



COUNTY OF HUMBOLDT

AGENDA ITEM NO.
H-2

For the meeting of: October 7, 2014

Date: September 11, 2014
To: Board of Supervisors *S. Buckley*
From: Phillip R. Crandall, Director
Department of Health and Human Services – Public Health
Subject: State On-site Wastewater Treatment Systems Policy Compliance.

RECOMMENDATION(S):

1. Approve the Department of Health and Human Services' (DHHS) recommendation to implement the Tier 2 Local Agency Management Program (LAMP) and authorize DHHS to proceed with LAMP development.
2. Direct DHHS to concurrently conduct public outreach to assure diverse stakeholder input will occur during the LAMP process.
3. Direct DHHS to prepare a letter to the North Coast Regional Water Quality Control Board (NCRWQCB) confirming the County of Humboldt's intention to adopt the Tier 2 path to OWTS Policy compliance via development of a LAMP.

SOURCE OF FUNDING:

Public Health Fund.

DISCUSSION:

Before your Board is the decision on how Humboldt County will manage onsite wastewater treatment systems (OWTS), formerly called septic systems or sewage disposal systems, into the foreseeable future. Two options are available: one option will result in restrictive state regulations which will effectively halt development in the non-sewered areas of the County; the alternative option, and the one that DHHS recommends, will not only be compliant with state mandates, but will fulfill the County's dual interests of fully protecting public health and the environment while allowing continued development to occur.

Prepared by DJ Wieman, Administrative Analyst *DJ* CAO Approval *Amryn Olsen*
REVIEW: Auditor _____ County Counsel *an* Human Resources _____ Other _____

TYPE OF ITEM:
 Consent
 Departmental
 Public Hearing
 Other _____

PREVIOUS ACTION/REFERRAL:

Board Order No. _____

Meeting of: _____

BOARD OF SUPERVISORS, COUNTY OF HUMBOLDT
Upon motion of Supervisor *Fennell* seconded by Supervisor *Bass*
Ayes *Sundberg, Lovelace, Bohn, Fennell, Bass*
Nays _____
Abstain _____
Absent _____

and carried by those members present, the Board hereby approves the recommended action contained in this Board report.

Dated: *Oct. 7, 2014*
By: *An Huntwell*
1 Kathy Hayes, Clerk of the Board

By way of background, the California Legislature passed Assembly Bill 885 in 2000, mandating that the California State Water Resources Control Board (SWRCB) adopt state-wide standards governing the permitting and operation of OWTS. Necessary to more than half of the households in Humboldt County, OWTS are used for the treatment of wastewater in areas not served by centralized treatment systems. In Humboldt County, OWTS are regulated by the DHHS, Division of Environmental Health, Land Use Program; some are also regulated by NCRQWCB. SWRCB, after more than a decade of substantial public debate, adopted the OWTS Policy which became effective on May 13, 2013. Stakeholders in the longstanding debate included organizations such as the California Association of Realtors, Humboldt Association of Realtors, California State Association of Counties, League of California Cities, Rural County Representatives of California, Heal the Bay, Heal the Ocean and Clean Water Action, among many others. The NCRWQCB adopted the OWTS Policy into its Basin Plan, as required, on June 19, 2014. The OWTS Policy mandates that local agencies have OWTS programs in place that comply with the OWTS Policy within 5 years, or by May 13, 2018. (A compliance timeline is included as Attachment 1.)

The OWTS Policy presents a risk-based, 5-tiered approach to regulation of onsite systems and establishes performance standards for a small number of them. All jurisdictions must comply with Tier 0, Tier 3 and Tier 4 of the OWTS Policy. In addition, all jurisdictions must select and implement either Tier 1 or Tier 2.

1. Tier 1 sets statewide criteria for installation or replacement of OWTS under ideal or "Low Risk" conditions (ideal soil and 8 feet or more to groundwater) and does not account for the differences in climate or terrain among California's 58 counties (in other words, the standards for Humboldt County under this tier would be the same as that of hot, desert areas like Riverside or San Bernardino Counties). Humboldt County has very few areas with conditions that could meet Tier 1 standards. Non-Standard OWTS such as Wisconsin Mounds are not allowed under this tier.
2. Tier 2 allows a jurisdiction to propose a local program, via a LAMP, that demonstrates it is as effective at protecting water quality and public health as Tier 1. DHHS believes that the regulations it has employed for the past three decades can be used as a basis for a LAMP that will meet the OWTS Policy's mandate.

