to equally apply the scientific methods that Jefferson County Board of Health PROMISED and PREACHED would be followed to the entire area of Indian Hills Parmalee Gulch basin. This was requested by the Board of Health. Not selected areas. To prevent further groundwater contamination for all of our community is a failure to protect the property owners and residents of the Parmalee Gulch drainage. So based on the science based approach is only valid in the prohibition area and upslope of those undeveloped lots? Lots outside this prohibition area are not subject to the science based data? This makes absolutely no sense. The science only works where the Jefferson County Board Staff seems it should? Apply the science to the entire area. If I and others are wrong on this point we need a complete and thorough understanding why this is. This policy as drafted is not in the best interest of our community, our health and sustainable growth. Science-based approach in Attachment B Table 1 must be applied to all of Indian Hills / Parmalee Gulch and not just to a few selected lots. As drafted the intent is just for the prohibition areas. WHY? Residents of the Parmalee Gulch area have been expressing and presenting many science based studies and data for decade's yes decades. I cannot support this proposal as written. It will not protect our water shed and the property owners and residents. In earlier discussions the representatives and employees promised to include the community in a proposal. I ask and have not heard anything. Jim Rada stated that a public information session will be held. This was said with the caveat "It will be towards the end of the public comment period." If you had the residents best interest you would have presented at draft rollout. We the people of Indian Hills are the Stakeholders and we must protect our water resources and community. Thank You
2	9/8/2021 14:49	We need to protect and preserve our groundwater, regardless of "politics." It is not acceptable to have a policy that protects only a small portion of the community from over-development and over-pollution with sewage. We need to ensure that proper limits are put into place across the board for the entire IH and Parmalee Gulch watershed. Furthermore, residents in these areas need to be highly involved in the process so we can make sure decisions made represent what's best for those living here.
3	9/10/2021 1 20:24	As a land owner in Indian Hills we have asked you, the county health dept, questions about this proposal and have not given any answers to very direct and

		repeated question. Only to be told that you cannot or don't have the time to answer emails and to leave comments in a public comment web site. Really? This is disgusting. No reply from the comment web site. Also supposedly a "robust information and outreach will be made". Other than this locally posted site I have not seen any information. Where's all this outreach?
4	9/19/2021 15:44	I am submitting comments related to the White Paper Nitrate Loading Model to JCPH staff, since it is in a pdf format with charts included. I will also submit separately comments related to the BOH Resolution as well as the OWTS Regs now being reviewed. Please include my comments in your review.
5	9/19/2021 19:05	Comments on 2020 OWTS Regulations, Draft - The county, the nation, and the world are at an inflection point where past practices and policies no longer are sufficient for the challenges of the 21st century. Climate change is upon us, and the droughts in the American west are impacting local residents significantly. Water scarcity, uncontrollable wildfires, increased population density with the accompanying stress on resources are some of the issues we face. The time is NOW to carefully plan for the future, particularly in land use policies. For Jefferson County, the early 1900s was also a time for critical land use decisions, as Denver began to grow. Some decisions were very good and some were very bad. We still benefit from the foresight of John Walker and others, who saw the need for preserving open spaces in the mountains as parks for Denver residents to enjoy. JeffCo Open Space has built on this heritage. On the other hand, the mortician and developer George Olinger, sought maximum profit from the land, and today residents of Indian Hills still suffer from his lack of foresight. Our challenge today is that we have 150 year old water laws, 100-40 year old infrastructure, while facing 21st century problems. Jefferson County, CO has an additional problem of trying to govern a large, complex region from the county seat. Unfortunately, most of JeffCo is unincorporated, lacking local governance and/or representation. Two of the biggest challenges as we enter this new reality are climate change and water scarcity. I urge you to use this opportunity of revisiting OWTS regulations, to work toward positive, long-term solutions for land use in our county. I will list some general recommendations and then some very specific comments on the current OWTS regulations. WATERSHED PERSPECTIVE - Water quality and quantity can best be assessed by evaluating an entire watershed, not just a small area of the watershed. The Parmalee watershed is a part of the larger Bear Creek Watershed. What is condition of this larger watershed? What are the quality and quantity issues facing BCWA? Drilling down to specific regulations for specific lots, as in the Indian Hills Resolution, misses the larger issues of water quantity and quality related to the watershed. BROADER ISSUES RELATED TO WATER QUALITY = Water quantity and quality are very integrated issues. JCPH's attempt to narrow its concern to water quality, without a scientific based assessment of water quantity can result in long term negative impacts. The need for water districts and even private wells is CLEAN WATER. As mentioned in the draft, fractured

	<p>bedrock (mountain soil) is not conducive to filtering polluted water. Other factors such as recharge (need significant clean water to dilute polluted water), area of non-potable discharge, consumptive use, etc. are factors to be considered when determining OWTS regulations. INTEGRATED DEPARTMENTAL APPROACH TO REGULATIONS - JeffCo's various departments related to land use need to be better integrated so that P&Z knows what JCPH is doing. The departments need to work together to establish land use regulations that are integrated, make scientific sense, and are relatively easy to understand. Currently it is very hard for a potential buyer of land, or even a house, to navigate the maze of what is permitted, what is not permitted, what violations have occurred or are ongoing, etc. Of course, buyer beware, but JeffCo makes it very hard to understand the multiple issues involved with mountain property, and Realtors don't help. Reducing the opportunity for variances would also help establish a standard that people know is in place.</p> <p>MITIGATION EFFORTS FOR WATER QUALITY - Mitigation: We all understand the need for forest mitigation. It is very helpful when dealing with wildfire. However, mitigation (or remediation) can also be done with water: augmentation plans are an example. The Indian Hills Resolution draft policy proposes mitigation in terms of new development being required to reduce the overall nitrogen loading by 25%. I think this type of mitigation would be good for all of the watersheds, particularly for those that have nitrate issues. The goal would be to not only stop rising nitrate levels, but to reverse them. Repair/replacement offers mitigation by installing a HLT system; new development should also install HLT systems as well as contribute toward mitigating the current nitrate situation. A possible structure for this would be to require a certain dollar amount from all new development to be given to a fund which would help to partially cover the costs of replacing old systems for those who have trouble affording them. JEFFERSON COUNTY COMPREHENSIVE MASTER PLAN JeffCo's Comprehensive Master Plan should be referenced, including the appropriate Community Plans. If new development does not comply with the Master Plan, it must be noted and rationalized using scientific data. LAND USE AND PROPERTY RECORDS: ACCESSIBLE AND THOROUGH Just as it is easy to access the Assessor's records for a property, it should be as easy to access other records such as past filings, case files, P&Z rejections, permit violations, etc. I know JCPH is trying to update its OWTS records, which is good. Well testing results (with privacy secured), should also be available to public inspection. WAA UPGRADE AND USE: WAA tool, which includes a water quality overlay (impacts of septic), should be used for all new development. In fact, should be available on a watershed basis, so that hydrogeologists and other experts can assess the overall water quantity and quality when any new development is being proposed. The Mountain Groundwater Study should also be referenced. 'Water Resources Assessment of the Turkey Creek Watershed' published by MGWRS in 2001 states: "When compared to water quality data collected in the 1970s and 1980s there appears to be a trend of decreasing water quality; as demonstrated by increasing concentrations of nitrate plus nitrite and chloride." (pg. 4) "It appears that the amount of water that enters long-term storage</p>
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(approx. 1.8 inches) is nearly equal to the amount of water that is withdrawn from long-term storage on an annual basis." (pg. 14) [and this was written in 2001!] It is disturbing that many of today's water-related decisions are based on data derived from a time (~1985-2004) when JeffCo had an exceptionally high precipitation rate. We are in a very different period now with climate change (see NOAA charts). There at the very least needs to be flexibility to account for the fluctuations in the hydrologic cycle.

