



**JNM TECHNOLOGIES, INC.**  
WATER RESOURCE SOLUTIONS

December 14, 2010

Sunset Advisory Commission  
P.O.Box 13066  
Austin, Texas 78711

Ref: On-Site Wastewater Treatment Research Council

Dear Commission,

I will not take long in making my comments about your proposal to end the TOWTRC and move those responsibilities to the TCEQ staff currently serving the OSSF program. Several other letters have been sent to you and I will simply add my comments to those made by my colleague Mr. Randy Weber, P.E. It will be at best ill advised to move forward with such a proposal. I have worked in the onsite wastewater industry since the late 80's and have followed it in many states across our great country. The one thing that becomes very obvious in any state I have worked is whether or not it has a good connection with the actual industry which includes owners of onsite systems, installers, designers as well as the regulatory community. This connection is not achieved by a relationship that occurs over a counter where fees and permit applications pass and mandates are forced on its members with little consideration for reality. It occurs where members of all parties involved have a say or a voice into how a program is governed or how it is progressed and made stronger in the future. Texas has such a connection and that is through the TOWTRC. Treating this need as nothing more than a management task that can be reassigned to an understaffed or inexperienced group in state government would show a true lack of understanding with regards to its significance. Nor can the belief that an arbitrary, short term volunteer group be capable of assisting the OSSF staff effectively and have the same impact, clarity of thought and clarity of action that comes from an appointed and experienced work group like the ones that have served the TOWTRC over the years. What we have in the State of Texas is enviable and something to be proud of so please reconsider your recommendation so that the TOWTRC can remain in place and keep our industry moving forward in Texas.

Sincerely,

James F. Prochaska, M.S., P.E.  
President, JNM Technologies, Inc.