The adopted OWTS Policy includes many technical specifications that may have the potential to significantly affect future development in Humboldt County. An analysis of the expected impacts of each tier option is attached as LAMP Impact Analysis Summary (Attachment 2). In summary, Tier 1 would prohibit almost all new development due to one-acre or less minimum parcel size and minimum eight foot depth to groundwater requirements. On the other hand, Tier 2 best serves the County in that an approved LAMP will meet mandated levels of environmental protection while allowing continued development. Tier 2 allows the County greater flexibility to apply local knowledge of Humboldt's site-specific conditions to development proposals; flexibility that is not available under Tier 1. In addition, it does not conflict with current General Plan provisions regarding residential density. The OWTS Policy also places more responsibility on local jurisdictions, and less on the state, for the enforcement of OWTS standards. A substantial increase in personnel costs should therefore be expected under Tier 2 because of increased scope of responsibility, monitoring, data collection and reporting requirements. The costs for the increased level of services are anticipated to be recovered through fees to the regulated community.

Given the high cost of centralized sewage collection systems, the percentage of structures using OWTS in Humboldt County is unlikely to change. With the daily discharge of more than 3.5 million gallons of wastewater into Humboldt County soils from rural onsite systems, it is important that the County maintain effective regulations that allow development while protecting human health and water quality. (A few facts relating to wastewater disposal are included as Attachment 3.)

Regardless of which tier is selected, local ordinances and regulations will have to be modified to align them with the OWTS Policy. If the Board decides to proceed with development of a LAMP, DHHS will need to develop and implement a process to compare elements of the current sewage disposal ordinance and regulations with OWTS Policy minimum standards. The regulations' review process will include a working group composed of diverse stakeholders who will provide input regarding adjustments to the County's Sewage Disposal Ordinance (Humboldt County Code Title VI, Division 1) and to the County's Sewage Disposal Regulations which enforce the Ordinance. From that process, DHHS will propose necessary changes to the ordinances and regulations to become fully compliant with the OWTS Policy.

The Tier 2 option represents an opportunity to retain local control and an opportunity to address both environmental and development concerns with the same action. DHHS intends to conduct public outreach to inform the community of the state-mandated OWTS Policy, and to respond to any concerns or inquiries regarding OWTS Policy compliance and resulting impacts. DHHS will also take this opportunity to receive suggestions and feedback from the community regarding potential candidates to serve on the working group.

The proposed LAMP must be submitted to the NCRWQCB no later than May 13, 2016. The deadline for implementation of a local program that is fully compliant with the OWTS Policy (whether Tier 1 or Tier 2 is chosen) is May 13, 2018.

FINANCIAL IMPACT:

The cost associated with development of a LAMP was included in the approved County Budget for Fund 1175, Budget Unit 486 – Land Use, for Fiscal Year 2014-15. The budget included the salary and benefits for an extra-help Senior Environmental Health Specialist, whose primary responsibility is the development of the LAMP. The cost of LAMP development will be included in the County Budget for Fiscal Year 2015-16. The approval of a LAMP would likely occur in Fiscal Year 2016-17.

The cost for implementation will need to be evaluated and incorporated into the Land Use program's fee schedule and budget. It should be noted that implementation of a LAMP after its acceptance and approval by the NCRWQCB will likely result in significant additional costs to the County. Due to monitoring and reporting requirements and the transfer of some state-permitted OWTS to local jurisdiction (annual state fees for these permits currently range from \$1800 to \$9500), it is anticipated that the Land Use program within the Division of Environmental Health would need to hire two Environmental Health Specialists to implement the LAMP. The cost of these additional staff plus overhead would be, at minimum, an estimated \$200,000 increase to DHHS Land Use's annual budget. These costs are estimates only and subject to upward adjustment. These increased departmental costs will be passed along as fees to the regulated community. If fees are not paid by the regulated community, they must be paid by taxpayers generally.

The OWTS LAMP supports the Board's Strategic Framework by creating opportunities for improved safety and health.

OTHER AGENCY INVOLVEMENT:

North Coast Regional Water Quality Control Board, and cities interested in adopting the revised Humboldt County OWTS regulations will be offered the opportunity to participate.

ALTERNATIVES TO STAFF RECOMMENDATIONS:

1. The Board may choose to adopt Tier 1 of the OWTS Policy, avoiding much of the cost of implementation and all of the local input associated with development of a LAMP. This option is not recommended because it will result in little to no development of land as the majority of Tier 1 standards are more restrictive than the County's current Sewage Disposal Regulations.

2. The Board may decide to take no action, and to relinquish full oversight and regulation of OWTS, currently a reliable local program, to the State. This option is not recommended because it will remove the ability of local professionals to respond to local needs. The County would adopt, by default, Tier 1 standards which would be overseen by the State.

