

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Coast Regional Water Quality Control Board

November 3, 2014

Lawrence D. Fay
Director, Environmental Health Services
Santa Barbara County
Lawrence.fay@sbcphd.org

TRANSMITTED VIA EMAIL ONLY

Dear Mr. Fay:

ADDITIONAL COMMENTS ON SANTA BARBARA COUNTY'S DRAFT LOCAL AGENCY MANAGEMENT PLAN (LAMP) FOR ONSITE WASTEWATER TREATMENT SYSTEMS (OWTS)

This letter supplements our letter to you of July 9, 2014, and includes comments raised by the Central Coast Water Board at its meeting on August 1, 2014, in Santa Barbara. We realize that the County Board of Supervisors will consider adoption of the LAMP on November 4, 2014, and want to make sure you are aware of our concerns.

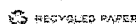
As the Water Board discussed at the meeting in Santa Barbara, the Water Board is planning to hold a workshop to discuss the state policy regarding onsite wastewater systems and local agency management plans. We have not scheduled the workshop yet due to the redirection of staff resources to responding to drought issues. The workshop may prompt the Water Board to raise additional issues not included in its preliminary discussion at the August meeting or in this letter.

One of the topics discussed at the August 2014 board meeting was how the County will address areas known to have high rates of failing septic systems and areas where septic systems have degraded groundwater quality, such as the Santa Ynez Valley generally and Los Olivos specifically. The County's draft LAMP is silent on how the County will manage septic systems in these areas to protect public health and water quality.

Before the County finalizes the LAMP and brings it to the Central Coast Water Board for approval, we recommend that you add provisions for managing septic systems in specific problems areas. These provisions should address the data and recommendations from the 2003 Questa Engineering Septic System Sanitary Survey. As the survey states, a management plan "is intended to examine the area in detail and

DR. JEAN-PIERRE WOLFF, CHAIR | KENNETH A. HARRIS JR., EXECUTIVE OFFICER

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Item 24a Attachment 2
November 13-14, 2014

Central Coast Water Board staff comment letter dated November 3, 2014

define appropriate standards and solutions for the types of problems or issues that are particular to the area." (p. 9-7). Standards and solutions for problem areas could include groundwater monitoring programs, septic system information reviews, and operating permits for alternative systems. The LAMP should also identify areas where additional, more-stringent options, such as mandatory inspection and upgrade programs, moratoriums on new septic system permits, and public sewer installation should be considered.

County Health Department staff has indicated its intent to request Water Board approval of the LAMP if it is adopted by the Board of Supervisors as planned. Please keep in mind that the Water Board will review the LAMP thoroughly and could decide to not approve the LAMP, and instead request additional changes and information.

We appreciate the County's willingness to be a leader in LAMP development, and we are committed to working with the County to develop a meaningful management plan.

If you have any questions, please contact **Harvey Packard** at **(805) 542-4639** or at **Harvey.packard@waterboards.ca.gov**.

Sincerely,



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for Kenneth A. Harris Jr.
Executive Officer

cc:

- Supervisor Salud Carbajal, SupervisorCarbajal@co.santa-barbara.ca.us
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- Harvey Packard, Water Board staff, Harvey.packard@waterboards.ca.gov

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