January 12, 2017

Paul Toomey
Director of Community Development
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, CA 92399-9950

COMMENTS REGARDING CITY OF YUCAIPA PROPOSED LOCAL AGENCY MANAGEMENT PLAN

Dear Mr. Toomey:

This is in response to your May 12, 2016 submittal regarding the City of Yucaipa’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 Yucaipa 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 have the following comments:

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.

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.
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.

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.).

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 a 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.

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)).

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.

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.

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.
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.

We appreciate the opportunity to comment on the City's proposed LAMP and would be happy to discuss these comments with you, as necessary. Please submit the revised LAMP by March 6, 2017. 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 Section

cc: SWRCB, Division of Drinking Water – Sean McCarthy
San Bernardino County Environmental Health Services – Jason Phillippe
Charles Abbott Associates, Inc. – Mike Podegracz