COMMENTS ON 2020 REGULATIONS - DRAFT DEFINITIONS - Under Definitions there is nothing that refers to a hydrologist or hydrogeology expert. This needs to be included in definitions and also when referring to professionals who can approve/design/evaluate specific OWTS sites. The hydrogeology expert needs to be certified by either the American Academy of Water Resources Engineers (AAWRE) or the American Institute of Hydrology (AIH), 4.1.C.6 - "System design prepared or approved by a Professional Engineer..." The professional who needs to be preparing and approving a site specific system design needs to be a Hydrogeologist, a geologist who specializes in understanding how water works in highly fractured bedrock. There are many types of engineers who know nothing about this speciality. Also the hydrologist should be without a conflict of interest, and not expect any economic gain by approving the site design. Unfortunately, for decades the "engineer" who approved the site was the same engineer who installed the OWTS, raising the serious issue of conflict-of-interest.

TABLE 4.1 This infamous Table is not based on any scientific reasoning or data, simply on the date of platting. There are over 3,000 old plats still within JeffCo. They are ripe for dense development and would put stress on water quality and quantity of the surrounding areas. In Indian Hills, the difference between the public water system and private wells is almost negligible in terms of where the water comes from. District wells are mixed with private wells and they all draw upon the same water reservoir within the fractured granite bedrock. The 0.5 acre minimum lot size makes NO SENSE from a health and welfare perspective. It only makes sense if the goal is short term economic gain for the few.

MINIMUM LOT SIZE Another factor in lot size is consideration of the Comprehensive Master Plan of Jefferson County along with the various Community Plans. Unless there is a total disregard for the efforts hundreds of people have put into thinking about their communities, the lot size needs to be in line with these plans, or at the very least, to recognize the plans and give reasons for not following the CMP directives, For example, the Indian Hills Community Plan states: Land Use Recommendations: "The consequences of continuing to allow building on these old plats in the mountains are the continued degradation of water supplies, and overcrowding of County and community roads. " Water and Sanitation: "New or existing development should not be allowed to deplete the existing ground water supply beyond the ability of the local area to adequately recharge itself. All new development, supplied by individual wells, should have a maximum density of 1 dwelling unit for each 10-acre parcel, unless the conditions of #2 are met.....which allows for a reduction to a minimum of 5 acres. Water Quality Protection: Ground water and surface water quality in the Septic Prohibition Area and the surrounding

		<p>area should be monitored by the Bear Creek Watershed Association or JCPH. The size of the Septic Prohibition Area should only be reduced once sufficient seasonal water quality data indicated definite positive trends in the quality of the resource.</p> <p>WATER TESTING - When installing an OWTS, there needs to be well testing beyond the specific lot on which the OWTS will be located. What are the nitrate levels or surrounding wells? What is the recharge rate for the drainage area? What is the evidence that surrounding wells will not be damaged by the proposed OWTS system, particularly when it is on small lots (0.5 acres, or 1 acre) or within wetlands or ravines. What is the consumptive use in this area and how will it affect the water quality and quantity? (In Indian Hills the average consumptive use is about half of the 75 gpd average usually referred to in the calculations.)</p>
6	9/19/2021 19:10	<p>Comments on White Paper: Nitrate Loading Model, page 8</p> <p>1. Average Annual Precipitation: 17.1 This figure is based on a study done in 2003. Note from the NOAA precipitation chart, that 2003 was a year that came toward the end of a very wet period (~1981 - 2004; see chart below). The average precipitation since then has decreased significantly. The Anomaly now is -8.68 from historic records. In the Bossong Report, it was stated [in 2003] that the waters of the Turkey Creek basin were near maximum appropriation. Today the limited water from the Turkey Creek basin is over appropriated.</p> <p>2. There is nothing in the equation or data that lists the daily water use of the house/ facility in regards to how much water will be entering the HLT system. Generally daily water use is calculated at 75-100 gpd per person. Given water scarcity in Indian Hills, it is estimated that the daily use per person is more like 40 gpd or less. How does this effect the nitrate level entering the groundwater? Is there a connection between the amount of water going into the system and the level of nitrates in the effluent?</p> <p>3. The amount of land required per person to dilute and attenuate the annual per person nitrogen load to groundwater to achieve the groundwater nitrogen goal is 0.28 acres. Why then does JCPH pressure IHWD to provide taps for a 4 bedroom house on 0.5 acres? Isn't this a guarantee of further groundwater pollution?</p> <p>4. The table also lists the acceptable level of nitrates as 8 mgl. This is not far from the legal limit of 10 mgl. This leaves no room for flexibility. In Indian Hills the nitrates have been going up slowly over the years. They have never decreased as far as I know. Large amounts of clean water are needed to dilute the water just to provide clean drinking water. Setting the target level at 8 mgl is a dereliction of duty by JCPH, which unlike JCPH in the 1970s, seems to prioritize development over the health and safety (and clean water) of county residents.</p>

Jefferson County, Colorado Precipitation
60-Month Period Ending in August



DRAFT1 JCPH OWTS Nitrate Loading Model

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OWTS NITRATE GROUNDWATER LOADING MODEL Version 5

The following represents an OWTS nitrate groundwater loading model run using the input parameters identified in the previous section. The model calculates the number of acres required per person to dilute and attenuate the per person nitrate load to groundwater to meet the nitrate in groundwater goal.

