

**STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF OCTOBER 14, 2021**

Prepared on September 1, 2021

**ITEM NUMBER:** 7

**SUBJECT:** **Consideration of Proposed Resolution No. R3-2021-0087 Approving Santa Cruz County’s Local Agency Management Program (LAMP) for Regulating Onsite Wastewater Treatment and Disposal Systems**

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**KEY INFORMATION**

Location: Unincorporated areas of Santa Cruz County and within Santa Cruz, Scotts Valley, and Capitola City Limits  
Type of Discharge: Discharges from Onsite Wastewater Treatment Systems  
Design Capacity: Less than 10,000 gallons per day  
Treatment: Onsite Treatment  
Disposal: Onsite Disposal  
Reclamation: None  
Existing Orders: Multiple

**ACTION:** **Adopt Resolution No. R3-2021-0087**

**SUMMARY**

The State Water Resources Control Board (State Water Board) *Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems* (OWTS Policy)<sup>1</sup> establishes statewide regulations for onsite wastewater systems (commonly known as septic systems, hereafter “OWTS”). The OWTS Policy established a statewide, risk-based, tiered approach for regulation and management of septic systems and sets minimum performance standards. The OWTS Policy became effective May 13, 2013.

To accommodate regional geologic and climatic conditions, the OWTS Policy allows local agencies to propose a local agency management program (LAMP), and, upon the regional board’s approval, the local agency can then manage the installation of new and replacement septic systems in accordance with that LAMP. LAMPs allow local agencies

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<sup>1</sup> [https://www.waterboards.ca.gov/water\\_issues/programs/owts/board\\_adopted\\_policy.html](https://www.waterboards.ca.gov/water_issues/programs/owts/board_adopted_policy.html)

to establish criteria that may differ from the minimum performance standards set in the OWTS Policy.

The OWTS Policy requires the Central Coast Water Board to approve LAMPs via the adoption of resolutions; for the Santa Cruz County LAMP, this is achieved by adopting the attached proposed Resolution No. R3-2021-0087 (Attachment 1). Central Coast Water Board staff worked closely with Santa Cruz County Environmental Health Division (Santa Cruz County) staff to ensure the LAMP includes standards that are protective of water quality. Without an approved LAMP, local agencies may permit new or replacement OWTS only if they are consistent with the siting and design requirements established in the OWTS Policy.

This staff report highlights the most critical standards and operating requirements presented in the proposed Santa Cruz County LAMP. Installation of OWTS according to the requirements included in the proposed LAMP protects water quality, takes local conditions into account, and complies with OWTS Policy requirements to ensure protection of water resources.

## **DISCUSSION**

### **Background**

In accordance with Water Code section 13290 et seq., the OWTS Policy sets standards for:

- a. The construction or replacement of OWTS.
- b. OWTS that are subject to a major repair.
- c. OWTS that pool or discharge waste to the surface of the ground.
- d. OWTS that are affecting, or will affect, groundwater or surface water to a degree that makes them unfit for drinking water or other beneficial uses, or causes pollution, nuisance, or contamination, or that has reasonable potential to cause a violation of water quality objectives.

The OWTS Policy also includes minimum requirements for OWTS, including:

- a. Siting, construction, and performance requirements.
- b. Requirements for OWTS near certain waters listed as impaired under section 303(d) of the Clean Water Act.
- c. Authorizing local agency implementation of the requirements through LAMPs.
- d. Corrective action requirements.
- e. Minimum monitoring requirements.
- f. Exemption criteria.
- g. Determining when an existing OWTS is subject to major repair.
- h. A conditional waiver of waste discharge requirements.

Santa Cruz County and Central Coast Water Board staff have been working to develop the proposed LAMP since 2016. The LAMP was modified through two written comment

and response documents and several technical working meetings between Central Coast Water Board and Santa Cruz County staff.