ATTACHMENTS:

1. OWTS Policy compliance timeline
2. LAMP Impact Analysis Summary
3. Wastewater Facts

Attachment 1

OWTS Policy Compliance Timeline

Report to the Humboldt County Board of Supervisors

OWTS Policy Compliance Timeline

Humboldt County Department of Health and Human Services,
Division of Environmental Health (DEH) Land Use Program

- May 13, 2013 **Effective date** of Statewide OWTS Policy (*Water Quality Policy for Siting, Design, Operation and Maintenance of Onsite Wastewater Treatment Systems*). Five year clock starts ticking.
- June 19, 2014 **Incorporation of Statewide OWTS Policy** into the *Water Quality Control Plan for the North Coast Region* (Basin Plan).
- May 13, 2016 **Deadline for submittal of Humboldt County Local Agency Management Program (LAMP)** to the North Coast Regional Water Quality Control Board (NCRWQCB). It is our goal to seek NCRWQCB staff review and concurrence of key elements prior to formal submittal to the NCRWQCB. Departmental goal calls for final submittal between 6 months and 12 months prior to the state-mandated deadline.
- Nov 13, 2016 **Deadline declaration of completeness** of LAMP. The NCRWQCB has up to 6 months from submittal of LAMP to declare the LAMP complete. If not complete, NCRWQCB must specify deficiencies. NCRWQCB can declare the program “complete except for specific elements.”
- May 13, 2017 **Deadline for approval of all LAMPs** by NCRWQCB. The NCRWQCB has up to 1 year from submittal to approve or deny a LAMP. Beyond 1 year, the LAMP may be submitted to the State Water Resources Control Board (SWRCB) for decision.
- May 13, 2017 **Initial reporting period starts.** All data gathering and reporting procedures should be in place within DEH by this date to facilitate reports required by the NCRWQCB and to avoid costly (manual) searches for required information.
- June 13, 2017 **Deadline for Humboldt County to appeal.** Should the NCRWQCB fail to approve our LAMP submittal, we may appeal to State Board. The public may also appeal the NCRWQCB decision to the State Board if there is substantial disagreement.
- Feb 1, 2018 **Due date for first annual report to RWQCB.** For Tier 2 agencies, the report is detailed. For Tier 1 agencies, the report is more basic.
- May 13, 2018 **Deadline for all local agencies to be in compliance with OWTS Policy.** Current County standards remain in effect until this date.

Attachment 2

LAMP Impact Analysis Summary

Report to the Humboldt County Board of Supervisors

Local Agency Management Plan (LAMP) Impact Analysis Summary

Humboldt County Department of Health and Human Services
Division of Environmental Health (DEH) Land Use Program

At its meeting of June 19, 2014, the North Coast Regional Water Quality Control Board (NCRWQCB) adopted Order R1-2014-0009 to amend the North Coast Region Basin Plan. The amendment replaces the former *Policy on the Control of Water Quality With Respect to On-site Wastewater Treatment and Disposal Practices* with a uniform statewide policy regulating the design and installation of on-site wastewater treatment systems (OWTS). The new OWTS Policy could have substantial impact on rural development in Humboldt County.

The new policy, developed under mandate from Assembly Bill 885 (AB 885) to ensure consistency across California in the control of on-site sewage disposal systems, was more than ten years in the making. The overall goal of AB 885 is to prevent pollution of surface water and groundwater from OWTS.

After considerable public debate, the policy was adopted by the State Water Resources Control Board on May 13, 2013. The State Board policy requires Regional Boards across the state to amend their Basin Plans within one year to align them with the new statewide standards. In turn, it allows counties up to five years to develop wastewater programs in compliance with the amended Basin Plans.

In meeting its water quality protection goals, the mandate places more responsibility on local jurisdictions (counties) to enforce OWTS standards, and places the Regional Boards in the position of approval and oversight of local programs. For Humboldt County, the policy includes numerous technical changes that may affect future development.

The new policy includes five regulatory tiers providing for the permitting and oversight of new as well as existing OWTS:

- Tier 0 establishes oversight protocols for existing, properly functioning non-polluting standard systems.
- Tier 1 provides a set of prescriptive minimum (default) OWTS siting and design standards for counties who do not wish to develop locally-tailored standards.
- Tier 2 provides for the development of local standards under a "Local Agency Management Program" (LAMP) which consider local hydro-geologic conditions in the regulation of OWTS.
- Tier 3 regulates on-site wastewater disposal near water bodies impaired for nitrogen or bacteria. The State reviews its list of impaired water bodies every three years. New or

replaced OWTS in listed impaired areas require supplemental treatment to meet prescribed performance standards.