		Input Value	Conversion Factor	Calculated Value
DESCRIPTION OF PARAMETER	VARIABLE	VALUE	COMMENT / INSTRUCTIONS / SOURCES / REFERENCES	
Kilograms of nitrate per person per year that reaches the groundwater table	A	2.7	See Buzzards Bay Study for the selection of this value.	
Percent of nitrogen remaining after treatment	B	29%	Per JCPH OW Regulation Table 12-2 For TL1, TL2 and TL3 use 100% For TL2N use 50% For TL3N use 29% (ranges from 25% to 33%)	
Percent of nitrogen remaining after nitrogen attenuation / removal through the soil treatment	C	100%	The amount of nitrogen remaining after soil treatment can range from 10% to 100% depending nitrogen removal processes in the soil, such as, biotransformation, denitrification, plant uptake. See Siegrist, Geza, Farrell and others.	
Average annual precipitation in inches	D	17.1	Precipitation data for the Turkey Creek Study (Bossong 2003) reports a precipitation range of 9.47 to 23.18 inches per year with a mean of 16.49 inches per year and a PRSM value of 17.13 inches per year.	
Percent of precipitation available to the nitrate mixing zone	E	20%	Figure 3-7 and 3-9, Upper Mountain Counties Report (CDM 2011), presents conceptual models of the water budget and precipitation partitioning based on the Turkey Creek Study.	
OWTS nitrate in groundwater goal in milligrams per liter	F	8	Using the EPA safe drinking water standard of 10 mg/L nitrate and a background value of 2 mg/L nitrate, the nitrate contribution from OWTS effluent must be 8 mg/L or less to keep the total nitrate concentration in groundwater at or below the EPA safe drinking water standard.	
Units conversion factor	G	9.74	= (1,000,000 mg/kg)*(12-inches/1-foot)*(1-acre/43560-square feet)*(1-cubic foot/7.48-gallons)*(1-gallon/3.78-liters)	
Acres required per person to dilute and attenuate the annual per person nitrogen load to groundwater to achieve the groundwater nitrogen goal	H	0.28	H= ABCDEFx G	

7 7/23/202 1 22:17 Jim, all,
Thank you. Great effort by the entire team. Thankfully there we appear to be finally moving forward to a more science based approach versus the infamous table 4-1. Good to see the draft, again thank you.
Here is my first review/response:
Is the intent of the policy to limit this only to the prohibition area and not to address all of Indian Hills/Parmalee Gulch area?
I could be wrong, however I believe the Board of Health asked for a replacement policy for the current Indian Hills OWTS Policy, not just a policy limited to the prohibition area within Indian Hills. This is a great start, however I believe some clarity is needed. I hope the intent matches the "TITLE: Onsite Wastewater

Treatment System Standards for the Indian Hills / Parmalee Gulch Area". Page numbers are very helpful. Example: Top of page 5 of the PDF, the "SUBJECT: Standards for the issuance of onsite wastewater treatment systems within and the upslope of the Prohibition Area" seems to conflict with the Top of Page 5 of the PDF "TITLE: Onsite Wastewater Treatment System Standards for the Indian Hills / Parmalee Gulch Area". Without page numbers, how would the public make appropriate reference? I would propose a SUBJECT of "Standards for Onsite Wastewater Treatment Systems within the Indian Hills / Parmalee Gulch area."

There seems to be confusion, as the Title states "Onsite Wastewater Treatment System Standards for the Indian Hills / Parmalee Gulch Area" and yet very little about the non-prohibition area is within the policy. Seems the focus is on only the prohibition area and not a policy for all of Indian Hills / Parmalee Gulch Area. Clarity is a must, this policy including Attachment B Table 1 must apply not just to the prohibition area, but to all of Indian Hills / Parmalee Gulch. Failure to apply Attachment B Table 1 to all of Indian Hills would allow for a 12 bedroom home on a 1/2 area lot with a huge negative impact to ground water and very likely a negative impact of private wells located within a two hundred feet of the STA area of the new home. Plenty more examples can be provided. All new development and any additional dwelling units or increasing of bedrooms must follow the same science based formula, not just the "prohibition area" as draft policy leads the public to read. A 4 bedroom home should not be allowed to be built on a 1/2 acre in accordance with the science based formula used to create attachment B Table 1, with TL2N it must require 2.7 acres and with TL3N must be minimally 1.56 acres regardless where within Indian Hills / Parmalee Gulch area. The same standards of Attachment B Table 1 must be used for all of the Parmalee Gulch area, not just the prohibition area.

"A. ONSITE WASTEWATER TREATMENT SYSTEMS IN THE PROHIBITION AREA" should follow "J. VAULTED PRIVIES AND WASTEWATER VAULTS". Most of the policy should be directly dealing with all of Indian Hills, where as the "A" is limited to the prohibition area, along with being followed by Attachment A

"B. ONSITE WASTEWATER TREATMENT SYSTEMS IN THE UPSLOPE OR HYBRID AREA" should really cover "B. ONSITE WASTEWATER TREATMENT SYSTEMS" not limited to "upslope or hybrid area" but all of Indian Hills. Additionally Attachment B, Table 1, must be part of any requirement for OWTS within all of Parmalee Gulch Area/ Indian Hills, current table within "B." fails to take into any consideration nitrate load of new OWTS with respect to occupancy/bedrooms and must be tied to Attachment B Table 1.

Please review attached "updated with track changes" documents for suggestions to consider. I took the PDF, exported to MS Word and set Track Changes to give some ideas. Sometimes seeing makes more logical sense than idea, such as relocating section A to become Section J as well as "SUBJECT" update.

