

Regional Water Board Required Changes and General Comments
& Permit Sonoma Staff Responses

Required Changes

1. LAMP, part B, section 9.1.8, page 20 (Surface water within the watershed is listed as impaired for nitrogen or pathogens)

The LAMP should also state explicitly that TMDL requirements will control if it is not possible to comply with both the TMDL and LAMP Special Provisions requirements.

Comment noted. Revisions have been proposed to LAMP section 9.1.8 to be explicit.

LAMP section 9.1.8

9.1.8 Impaired Water Bodies

Sonoma Creek is subject to a previously approved TMDL Implementation Plan, established prior to the adoption of the OWTS Policy. The Petaluma River is subject to an approved TMDL Implementation Plan. Identified water bodies listed as impaired under the Clean Water Act section 303(d) within the Russian River Watershed are subject to the OWTS Policy Tier 3.

An Advance Protection Management Program (APMP) has been created for each of the three water bodies. The APMPs are in OWTS Manual Section 19 (OWTS Policy Tier 3, Total Maximum Daily Load and Advanced Protection Management Program). TMDL requirements will control if it is not possible to comply with both the TMDL and LAMP Special Provisions requirements.

2. The APMP for the Sonoma Creek, Petaluma River, and Russian River watersheds described in the OWTS Manual (Section 19)

The defined APMP areas are inconsistent with the OWTS Policy, adopted Region 2 TMDLs, and the draft Region 1 TMDL. The OWTS Policy and these TMDLs make no distinction between which parts of the OWTS need to be within the geographic area of the APMP for the APMP requirements to apply. Therefore, if any portion of the OWTS falls within the geographic area of the APMP, not just the dispersal system, then the regulations of the APMP should apply.

Comment noted. Revisions have been proposed in the following sections to address the concern.

OWTS Manual Section 2 – OWTS definition

Onsite Wastewater Treatment System(s) (OWTS) includes individual ~~dispersal disposal~~ systems, community collection and ~~dispersal disposal~~ systems, and alternative collection and ~~dispersal disposal~~ systems that use subsurface dispersal. Components of an OWTS include a septic tank or primary settling, supplemental treatment units, and/or dispersal systems. The short form of the term may be singular or plural. OWTS do not

include “graywater” systems pursuant to the Health and Safety Code Section 17922.12. Commonly referred to as septic system(s).

OWTS Manual Section 19.1.C (Russian River) – Applicable OWTS.

C. The applicability of these Special Provisions is determined by the location of any component of the OWTS system. ~~the dispersal system~~. The OWTS ~~dispersal~~ system must be completely or partially within 600 linear feet from the top of the watercourse bank in the horizontal (map) direction on either side of the watercourse to be subject to these Special Provisions. OWTS ~~with effluent dispersal~~ systems entirely outside the 600 linear foot distance are not subject to these requirements.

OWTS Manual Section 19.2.C (Petaluma River) – Applicable OWTS.

C. Applicable OWTS. All OWTS with any component of the OWTS system ~~the effluent dispersal system~~ within or partially with the APMP. OWTS ~~with effluent dispersal~~ systems entirely outside the APMP are not subject to these requirements.

OWTS Manual Section 19.3.C (Sonoma Creek) – Applicable OWTS.

C. Applicable OWTS. All OWTS with any component of the OWTS system ~~the effluent dispersal system~~ within or partially with the APMP. OWTS ~~with effluent dispersal~~ systems entirely outside the APMP are not subject to these requirements.

Additional comments on Section 19 are:

A. 19.2.E.1 - The start of the countdown for the due date for first inspection needs to be changed from January 1, 2022 to reflect the effective date of the TMDL.

OWTS Manual Section 19.2.E.1 is proposed to have date read “May 10, 2021” as follows:

1. Inspection frequency shall be within two years of ~~January 1, 2022~~, May 10, 2021, and once every ten years thereafter.

B. 19.2.E.2 - Inspections should include not only “effluent dispersal area(s)” but the “effluent dispersal system(s)” to reflect the need for a more in depth inspection than merely a visual inspection of the surface area.

