



February 28, 2017

Milaso C. Gaslan, Chief, Wastewater Program  
Santa Ana Regional Water Quality Control Board  
3737 Main Street, Suite 500  
Riverside, CA 92501

**SUBJECT: Response to Comments on the City of Yucaipa Local Agency Management Program**

Dear Ms Gaslan:

The City of Yucaipa appreciates the comments provided by your office dated January 12, 2017 on the City's Local Agency Management Program (LAMP) that was submitted on May 12, 2016. To assist you in your review of the revised LAMP document, the City is provided this response letter in a format that follows the Regional Board's comment letter.

**Comment No. 1**

*Chapter 1, Introduction, City of Yucaipa General Information: This chapter identifies three remaining areas where there is intermittent sewer infrastructure and note/identify those areas that will be allowed to develop utilizing OWTS in a map (Figure 1-2); however, the map is not legible nor does it delineate those three areas referenced. Please update/replace Figure 1-2 with a map that clearly identifies those areas. Please also provide a map that identifies the location of existing OWTS and those areas of high OWTS density.*

**Response:**

Chapter 1, Introduction, City of Yucaipa General Information, third paragraph has been revised to read "Figure 2-1 identifies those parcels of land that are connected to sewer; parcels not connected to sewer and utilize OWTS; and those parcels that are currently vacant (the information on Figure 2-1 was provide by the Yucaipa Valley Water District). Also identified on Figure 2-1 are three areas in the City that have limited or intermittent sewer infrastructure. These areas include:

- The Dunlap Acres area generally bounded by Yucaipa Boulevard and Tennessee Street to the north; Oak Glen Road on the southeast; and Interstate 15 on the southwest.
- The North Bench area located in the northeast portion of the City.
- The Wildwood Canyon area located along Wildwood Canyon Road in the southeast portion of the City."

In addition, Figure 2-1 has been replaced with a new figure that identifies parcels currently utilizing OWTS, and more clearly identifies the three areas of the City that have limited or intermittent sewer infrastructure.

### **Comment No. 2**

*Chapter 1, Introduction, City of Yucaipa General Information: The fourth paragraph on page 3 refers to the City of Redland's Wastewater Reclamation Facility as receiving septage generated by OWTS within the City of Yucaipa's boundaries. This paragraph further states that other septage receiving facilities are also located in the City of Chino and County of Riverside. Please identify the facilities in these other locations that the City-approved haulers may direct septage generated from the City along with the basis for re-directing them despite availability of capacity at the Wastewater Reclamation Facility.*

### **Response:**

Chapter 1, Introduction, City of Yucaipa General Information, the fourth paragraph has been revised to read "The City of Redlands owns and maintains a septage receiving facility located at their Wastewater Reclamation Facility that accepts septage generated by OWTS within the City boundaries. Septage haulers are required to obtain an annual permit from the City in order to dispose of septage at this facility. The septage receiving facility has adequate capacity to receive deliveries from new OWTS. Other septage receiving facilities are also located at the Inland Empire Utilities Agency's Regional Water Recycling Plant No. 1 located in the City of Ontario; and the City of Riverside's Water Quality Control Plant in the City of Riverside. Septage haulers must also obtain an annual permit from each of these agencies in order to dispose of septage waste at either facility. The septage hauler will use the facility where the hauler has obtained their annual permit from."

### **Comment No. 3**

*Chapter 1, Introduction, City of Yucaipa General Information: Please identify the appropriate groundwater management zone designated in the Basin Plan for purposes of water quality assessment.*

### **Response:**

Chapter 1, Introduction: City of Yucaipa General Information, the following sentence has been added to the beginning of the seventh paragraph "The City lies primarily within the Yucaipa Basin Groundwater Management Zone. The Yucaipa Basin is a subbasin of the ....."

### **Comment No. 4**

*Chapter 3, OWTS Onsite Evaluation and Permitting, Evaluation and Permitting Process: Please include organizational charts for all departments involved in OWTS permitting, inspection and enforcement (e.g. building and safety, planning, code enforcement, etc.).*

Response:

Chapter 3, OWTS Onsite Evaluation and Permitting, Evaluation and Permitting Process, a City Organization Chart that identifies the City staffing involved in the review, approval and inspection of OWTS has been included.

**Comment No. 5**

*Chapter 3, OWTS Onsite Evaluation and Permitting, Maximum Flow and Land Use Density: The City proposes to continue with the Santa Ana Region's one-half acre minimum lot size requirement (MLSR) Resolution No. 89-157 except for bullet no. 2 which indicates the City proposes to reduced minimum net area of 15,000 square feet individual lots for single-family homes. Please clarify the rationale for proposing to lower existing standards to the 15,000 sq. ft. net minimum size as one-half acre lot size should be 21,780 sq. ft. Further you indicate there may be more stringent lot size requirements in specific areas if it is deemed necessary to protect water quality. 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 these instances or indicate and provide supporting information of an alternative increased lot size that will still remain protective of water quality. Please note that the MLSR provisions in our Basin Plan will sunset once all the LAMP's within our Region have been adopted or on May 13, 2018, whichever occurs first.*

Response:

Chapter 3, OWTS Site Evaluation and Permitting, Maximum Flow and Land Use Density, first paragraph as been revised as follows:

OWTS can be utilized for existing and new developments where the discharge is composed of domestic wastewater only (industrial waste discharges are prohibited), and where the following conditions and restrictions apply:

- The wastewater flow for single family residential does not exceed 500 gallons per acre per day as determined using Appendix H Table H2.1 in the California Plumbing Code.
- The wastewater flow for non-residential or mixed use occupancy does not exceed 300 gallons per day (flow equivalent for a 3-bedroom, 2-bathroom single family home), using Table 422.1 in the California Plumbing Code to determine occupant loads.
- Individual lots created by subdivision prior to September 7, 1989 will be allowed to utilize OWTS on the current lot size configuration.
- Individual lots created by subdivision on or after September 7, 1989 and prior to the effective date of the LAMP shall have a minimum lot size of one-half acre (average gross area). Easements (including streets, curbs, commons and greenbelts), or those portions which were part of the property when developed can be included in the calculation of the

average gross area of land.

- Individual lots created by subdivision after the effective date of the LAMP shall have a minimum of one acre. However, individual lots located within the boundaries of the “Dunlap Acres” as identified on Figure 2-1 shall not be allowed to further subdivide and continue use with OWTS. Individual lots in the “Dunlap Acres” area will require connection to sewer upon subdivision of existing created lots.

#### **Comment No. 6**

*Chapter 3, OWTS Onsite Evaluation and Permitting, Setback Requirements: Based on comments we received from the State Water Resources Control Board, Department of Drinking Water, regarding other draft LAMP's, please revise Table 3- 1 setback requirement for "private domestic water lines" for septic tank, leach field and seepage pit to 25 feet (Title 22, CCR, Section 64572(f)).*

#### **Response:**

Chapter 3, OWTS Onsite Evaluation and Permitting, Table 3-1 Setback Requirements, “Public domestic water lines” have been revised to reflect an OWTS Separation of 25 feet.

#### **Comment No. 7**

*Chapter 5, Supplemental Treatment Systems, Design Criteria: Design Criteria 1. Indicates all supplemental treatment systems must be certified by the NSF to meet the minimum requirements of NSF standard 40. Please delete the requirement for NSF 40 as NSF 245 also achieves nitrogen reduction. The OWTS Policy requires supplemental treatment components designed to reduce nitrogen be certified by NSF.*

#### **Response:**

Chapter 5, Supplemental Treatment Systems: Design Criteria, the second sentence of Item No. 1 has been revised to remove the reference to NSF 40. This paragraph now reads “....to meet the requirements of the City and NSF or must meet standards.....”

#### **Comment No. 8**

*Chapter 6, OWTS Requiring Corrective Action: Corrective Actions Requirements item 8 references Chapter 2 and believe you intended to reference Chapter 3, please review.*

#### **Response:**

Chapter 6, OWTS Requiring Corrective Action: Correction Action Requirements, Item 8 has been revised to read “All repairs shall follow proper permitting procedures and inspections by the City as detailed in Chapter 3.”

### **Comment No. 9**

*Chapter 8, Data Collection, Reporting and Public Outreach Education: Reporting to RWQCB, item 5, please update to also include the location and volume of the disposed septage waste.*

#### **Response:**

Chapter 8, Data Collection, Reporting, and Public Education: Reporting to RWQCB, Item 5 has been revised to read “The number, location, and results of septic tank pumper inspection reports received, and the location and volume of the disposed septage waste.”

### **Comment No. 10**

*Chapter 8, Data Collection, Reporting and Public Outreach Education, 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.*

#### **Response:**

Figure 2-1 has been replaced with a new figure that identifies parcels currently utilizing OWTS.

In Chapter 8, Data Collection, Reporting and Public Education, Water Quality Assessment Program, the first bullet of the first paragraph has been revised to read “Random well samples obtained by the four agencies that provide water to the City, the Yucaipa Valley Water District (YVWD), South Mesa Mutual Water Company, Western Heights Water Company, and the City of Redlands Municipal Water Department. and Golden State Water Company (GSWC). The location of these water wells are identified in Figure 8-1.” A new Figure 8-1 has been added that identifies the location of existing municipal well locations that are, and will be, used for groundwater sampling.

### **Additional Comment**

*Via e-mail, a request was made that the LAMP address Class V Injection Wells.*

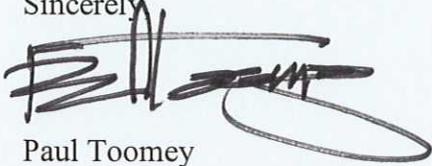
#### **Response:**

Chapter 7, Lamp Scope of Coverage, a new Item No. 9 as been added which reads “Class V Injection Wells, which are defined by the United States Environmental Protection Agency as

OWTS that has the capacity to serve 20 or more persons per day; receives wastewater other than domestic wastewater, such as that generated by manufacturing, chemical processing, industrial fluid disposal, automotive repair, or recycling; or receives sewage containing biological agents such as wastewater from recreational vehicles or portable toilets.”

Please find attached the City’s Draft LAMP for your review. Please do not hesitate to me at (909) 797-2489 ext. 247 or at [ptoomey@yucaipa.org](mailto:ptoomey@yucaipa.org) should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Toomey', with a large, sweeping flourish underneath.

Paul Toomey  
Director of Community Development