I look forward to updated drafts and public comments. If a new draft is created,

		<p>please provide. Thank you</p>
8	7/26/2021 10:17	<p>Jim, All, I want to thank you for moving forward with updating us on the progress that is moving this process forward. One question that some residents have asked is what lots are associated with their homes as they have not been able to find this information. Can you provide a map of the lots and numbers for Indian Hills area? I believe I have seen a map of these numbers along with outlined property lines. This would be helpful. Thank You</p>
9	7/27/2021	<p>Jim, Thank you for the acknowledgement of my email and comments. Could you please answer the question: Is the intent of the draft policy to limit this only to the prohibition area and not address all of Indian Hills/Parmalee Gulch or is the intent this new draft policy and attachment B Table 1 would apply to all of Indian Hills / Parmalee Gulch area? It is vital for all stakeholders to have a clear understanding of the scope of the policy, as the currently written draft policy leaves lacks clarity of scope.</p>
10	7/28/2021 10:09	<p>"Hello All", Thank you. Yes, we had been encouraging residents to get involved, to read, review and provide comments. I made a post within our local Indian Hills Community FB group including the draft policy on July 22. (copy/paste and saved into PDF is attached). Link is: https://www.facebook.com/groups/IndianHillsColorado/posts/10161607157854782/ and has reached 443 people with 19 engagements thus far, 13 comments and 6 thumbs up. I need to post the clarity of your "JCPH Intent" as provided. Additionally, the draft OWTS Policy document and email made local Indian Hills News as found at: https://indianhillscolorado.com/jefferson-county-board-of-health-releases-draft-update-to-the-indian-hills-owts-resolution-and-policy/ Sharing interesting statistics from that website: April 2021 that website received 11,858 unique visitors, May 2021 - 12,050 unique visitors, June 2021 - 12,073 unique visitors, and July 2021 the site has had 10,592 unique visitors thus far or 46,573 unique visitors in the past four months, the site has a good healthy reach. Not bad for a local community site with news to have such a large reach. A science-based OWTS policy for all of Indian Hills, anything less is a failure by Jefferson County Public Health (JCPH) and the BOH. The Board of Health (BOH) has acknowledged the issues and clearly stated their request to JCPH for the updated Indian Hills OWTS policy to be science based. Citizens expected the draft policy to include all of Indian Hills using a science-based approach, whereas your</p>

proposed draft policy excludes the majority of Indian Hills from a science-based policy.

Your stated intent is Very disappointing to say the least. You had my support; however, no longer once clarity was provided on intent by JCPH and apparently the BOH (as indicated in the response). What a disappointment! Based upon conversations, JCPH has lost the support of many other stakeholders as well. We do hope JCPH reads and "hears our concerns".

The BOH did not request an updated policy that ignores science for the majority of Indian Hills. They asked for a science-based OWTS resolution and policy that covers all of Indian Hills.

Your intent and the draft policy have clearly excluded the majority of Indian Hills from the science-based approach. For a limited number of lots, your team wants follow science. For all others, regardless that a science-based approach is documented and available, JCPH has chosen to ignore science. The public must question why JCPH is choosing to ignore science.

Imagine JCPH knowing the vaccine works for everyone; however, JCPH only requires 5 out of every 500 to be vaccinated, following the science for 5 but ignoring science for the other 495.

We strongly recommend revisiting and changing your organizational intent from excluding the majority of Indian Hills to including all of Indian Hills within the science-based approach. A policy that uses Attachment B table 1 minimal lots sizes for issuance of new OWTS permits of any new or newly documented living space/adu's/new development, etc within Indian Hills / Parmalee Gulch.

Failing to ensure the updated draft Indian Hills OWTS Policy science-based Attachment B Table 1 applies to all of Indian Hills / Parmalee Gulch would be a failure by JCPH and the BOH to protect public health based and groundwater quality. This would continue to leave in place the infamous arbitrary and capricious Jeffco OWTS Policy table 4-1.

Attachment B Table 1 was created using the science-based formula JCPH presented to the BOH back in November 2019. Why is "JCPH and the BOH" choosing to ignore science for the majority of Indian Hills?

Without the science-based approach applied to all of Indian Hills, JCPH seems to promote the continuation of the same non-science-based approach, allowing a 4-bedroom home or a 12-bedroom home to be built on 1/2-acre size lot.

The documented science-based approach, attachment B Table 1 of draft policy, would require minimally 1.56 acres with TL3N for a four-bedroom home, and 4.01 acres with TL3N for a 12-bedroom home, NOT a 1/2 acre. Infamous Table 4-1 continues to rule allowing a 12-bedroom or a 4-bedroom or a 6-bedroom home to be built on a 1/2-acre lot with no regard to amount of projected effluent and amounts of Nitrate contamination to be added to our groundwater.

Is it too much to expect JCPH to meet what BOH and the very concerned citizens have asked for? An updated science based Indian Hills OWTS resolution and policy that is inclusive of all property within Indian Hills.

The science-based approach in Attachment B Table 1 must be adopted for all of

Indian Hills, not just for new development of prior OWTS prohibited Indian Hills lots. If Attachment B Table 1 is not adopted for all of Indian Hills, this is a complete waste of time and a clear indication your organization has effectively failed to hear decades of comments by the citizens of our community and the specific tasking by the Board of Health.

The infamous Jeffco OWTS Policy Table 4-1 is not science-based; it is merely random dates plucked out of the air placed into a policy table.

With the facts of the BOH public acknowledgement of known nitrate contamination issues; the BOH request for a science-based updated Indian Hills OWTS resolution and policy; where a science-based approach has been documented and publicly presented by JCPH to BOH; any usage of Table 4-1 now or in the future by JCPH and BOH for OWTS permit approvals any within Indian Hills or the Jefferson County Mountain Groundwater Overlay district should be considered a known failure to protect public health and groundwater quality. Furthermore, any such usage of the existing Jeffco OWTS Policy of Table 4-1 within the Jefferson County Mountain Groundwater Overlay District would be doing so with the informed knowledge of harming groundwater quality and public health while at the same time being in possession and knowledge of a science-based approach, where that science-based approach would protect public health and groundwater quality. Random dates to pick and choose how much land is required to attenuate the pollutants within OWTS is rather arbitrary and capricious at best and is most certainly not science based.

While all of us look forward to the public comments, clarity must be provided by JCPH. We do strongly recommend and ask for your organization to ensure clarity when the draft Indian Hills OWTS resolution and policy are posted on Jefferson County's website for comment. Specifically, we would recommend the following statement: JCPH knowing of the negative public health impact and documented groundwater nitrate contamination issues has chosen to only apply science to a limited number of parcels for new development. JCPH has additionally chosen to ignore science for the majority of Indian Hills / Parmalee Gulch and instead will continue to follow the arbitrary and capricious random date policy as found within the existing Jeffco OWTS Policy table 4-1.