OWTS Manual Section 19.2.E.2 is proposed to replace “area(s)” with “system(s)” as follows:

2. Inspections shall include the septic tank, effluent dispersal system(s) ~~area(s)~~, and related appurtenances of the OWTS. A basic operational inspection shall provide sufficient information to determine that the OWTS are not discharging any waste to the river or its tributaries. The inspections should evaluate the following components:

General Comments

3. Check the use of supplemental treatment vs. pretreatment throughout LAMP and OWTS Manual.

Sometimes, supplemental treatment is written as “supplement treatment”. The definitions clarify that pretreatment is a form of supplemental treatment and pretreatment units are also referred to as supplemental treatment units. Ensure that the terms are used intentionally and not interchangeably.

Comment noted. “Supplement” treatment was a typo and is proposed to be revised to read “supplemental” treatment. We found the following four instances in the OWTS Manual:

13.4.E The performance well criteria for at grade OWTS include the following:

1. At grade OWTS with supplemental treatment requires a minimum of five performance wells within and around the system.

14.E OWTS with a supplemental treatment unit and which have standards for performance wells within the respective OWTS Section shall comply with those performance well standards. OWTS without a supplemental treatment unit are not subject to the respective performance well standards, except for mounds and at grade OWTS. Mounds and at grade OWTS without supplemental treatment units are subject to the performance well standards contained in the Wisconsin Mound Manual and the Wisconsin at grade Manual, respectively.

19.2. E.2.e Supplemental Treatment Units or Custom-Designed Systems

4. The maximum daily flow volume of OWTS subject to County oversight increased from 1,500 gallons per day to 10,000 gpd (OWTS Manual section 1.3).

Recommend adding that the County will provide notice and opportunity for Region 2 Water Board to review for large or community OWTS (e.g., with flows greater than 5,000 gpd). This is typical of other LAMPs in Region 2 and keeps the regional water boards apprised of larger OWTS and any community systems and offers an opportunity to provide input.

The County respectfully disagrees. Implementing this comment puts a burden on the County to track and report on OWTS greater than 5, 000 gpd. The County will do our best to track and report.

5. Shifting site evaluation work to designers (OWTS Manual section 7)

This is concerning and may create a conflict of interest. Water Boards staff urge you to reconsider this new procedure. If unwilling to drop this provision, we request the County include in its LAMP a plan to develop a program to assess the effectiveness of this policy in achieving the goals of the OWTS Policy. The results of this assessment program should be included in the five-year reports provided to the Regional Board.

The County respectfully disagrees. Implementing this comment puts a burden on the County to track and report on site evaluations. The County will be on-site during a pre-plan review site evaluation and during construction. The County intends to evaluate the site evaluation results at these times. Significant deviations will be addressed with the designer and county staff. The County will use this information internally to adjust the site evaluation process as needed.

6. Operational Monitoring Program.

The program was revised in 2023 to only require OWTS with a supplemental treatment unit be placed in the OPR program. The OWTS Manual was updated to reflect this. OWTS Manual Section 14.E states that “OWTS without a supplement[al] treatment unit are not subject to the respective performance well standards, except for mounds and at grade OWTS. Mounds and at grade OWTS without supplemental treatment units are subject to the performance well standards contained in the Wisconsin Mound Manual and the Wisconsin at grade Manual, respectively.” It would be helpful to clarify within this section what is considered supplemental treatment (or what is not). Clarify the relation between performance wells and OPR. Clarify whether all non-standard systems require monitoring even if not part of the OPR program.

Comment noted. No edits are proposed.

The OWTS Manual contains the following definition, which is applicable throughout the OWTS Manual, including section 14.

“Supplemental Treatment Unit means any OWTS or component of an OWTS, except a septic tank or dosing tank, that is NSF listed and certified which performs additional treatment of domestic wastewater to decrease the constituents of concern before they reach primary treatment components or the final effluent dispersal field. Supplemental treatment units encompass pretreatment units. Pretreatment units are also referred to as supplemental treatment units.”

The concern was centered on performance wells versus observation wells. For mounds and at-grade systems, observation wells are required within or adjacent to these systems as part of their design as indicated in their respective design manuals.

These system types are non-standard systems. As such these were required to be in the OPR program and to have performance wells downslope of the system (in addition to the observation wells within).

As currently proposed, these systems only need the downslope performance wells when supplement treatment is part of the overall site design, meaning the system is in the OPR program.

