



COUNTY OF LAKE

HEALTH SERVICES DEPARTMENT

Division of Environmental Health
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#57

May 4, 2012

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
Via email: commentletters@waterboards.ca.gov.

Dear Ms. Townsend and State Water Resource Control Board members:

Lake County is a rural area and our economic life is primarily based on agriculture and tourism. Clear Lake, as a unique feature is the largest natural lake in California, is one of the oldest lakes in the Western Hemisphere and is the central focus of our county. Our population is about 65,000 year round with significant summer and weekend visitors. In addition many of our citizens are retirees and many families maintain a second home here.

We very much appreciate the effort State Water Board staff have put forth on this project, particularly the efforts since the unsuccessful 2008 draft. I have participated in these efforts, alongside the representatives from CCDEH and RCRC, since the statute passed the legislature and was signed into law.

We consider the present draft risk-based policy, which recognizes existing successful Onsite Wastewater Programs, to be far superior to your previous draft regulations. We intend to work with our California Regional Water Quality Control Board, Central Valley Region and submit for approval a comprehensive Local Agency Management Program.

We believe we can amend our present local ordinance and uniform regulations to comply with requirements outlined in the policy as Tier 2. Our most significant change will be the addition of a Monitoring and Reporting component.

1 → But we believe the draft policy could go a little farther in recognition of local programs that are now protecting water quality. Generally, prescriptive standards in the Tier 2 context should be part of the Local Agency Management Program. Specifically, the very prescriptive standards required for a Tier 2 program in sections 9.4.10, 9.4.11 and 9.4.12 are not needed.

Clear Lake is a raw water source for seventeen Public Water Systems. Almost all of the shoreline property is served with community sewerage systems. There are however some developed areas along the lake with no sewer service. The prescribed setback

distance (sections 9.4.10.4 and 9.4.10.5) of 400 feet and 200 feet when a surface water intake is 1,200 feet away and 2,500 feet away results in costly restrictions without any actual water quality benefit.

Please note the following points:

1. Our Public Water System treatment plants are designed, built and operated to effectively treat surface water. Multiple treatment steps are employed including redundant disinfection.
2. The specific location of the raw water intakes in Clear Lake is not published and is not described on maps. Our Environmental Health agency does not have access to this information and we do not intend to obtain and keep information for the exact location of raw water intakes for the water systems.
3. The water quality protection in our Local Agency Management Program is based on evaluating a proposed site, including the available area and soil properties for adequate treatment of effluent. We do not approve a proposal where water quality will be degraded. Proper site evaluation and system design will provide adequate treatment in the soil system where effluent is dispersed. Arbitrary extended setback distances to a water body will deny some development without water quality benefit.

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→ The prescribed variance options in section 9.4.11 and 9.4.12 are not helpful. In 9.4.11 we can reduce the setback with supplemental treatment. The extra cost and extra risk of supplemental treatment, however, should be reserved for those cases where adequate soil properties or available area are not quite suitable for effective effluent treatment in the soil system. In 9.4.12 we can reduce the setback distance with a

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→ disinfection component. Disinfection of effluent is contraindicated for any system that intends to use the soil system as a treatment component. The disinfection process will kill not just pathogens but all microbes and then the soil treatment will be less effective as it will have to reestablish a working microbial fauna.

Thank you for your support of effective local programs and this opportunity to comment again. We all look forward to the next step as the process shifts to the Regional Boards.

Sincerely,



Raymond Ruminski
Environmental Health Director

cc: RCRC, Hemminger
CCDEH, Sipe, Schmidtbauer, Malan
SWRCB, Polhemus
COWA, Adams