Santa Cruz County supported its onsite wastewater management and policy development by extensive field work to measure water quality and assess actual field conditions. The results of this work are reflected in the Santa Cruz County LAMP. This field work included:

- Santa Cruz County contributions to the U.S. Soil Conservation Service to update the Santa Cruz County Soil Survey, 1980.
- Water quality monitoring and investigation dating back to 1975, averaging approximately 2,100 groundwater and surface water samples per year countywide.
- Evaluation of shallow groundwater quality in 100 boreholes downgradient of disposal systems for various soil and groundwater conditions (1981-82).
- Installation of 200 boreholes to assess shallow groundwater levels in San Lorenzo Valley communities (1986) and ongoing monitoring of 20 holes with water quality testing in 10.
- Lot-by-lot surveys of 2,200 properties in the San Lorenzo Valley and 300 properties in the Amesti Road area for indications of failing systems, with follow-up corrections, as needed.
- Creation and analysis of a database of installation information, site information, inspection results, permits, complaints, and pumping results for areas of concerns and eventually all onsite systems in the county.
- Follow-up investigations of systems with failing pumper reports.

The proposed LAMP protects water quality, takes local conditions into account, and complies with OWTS Policy requirements to ensure protection of water resources.

### **LAMP Applicability**

This LAMP applies to all unincorporated areas of Santa Cruz County. It is proposed that this LAMP will also apply within the cities of Santa Cruz, Scotts Valley, and Capitola, given that these cities have delegated authority for regulation of OWTS in the city limits to the County Health Officer. The City of Watsonville does not issue permits for OWTS and has a small number of legacy OWTS within its city limits. County and city codes will be amended as needed to extend County authority over OWTS to cities (Santa Cruz, Scotts Valley, Capitola, and Watsonville), including written agreements extending the LAMP to the city areas. The Santa Cruz County LAMP will not apply to state or federally owned properties, including any United States Forest Service or Bureau of Land Management lands. Properties regulated by the California Department of Housing and Community Development, including recreational vehicle parks and mobile home parks, are also not subject to the provisions of this LAMP.

## History

Historically, prior to when the OWTS Policy came into effect, the regulation of new and replacements of onsite domestic wastewater treatment systems was regulated by Santa Cruz County. Santa Cruz County reviewed and approved designs for new or replacement onsite wastewater treatment systems and ensured consistency with requirements contained in the Central Coast Water Board's Basin Plan, California Plumbing Code, and the 1995 County of Santa Cruz Wastewater Management Plan.

Poor OWTS conditions in the San Lorenzo Valley during the 1970s and early 1980s led to frequent failures and elevated nitrate and bacteria levels in the San Lorenzo Valley watershed's major perennial streams, including the San Lorenzo River, which serves as the City of Santa Cruz's main drinking water source. As a result, in 1982, the Central Coast Water Board adopted Resolution No. 82-10, which amended the Basin Plan by prohibiting new and existing discharges from OWTS in parts of the San Lorenzo Valley and noted that the San Lorenzo Valley Water District had investigated the necessity of implementing a municipal sewer system for the area. However, in 1985, the proposed sewer project failed, due to high cost, lack of grant funds, and substantial community opposition.

In 1986, Santa Cruz County proposed an additional solution to upgrading OWTS, whereby continued use of OWTS was allowed if they were upgraded over time to meet a minimum set of standards necessary to improve the water quality in the San Lorenzo River. Subsequently, Santa Cruz County applied most of these more-protective standards and procedures to all OWTS in the county. These standards were the precursor for many of the provisions in the proposed Santa Cruz County LAMP for countywide operations of OWTS. In May 1995, the Central Coast Water Board's Resolution No. 95-04 lifted the septic system prohibitions for this region and replaced them with regulation of OWTS through implementation of the County's San Lorenzo Wastewater Management Plan, which is essentially an advanced protection management program as described in the OWTS Policy.

## County-Specific Requirements

The following requirements are established in the Santa Cruz County LAMP:

- To protect countywide water supply resources, the Santa Cruz County General Plan requires a 10-acre minimum for creating new parcels in watersheds that supply drinking water. In the San Lorenzo and North Coast water supply watersheds, which have known nutrient impacts, new development using OWTS is prohibited on existing parcels less than one acre in size, leaving many existing parcels unbuildable. The area within one mile upstream of the North Coast water supply intakes is designated as a "Water Quality Constraint Area," and a 2.5-acre minimum parcel size is required for new development on existing parcels. These minimum parcel size requirements are equal or more stringent to the allowable average densities per subdivision under Tier 1 of the OWTS Policy, which is 0.75

to 1 acre for areas with average annual rainfall of 25 to 40 inches per year (Table 1 OWTS Policy).