Based upon the above, to get support, I would recommend JCPH Environmental Services to review and revise the proposed draft to include all of Indian Hills within the science-based approach and not just the few selected prior OWTS prohibitive lots. Science-based Attachment B Table 1 must be required for all new OWTS systems for developing undeveloped land and for any permitted ADU's/additional living space/additional occupancy within all of Indian Hills.

Again, we do thank you for the clarity you provided in your written intent.

News articles and public opinion posts of the written intent of Jefferson County Environmental Services Division could be posted reflecting the JCPH written intent and what appears to be a desire to only implement a science based OWTS Policy allowing new development of prohibition lots while leaving in infamous arbitrary and capricious policy of Table 4-1 for the rest of Indian Hills. JCPH is proposing to only

		<p>apply science-based approach to limited lots while ignoring science for the majority of Indian hills and where the majority of Indian Hills would continue to be subject to the random date policy. Would the public, Jefferson county tax paying citizens and property owners view such expressed opinions as if Jefferson County Board of Health directors and the Public Health Environmental Services Division are choosing to ignore science at the potential detriment of public health and groundwater quality?</p> <p>“Yes, folks, per the Jeffco Board of Health policy, with complete disregard to a known science-based approach of new OWTS systems, you can still build that 12-bedroom mansion on the 1/2 acre. According to JCPH and BOH no worries about the additional nitrate load to your groundwater that you drink or that your OWTS will contaminate your next door neighbors well, public health has approved the high OWTS Density based upon a random date, meanwhile the science-based approach indicates a minimum of 4.01 acres is the requirement. Yes, both JCPH and BOH are aware of the science-based approach and yet have chosen to ignore the science at the potential expense to public health and groundwater quality. According to JCPH and BOH, you can still go ahead and build as they have given you the approved OWTS permit for building as many bedrooms and as high of an occupancy you can afford on your 1/2 lot.”</p> <p>Don't worry, we will ensure the public reads and sees the "intent" that was not clear within the draft policy. Apply Science to a limited number of lots to enable development, while ignoring science for majority of Indian Hills. This is not providing an updated Draft science-based Indian Hills OWTS Policy for all of Indian Hills.</p> <p>Honestly, I would rather post and help move a science-based policy forward, the draft you have provided missed the mark, fails to be science-based for all of Indian Hills.</p> <p>Everyone these days is saying "follow the science", "follow the science" - and yet JCPH Environmental Services Division seems to be choosing to only follow "the science" for a few lots to allow new development while ignoring science for the vast majority of Indian Hills.</p> <p>Shaking head (left and right). The logic escapes me and others that I have discussed your written intent with prior to responding.</p>
<p>1 1</p>	<p>8/18/202 1 20:44</p>	<p>With the absolute chaos at yesterday's meeting I was never called on for public comment. I must commend you on running the meeting thru all the angry citizens. I hope this comment is not ignored.</p> <p>Concerning the draft policy proposal for the Indian Hills Area.</p> <p>Failure to equally apply the scientific methods that Jefferson County Board of Health PROMISED and PREACHED would be followed to the entire area of Indian Hills Parmalee Gulch basin. This was requested by the Board of Health. Not selected areas.</p> <p>To prevent further groundwater contamination for all of our community is a failure to protect the property owners and residents of the Parmalee Gulch drainage.</p>

		<p>So based on the science based approach is only valid in the prohibition area and upslope of those undeveloped lots? Lots outside this prohibition area are not subject to the science based data? This makes absolutely no sense. The science only works where the Jefferson County Board Staff seems it should? This policy as drafted is not in the best interest of our community, our health and sustainable growth. Science-based approach in Attachment B Table 1 must be applied to all of Indian Hills / Parmalee Gulch and not just to a few selected lots. As drafted the intent is just for the prohibition areas. WHY? Residents of the Parmalee Gulch area have been expressing and presenting many science based studies and data for decade's yes decade's. I cannot support this proposal as written. It will not protect our water shed and the property owners and residents. In earlier discussions the representatives and employees promised to include the community in a proposal. I ask and have not heard anything. A group of long time concerned citizens had been planning a water quality seminar this summer. I have sent several emails asking for supporting educational brochures. Nothing other than let me see what we have. Jim Rada stated that a public information session will be held. This was said with the caveat "It will be towards the end of the public comment period." If you had the residents best interest you would have presented at draft rollout. We the people of Indian Hills are the Stakeholders and we must protect our community.</p>
<p>1 2</p>	<p>8/19/2022 1 10:06</p>	<p>You say you are not "hiding anything". Please then provide the specific scientific reasons why you have opted to provide an update draft Indian Hills OWTS policy that only applies the science based approach to the minority of Indian Hills and fails to apply a science based approach to all of Indian Hills? Attachment B Table 1 - science based approach, you have opted to only apply it to a small portion of Indian Hills, while leaving the majority of Indian Hills with the snake oil solution of the infamous Table 4-1. Under Table 4-1, a Indian Hills property owner with 1/2 acre could be a 12 bedroom home, a 6 bedroom home or a 4 bedroom home with zero regard to science based approach. Under Attachment B table 1 - the science based approached: 12 Bedroom would minimally require 4.01 acres with TL3N, where a 6 Bedroom would require 2.01 acres with TL3N and a 4 Bedroom would require 1.56 acres with TL3N. Applying science to minority of Indian Hills to allow new development, meanwhile choosing to not follow science for all of Indian Hills. Board of Health in a public recorded meeting specifically asked for an Updated OWTS Policy for ALL of Indian Hills that was science based, not just for the minority moratorium lots. Your written intent speaking for both JCPH and the Board of Health (I had not realized the BoH authorized you to speak on their behalf) was clear - apply science</p>

