July 9, 2014

Lawrence D. Fay
Director, Environmental Health Services
Santa Barbara County
Lawrence.fay@sbcphd.org

TRANSMITTED VIA EMAIL ONLY

Dear Mr. Fay:

COMMENTS ON THE SANTA BARBARA COUNTY DRAFT LOCAL AGENCY MANAGEMENT PLAN (LAMP) FOR THE MANAGEMENT OF ONSITE WASTEWATER TREATMENT SYSTEMS (OWTS)

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff received and reviewed the draft Santa Barbara County Local Agency Management Program plan (LAMP). Thank you for the opportunity to comment on the draft LAMP. We greatly appreciate County staff's work on managing onsite wastewater treatment systems (OWTS) in Santa Barbara County. We also appreciate the efforts of stakeholders who have participated in these County efforts and have contributed their efforts toward a positive result.

As you know, the primary goal of the LAMP is to establish and implement a county-wide program that will allow the County to manage new and existing OWTS within unincorporated areas. Section 9.0 of the statewide OWTS Policy provides the County with the opportunity to submit a LAMP for approval by the Central Coast Water Board. The County has maintained an ongoing working relationship with Central Coast Water Board staff in order to achieve compliance with the OWTS Policy and develop a LAMP that satisfies, at a minimum, Tier I and Tier II criteria. We recognize that a major component for developing the LAMP is public involvement. The County established a LAMP stakeholder advisory committee and over the past six months has consulted with local design engineers, wastewater contractors, government representatives, real estate representatives, and environmental organizations. This effort has culminated in the development of the draft LAMP.

Overall, we are very pleased with the LAMP document. The attachment to this letter contains our comments on the document.

We continue to support the County's efforts to complete the LAMP. We appreciate the continued communication between County staff and Central Coast Water Board staff and look forward to our discussion at the Water Board's meeting in Santa Barbara on August 1. If you have any questions, please contact **David LaCaro at (805) 549-3892 or at dlacaro@waterboards.ca.gov**.

Sincerely,

Digitally signed by
Harvey C. Packard
Date: 2014.07.09
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for Kenneth A. Harris Jr.
Executive Officer

Attachment – Central Coast Water Board Comments on the Draft LAMP

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CENTRAL COAST WATER BOARD COMMENTS
ON THE
SANTA BARBARA COUNTY DRAFT LOCAL AGENCY MANAGEMENT PLAN (LAMP)
FOR THE
MANAGEMENT OF ONSITE WASTEWATER TREATMENT SYSTEMS (OWTS)
JULY 9, 2014

General Comments:

- It should be highlighted in multiple locations in the LAMP (and in the ordinance) that the default design criteria will be Tier 1 criteria identified in the OWTS Policy.
- The LAMP document should include a discussion for evaluating the LAMP program on a routine basis to assess functionality and programmatic efficiency, allowing the County to make changes to the ordinance to improve the efficiency of the OWTS program.
- Ordinance should also include numeric references. For example, Section 3.2 states that "the minimum daily design flow for residences shall be three hundred and seventy five gallons per day." Could these narrative values include a numeric values as well?

Specific Comments:

Comment No.	Reference	Comment/Question
1	Section I, Page 1, Paragraph 1	Consider including a discussion of how the Central Coast Water Quality Control Board oversees wastewater disposal for the County.
3	Section I, Page 2, Paragraph 2	Discusses how the LAMP is structured and organized in accordance with the LAMP guidance. We understand the guidance to be recommended and not mandatory. However, Regional Board staff believes that the guidelines are reasonable for the development of the LAMP.
4	Section I, Page 2, Paragraph 7	Should include the review of the LAMP every five years as required by Section 9.3.3 of the OWTS Policy.
5	Section II, Page 4, Paragraph 1	The introduction paragraph might include a brief discussion of other information sources beyond the sanitary survey.
6	Section II, Page 6, "Groundwater"	Are there data that demonstrate degradation in the groundwater basins? Maybe this section can be expanded.
7	Section II, Page 7, Paragraph 1, "Groundwater"	Should this include a discussion of water purveyors or is this discussed elsewhere in the document?
8	Section II, Page 13, Paragraph 5	This section discusses the number of complaints in certain focus areas, but does not include a discussion of what the complaints were about, such as effluent surfacing, backing up, etc.?
9	Section II, Page 14, Bullet Point #3	Discusses the number of failures, but does not include what failed. Same comment as above…surfacing effluent, backing up, etc.
10	Section II, Page 19, "Groundwater Basin Information"	First paragraph discusses nitrate problems. Can this be referenced to a document source…TMDLs, Basin Plan, etc.