- The use of seepage pits for wastewater disposal will no longer be allowed for new OWTS installations.
- Enhanced treatment with nitrogen reduction is required for all replacement seepage pits or where existing seepage pits are used to support a bedroom addition, major remodel, or other increase in wastewater flow.
- Santa Cruz County intends to require registration of qualified professionals who work on OWTS in Santa Cruz County. That registration can be suspended for violations of County code and permit requirements.
- Santa Cruz County will allow the installation of low-flow systems for repairs of dispersal fields that cannot meet new disposal area design standards. Low-flow systems require water conservation devices, flow monitoring, deed recordation, an annual fee, periodic inspection, and limits on remodels.
- Alternative design flows for enhanced treatment systems may be proposed by the designer to ensure proper operation of the treatment system components, provided the hydraulic capacity for soil absorption of peak design flows is maintained.
- The LAMP contains language for OWTS in degraded groundwater basins. Once the Central Coast Water Board identifies a groundwater basin or sub-basin where the use of OWTS is causing or contributing to groundwater degradation, Santa Cruz County will be required to develop a plan (called an advanced groundwater protection management program) for approval by the Central Coast Water Board to address the impacts.
- Santa Cruz County limits new development on existing parcels of record under several circumstances:
  - Within a water supply watershed, the minimum parcel size is one acre and 2.5 acres when within one mile of the intake for the North Coast watersheds.
  - For parcels without public water supply, the minimum parcel size is 15,000 square feet or 0.34 acres.
  - Seepage pits were installed extensively in Aptos in high-density subdivisions. For parcels on some older (pre-1983) high-density subdivisions in the Aptos area, the minimum parcel size is 15,000 square feet or 0.34 acres.
  - Parcels must also meet the technical standards of stream setback (100 feet), slope (less than 30%), and outside the flood plain. If any of those three standards cannot be met, the parcel is deemed unbuildable.
- New OWTS on undeveloped parcels are not permitted within 100 feet of a stream.<sup>2</sup>

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<sup>2</sup> A stream is a body of running water flowing over the earth in a natural water course, where the movement of the water is readily discernible or if water is not present it is apparent from review of the geology that when present it does flow, such as in ephemeral drainage, creek, or river. As defined in the OWTS Policy for 'flowing water body.'

- OWTS upgrades of a conventional system for increases of flow for an additional dwelling unit or additional bedrooms is not permitted when sited within 100 feet of a stream.
- Repairs of conventional OWTS or upgrades of existing enhanced treatment systems for added flow are not permitted, when sited within 50 feet of a stream.

### **Additional Protections**

Santa Cruz County staff has completed extensive field work to measure water quality and assess actual field conditions in developing onsite wastewater management policies. The complexities of geology, topography, soils, rainfall, and past development patterns pose challenges for OWTS in Santa Cruz County. As a part of policy development, Santa Cruz County was sensitive to issues of affordability and fairness to property owners. Conserving water and energy to reduce the effects of climate change are also important Santa Cruz County considerations for wastewater management.

Following is a brief description of conditions relative to onsite wastewater disposal in the various areas of Santa Cruz County served by OWTS. The Santa Cruz County LAMP provides direction on how best to design new, replacement, and OWTS repairs for these focus areas to ensure the protection of water resources.

Areas of Santa Cruz County Served by OWTS (Number of Existing OWTS)	Conditions/Limitations That May Be Present
San Lorenzo Valley (12,000)	<ul style="list-style-type: none"> <li>• Water supply watershed</li> <li>• Localized areas of high groundwater</li> <li>• Pathogen and nutrient TMDL</li> <li>• Sandy soils</li> <li>• Older, dense communities</li> <li>• Public water supply wells</li> <li>• Water supply streams</li> </ul>
North Coast-Bonny Doon (1,450)	<ul style="list-style-type: none"> <li>• Water supply watershed</li> <li>• Localized areas of high groundwater</li> <li>• Karst geology</li> <li>• Sandy soils</li> <li>• Clay soils</li> <li>• Private water supply wells</li> <li>• Least disturbed watersheds</li> </ul>
Aptos/Valencia Watershed: (3,360)	<ul style="list-style-type: none"> <li>• Sandy soils</li> <li>• Older homes</li> <li>• Some small lots (7,000-15,000 square feet)</li> <li>• Bonita, Huntington, Monte Toyon, and Rio del Mar Lodge subdivisions: <ul style="list-style-type: none"> <li>○ Seepage pits</li> <li>○ Near sanitary sewer collection lines</li> </ul> </li> </ul>
Soquel Watershed (2,620)	<ul style="list-style-type: none"> <li>• Localized areas of high groundwater</li> <li>• Older homes</li> <li>• Private water supply wells</li> <li>• Clay soils</li> </ul>
Carbonera/Branciforte (2,100)	<ul style="list-style-type: none"> <li>• Localized areas of high groundwater</li> <li>• Pathogen and nutrient TMDL</li> <li>• Older homes</li> <li>• Sandy soils</li> </ul>

