From: Don MacKenzie
To: CD STRComment
Subject: Occupancy limits and septic capacity
Date: Thursday, September 3, 2020 12:00:56 PM

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In support of my prior comments submitted on August 20, I am providing data on my cabin's actual water usage in mixed personal / rental use.

I encourage you to base occupancy limits on the definition of "bedroom" previously developed by the Planning Commission. This definition is flexible enough to recognize the wide variety of non-standard floorplans found in recreation properties, including cabins, A-frames, lofts, etc.

However, if you do proceed with linking occupancy limits to septic capacity, I encourage you to allow flexibility in recognition of fact that STR occupancy varies from day to day, and owners can reduce septic loads through water saving technologies. I encourage you to consider providing the following three sources of flexibility:

- Regulate average occupancy , for example “Average Occupancy shall not exceed the design value on the septic permit, and Peak Occupancy shall not exceed two times the design value.”
- Allow more occupants when owners have documented the installation of low-flow showerheads, dual-flush toilets, high-efficiency washers, or other water-saving technologies. Toilets, showers, and laundry are the largest sources of residential water use.
- Allow owners to apply for increased occupancy based on credibly documented actual septic load or indoor water use.

From July through November of last year (the dates for which my water district was able to provide consumption values), we averaged 45 gallons of water consumed per person per day, accounting for actual occupancy in both personal and rental use. This is already 25% lower than the design value of 60 gallons of septic demand per person per day, but the actual septic load would be even lower, due to evaporation, leakage, and outdoor uses such as irrigation. With the addition of water-saving showerheads, toilets, and a high-efficiency washing machine, our actual septic load would be reduced further - potentially to about 30 gallons per day, or half of the 60 gallons / day used for design purposes.

Don MacKenzie