Comment No.	Reference	Comment/Question
11	Section II, Page 19, Paragraph 2, last sentence. "Water System Information"	This sentence indicates "45 mg/L." This should also include "nitrate as nitrate" or "N03 as N03"
12	Section II, Page 19, "Water System Information"	Discusses nitrate problems. Can this be referenced to a document source…TMDLs, Basin Plan, etc.?
13	Section II, Page 20, "Local Problems Areas"	Both the Los Olivos and Janin Acres discussion include a reference to 45 mg/L but do not include N03 as N03.
14	Section II, Page 20, "Assessment Factors"	Are these assessment factors associated with the sanitary survey or another document?
15	Section II, Page 21, Paragraph 1 "Types and Age of System"	Not too sure that the high, medium, and low would be considered age indicators. However, if these are tied to the Sanitary Survey, then they should be left alone.
16	Section II, Page 21, Paragraph 1 "Proximity to Groundwater/Surface Water"	Why not use Tier 1 setback criteria factors to gauge high, medium, and low factors. However, if these are tied to the Sanitary Survey, then they should be left alone.
17	Section II, Page 22, "Summary of Results"	References Table 2-3, but could not find it in the LAMP document.
18	Section II, Page 22, "General Recommendations, Water Quality Monitoring"	Consider adding a discussion of feasibility for water quality monitoring. In other words, can the County feasibly implement a full water quality monitoring program based on current resource and staffing restrictions?
19	Section III, Page 25 "Water Quality Monitoring"	Consider adding a discussion on what Santa Barbara County used to establish/delineate local groundwater basins (i.e., Bulletin 118).
20	Section III, Page 27, Table 3-1	Explain nitrates. Nitrates as N or as N03? Needs to have some frame of reference.
21	Section III, Page 30 Paragraph 7	This paragraph explains that the Santa Ynez River Water Conservation District has several wells "as data points." What analysis will be conducted at these wells? Is this explained in another section of the document? And, how will these data points help?
22	Section III, Page 33, last paragraph	This section of the LAMP discusses data points for the groundwater monitoring component of the LAMP. I would suggest adding a brief discussion of additional information sources such as the state GAMA (groundwater ambient monitoring and assessment program), Department of Public Health Beach Assessments (Report Card), new well water quality assessments, future salt and nutrient management plan coordination, real estate transfers, and existing Water Board permits and monitoring programs.
23	Section IV, Page 34,Paragraph 5	This paragraph discusses the EHS Envision database. Does this database breakdown the applications by area (focus area)?

Comment No.	Reference	Comment/Question
24	Section VI	Consider including a discussion of designs of RV dump stations and the management of such facilities?
25	Section VI, Page 40 "General Policies Recommendations"	This section might include the County's ability to refer cases to Water Board staff or at least discuss the ability for consultation.
26	Section VI. Page 40, Paragraph 3	This paragraph discusses composting toilets or incinerating toilets, but lacks a discussion of how these are regulated. Consider expanding.
27	Section VI, Page 42 "Wet Weather Borings"	This section lacks the identification of areas prone to seasonally high or perched groundwater. Would these be considered the "focus areas?" Please expand.
28	Section VIII, Page 47 "Education and Outreach, Stakeholder/Community meetings"	This section should discuss the potential locations of such meetings or maybe where they might be the most useful (focus areas).
29	Section VIII, Page 48, "Ongoing Education"	Consider including a discussion of educational materials specific to supplemental system owners (new and existing).
30	Section VIII, Page 48, "Ongoing Education"	This section might include a discussion of outreach through the real estate community, what is the relationship? Is this a reasonable avenue to disseminate information to new home owners that will own a supplemental system?
31	Section X, Page 51, "Septage Management"	Contact the City of Guadalupe to determine the septage receiving station operating timeline. Once determined, this section should include a discussion of such facility.
32	Section XI, Page 53 Program Management"	This section should include a discussion on records management filing, and records keeping. (refer to Policy Section 9.3.1),
33	(Ordinance) Section 5.A.1	Consider including a bullet or disclaimer that future TMDLs may impact new systems and these systems may require supplemental treatment. This would allow the County to make determinations on new systems located near listed water bodies.