The entire section of 14.E reads:

“OWTS with supplemental treatment unit and which have standards for performance wells within the respective OWTS Section shall comply with those performance well standards. OWTS without a supplement[al] treatment unit are not subject to the respective performance well standards, except for mounds and at grade OWTS. Mounds and at grade OWTS without supplemental treatment units are subject to the performance well standards contained in the Wisconsin Mound Manual and the Wisconsin at grade Manual, respectively.”

Please see OWTS Manual sections 13.3.E and 13.4.E, for mounds and at-grades, respectively. And within each section, subsections 1 and 2. Subsection 1 is for

performance wells when there is a supplemental treatment unit. Subsection 2 is for observation wells when there is no supplemental treatment unit.

Section 14.E refers to the design section, in this case 13.3.E and 13.4.E for performance wells and observation wells depending on the presence or absence of a supplemental treatment unit.

7. Ensure that relevant sections of the Sonoma County General Plan are incorporated in the LAMP.

For example:

Policy WR-2e (formerly RC-3h): Require proof of groundwater with a sufficient yield and quality to support proposed uses in Class 3 and 4 water areas. Require test wells or the establishment of community water systems in Class 4 water areas. Test wells may be required in Class 3 areas. Deny discretionary applications in Class 3 and 4 areas unless a hydrogeologic report establishes that groundwater quality and quantity are adequate and will not be adversely impacted by the cumulative amount of development and uses allowed in the area, so that the proposed use will not cause or exacerbate an overdraft condition in a groundwater basin or subbasin.

The County respectfully disagrees. Policy WR-2e, proof of groundwater with sufficient yield, and test wells related to building permits and the ability to develop a parcel. Granted, all things development is related, but we hold building permits, not septic permits, for proof of groundwater in Class 3 and 4 areas.

Further, the Local Area Management Program is intended to demonstrate compliance with the State OWTS Policy and not how the County implements the local general plan.

Comments on the Water Quality Assessment Program

8. LAMP, part B, section 9.1.1, page 17 (Degree.of.vulnerability.to.pollution.from.OWTS.due.to.hydrogeological.conditions)

While this portion of the LAMP meets the minimum requirements of a Tier 2 program, North Coast Water Board has the following comments, with the intent that you incorporate this information into the LAMP's Water Quality Assessment Program:

The State Water Board with Department of Water Resources (DWR) gathered information identifying groundwater basins that are deemed hydrogeologically vulnerable areas (HVAs). There are six HVAs identified in Sonoma County including: i) Alexander Valley; ii) Cloverdale Area; iii) Santa Rosa Plain; iv) Healdsburg Area; V) Petaluma Valley; and vi) Sonoma Valley.

The HVA list was created in 2000 using DWR and US Geological Survey publications. Data from these publications were used to identify areas where geologic conditions are more likely to allow recharge at rates substantially higher than in lower permeability or confined areas of the same groundwater basin. Groundwater resources underlying designated (i.e.,

published) recharge, rapid infiltration, or unconfined areas were considered categorically more vulnerable to potential contaminant releases than groundwater underlying areas of slower recharge, lower infiltration rates, or intervening low permeability deposits (i.e., confining layers).

The Sonoma County General Plan also identifies Water Resources policies that will be pursued to investigate and resolve water quality problems. Specifically:

- A. Policy WR-1a: Coordinate with the RWQCB, public water suppliers, Cities, Resource Conservation Districts (RCDs), watershed groups, stakeholders and other interested parties to develop and implement public education programs and water quality enhancement activities and provide technical assistance to minimize storm water pollution, support RWQCB requirements and manage related County programs. Where appropriate, utilize watershed planning approaches to resolve water quality problems.
- B. Policy WR-1f: Work closely with the RWQCBs, incorporated cities, public water suppliers, and other interested parties in the development and implementation of water quality plans and measures.
- C. Policy WR-1l: Consider development or expansion of community wastewater treatment systems in areas with widespread septic system problems that are a health concern and cannot be addressed by on-site maintenance and management programs.
- D. Policy WR-1m: Consider on-site wastewater management districts in areas with septic problems. The County should consider how to incorporate these General Plan policies into the LAMP.

