
Santa Ana Regional Water Quality Control Board

August 31, 2016

Matthew Addington, Associate Engineer
City of Rancho Cucamonga
Building and Safety Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

**COMMENTS ON THE CITY OF RANCHO CUCAMONGA'S PROPOSED LOCAL
AGENCY MANAGEMENT PLAN**

Dear Mr. Addington:

This is in response to your May 11, 2016 submittal of the City of Rancho Cucamonga's proposed Local Agency Management Plan (LAMP) under the State's Onsite Wastewater Treatment Systems (OWTS) Policy. Although the Lahontan Regional Water Quality Control Board is the designated regional water board to coordinate review and approval of the San Bernardino County LAMP under the OWTS Policy, the City of Rancho Cucamonga has elected to submit its own LAMP separately from the San Bernardino County LAMP. As the City is fully within the Santa Ana Regional Board boundary, we have jurisdiction to review and approve the City's proposed LAMP. We offer the following comments:

1. Chapter 1, Introduction: Please include a discussion of the area in acreage which encompasses the City and identify those areas with development potential that may require OWTS. Please identify those areas in a map. In addition, please provide a map that identifies the location of existing OWTS and those areas of high OWTS density.
2. Chapter 1, LAMP Overview and Involved Agencies: Please update and include an organizational chart for the Building and Safety Department under Contact Information as well as any other City departments that will be involved (e.g., planning, permitting, inspection, code enforcement, etc.).
3. Chapter 2: Percolation Testing: Please revise the sentence as follows: "The City of Rancho Cucamonga Building and Safety Services **may will** require percolation testing for all new septic systems for residential and non-residential development where a percolation report has not already previously been completed." Otherwise, please specify conditions when the City will waive percolation testing. Clarification regarding when percolation testing will or will not be required is also needed in Chapter 4 - Procedures and Requirements for the Permitting Process. Similar

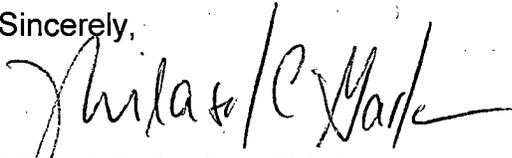
clarification as above applies to the requirement for when site evaluation is required or waived in Chapter 2.

4. Chapter 3, Siting Standards, Setback Requirements: Based on comments received from the State Water Resources Control, Department of Drinking Water, Table 3-1, please revise the setback requirement for "private domestic water lines" for septic tank, disposal field and seepage pit to **25 feet** (Title 22, CCR, Section 64572(f)).
5. Chapter 3, Density/Minimum Lot Size Requirements: The City proposes to continue with the Santa Ana Region's one-half acre minimum lot size requirement (MLSR) per Resolution No. 89-157 and indicates lots may be required to install alternative treatment systems or lot sizes shall be increased to eliminate any adverse impacts to water quality; however, it does not stipulate what that increased lot size may be. The OWTS Policy, Tier 1 indicates lot sizes shall increase to 2.5-acres in order to be protective of water quality. The City should either adopt the 2.5-acre requirement in this instance or indicate and provide supporting information of an alternative increased lot that will still remain protective of water quality. Please note that the MLSR provisions in our Basin Plan will sunset once all the LAMPS within our Region have been adopted.
6. Chapter 3, City Density/Minimum Lot Size Requirements, City Discretion: The City proposes to defer those projects that will not comply with these requirements or when an alternative treatment system will be utilized to the Santa Ana Regional Board for consideration. The LAMP (Tier 2) provides the City the opportunity to develop and implement a management program different from Tier 1 requirements provided it is protective of water quality. However, the OWTS Policy specifies the City consider the factors identified in Section 9.1 as well as the limitations in Section 9.4 in developing alternative lot sizes and not defer those projects to the Santa Ana Regional Board for consideration.
7. Chapter 14, LAMP Scope of Coverage, Public Outreach: The City proposes to utilize the information available in the San Bernardino County DEHS website. We have no objection to such proposal but note that not all of the requirements indicated in Section 9.2.5 of the OWTS Policy have been met. The City should coordinate with the County to have them also update and include information regarding alternative treatment system that owners are provided and informational maintenance or replacement documents and also, if applicable how to participate in volunteer well monitoring programs. To assist the public, please also provide a web link to the County's website to obtain this information.
8. Chapter 15, Data Collection/Reporting/Notifications, Reporting to the RWQCB: Please delete the last sentence of the first paragraph, *"A copy of the report will be provided to both the San Diego and Colorado River Basin RWQCB."*

9. Chapter 16, OWTS Water Quality Assessment Program: As part of the water quality assessment program (WQAP), please map the location of existing and new OWTS, focusing on areas with characteristics listed under Section 9.1 of the OWTS Policy. Mapping will assist in communicating the City's rationale for the design and implementation of the WQAP specified under Section 9.3.2. The WQAP is intended to determine the general operation status of OWTS and to evaluate the impact of OWTS discharges on ground water and local surface water quality. Please identify potential or existing well sampling locations and surface water sampling locations that the City may deem appropriate to assess OWTS impact on water quality. The Salt Nutrient Management Plan for Region 8 is now incorporated into the Basin Plan. The Basin Plan specifies surface and groundwater water quality objectives for TDS and N and identifies those groundwater basins that have no TDS assimilative capacity. The OWTS impact to TDS and N objectives should be included in the City's 5 year evaluation of OWTS impacts to groundwater and local surface water and discussed as part of the WQAP.

We appreciate this opportunity to comment on the City's proposed LAMP and would be happy to discuss these comments with you, as necessary. Should you have any questions please contact me at (951) 782-4419 or at milasol.gaslan@waterboards.ca.gov or Susan Beeson at (951) 782-4902 or at susan.beeson@waterboards.ca.gov.

Sincerely,



Milasol C. Gaslan, Chief
Wastewater Program

cc: SWRCB, Division of Drinking Water – Sean McCarthy
San Bernardino County Environmental Health – Jason Phillippe