



Public Health Environmental Health Services

Trudy Raymundo
Director

Corwin Porter, MPH, REHS
Assistant Director

Maxwell Ohikhuare, M.D.
Health Officer

Josh Dugas, REHS
Division Chief

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Mike Plaziak, P.G.
Supervising Engineering Geologist
Lahontan Regional Water Quality Control Board
14440 Civic Drive, Suite 200
Victorville, CA 92392

Response to Regional Water Board Comment Letter

The County of San Bernardino appreciates the opportunity to work with the State Water Board and its Regional Boards to protect our valuable water resources and to provide our residents and visitors with clean water that is protected from degradation by septic systems. On June 24, 2016, the County received from the Lahontan Regional Water Quality Control Board (Regional Water Board) comments on the Local Agency Management Program (LAMP) that the County submitted to the Regional Board on October 30, 2015. We are pleased to announce that the majority of requested changes can and will be accommodated by the County. Some of the recommendations from the Regional Water Board can be accommodated using a strategy that is different from that suggested by the Regional Water Board. Other recommendations cannot be accommodated due to one or more of the following reasons:

- The requested change is not required by Onsite Wastewater Treatment Systems (OWTS) Policy;
- The requested change is not feasible;
- The requested change is cost prohibitive.

Following are the recommendations that cannot be accommodated:

- Water Quality Assessment Program (WQAP) (Page 1, section A) - The County WQAP proposal meets OWTS policy requirement 9.3.2.
- Sewering High Density OWTS Areas (Page 3, section C, paragraph 3) - The County agrees that when the Regional Water Board determines that ground water is being substantially impacted by high density OWTS, municipal sewage collection should be sought. The County does not have the authority, nor the operating or financing mechanisms, to require this activity. Such activities would require further discussions with the Regional Water Boards and involved parties.
- LAMP scope of coverage and site assessment (Enclosure 1, item 16) – The County's current process for conducting inspections during construction meets OWTS policy standard 9.2.6. We will continue to ensure systems are properly designed and have adequate capacity as part of our plan review, inspection and approval process.

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- Areas of Special Concern and Designated Maintenance Areas (Enclosure 3, page 2, item 5) - Authority to designate Areas of Special Concern should remain solely with the Regional Water Boards Executive Officer. Fifty percent (50%) nitrogen reduction is adequate for OWTS's in Areas of Special Concern according to State OWTS policy 10.9.1.

The following are recommendations that can be accommodated in a manner differing from what was requested by the Regional Water Board:

- LAMP Standards Applicability, Requirements and Exceptions (Enclosure 1, item 10) - As an alternative to accepting national OWTS educational certification or creating a local program for service providers, the County will require annual certification from an approved third party for service providers.
- Annual Reporting and existing OWTS inventory (Enclosure 2, item 4) – Historical GPS data on existing septic system location is not available. The County will begin documenting GPS coordinates of OWTS's as new septic systems are approved, repairs are made or complaints are investigated. This information will be mapped and reported annually.
- Identifying Unauthorized Systems (Page 3, section E) - The County will actively search for unauthorized and failing systems during the course of routine field inspections and investigations. The County does not intend to initiate a grease trap interceptor program.

We look forward to continued partnership with Regional Water Boards in the development and implementation of the San Bernardino County LAMP. Please feel free to schedule a meeting if further discussion is needed.

Thank you,

A handwritten signature in black ink, appearing to read "J Phillippe". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

Jason Phillippe, REHS