Finally, the County should assess possible climate change impacts in this component of the LAMP.

The County respectfully disagrees. RWB staff state this section meets the minimum for a Tier 2 program. While noble goals, items A through D and climate change, are broad, generalized activities that exceed the scope and intent of the State OWTS Policy and a LAMP.

9. LAMP, part B, section 9.3.2, page 26 (Maintain a Water Quality Assessment Program)

Describe how the County will maintain a water quality assessment program that will determine the general operational status of OWTS, evaluate the impact of OWTS discharges, evaluate potential impacts to OWTS from climate change (e.g. sea level rise, rising groundwater levels) and assess the extent to which groundwater and local surface water quality may be adversely impacted with a focus on factors listed in Section 9.1 of the LAMP. Where it is or becomes available, monitoring data for nitrates and pathogens must be included in the County's water quality assessment program. It may also include data for other constituents which are needed to adequately characterize the impacts of OWTS on water quality.

The State Water Resources Control Board's Aquifer Risk Map is one source of information for the water quality assessment program. The Aquifer Risk Map was developed to fulfill requirements of SB-200 and is intended to help prioritize areas where domestic wells and state small water systems may be accessing raw source groundwater that does not meet safe drinking water standards. The Aquifer Risk map is used to inform the SAFER Needs Assessment and the Fund Expenditure plan to prioritize at-risk areas for SAFER funding. We encourage the County to access funding allocated from the SAFER program for counties or eligible partner entities to receive funding to implement regional programs that address drought-related and/or contamination issues for state small water systems (state smalls) and domestic wells serving disadvantaged communities (DACs) and low-income households.

Reference California Health and Safety Code Section 116772 (b)(1) and (2), which state: (1) By January 1, 2021, a local health officer or other relevant local agency shall provide to the State Water Board all results of, and data associated with, water quality testing performed by a laboratory that has accreditation or certification pursuant to Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101 for a State Small Water System or domestic well that was collected after January 1, 2014, and that is in the possession of the local health officer or other relevant local agency. (2) By January 1, 2022, and by January 1 of each year thereafter, all results of, and data associated with, water quality testing performed by a laboratory that has accreditation or certification pursuant to Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101 for a State Small Water System or domestic well that is submitted to a local health officer or other relevant local agency shall also be submitted directly to the State Water Board in electronic format.

Comment noted. No edits are proposed.

10. LAMP, part B, section 9.3.2.1, page 27 (Domestic Well Sampling)

A domestic well sampling program should be considered as part of a Water Quality Assessment Program. One option that the County might consider in lieu of a local agency-driven sampling effort is to develop a voluntary well sampling program that creates incentives for participation and is of low to minimal cost to homeowners. Program implementation can begin when there is funding to support it. Regional Board staff would be happy to support this effort.

Comment noted. No edits are proposed.

11. LAMP, part B, section 9.3.2.2, page 27 (Routine Real Estate Transfer Samples)

A domestic well sampling program at the time of a property transaction should be considered as part of a Water Quality Assessment Program. See comments for section 9.3.2.1.

Comment noted. No edits are proposed.

12. LAMP, part B, section 9.3.2.4, page 27 (Water Quality reports for New Wells)

A sampling program for new well development should be considered as part of a Water Quality Assessment Program. As with other comments on this LAMP, County staff should ensure that relevant sections of the Sonoma County General Plan are incorporated in the LAMP. Specifically:

Policy WR-2d: Continue the existing program to require groundwater monitoring for new or expanded discretionary commercial and industrial uses using wells. Where justified by the monitoring program, establish additional monitoring requirements for other new wells.

Comment noted. No edits are proposed. The County will continue our existing programs.

13. LAMP, part B, section 9.3.2.5, page 28 (Beach Water Quality Sampling)

Sonoma County Department of Health Services currently monitors freshwater beaches for total and fecal coliform, E.coli, and enterococcus. The LAMP should address how these monitoring data are or will be used as part of the County's Water Quality Assessment Program.

Russian River Pathogen TMDL data indicates a low presence of pathogens during summer months and a higher presence during the winter months. The freshwater beach monitoring is primarily during the summer months when the TMDL data suggests a low presence of domestic waste parameters. Further, during summer, groundwater levels go down, creeks go dry and there is less potential for pollutant transport. Surface water quality during times of depressed groundwater and dry tributaries is likely not be associated with OWTS. As such, freshwater beach water quality data is not proposed to be used in the Water Quality Assessment Program.