		<p>to only the minority of Indian Hills, make it sound like the new science based approach was for ALL of Indian Hills but in reality when digging into the details - science only is being applied to the minority of Indian Hills to only allow new development of the moratorium or prohibition land.</p> <p>Imagine Public health only recommending science based vaccines for the minority of the population for Covid... Is it now optional to pick and choose what part of a community or the county where the Board Of Health is going to follow science and ignore science based approaches for the majority? Because that is exactly what you are choosing to do with the draft Indian Hills science based OWTS Policy. Infamous table 4-1 is pure snake oil solution while you and the team know and have a science based approach to move to protect groundwater quality and public health with.</p> <p>Public Health is offering continued snake oil solution - random date pulled from the air, where land magically prior to November 10, 1973 absorbs waste water and filters nitrates better than November 11, 1973 and then after Dec 5 1977 it takes 10 times the amount of land for waste water nitrates to be processed... Random dates are nothing but snake oil and completely fails any scientific validation or basis. So please do share your scientific reasons to only apply science to the minority of land within Indian Hills and not apply science to all of Indian Hills. The citizens of our community deserve better than snake oil solution of table 4-1.</p> <p>Also why does your site not work for being notified of updates such as when your team posted the draft policy? Notification should have been sent out, notification was not.</p>
<p>1 3</p>	<p>8/19/2021 13:36</p>	<p>Hello Jim,</p> <p>Thank you for the non-answer, nicely done! Yes, I get that you want all citizens to follow any processes you ask them to follow. That process does not instill any belief that leadership leading the effort concerning our community, our groundwater quality, our public health, will even do anything with such submitted comments. In fact governments have been known to ignore the citizens, especially unelected government officials as no methods exist for accountability to the public they are suppose to serve and whose tax dollars pay the salaries for.</p> <p>For unknown reasons, you have continued to refuse to provide any science-based reasons or justification why you and your team, upon your direction, have chosen to only apply science to the minority of Indian Hills while choosing to ignore applying the same science based methodology for all of our community. Why then would we believe a process setup by government will result in positive change and for scientific based methodology to be equally applied to all of Indian Hills? Your draft policy you have provided as well as your written intent, clearly provides the public with just the opposite understanding, in fact gives the clear appearance you have zero desire to apply science based methodology to all of Indian Hills but are continuing to push your half baked random date snake oil solution of Table 4-1. See attached snake oil solution being sold by you - infamous Table 4-1, where majority of Indian Hills will continue to fall under a non-science based solution.</p>

Do you have any scientific basis for continuing to promote infamous table 4-1 where random dates are pulled from the air? If not, I would strongly encourage you to move to using science versus what just feels good. Snake oil solutions are not what our community has asked for nor are they what the Board of Health requested, however that is what you are proposing and what you have refused to provide any scientific reasons or justification for.

Your intent and as you stated the intent of the BoH (at represented by you), results in only applying science to the minority of Indian Hills to allow new development on the prohibition areas, meanwhile clearly also choosing to ignore the same scientific approach for all of Indian Hills. If it was your community, your children, your groundwater and the drinking water your children drink, I somehow doubt that you would make such choice in proposing the "updated Indian Hills OWTS Policy" to only apply science to the minority of Indian Hills Parmalee Gulch.

Somehow, I doubt the Board of Health would only want to apply science to the minority, when groundwater quality impacts all of Indian Hills. Did you share with the Board Of Health where you and your team recently attended an Indian Hills Water District meeting in supporting of a private property owner to build a 4 bedroom home on just a 1/2 acre ? In fact during that meeting, you and your team spoke directly supporting that home owner to build that 4 bedroom house on a 1/2 area with full knowledge of the science based formula that takes into considerations such as # of bedrooms, occupancy, etc and the science based approach would require minimally 1.56 acres the TL3N.

Your actions give the appearance to the citizens and our community that you truly don't support science and have chosen to continue to look the other way with regards to our community, while clearly at the same time, ensuring more development by applying science to only limited land within Indian Hills. 4 Bedroom on 1/2 area - not supported by science but supported by Director Mr. Jim Rada in area of known groundwater contamination. Specifically you and your team testified, during public water tap variance meeting in front of a elected Board of Directors, supporting a property owner to build a 4 bedroom home on 1/2 acre lot within Indian Hills in the last couple of months. You were and are clearly aware of the Science based methodology that would require minimally 1.56 acres with TL3N. And now you continue to kick science down the road, only desiring to apply science to a limit small part of Indian Hills and choosing to ignore science for all of our community.

A Great headline for a news article: Public Official and Director of Environmental Health Services Jefferson County and representing the Jefferson County Board of Health - chooses to randomly ignore science, continues to promote snake oil solutions and fails to listen to the impacted community concerned with their public health and groundwater quality.

With all the demands of Vaccine's, can you imagine the Board of Health randomly recommending Covid Vaccines only to 10% of the community, while then providing snake oil to solve Covid for the other 90%? Well, you seem to be doing just that for our community.

		<p>Jefferson County Citizens and Indian Hills community deserve much better than half baked snake oil solutions.</p> <p>Infamous Table 4-1, at best a snake oil solution, using random dates and with the false believe that land plat dates determine how land absorbs waste water or effluent must be removed. Prior to November 10, 1973, 1/2 acre could absorb unlimited amount of effluent without issue, you can build a 12 bedroom home - it is allowed. On November 10 1973, all of a sudden 4 times the land is required as land just can not absorb like prior to November 10 1973... And then on Dec 5 1977, a miracle occurred and now it takes 10 times the amount of land to absorb the same effluent.... Random dates plucked from air built into policies having zero scientific basis and yet you and your team continue to promote the pure snake oil as a solution, Table 4-1, for groundwater quality and public health within Indian Hills.</p> <p>Jefferson County Public Health and the Board of Health must ensure the full application the science based solution proposed in Attachment B, Table 1 to all of Indian Hills.</p> <p>Good day.</p>
<p>1 4</p>	<p>8/19/202 1 14:24</p>	<p>Steve, Jim</p> <p>Thank You for your response.</p> <p>Jim why as a Jefferson County Employee are you not answering our questions? You stare that your not going to respond to all emails, but the one email you respond to you fail repeatedly to answer simple questions. What is your reasoning? You fail to understand we are the people whom ultimately employed you thru our tax dollors. We want the best science applied to our entire community.</p>
<p>1 5</p>	<p>8/27/202 1 15:34</p>	<p>I got around to really going over the draft policy and I have some questions / suggestions (for what they're worth)...</p> <p>SECTION A</p> <p>I think it might be helpful to add some brief clarification on how the “decrease in mass load discharged into the Prohibition Area” it to be accomplished, such as “This will require the upgrading of an existing OWTS along with the construction of a new one with higher level treatment to serve a new dwelling or structure as set forth in ATTACHMENT A.”</p> <p>One thing I’m confused about is that this section requires the demonstration of a “25% decrease” in mass loading, but I don’t see that this is accounted for in ATTACHMENT B, Table 1 unless it is already factored in (which—knowing Roy--it probably is 😊).</p> <p>I would also suggest that this entire Section be ‘moved down’ in the body of policy itself since it will probably not be utilized as often and the sections that apply to the</p>

upslope area , repairs to existing dwellings, etc.

