

## Lahontan Regional Water Quality Control Board

November 15, 2016

ECM: LAMP – Mono County

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### Water Board Comments – Proposed Mono County Local Agency Management Plan

Lahontan Water Board staff has reviewed your proposed Local Agency Management Program (LAMP) for Mono County. You submitted the proposed LAMP by email on May 18, 2016. Our comments, which are not listed in any particular order, are the following:

1. LAMP in general – The LAMP is your program to regulate onsite wastewater treatment systems (OWTS) within your jurisdiction. Therefore, the LAMP must include the entire County program, which includes codes, technical guides, and ordinances. Please submit a revised proposed LAMP that includes these items.
2. Past Local Program – OWTS Policy §9.6 states that a Water Board, in reviewing a LAMP, must consider the past performance of the local agency's program to adequately protect water quality. We interpret this to mean, in part, that local agencies may use their existing Memorandum of Understanding (MOU) agreements as a baseline for the LAMP. Therefore, please consider incorporating the existing Basin Plan MOU agreements into your LAMP as long as they meet Tier 2. Also, please provide an effectiveness evaluation of the current program to protect human health and water quality.
3. Tier 1 verses Tier 2 LAMP – Under Section Tier 2 (LAMP) OWTS, you propose to use Tier 1 siting and design requirements except for selected Tier 1 percolation rates. Since you have at least one requirement that is different from Tier 1, you must have a Tier 2 LAMP. Tier 1 applies only when you do not have a LAMP.
4. OWTS Projected Flow – Please provide the maximum projected flow limit for an OWTS, in gallons per day, that you intend to authorize construction. The OWTS Policy allows a projected flow up to and including 10,000 gallons/day. Please

provide your projected flow value for both conventional and non-conventional OWTS (see Enclosure, Onsite Systems Type Hierarchy), even if both are the same.

5. Equivalent dwelling unit flow – Please provide your selected equivalent dwelling unit flow, in gallons per day. Please justify a flow value that is greater than the existing Basin Plan value of 250 gallons per day.
6. Tier 2 Prescriptive Requirements – The OWTS Policy has few prescriptive requirements for Tier 2 LAMPs. Instead, the OWTS Policy requires a local agency to address “considerations.” This means that the local agency must describe how they will meet each of the OWTS Policy considerations in a LAMP. The considerations are presented in OWTS Policy §9.1 and §9.2. Some considerations are required and others are optional. Please describe how you will address each consideration in your LAMP.
7. Supplemental treatment system monitoring and inspections – OWTS Policy §9.4.6 requires monitoring and inspections for supplemental treatment systems. Please provide procedures and implementing ordinances to meet this requirement.
8. Water Quality Assessment Program (WQAP) – We suggest a focused areas WQAP and collaboration with other agency programs.
  - a. Focused areas – The suggested focus areas are Mammoth Lakes and other areas yet to be identified.
    - i. Mammoth Lakes area – In the Mammoth Lakes area, the U.S. Forest Services has a campground south of Sherwin Creek. U.S. Forest Service campground’s restrooms were connected to a sewage collection system. The collection system was connected to an interceptor that conveyed sewage to the Mammoth Community Water District Sewage Treatment Plant. A separate private group camp was also connected to this sewage collection system. The sewage collection system was probably installed to comply with the Basin Plan prohibition for the Mammoth Lakes Area.

A few years ago, the US Forest Service installed holding tanks at their campground, thereby discontinuing the sewage collection system. This left the private group camp without a sewage disposal means.

The private group camp proposed an OWTS with a large leach field for disposal. Because there was no other disposal option for the private group camp, the Water Board executive officer approved an exemption to the prohibition, thereby authorizing the county to issue a building permit for the OWTS.

Because this OWTS is in a prohibition area, we recommend, as part of the WQAP, periodic inspections of the camp's OWTS for subsurface seepage, particularly during periods of campground use. The inspections could be done by your agency, or a partnership with the campground where they perform the inspections and provide inspection results to you.

- ii. We also recommend monitoring and reporting for any other area where OWTS could affect beneficial uses of surface water or groundwater. We recommend periodic sampling, analysis, and reporting of key domestic wells and at risk surface waters. Recommended sampled constituents are pathogens and nutrients. Nutrients include nitrogen series consisting of organic nitrogen, ammonia nitrogen, nitrate, and total nitrogen.

b. Collaboration

- i. OWTS Policy §9.3.2 states that you may use existing water quality data from other programs in your WQAP. Of significance are programs established and managed under Water Code §13181. We recommend collaboration with programs in your jurisdiction to reduce costs and resources.
- ii. Another example is participation in the development and implementation of a Salt and Nutrient Management Plan (SNMP). An amendment to the State's Recycled Water Policy §6.b(1)(a1) states "it is the intent that every groundwater basin/subbasin in California to have a consistent salt/nutrient management plan." Therefore, we expect one or more SNMPS will be prepared and implemented in your area of jurisdiction. Integrated Regional Water Management (IRWM) groups are responsible for SNMP development. The local IRWM group is the Inyo – Mono County Integrated Regional Water Management Program <http://inyo-monowater.org/>. The Program Manager is Mark Drew ([mdrew@caltrout.org](mailto:mdrew@caltrout.org)) 760-924-1008.