- Tier 4 sets policy for the repair or replacement of existing failed, polluting OWTS.

While all counties must comply with statewide standards in Tiers 0, 3 and 4, local jurisdictions may opt to accept either Tier 1 prescriptive standards (one-size fits-all) or adopt, under Tier 2, standards which match hydro-geologic and development realities that may be unique to each county.

Should a county choose to ignore the new state policy or to dissolve its existing OWTS permitting program, the Regional Board would become the primary permitting agency, and all permits would have to be reviewed and approved by Regional Board staff.

Regardless of which tier is selected, local ordinances and regulations will have to be modified to align them with State and Regional Board technical requirements, such as the minimum allowable depth to groundwater and minimum system sizing. The decision "to LAMP or not to LAMP" should take into account personnel costs, impact on rural development, local hydro-geologic conditions, permit and construction costs, and future growth trends in the county, in addition to the issue of flexibility and autonomy in local government. The decision should seek to optimize public health and environmental protection for the Humboldt County population.

The discussion below briefly weighs each of these major non-technical impacts to assist the Humboldt County Board of Supervisors in reaching a decision:

Impact on Personnel Costs

1. Scope of authority.

LAMP OPTION: The new policy adds to the current scope of authority for local agencies the regulation of OWTS treating up to 10,000 gallons per day (gpd) as well as major subdivisions (subdivisions creating more than 4 parcels). Since the current daily flow limit of DEH regulatory authority is 1,500 gpd, the increase will add substantially to the workload of the DEH Land Use Program. DEH would provide permitting, oversight and enforcement of large OWTS, such as mobile home parks, campgrounds, restaurants, resorts and hotels, as well as major subdivisions in rural areas that are currently under the authority of the Regional Board.

The higher workload could require the addition of one to two full time equivalent employees (FTE) and corresponding training costs. The addition of personnel, with overhead, would require an estimated increase of \$100,000 to \$200,000 to the annual DEH Land Use Program's budget.

NO-LAMP OPTION: This option will moderately increase DEH workload since in addition to its current responsibilities, the County would assume authority for OWTS repairs for systems up to 3,500 gpd. Rural systems formerly under Waste Discharge Requirements (WDR) would be required to continue to comply with those permit conditions, presumably without oversight as long as they "function properly." When they fail, the problem defers to DEH for solution and

enforcement. Such failures are usually complex and difficult to resolve when they occur. DEH would likely incur additional training costs to effectively implement this portion of the Tier 1 standards. New one-time programmatic costs under Tier 1 requirements could range between \$40,000 and \$50,000.

2. Annual reporting.

LAMP OPTION: The new Policy requires in-depth annual reporting to the RWQCB. To meet Tier 2 LAMP standards, DEH will have to develop data management systems to monitor groundwater quality, wastewater volumes, OWTS complaints (and detailed information regarding complaint disposition), septage volumes, etc. The data must be consolidated into an annual report in electronic format and submitted to the NCRWQCB each year. Data collection, integration, management and reporting will likely add .25 FTE to the DEH workload (included in the estimate in 1 above).

NO-LAMP OPTION: Annual reporting requirements under Tier 1 standards are substantially less than for Tier 2. Tier 1 data includes a complaint registry, number of permits and septage hauler permit data. All are currently available within DEH; data management and reporting will have nominal impact on workload.

3. Training costs.

LAMP OPTION: As noted above, increased training costs under a LAMP will be associated with the increased regulation and oversight of large OWTS up to 10,000 gpd since such systems are usually complex and require substantial engineering. When large systems fail, they impact a greater number of people. Legal assistance may be necessary for enforcement of polluting systems.

NO-LAMP OPTION: Large OWTS will remain under the jurisdiction of the NCRWQCB (or will be self regulating) until system failure, in which case repair permitting will defer to DEH. The current DEH staff likely has the capacity to review, and when necessary, design OWTS up to 3,500 gpd with moderate additional training.

• **Impact on Development**

1. Subdivisions minimum densities.

LAMP OPTION: Current County subdivision standards comply with the Subdivision Map Act and are thus, technically defensible. If the current OWTS regulations were incorporated into a LAMP, there would be minimal reduction in the subdivision potential of rural lands in Humboldt County. (Regardless of which optional Tier is selected, other OWTS Policy requirements will affect parcels near impacted water bodies and public water system intakes.)