14. LAMP, part B, section 9.3.2.9, page 28 (Groundwater Ambient Monitoring and Assessment Program)

Because the currently available groundwater data in GAMA is for deep aquifers, this data is unlikely to provide much insight into the impacts from OWTS. A shallow well monitoring network would be more appropriate and could be developed as part of its Water Quality Assessment Program. LAMP, part B, section 9.1.1 states that Permit Authority may occasionally sample Non-Standard OWTS performance wells for total coliform and fecal coliform bacteria and nitrates as indicators of the degree of treatment and function of Non-Standard OWTS; this could be one component of such monitoring. Developing a monitoring program that distinguishes deep wells from shallow wells is key in understanding shallow impacts from OWTS, risk to shallow domestic and irrigation supply wells, and risk to deeper municipal water supply wells. GAMA data is not yet well sorted between deep and shallow wells. Therefore, establishing a monitoring network that feeds GAMA information and targets distinct water-bearing units is the objective.

The State of California collects well completion reports for each well drilled in California. The well completion reports document the screening interval and the elevation of groundwater extraction. The State of California could distinguish deep wells from shallow wells for those wells in the GAMA program.

The County of Sonoma does not have the legal authority to require water quality sampling for most domestic wells.

No edits are proposed.

Comments on Special Areas

15. LAMP, part B, section 9.1.9, page 20 (OWTS is located in an area of high OWTS density)

The Special Standards Areas identified in the OWTS Manual (Section 18 Variance Prohibition and Special Standards Areas) were established many decades ago. In the first five years of LAMP implementation the County should investigate and identify other areas where OWTS exist in high densities and where special standards may be appropriate now or in the future under various climate change and development scenarios. Consider information regarding OWTS density contained in the North Coast Regional Water Board March 24, 2021 Final Staff Report for North Coast Hydrologic Region Salt and Nutrient Management Planning Groundwater Basin Evaluation and Prioritization. This report was provided to the Regional Water Board at its April 15, 2021 Board Meeting and is available for download on our Regional Board website and also upon request. Desktop analyses such as those performed to assess nitrogen impacts in Hantzche & Finnemore (1992) may also be useful for this purpose.

Comment noted. No edits are proposed.

16. LAMP, part B, section 9.1.4, page 18 (OWTS located in area with high domestic well usage)

The domestic well mapping project to identify high use areas is good; please clarify the language to state both new and existing domestic wells (as available) will be included in the map. A more definite commitment to study whether domestic water supply in high domestic well use areas is vulnerable to OWTS pollution would be preferred. North Coast Water Board staff support water quality sampling from domestic wells as this would provide a more definitive indication of vulnerability.

Reference: State Water Resources Control Board Aquifer Risk map, which includes a domestic well density layer derived using Well Completion Records from Department of Water Resources.

<https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=17825b2b791d4004b547d316af7ac5cb>

We currently require the location to be shown as GPS coordinates. Staff review the well application to ensure the location / GPS coordinates are presented. In the past, the latitude

/ longitude coordinates were not always presented and staff relied on the site map to locate the well. Essentially, the older well applications were not robust enough to have the location readily uploaded into a GIS system / layer.

17. LAMP, part B, section 9.1.7, page 19 (Surface water is vulnerable to pollution from OWTS)

In addition to perennial and intermittent watercourses, lakes, ponds, and reservoirs, vulnerable surface water bodies include wetlands, vernal pools, wet meadows, and seeps. While the OWTS Manual establishes setbacks for wetlands, setbacks should be considered for these other vulnerable water features.

Comment noted. No edits are proposed.

Comments on Areas Near Impaired Waters

18. LAMP, part B, section 9.1.8, page 20 (Surface water within the watershed is listed as impaired for nitrogen or pathogens)

On page 14 of the LAMP, it states " The Russian River Watershed Pathogen TMDL APMP will be addressed as an addendum to this LAMP after the adoption of the Russian River Pathogen TMDL." This may be a remnant of the previous LAMP version and should be deleted.