Therefore, please describe your commitment to a SNMP as required in OWTS Policy §9.2.8. We suggest coordination of surface water sampling in areas of high density OWTS.

9. Density exemption request for the Twin Lakes Subdivision – The exemption process goes away under a LAMP. The draft Mono County LAMP states that an overall density of 500 gallons/day/acre for OWTS will be allowed. Because the overall density of OWTS development in the Twin Lakes is already approaching 500 gallons/day/acre, it is not appropriate to request an exemption. Rather, it is appropriate to justify the OWTS density proposed as a process within your LAMP. This is an area where a focused cumulative impact assessment may be appropriate as part of the Water Quality Assessment Program.



10. OWTS loading rates greater than 500 gallons/day/acre – In the Introduction section, you state that any OWTS with a projected loading rate greater than 500 gallons/day/acre will require the owner to obtain waste discharge requirements (WDR) from the Lahontan Water Board. This is the correct step, as individual Executive Officer approved exemptions that were allowed under the existing MOUs can no longer be granted under the OWTS Policy. Please note that we have limited staff resources to process WDRs.

As an alternative, we encourage you to include in your LAMP scope coverage of onsite systems with projected loading rates greater than 500 gallons/day/acre, providing the owner installs a supplemental treatment system (see definition in the OWTS Policy). The purpose of a supplemental treatment is to reduce the pathogen and nutrient load to the dispersal system that is equivalent to an OWTS load of 500 gallons/day/acre or less. Under this approach, the owner would not need to apply for waste discharge requirements.

11. LAMP scope of its coverage (OWTS Policy 9.2) – Discharges from new or replacement OWTS that are within your scope of coverage (OWTS Policy §9.2) also receive coverage under the conditional waiver of waste discharge requirements (WDR) (OWTS Policy §2.6.1 and §12.0). Please make sure your scope of coverage is precisely defined in your LAMP, including coverage for specific kinds of conventional and non-conventional OWTS (see Enclosure, Onsite Systems Type Hierarchy). This is because owners of new and replacement systems outside your scope of coverage must submit a report of waste discharge, pay annual fees, and obtain waste discharge requirements (WDR) from the Lahontan Water Board. The WDR authorize the owner to discharge waste from their OWTS providing they meet the WDR performance requirements. Please note that we have limited staff resources to process WDRs for individual OWTS.

Equally important is the jurisdictional area scope of coverage. Please identify and describe your authority on US Forest Service lands, Bureau of Land Management lands, Federal reservations, and Los Angeles Department of Water and Power. Please include drawings at an appropriate scale that shows jurisdictional boundaries.

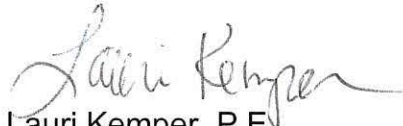
12. Water Board siting and design approval – State Water Code §13360 prohibits the Water Board to approve the siting and design of any OWTS. Nevertheless, Water Board staff will, upon local agency request, review the siting and design of any new or replacement OWTS and provide recommendations to the local agency. Please provide your procedures that for selecting and referring types of OWTS to the Water Board for recommendations. Typically, referred systems require a report of waste discharge be submitted and adoption of waste discharge requirements.
13. LAMP effective date – The LAMP must have an effective date. The Basin Plan MOUs expire on the LAMP effective date, or May 18, 2018, whichever occurs first.

Therefore, the LAMP effective date may range from the county LAMP approval date to May 18, 2018.

### Closing

1. We plan to schedule your LAMP for Water Board approval at its July 2017 meeting. To meet our schedule for processing agenda items, we must assemble a complete agenda package on or before March 15, 2017. We need a week to assemble your LAMP documents into the agenda package. Therefore, you must submit the board of supervisors approved LAMP to us or before **March 10, 2017**. The LAMP must address the comments in this letter and meet the requirements of OWTS Policy Tier 2.
2. Please send all future correspondence regarding your LAMP to the Water Board's email address at [Lahontan@waterboards.ca.gov](mailto:Lahontan@waterboards.ca.gov).
3. Because your LAMP has generally organized in the same manner as the Inyo County proposed LAMP, we are sending a courtesy copy of this letter to Inyo County Health Department.

If you have any questions, please contact Mike Coony at (760) 241-7353 ([mike.coony@waterboards.ca.gov](mailto:mike.coony@waterboards.ca.gov)), or Jehiel Cass, P.E., Senior Engineer, at (760) 241-2434 ([jehiel.cass@waterboards.ca.gov](mailto:jehiel.cass@waterboards.ca.gov)). We are also available to hold a meeting to discuss these comments with you.



Lauri Kemper, P.E.  
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Enclosure: Onsite Systems Type Hierarchy

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Enclosure

# Onsite System Type Hierarchy