SECTION B

Seems very straightforward, but do we want to consider phasing out allowing 'segregated systems' as they have been superseded by new technology? Also, see my comments about this table vs. ATTACHEMNT B, Table 1

SECTION C

Looks good.

SECTION D

Just something to think about – how will this process function? If we approve the OWTS permit, I thought the building department already checked for bedroom equivalency before issuing a building permit. This might be just using both belt-and-suspenders, which is also fine.

SECTION E

This is a good idea but since there are no standards associated with individual well water, would we issue the OWTS permit regardless of the nitrate levels in the onsite well? From the policy it appears so. This section seems to be more about data collection than anything else as it compels the owner to drill a well and submit a sample before proceeding with their OWTS permit (and of course, their building permit), which can cost well over \$10,000 up front (which is a cost they have to foot anyway). Would it be possible to require them to submit sample results before final OWTS approval or building permit sign off? But again, what we would be our response if the nitrate levels are high? We can't mandate them to install a drinking water treatment system, so what's the point (except for data collection, of course)?

SECTION F

Looks good.

SECTION G

Ditto.

SECTION H

Ditto.

SECTION I

Ditto, but do we want to make a distinction that a 'permanent water supply' as being either IH water or a well piped into the structure? Not sure that hand pumped wells should be included.

SECTION J

Looks good.

		<p>ATTACHMENT A Fine.</p> <p>ATTACHMENT B TABLE 1 - I think having the column for “Number of People” can be a bit confusing – suppose someone wants to build a 4 bedroom house but says ‘we are only a retired couple who will living there’? I think it might be clearer just to remove this column and add a note to the table stating that the occupancy (and wastewater flow) is determined by assigning 2 persons per bedroom for the first 3 bedrooms and 1 person be bedroom thereafter, regardless of the size of the family the original owner may have. Or something like that so there isn’t an argument over ‘planned’ vs maximum allowable occupancy of the dwelling.</p> <p>Why do we have a different tables for SECTION B and ATTACHMENT A? All of Roy’s work has demonstrated that Table 1 is scientifically supportable, so who not use if for both Prohibition and upslope areas?</p> <p>INSTRUCTIONS FOR THE EXISTING PROPERTY (Subject Property 1) 1. Select the row with the number of bedrooms proposed for the existing developed property. 2. Select the column with the proposed treatment level for the OWTS THAT WILL SERVE THE existing STRUCTURE ON THE property.</p> <p>FOR THE VACANT PROPERTY (Subject Property 2) 3. Select the row with the number of bedrooms proposed for the existing developed property. 4. Select the column with the proposed treatment level for the existing property. THIS IS A LITTLE CONFUSING SINCE THE HEADING READS: “FOR THE VACANT PROPERTY” BUT #3 AND #4 REFER TO ‘EXISTING PROPERTY’. PERHAPS SOME DIFFERENT LABLES MIGHT BE MORE APPROPRIATE?</p> <p>Also, how will we be able to assure that the existing property OWTS is actually upgraded to HLT? Will be applicant for the vacant parcel be required to do that work first before getting his own OWTS permit?</p> <p>Anyway, sorry it took me so long to get around to reviewing this. Lot of good work, all.</p>
1 6	9/19/202 1 15:48	email submitting white paper pdf, see rows 4-6
1 7	9/21/202 1 18:17	The neighboring Jefferson County community of Kittredge, is smaller than Indian Hills in total area and population, yet on public sewer. A more effective long term solution would be investing in a public sewage treatment system for areas of concern within Indian Hills.

1 8	9/21/202 1 18:51	Water issues are immense in this valley, and the continued development is depleting more and more of our water availability while ensuring our nitrates will be even worse with the install of additional OWTS to serve said development. I am deeply against any changes or modifications to policy that would lessen restrictions or allow more OWTS to be installed and operated in Indian Hills.
1 9	9/23/202 1 13:11	Science based criteria should include the entire valley... Not just a select portion of it.
2 0	9/23/202 1 13:14	Apply science to all septic systems in our valley.
2 1	9/24/202 1 11:22	Our nitrate levels are increasing again because of too many ppl putting in too many septic systems. The area is already over built & cannot sustain more septic systems leaching into wells. I am totally against this ^^^ proposal. Jeffco needs to be accountable to Indian Hills & STOP all future building permits & water taps!
2 2	9/28/202 1 8:48	I believe the approach, and the proposed resolution, is appropriate. This is based on available existing information, and studies performed in other areas with conditions similar to the conditions within the Indian Hills drainage. My additional comments include: 1 - more well water testing is needed throughout the county to get a better understanding of the impacts of OWTS in the county. This information can be used to adjust the nitrate modeling. It can also be used to determine the suitability of the existing OWTS regulations. 2 - The resolution calls for a sample of the well water at the time of permitting. I believe it should also require a sample of the well water at title transfer, and annual well water sampling if a TL2N or TL3N needs to be installed. 3 - I believe sampling for bacteria and nitrates should be required as part of the title transfer program to determine whether or not the Indian Hills Policy should be extended to the entire county - especially in the fractured bedrock areas. 4 - Technology exists to meet a TN concentration of less than 10 mg/l. This technology should be encouraged for the sites that do not meet the Standard 5 Demonstration of Nitrate Load Decrease. These sites can be used for technology verification.
2 3	9/28/202 1 22:48	Dear Sir/Madam, Please consider allowing installing new septic systems on 0.5 acres lots in Indian Hills Prohibition Area. That area has some properties owners who will benefit from it by developing those lots. The impact will be minimal, since there are not that many undeveloped lots like that. That will also benefit community as a whole in a long run and also bring new tax revenue to the county. Thank you, Sincerely
2 4	9/29/202 1 14:46	When Indian Hills was developed by George Olinger in the early 1920's, present community problems began. Small lot sizes were chosen to be the standard based

