

From: Coony, Mike@Waterboards
Sent: 12/28/2016 3:14:00 PM
To: Carpenter, Katie@Waterboards
cc: Rapport, Eric@Waterboards, Fenton, Donna@(KERN COUNTY),
'rutledgea@co.kern.ca.us', 'jaizbick@usgs.gov', 'ccfaunt@usgs.gov', Cass,
Jehiel@Waterboards, Kemper, Lauri@Waterboards, Tucker, Robert@Waterboards
Subject: Kern County LAMP revisions

Ecm: (LAMP) KERN

COUNTY

Katie Carpenter, Engineering Geologist
Central Valley Regional Water Quality Control Board, Central Valley Region, Fresno Office
HYPERLINK "mailto:Katie.Carpenter@waterboards.ca.gov"
Katie.Carpenter@waterboards.ca.gov

Subject: Kern County LAMP revisions

Katie,

On December 20, 2016, Kern County Environmental Health Division (Kern County) submitted a revised Local Area Management Program (LAMP) consisting of 1) Kern County's draft Onsite Wastewater Treatment System (OWTS) Ordinance and 2) Onsite Systems Manual Part 1.

Lahontan Water Board staff has reviewed the revisions by each of the items in Lahontan Water Board comment memorandum of August 8, 2016, and finds that the County has completed proposed LAMP revisions and satisfies Lahontan Water Board staff comments. The details of this review are presented as follows.

Item 1, Water Quality Assessment Plan (WQAP) – Lahontan Water Board's August 8 2016 comment memorandum requested prediction of future water quality impacts from both existing platted parcels and future development, particularly in clustered higher density areas. Both Lahontan Water Board staff and Central Valley Water Board staff have suggested use of an existing USGS model or other equivalent model to address these impacts, particularly for nitrate. The USGS model has an advantage in that it was used in Yucca Valley, a region with similar geological and climatic conditions. The County's proposed LAMP change submitted December 28, 2016, addresses this comment. In performing this task, Lahontan Water Board staff supports coordination and partnering with other local agencies to share results and reduce individual agency costs.

Item 2, Areas of high OWTS density – As discussed in the October 18 2016 conference call, Kern County will conduct cumulative impact assessments in new subdivisions with lots smaller than 2.5 acres. Kern County's revised LAMP incorporates this comment.

Item 3, Migration of Lahontan Water Board's onsite system criteria for new developments – The proposed Kern County LAMP does not contain existing Lahontan Water Board Memorandum of Understanding (MOU) density criteria. However, the Item 2 density controls for conducting cumulative assessments at development smaller than 2.5 acres per parcel, as well as performing computer modeling (item 1) at existing clustered high density areas, is more restrictive than the MOU density criteria. Therefore, Lahontan Water Board staff does not require MOU migration into the Kern County LAMP.

Item 4, OWTS Scope of Coverage – In this comment Lahontan Water Board staff asked Kern County to modify the LAMP to reflect that Water Boards have no design approval authority. After reconsidering this comment, Lahontan Water Board staff will not require a LAMP modification. The comment was meant to alert Kern County staff that Water Board staff has no design approval authority yet they will provide design recommendations at the request of Kern County.

Item 5, Salt Nutrient Management Plans (SNMP) – The revised LAMP references and considers the completed SNMP for the Antelope Valley and the pending SNMP for Indian Wells Valley.

If the Kern County has any questions, please call me at 760-241-7353 (Mike.Coony@waterboards.ca.gov) or Jehiel Cass, P.E., Senior Engineer 760-241-2434 (jehiel.cass@waterboards.ca.gov).

Francis

Francis (Mike) Coony, Water Resources Control Engineer
15095 Amargosa Road
Building 2, Suite 210
Victorville, CA 92394

Phone: 760-241-7353
Fax: 760-241-7308
Email: Mike.Coony@waterboards.ca.gov

cc: Eric Rapport, Reg 5 [HYPERLINK "mailto:Eric.Rapport@waterboards.ca.gov"](mailto:Eric.Rapport@waterboards.ca.gov)
Eric.Rapport@waterboards.ca.gov
Donna Fenton, Kern Co [HYPERLINK "mailto:donnaf@co.kern.ca.us"](mailto:donnaf@co.kern.ca.us) donnaf@co.kern.ca.us
Amy Rutledge, R.E.H.S [HYPERLINK "mailto:rutledgea@co.kern.ca.us"](mailto:rutledgea@co.kern.ca.us)
rutledgea@co.kern.ca.us
John Izbicki, USGS [HYPERLINK "mailto:jaizbick@usgs.gov"](mailto:jaizbick@usgs.gov) jaizbick@usgs.gov
Claudia Faunt, USGS [HYPERLINK "mailto:ccfaunt@usgs.gov"](mailto:ccfaunt@usgs.gov) ccfaunt@usgs.gov
Jehiel Cass [HYPERLINK "mailto:Jehiel.Cass@waterboards.ca.gov"](mailto:Jehiel.Cass@waterboards.ca.gov)
Jehiel.Cass@waterboards.ca.gov
Lauri Kemper [HYPERLINK "mailto:Lauri.Kemper@waterboards.ca.gov"](mailto:Lauri.Kemper@waterboards.ca.gov)
Lauri.Kemper@waterboards.ca.gov
Rob Tucker [HYPERLINK "mailto:Robert.Tucker@waterboards.ca.gov"](mailto:Robert.Tucker@waterboards.ca.gov)
Robert.Tucker@waterboards.ca.gov

Note: The Lahontan email box is [HYPERLINK "mailto:lahontan@waterboards.ca.gov"](mailto:lahontan@waterboards.ca.gov)lahontan@waterboards.ca.gov