Corralitos Watershed (1,560)	<ul style="list-style-type: none"> <li>• Water supply watershed</li> <li>• Private water supply wells</li> <li>• Some small lots (7,000-15,000 square feet)</li> <li>• Old homes</li> <li>• Narrow canyons</li> </ul>
La Selva Beach (850)	<ul style="list-style-type: none"> <li>• Very small lots (5,000-12,000 square feet)</li> <li>• Seepage pits</li> <li>• Sandy soils</li> <li>• High nitrate concentrations in groundwater</li> <li>• One mile from public sewer system</li> <li>• Outside urban services area</li> </ul>
Pasatiempo (800)	<ul style="list-style-type: none"> <li>• Some small lots (7,000-15,000 square feet) on public water</li> <li>• Inside urban services area with nearby sewer line</li> <li>• Sandy soils</li> <li>• Clay soils</li> <li>• Perched groundwater on shallow bedrock</li> <li>• Seepage pits</li> </ul>
Pinto Lake/Amesti Road (500)	<ul style="list-style-type: none"> <li>• Some small lots (7,000-15,000 square feet) on public water</li> <li>• Clay soils</li> <li>• Perched groundwater on shallow bedrock</li> <li>• Seepage pits</li> </ul>
Manfre/Buena Vista Road (240)	<ul style="list-style-type: none"> <li>• Some small lots (7,000-15,000 square feet) on public water</li> <li>• Clay soils</li> <li>• Designated disadvantaged community</li> </ul>

### Prohibitions

OWTS in Santa Cruz County are prohibited in areas being served by a sanitary sewer collection system and a centralized wastewater treatment plant. The LAMP has other prohibitions consistent with the OWTS policy (e.g., cesspools, flows greater than 10,000 gallons per day, surface disposal, etc.). Commercial and industrial wastewater mixed



with or segregated from domestic wastewater is a prohibited discharge. Additionally, OWTS must meet minimum lot size requirements pursuant to Santa Cruz County ordinance 7.38.045 – *Lot size requirements for existing lots of record*.

### **Enhanced Treatment Systems**

Enhanced treatment systems are required to overcome specific site constraints, such as shallow groundwater or shallow soils.<sup>3</sup> Examples of enhanced treatment systems include aerobic treatment units, sand or textile filters, and mound systems. Enhanced treatment systems are typically designed to reduce total suspended solids (TSS), biochemical oxygen demand (BOD), and nitrogen. In locations with shallow groundwater where vertical separation requirements cannot be met, disinfection will be included in the enhanced treatment system.

New OWTS installed in areas designated as having potential impact to water resources will be required to have an enhanced treatment system to reduce TSS, BOD, and nitrogen. Owners of enhanced treatment systems are required to maintain an ongoing service agreement with a Certified Onsite System Service Provider and required to submit annual reports to Santa Cruz County.

Enhanced treatment systems will also be required to have a *Notice of System with Special Operating Requirements and Limitations* recorded with the Santa Cruz County Clerk Recorder's office to inform future owners, heirs, executors, administrators, or successors that the subject property is served by an enhanced treatment system. The Notice will include provisions for current and future owners to maintain a service agreement and comply with all established monitoring, reporting, inspection, and maintenance requirements.