The County's APMP (Special Provisions) for the Russian River is described in section 19.2 of the OWTS Manual. The County should add a statement that the APMP may be amended after the adoption and final approval of the Russian River TMDL Action Plan to ensure that the LAMP is consistent with the Action Plan, which may include new prohibitions or specific requirements for OWTS. The LAMP should also include a description and timeline for the County's process of amending the LAMP under this circumstance.

Comment noted. No edits are proposed.

19. LAMP, part B, section 9.2.2, page 22 (Special provisions for OWTS in specified geographic areas near specific impaired surface water bodies listed for pathogens or nitrogen)

The statement in the third paragraph is not completely accurate. We recommend the following language:

"To address pathogen pollution and impairments in the Russian River watershed, in 2021, the North Coast Water Board adopted the Action Plan for the Russian River Watershed Pathogen Total Maximum Daily Load (Action Plan) and Russian River watershed Prohibition Against the Discharge of Fecal Waste Materials for amendment to the Water Quality Control Plan for the North Coast Region (Basin Plan). In 2024, before State Water Resources Control Board consideration, the North Coast Water Board elected to revise the Action Plan's Onsite Wastewater Treatment System (OWTS) implementation requirements. This decision was

made to better align the proposed Action Plan with the statewide OWTS Policy, including Tier 3 requirements. The revised Action Plan is expected to be considered by the North Coast Water Board in June 2025 followed by the State Water Resources Control Board in Fall 2025.”

Comment noted. LAMP section 9.2.2, third paragraph, is proposed to be edited as follows:

~~In 2019, the North Coast RWQCB and the State Water Resources Control Board proposed the adoption of an amendment to the Water Quality Control Plan (Basin Plan for the North Coast Region) to establish a Russian River Watershed Pathogen Total Maximum Daily Load (TMDL) and Implementation Plan. In 2024, the Russian River Watershed Pathogen TMDL was postponed. The North Coast RWQCB indicates a revised TMDL will be considered in early 2025. The County anticipates the revised TMDL will rely on the State’s OWTS Policy Tier 3 provisions due to the impaired reaches of Russian River and that Tier 3 addresses impaired water bodies.~~

To address pathogen pollution and impairments in the Russian River watershed, in 2021, the North Coast Water Board adopted the Action Plan for the Russian River Watershed Pathogen Total Maximum Daily Load (Action Plan) and Russian River watershed Prohibition Against the Discharge of Fecal Waste Materials for amendment to the Water Quality Control Plan for the North Coast Region (Basin Plan). In 2024, before State Water Resources Control Board consideration, the North Coast Water Board elected to revise the Action Plan’s Onsite Wastewater Treatment System (OWTS) implementation requirements. This decision was made to better align the proposed Action Plan with the statewide OWTS Policy, including Tier 3 requirements. The revised Action Plan is expected to be considered by the North Coast Water Board in June 2025 followed by the State Water Resources Control Board in Fall 2025.

20. LAMP, part B, section 10.0 (Advanced Protection Management Program)

The references to the OWTS Manual sections need to be updated – the LAMP references OWTS Manual sections 9.2 through 9.4, but should be 9.1 through 9.3.

Comment noted. Proposed edits as follows:

10.0 Advanced Protection Management Program

The State OWTS Policy Tier 3 requires that OWTS in impaired areas that are listed in the OWTS Policy Attachment 2, be subject to a higher standard than Tier 2. These standards are to be contained in an Advanced Protection Management Program (APMP). The OWTS Policy Tier 3 allows one of the following options:

- Provisions consistent with an approved TMDL Action Plan.
- Special provisions detailed in the LAMP.
- Standard provisions contained in OWTS Policy Tier 3, Section 10.

The County proposes to use the first option for the Petaluma River watershed and the Sonoma Creek watershed both of which have an approved TMDL Action Plan (OWTS Manual Sections ~~19.3~~ 19.2 and ~~19.4~~ 19.3, respectively). The County proposes special provisions for the listed reaches in the Russian River watershed (OWTS Manual Section ~~19.2~~ 19.1).

