

# MONTEREY COUNTY



DEPARTMENT OF HEALTH LEN FOSTER, Director

ADMINISTRATION  
ANIMAL SERVICES  
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CLINIC SERVICES  
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ENVIRONMENTAL HEALTH  
OFFICE OF THE HEALTH OFFICER  
PUBLIC ADMINISTRATOR/PUBLIC GUARDIAN

Matthew Keeling, P.E.  
CRWQCB - Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

October 15, 2008

RE: Applications for a Waiver of Waste Discharge Requirements for Alternative Disposal Systems for 192 & 194 San Remo Road, Carmel Highlands – Moeller Projects

Dear Mr. Keeling,

Monterey County Environmental Health Review Services (EHRS) have reviewed the letters of opposition to these projects.

Many opponents identified concerns regarding the proposed lot line adjustment (LLA). Currently, there are two legal lots, each entitled to develop its first beneficial use or one home, regardless of the LLA being approved by Monterey County. The proposed LLA configuration would provide a better suited building envelope, reducing development on slopes which is more consistent with Local Coastal Plan policies.

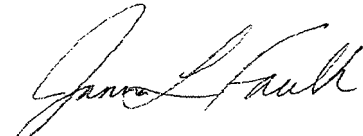
The following are the EHRS responses to concerns regarding the adequacy of the proposed onsite wastewater treatment systems (OWTS) for the above-referenced properties:

- The proposed alternative onsite wastewater treatment systems include advanced treatment and will be better suited for each site than a conventional system. These are not experimental systems; alternative OWTS such as these are National Science Foundation approved and have been installed across the country.
- The effluent will be treated prior to subsurface dispersal and thus contain lower bacteria levels and contaminant concentrations than a conventional system. Also, these systems are proposing very shallow dispersal which utilizes evapotranspiration which will further aid in treating the effluent.
- The Moeller's and all future owners of the properties will be required by EHRS to uphold a service contract to inspect and maintain the system. A deed notice informing new owners of their responsibilities and the regulations pertaining to their alternative OWTS will be recorded to each property.
- These alternative OWTS include telemetry systems which will inform the service contractor immediately when the power goes out or when the system is malfunctioning. This ensures that the system is maintained properly and minimizes the chance of environmental degradation from system failure.

- Per BioSphere Consulting analysis, these systems will not be greatly impacted by excess rainfall, particularly because the sloping site topography results in sheet-flow run-off, minimizing absorption of precipitation on site.

Further review of the OWTS design revealed proximity concerns between the disposal field and retaining walls, potable water lines and potential curtain drains. Monterey County does not have regulations for alternative OWTS at this time; EHRS will consider setback variances from Monterey County Code based on Regional Water Quality Control Board recommendations.

Best Regards,



Janna L Faulk, REHS  
Environmental Health Specialist III