For each enhanced treatment system installation, a qualified service provider will be responsible for:

- Performing routine activities required to keep the system operational.
- Responding to emergencies in a timely manner.
- Performing annual inspections.
- Collecting and recording information regarding operational status of treatment components and recommending timely maintenance, replacement, and pumping of various components as required.
- Monitoring system performance through collection and analysis of effluent samples when required.
- Reporting system operational status or system performance to the property owner and Santa Cruz County, including the results of all inspections and results from any analysis of the wastewater for TSS, BOD, and nitrogen.

Enhanced treatment system installations in the nitrate concern areas will be required to reduce total nitrogen to either 30 milligrams per liter (mg/L) as nitrogen or by 50% from

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<sup>3</sup> For example, shallow soils overlying an impermeable layer or bedrock.

influent concentration. These effluent limits along with groundwater separation requirements and lot-density control are based on best available control technology capabilities and are standard industry practices.

### **OWTS Repairs**

LAMP requirements will apply to all future OWTS repair situations to the extent practicable. For example, repair and replacement of seepage pit disposal systems will require installation of an enhanced treatment system. There are some other allowances for repair of failed systems on parcels with constraints, but any system repair or upgrade supporting an increased wastewater flow must be brought up to new installation standards contained in the LAMP.

Provisions are made in the LAMP for repairs in financial hardship situations declared by property owners. In such cases, a declaration on the property deed is required stating that the OWTS has been repaired in a manner that does not conform with the LAMP. The deed restriction will require the upgrading of the OWTS to conforming status at the time of property transfer.

### **Variances**

Santa Cruz County Code Chapter 7.38, Sewage Disposal, provides the basic requirements for OWTS design, installation, and use in the county. It also provides the authority for specific variances from the new system standards for the repair or replacement of existing systems, including minimum thresholds and prohibitions. The basic standards and allowable variances are described in the county's *Standards and Procedures for the Repair and Upgrade of Septic Systems* (for existing systems built prior to September 16, 1983), Appendix A Chapter 7.38, Appendix C Summary of Onsite Wastewater Treatment System Requirements, and Appendix D Enhanced Treatment System Regulations. The *Standards and Procedures for the Repair and Upgrade of Septic Systems* document applies to 78% of the properties in the county that were developed prior to establishment of current standards for new systems. They are designed to guide the trade-offs between continued use of existing systems, improvements needed for water quality and public health protection, addressing housing needs, and manageable costs for property owners to continue to encourage them to properly repair and upgrade their systems at the first indications of failure. *Standards and Procedures for the Repair and Upgrade of Septic Systems* only apply to properties that had an OWTS installed prior to September 16, 1983, which is the date that stricter standards for onsite wastewater disposal were adopted into the Basin Plan.

Wildland fires in recent years have destroyed many structures, including homes with OWTS, in Santa Cruz County. The LAMP addresses this issue by stating that reconstruction of any legal structure partially or wholly destroyed by fire, flood, land movement, other natural calamity, or any other calamity beyond the control of the owner will not be considered new development if:

1. The structure was a legal structure prior to the calamity.

2. The application to rebuild is submitted within 10 years of the calamity.
3. The OWTS to serve the reconstruction must meet design standards for upgraded systems as provided in County regulations.
4. Any contiguous undeveloped properties of the owner must be combined to achieve a minimum parcel size of at least 15,000 square feet.

Classifying these rebuilt systems as upgrades as opposed to new development allows residents to rebuild their systems as previously installed if the former systems were protective of water quality.

### **Reporting**

Santa Cruz County will annually submit a tabular summary of OWTS-related actions taken during the previous year to the Central Coast Water Board. The annual summary will include:

- The number and location of complaints pertaining to OWTS operation and maintenance and identification of those that were investigated and how they were resolved;
- The applications and registrations issued as part of the local septic tank cleaning registration program;
- The number, location, and description of permits issued for new and replacement OWTS and the design flow of the permitted OWTS; and
- The number, location, description, and rationale for permits issued for OWTS where a variance to LAMP requirements was granted.

### **Human Right to Water**

California Water Code section 106.3, subdivision (a) states: It is a policy of the State of California “that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation purposes.” On January 26, 2017, the Central Coast Water Board adopted Resolution No. R3-2017-0004, which affirms the realization of the human right to water and the protection of human health as the Central Coast Water Board’s top priorities.

