

The County of Yuba

Community Development & Services Agency

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To State Water Resources Control Board:

These comments are the result of a review of the State proposed Onsite Wastewater Treatment Systems Policy and the Preliminary Substitute Environmental Document by the Yuba County Environmental Health Department. Yuba County's septic program has been very aggressive at the proper permitting, designing and siting of septic systems for the last twenty years. We have found that the new proposed regulations follow our policies very closely but there are a few areas of concern that we would like to address. We have listed the areas of concern with a brief narrative below:

- 1.) The PUBLIC COMMENTS DRAFT dated September 30, 2011 uses the descriptions Advanced Systems, Advanced Treatment Systems and Treatment Systems without a definition for those types of systems. They seem to be used interchangeably in some sections but as separate terms in other sections. Defining these terms would help with interpreting the policy.
- 2.) There appears to be no flexibility for monitoring of advanced systems as stated in § 9 which is further complicated by the lack of a definition of what is included under an advanced system. It may be prudent to attach the monitoring requirement to those systems that have a manufacturer's requirement for maintenance and monitoring. The maintenance and monitoring done under this requirement would be easier to track with detailed reports provided by certified service providers.
- 3.) Section 7.8 sets a parcel size of 2.5 for parcels using OWTS under Tier 1. We would like to suggest that parcels that are created where a public water system is used and all new wells are tested at time of drilling be allowed to be reduced to one acre.
- 4.) The application rate table on page 21 seems to factor in a level of protection that will require new systems to have leach line sizes that will be much larger than those we now use. We have used sizing criteria from "The manual of Septic Tank Practices" for standard systems and engineered systems that have not shown any adverse impacts or premature failures over the past 20+ years. Based on your proposed application rates the leach fields will be much larger and have an additional cost to the home owners. To obtain equal distribution, the leach fields for many homes would be required to have pumps or siphons which again would be at an added cost to the homeowners.
- 5.) The depth of the percolation rates or the soil morphology determination has not been established in any of the guidelines. Is it to be the trench bottom, a standard depth of 30 – 36 inches, or the most restrictive layer under the system within a certain depth range? Can

an average of differing depth percolation rates be used to design an engineered system where the trench depth is not at the standard depth?

- 6.) The definitions mentioned in item 1.) would also help clarify the conflict between the following two comments contained in the policy:

This is allowed in Tier 2:

"9.4.9 Separation of the bottom of dispersal system to groundwater less than two (2) feet except where advanced treatment systems are utilized and the dispersal system is not a seepage pit." What deviation from 2 feet will be allowed?

Will not be allowed in Tier 3 even with an advanced system:

"10.4.9 Separation of the bottom of dispersal system to groundwater less than two (2) feet."

- *Quotes added*

- 7.) The Environmental document states that the costs to implement this would be minimal but does not outline what costs, if any, were actually analyzed or whether or not the State will have fees to the counties that submit Local Area Management Plans and will be required to report to the State. If the State plans to charge the Counties for administration of the policies then the proposed costs should be outlined in the document.

Thank you for your time and consideration:



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Environmental Health Supervisor
Yuba County



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Cc:
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