Comments on Policy Integration and Coordination

21. LAMP, part B, section 9.2.7, page 24. (Maintenance Districts or Zones)

This section cites two examples of where the County has either established a County Service Area (The Sea Ranch Association) or established special conditions in a County use permit (Odd Fellows Recreational Club) to manage groups of OWTS. This section could be expanded to cite the Water Resources section of the Sonoma County General Plan, as follows:

- A. Policy WR-1l: Consider development or expansion of community wastewater treatment systems in areas with widespread septic system problems that are a health concern and cannot be addressed by on-site maintenance and management programs.
- B. Policy WR-1m: Consider on-site wastewater management districts in areas with septic problems.
- C. Policy WR-1n: Initiate a review of any sewer systems when they persistently fail to meet applicable standards. If necessary to assure that standards are met, the County may deny new development proposals or impose moratoria on building and other permits that would result in a substantial increase in demand and may impose strict monitoring requirements.
- D. Policy WR-1o: Require that commercial and industrial uses reduce and pretreat wastes prior to their entering sewer systems.

Comment noted. No edits are proposed.

22. LAMP, part B, section 9.2.8, page 25. (Regional Salt and Nutrient Management Plan [SNMP] consideration)

This section would benefit from further development. A SNMP has been developed for the Santa Rosa Plain, but the LAMP fails to acknowledge it, describe its implications, or explain how it is participating in the stakeholder process. The SNMP indicates that farmsteads/septic systems account for 20% total acreage in the SR Plain and are estimated to be 31% percent of the salt and nutrient load. The linkage and loading analysis presented in the SNMP septic systems are the single most significant source in the basin. The LAMP should address salts and nutrients programmatically and in areas outside the DWR identified groundwater basins. As a reference, see information regarding groundwater basin prioritization contained in the North Coast Regional Water Board March 24, 2021 Final Staff Report for North Coast Hydrologic Region Salt and Nutrient Management Planning Groundwater Basin Evaluation and Prioritization. Reference priority basins for Salt and

Nutrient Management Planning listed in North Coast Regional Water Board Resolution No. R1-2021-0006.

[Comment noted. No edits are proposed.](#)

23. LAMP, part B, section 9.2.9, page 25. (Watershed Management Group coordination)

This section refers to a "Watershed Advisor." Please provide more information about the Watershed Advisor identified in the LAMP. This section also provides an opportunity to describe how Permit Sonoma coordinates with the groundwater sustainability agencies under SGMA and resource conservation districts (RCDs) within the county.

[Comment noted. No edits are proposed.](#)

Comments on Specific Components

24. LAMP, part B, section 9.2.5, page 24. (Education and Outreach for OWTS Owners)

The LAMP states that informational materials are provided to OWTS owners of standard and non-standard systems about how to operate and maintain their OWTS. These materials should be advertised and located more prominently on Permit Sonoma's website and existing OWTS owners more actively notified (e.g., through periodic mailings). Furthermore, both Region 1 and Region 2 staff should be invited to the one-day educational programs the county provides to these OWTS owners.

[Comment noted. No edits are proposed.](#)

25. LAMP, part B, section 9.4.7 page 30 (RV Holding Tanks)

The LAMP and the OWTS Manual should be clear how new and replacement OWTS with RV holding tank wastewater will be handled by the County. The County should also reference CA Health & Safety Code § 25210.2 and incorporate its requirements into the LAMP. The LAMP and OWTS Manual should provide a definition of "incidental dumping" and at what point incidental dumping becomes a significant portion of the waste stream so that it is no longer domestic waste and outside the jurisdiction of the LAMP. North Coast Water Board staff are interested developing a local policy to control RV waste discharges.

[CA Health & Safety Code § 25210.2 prohibits the use of chemical compounds that inhibit biological activity in an OWTS within RV holding tanks.](#)

[Our OWTS Manual section prohibits OWTS dedicated to receiving significant amounts of RV holding tank discharges \(section 4.6.B.8\). This language was taken directly from the State's OWTS Policy. Our LAMP states we allow incidental RV holding tank discharges to an OWTS section 9.4.7\). There is a discrepancy between the two. As such, LAMP Section 9.4.7 is proposed to be revised as follows:](#)

9.4.7 RV Holding Tanks

The OWTS Manual ~~prohibits OWTS that are dedicated to receiving significant amounts of wastes from RV holding tanks. defines domestic wastewater to include only incidental RV holding tank dumping but does not include wastewater consisting of a significant portion of RV holding tank wastewater such as an RV dump station.~~ OWTS Manual section 4.6.B.8.