This LAMP increases the protection of surface and groundwater resources in areas most likely to be impacted by nitrate pollution in the future. Enhanced treatment systems will reduce total nitrogen discharged to groundwaters and will result in improved water quality. This will protect the municipal and domestic supply drinking water beneficial uses and will protect drinking water quality for those that depend on groundwater and surface water as their drinking water source.

### **Disadvantaged Communities**

The Central Coast Water Board implements regulatory activities and water quality projects in a manner that ensures the fair treatment of people of all ethnicities, cultures, backgrounds and income levels, including disadvantaged communities (DACs).

Additionally, the Central Coast Water Board is committed to providing all stakeholders the opportunity to participate in the public process and provide meaningful input to decisions that affect their communities.

As stated above, provisions are made in the LAMP for financial hardship situations declared by property owners for OWTS requiring repair.

If impacts to surface water or groundwater pollution results from the discharges regulated by the proposed Resolution, Central Coast Water Board staff will help facilitate outreach and education to inform affected persons and connect them with available resources, especially in disadvantaged communities.

### **Climate Change**

The Central Coast faces the threat and the effects of climate change for the foreseeable and distant future. To proactively prepare and respond, the Central Coast Water Board has launched the Central Coast Water Board's Climate Action Initiative, which identifies how the Central Coast Water Board's work relates to climate change and prioritizes actions that improve water supply resiliency through water conservation and wastewater reuse and recycling; mitigate for and adapt to sea level rise and increased flooding; improve energy efficiency; and reduce greenhouse gas production. The Climate Action Initiative is consistent with the Governor's Executive Order B-30-15 and the State Water Board's Climate Change Resolution No. 2017-0012.

The LAMP regulates the discharge of OWTS wastewater, supports beneficial uses, and indirectly supports water reuse by recharging aquifers. Community use of individual OWTS eliminates emissions resulting from activities associated with the construction and operation of municipal wastewater collection and wastewater treatment systems.

### **PUBLIC OUTREACH AND COMMENTS**

Santa Cruz County provided multiple opportunities for the public to learn about the proposed LAMP and to provide input during LAMP development. This included technical advisory committee (private professionals) meetings, Water Advisory Commission (public agencies) meetings, County Board of Supervisors meetings, meetings with real estate professionals, and publishing a public notice in a local newspaper.

On November 13, 2020, a draft Santa Cruz County LAMP was posted on the County website for a 30-day comment period. Notice was posted on the Central Coast Water Board website and sent to the Central Coast Water Board and Santa Cruz County septic system interested persons lists. From January 2021 to June 2021, Santa Cruz County collaborated with Central Coast Water Board staff to make significant revisions to the LAMP in response to the comments received.

On June 7, 2021, a revised draft Santa Cruz County LAMP was posted on the County website for a second 30-day comment period. Notice was posted on the Central Coast Water Board website and sent to the Central Coast Water Board and Santa Cruz County septic system interested persons lists. Santa Cruz County and Central Coast

Water Board staff participated in a public outreach meeting and several individual meetings with stakeholders to answer questions and receive input on the LAMP.

Santa Cruz County received comment letters on the revised draft Santa Cruz County LAMP from the following: Ann R. Thryft, Peter Huston, Becky Steinbruner, Stephanie Winegarten, City of Santa Cruz, Eric Gobler, and Biosphere Consulting.

Santa Cruz County made additional changes to the revised draft LAMP in response to comments. A summary of comments and changes made is presented in Attachment 3.

## **CONCLUSION**

The proposed LAMP protects water quality, takes local conditions into account, and complies with OWTS Policy requirements to ensure protection of water resources.

## **RECOMMENDATION**

Adopt Proposed Resolution No. R3-2021-0087.

## **ATTACHMENTS/LINKS**

1. Proposed Resolution No. R3-2021-0087
2. Proposed Santa Cruz County Local Agency Management Program. The attachment is available electronically at:  
[http://scceh.com/Home/Programs/LandUse,SewageDisposalWasteWaterManagement/LocalAreaManagementPlan\(LAMP\).aspx](http://scceh.com/Home/Programs/LandUse,SewageDisposalWasteWaterManagement/LocalAreaManagementPlan(LAMP).aspx)
3. Santa Cruz County LAMP Response to Comments

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