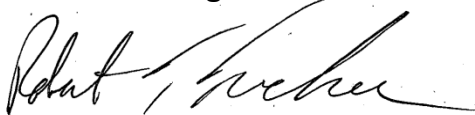

Lahontan Regional Water Quality Control Board

TO: Eric Rapport
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California Regional Water Quality Control Board, Central Valley Region


FROM: Robert Tucker
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California Regional Water Quality Control Board, Lahontan Region

DATE: May 10, 2016

SUBJECT: Comments on the El Dorado County Local Agency Management Plan (LAMP)

We appreciate the opportunity to comment on the El Dorado County LAMP for onsite waste treatment systems (OWTS). Our comments are limited because we are not aware of any portions of El Dorado County within the Lahontan region where the discharge of treated wastewater from OWTS is legally allowed. Basically, OWTS discharges in most - if not all - of El Dorado County that is within the Lahontan Region are restricted by the California Water Code to provide for protection of Lake Tahoe water quality. Here are our comments/questions on the LAMP:

1. A map of El Dorado County would be helpful to understand if any portion of the county is within the Lahontan Region, but not within the Lake Tahoe watershed. Please consider providing a map of the County.
2. In reviewing the LAMP we did not see information on minimum parcel size regarding the siting criteria for OWTS, but in section 5.3.1.2 the LAMP appears to be very strict requiring 5 acres for an OWTS without a public water system available. The cited section appears to be a requirement for new subdivisions. Is that correct? Is there a minimum parcel size siting criterion for new OWTS on existing lots?
3. In the introduction of the LAMP on page 9, under "Reporting to RWQCB," number 3 states the following:

"The number, location and description of permits issued for OWTS where a variance from the approved LAMP was granted."

We did not find the procedures for a variance in the LAMP. It is understandable that variances may need to occur; however, there needs to be a description of the procedure in the LAMP. We suggest Lake Tahoe basin should be singled out as an area where no variance for OWTS will be allowed. A variance for a holding tank within the Lake Tahoe watershed basin could be acceptable (no discharge). A variance for an OWTS with a discharge within the Lake Tahoe watershed basin would be an illegal variance from the California Water Code Sections 13951-13952.2. The LAMP must describe the procedures for allowing a variance.

Please contact me at (530) 542-5467 (robert.tucker@waterboard.ca.gov) if you have any questions.

cc (via email): Scott Armstrong, Senior Engineering Geologist, SWQCB, Region 5
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RTT/ma/T: Comments on El Dorado LAMP
File Under: ECM/General/Counties/El Dorado/Septic Systems