		<p>on the premise that potential buyers would be accustomed to small city-like lots offered at lower prices would be easier to sell and still return a reasonable investment. Current Indian Hills residents are now paying the price in the form of water pollution. Originally land was set aside to protect the drainage and flood plains, but now these areas are being built on and have caused a negative impact on water quality and quantity. Individual and group goals established in 1974 lists the top three issues facing Indian Hills residents as: Improve water conditions Controlled growth and planned development Improve sanitation conditions Sanitation Conditions (From the Indian Hills Environmental Resource Inventory: A Citizens tool for Planning, written In February, 1975) The major concerns of Indian Hills residents, based on surveys done in 1974 and 1996 (over 20 years apart) are: Ensure that water resources are not depleted Maintain or improve water quality as new development occurs Identify existing water contamination sources and mitigate or remove them (From the Indian Hills Community Plan, produced in December, 1997 by the Jefferson County Planning Department) Based on recent meetings at the Indian Hills Community Center, these goals and concerns are the same now in 2021 as they were almost 50 years ago. Technology advances have helped, but the problems continue to increase. The Prohibition zone has only been partially successful in 40 years. The regulation of no development within the zone can't be any stricter, so present day rising nitrates are most likely originating from upslope properties. In order to not regress any past gains, any new policies need to be science based and need to address development within the entire watershed not just the old prohibition lots. JCPH over the past 20 years has progressively adopted less restrictive regulation for the upslope areas, which is hard to understand based on larger homes being built, water sources being depleted and becoming increasingly contaminated by nitrates. Jefferson County Public Health must implement a sound Science Based formula that applies to the entire watershed. JCPH must be resolute in following its own policies as the sustainability of our community, the health and quality of life of present and future generations of residents entirely depends on sound and effective Jefferson County regulation.</p>
<p>2 5</p>	<p>9/29/202 1 17:08</p>	<p>Board of Health, Thank you for taking the time to review and adjust the OWTS regulations to reflect current technologies and landowner needs, while working toward a cleaner environment. I am in support of this resolution. I am in support of the mechanism for allowing development in the current prohibition area, while at the same time reducing nitrate loading to the groundwater, this is a win-win. I think Part B. (Upslope Regs.) is an improvement over the current regs. but falls short of the engineering approach that was discussed in previous meetings. Without a limit on bedrooms vs. lot size vs. Treatment Level, I don't see how lasting protection of the groundwater quality is achieved. Thanks</p>
<p>2 6</p>	<p>9/29/202 1 22:38</p>	<p>I have lived in Indian Hills for 40 years and have watched the overpopulation of this beautiful little area. During this time developers have had their way with the land</p>

		and taken down trees and scarred the land without them having to deal with the results in the years after. I live in an area that has been almost unchanged in the 40 years I have been here and now there are 22 new homes on 2 roads within 2 miles. We cannot afford to destroy the land anymore. Thank you and respectfully submitted.
2 7	9/30/2021 1 13:29	The purpose of this revision is not to establish OWTS application and permit standards for Indian Hills/ Parmalee Gulch Watershed. It only pertains to the prohibition area and the upslope or hybrid areas. That needs to be edited and clarified immediately. Next, what is the science behind only requiring the prohibition area to demonstrate decrease in nitrogen load? Why do the upslope/hybrid areas have a different set of requirements or lack thereof? All of Indian Hills has contaminated ground water, not just the prohibition area. How does this meet the needs of the Jefferson County community, specifically, the rest of Indian Hills? Also, why would your goal only to be at the MCL for NO3 of 10mg/L? Why is it not proposed to be below the MCL instead of at the MCL? Jefferson County has a chance to be proactive but this proposal allows for you all to continue to operate reactively. In summary, the advanced OWTS technology should be optimized to its fullest potential and it should cover all of Indian Hills and not just a small portion.
2 8	9/30/2021 1 14:18	Hello, I would like to add to my comments. Due to this meeting being on Zoom many of the residents do not have zoom or unaware of how to use zoom. Also many are totally unaware of this meeting.
2 9	9/30/2021 1 16:30	just in case JCPH only accepts comments via this medium and would decide to ignore comments provided within valid communications (email correspondence), I will attempt to ensure record was submitted here indicating prior comments provided by and must be taken into consideration of: (1) reference all emails send by Indian Hills residents to JCPH and BOH, (2) emails indicating Mr. Rada speaking for BOH and JCPH with no intent to apply science equally to all of Indian Hills, but to only a minority of land within Indian Hills to allow new development meanwhile ignoring science to be applied to all of Indian Hills, (3) No reasons provided as to why no apply science equally by JCPH, (4) Nothing in proposed policy covers OWTS Capacity limitations documented within issued OWTS Usage permits or othewrise, (5) Indian Hills asked BOH for SCIENCE BASED POLICY for OWTS Density, BOH asked JCPH for SCIENCE BASED POLICY and yet what was delivered is a failure - fails to apply known science based formula to all of Indian Hills. Please ensure all comments are reviewed and considered, not ignored as we, Indian Hills concerned citizens of Jefferson County has been working for decades to protect our Groundwater quality, and protection of Groundwater Quality is the duty and responsibility of the Board of Health with regards to OWTS Density per statute, thus it is also the responsibility of JCPH, Dr. Comstock and staff.

3 0	9/30/202 1 16:57	While I appreciate all the thought and work that has gone into this resolution, I have to say that I feel this is a step backwards for the water quality in Indian Hills. Applying this new formula to the prohibition zones sounds very unwise. Has the science upon which this formula is based been vetted for use in areas where nitrate levels are at or above recommended safe levels, as seems to be the case in these zones? Considering that all OWTS release some nitrates, how can the release of ANY amount of nitrates be wise, especially in Indian Hills and especially in the prohibition zones?
3 1	9/30/202 1 18:35	I am a latecomer; although I've lived in IH for several decades I have not heard from my county departments about any of these concerns until I was notified recently through fb by some community members. I am building my understanding as fast as I can. I STRONGLY request that you use the expertise of a hydrogeologist and the science- based person/nitrogen output model in creating a new OTWS policy for the entire basin. This is a logical protocol for any local, state, federal science determinations in a wide range of health and environmental arenas. It is not wise to continue modified versions of past models based on old or outdated scientific data. As there is definitely an undercurrent of belief in IH that our Jeffco Depts. are not broadly fair in decisions made, focusing this draft policy on a narrow portion of the environment has a poor appearance of inequity and lack of scientific foundation. I appreciate the opportunity you created to allow the public voices at this time in the draft process. I'll continue to stay informed and hope to see another opportunity for public input. Thank you,
3 2	10/1/202 1 9:24	I think that TL3N treatment should be required on any lot requiring treatment. The cost difference between TL2N and TL3N is very small and the TL3N system provide much better, consistent nitrogen removal. I also agree that it would make sense to apply the requirements for the entire watershed and possibly all areas with fractured bedrock, in order to be protective of groundwater. Thank you for taking steps to help with groundwater contamination!