26. LAMP, part B, section 9.2.6, page 24. (Septage Disposal)

For long-term planning purposes and for developing contingency plans if there is an extended disruption in waste acceptance at septage receiving facilities currently being used, the local agency responsible for overseeing OWTS should have a means for determining the volume of septage generated within its jurisdiction, the capacity of facilities to accept it, and accounting for its final disposition. The PRMD should coordinate with the County Department of Health Services in this regard.

Permit Sonoma will coordinate with County Health Services in this regard.

27. LAMP, part B, section 9.4.8 page 30 (Separation to Groundwater)

The minimum amount of native soil allowed for installation of an OWTS with supplemental treatment or experimental OWTS is two feet between the dispersal and the limiting layer including groundwater. The LAMP notes in sections 9.1.5 and 9.1.6 that a pretreatment unit or above grade sand filter is equivalent to one foot of soil; please confirm that the equivalent of one foot of soil is to achieve a total of three feet between the dispersal and the limiting layer (including groundwater) and does not count towards the minimum two feet of native soil.

Correct. The standard is three feet of good soil below dispersal. Treatment units or other mitigation only allows a decrease to two feet of good soil below dispersal.

28. LAMP, part B, section 9.2, page 22 (Scope of Coverage, Permitting, Site Evaluation, Design, and Construction)

This paragraph states that the Permit Authority provides, when applicable, monitoring oversight of winery process wastewater subsurface dispersal systems. This is not mentioned in the OWTS Manual. The County does not have permitting authority for industrial waste discharges and it is unclear why a monitoring program would exist for them. This may be an inclusion that is not intended and should be cut.

The County does permit the construction of industrial treatment facilities and/or components, and the County does review the design of industrial treatment facilities under our land use authority. The County's permitting is limited to the construction, and we do not permit the treatment or discharge of industrial wastewater. Due to a similar comment, we

have removed the process wastewater section from the OWTS Manual and are proposing to now removed from the LAMP.

LAMP Section 9.2 is proposed to be revised as follows:

9.2 Scope of Coverage, Permitting, Site Evaluation, Design and Construction

The Sonoma County LAMP covers the following types of OWTS: residential and commercial domestic wastewater systems producing flows of 10,000 gallons per day or less; and high strength domestic wastewater from commercial food service buildings that do not exceed 900 mg/L BOD. ~~In addition, in collaboration and coordination with RWQCB requirements, Permit Authority provides local permitting, design review, and installation, and when applicable monitoring oversight of winery process wastewater subsurface dispersal systems.~~ The OWTS Manual provides regulations/guidelines for the local site evaluation conducted by a qualified professional, siting, design, construction monitoring and maintenance requirements. OWTS Manual Sections 4 (Criteria for all OWTS), 7 (Site Evaluation Methods and Investigation Requirements), 9 (Criteria for Standard OWTS), 11 (Criteria for Commercial, Industrial, and Institutional OWTS), 12 (Non-Standard Experimental & Alternative OWTS Approval Process), 13 (Non-Standard Experimental & Alternative OWTS Approval Standards), and 14 (OWTS Operational Permit and Monitoring).

29. OWTS Manual section 9.3 (Seepage Pits)

We recommend that the LAMP (and OWTS Manual) specifically state that seepage pits are not allowed as new systems on undeveloped parcels (leaving room for the conversion of cesspools to seepage pits in existing OWTS).

The State OWTS Policy and the Russian River TMDL Action Plan allow seepage pits. The County proposes to keep seepage pits with a 10' separation to groundwater, per the State OWTS Policy.

30. LAMP, part B, section 3.0, page 15 and section 3.3.3, page 28

In addition to the information listed in section 3.3 of the Policy as required in the annual report, the County should add to its annual report the number, location, and description of permits issued as replacement OWTS under hardship replacement permit program.

Comment noted. No edits are proposed to the LAMP or OWTS Manual. In the short term, staff will search for hardship request through the description field. In the long term, staff will have a field added to our permit tracking system to more readily find these. To date, we've had one request, but the permit was not issued.