NO-LAMP OPTION: Tier 1 standards require a one-acre minimum parcel size per residential unit. One-acre parcels would not be permitted to construct secondary dwellings or multiple family structures.

2. New construction, minimum parcel size.

LAMP OPTION: Current county OWTS regulations allow residential development if a conforming system can be accommodated on the parcel, regardless of parcel size. This approach is technically defensible since zoning regulations, rather than OWTS regulations, determine minimum parcel size. If the current standard were incorporated into a LAMP, development potential for rural lots would remain unchanged (except for parcels in close proximity to impaired water bodies).

NO-LAMP OPTION: Tier 1 allows densities no greater than one acre per residence. The requirement would render some lots in Humboldt County as “unbuildable” and would prevent many others from adding secondary dwellings or multiple apartment units.

3. OWTS siting/design criteria.

LAMP OPTION: The current County regulations allow development on sites with shallow soils and/or high groundwater to within two feet of the ground surface, a condition frequently encountered in Humboldt County’s coastal geology. Our current standards are technically defensible in providing ample public health protection while offering a wide range of development options for rural property owners. Development potential would remain relatively unchanged if the current County regulations were incorporated into a LAMP and approved by the NCRWQCB.

NO-LAMP OPTION: Tier 1 standards call for a minimum of 5’ of permeable soil under OWTS dispersal fields above the level of a winter water table. An OWTS could not be constructed on sites where the water table was within 7-10 feet of the surface. This requirement would severely limit or preclude development and subdivision options in many areas of the County.

4. Hydro-geologic conditions.

LAMP OPTION: The range of soil types in Humboldt County varies widely from highly sandy dune terraces to dense, heavy clays typical of Redwood forests. Local OWTS standards encoded in current regulation have evolved to adjust OWTS design according to soil types to provide optimal treatment for each site. In addition, local standards provide a range of OWTS design options to compensate for sites with high water tables or shallow bedrock. It is likely that many standards currently in effect in Humboldt County could be incorporated into a LAMP that would be accepted by the NCRWQCB.

NO LAMP OPTION: Tier 1 standards allow a very limited range of OWTS design options since they assume more optimal soils and hydro-geologic conditions than are encountered in much of the County. The number of buildable lots in the County would substantially decrease should the Board decide to proceed under Tier 1.

5. Permit costs and construction cost impacts.

LAMP OPTION: Since the LAMP will increase personnel costs, permit fees will likewise increase to cover additional staff time (unless offset by other revenue sources), training and reporting systems. If most of the standards currently in effect are incorporated into the LAMP, OWTS system construction costs will remain largely unchanged.

NO-LAMP OPTION: Since system sizing specified by the Tier 1 standards is generally less than required by current County Code, OWTS construction costs (materials and labor) would be lower for those parcels meeting Tier 1 site criteria. Few areas in the County, however, would meet Tier 1, criteria.

REVENUE SOURCES: Increased program costs will drive the need to identify additional revenues. Minor increases under Tier 1 requirements could likely be recovered through moderate fee increases and new fees relating to operational oversight of larger systems (mobile home parks, campgrounds, hotels and restaurants) in rural areas of the County.

While the program costs are yet undetermined, estimated costs of Tier 2 could present a greater challenge. One revenue mechanism suggested by the State Water Resources Control Board is the creation of a special services district in unsewered areas to provide a broad array of services relating to OWTS to better ensure their long-term performance. Some California counties have developed county-wide "Septic Tank Maintenance Districts" that support in-depth OWTS programs designed to provide cost-effective monitoring, sampling and servicing for owners of on-site sewage disposal systems.

- **Future considerations**

1. **The future of OWTS.** Given the high, and ever increasing, cost of centralized wastewater collection and treatment systems, it is reasonable to assume that rural areas of the county will depend on OWTS for the lifetime of the dwellings of which they serve. This is true even for semi-urbanized communities like Trinidad.

Additionally, more than half of the existing housing stock in unincorporated Humboldt County depends on OWTS to treat and dispose of wastewater. This proportion is unlikely to decline. It is incumbent on the Humboldt County Board of Supervisors to select the option which will provide the most assurance that OWTS are properly sited, designed and maintained for the next 100 to 200 years (the life span of a home) while seeking to minimize costs for homeowners for system maintenance, prevent environmental pollution and public health threats.

The current Humboldt County regulations were crafted to meet such goals. If adopted as part of LAMP, they could continue to provide a known level of assurance well into the future.

If the County decides that the Tier 1 option is better, short-term program costs will be minimized and County oversight of non-standard wastewater treatment systems may be reduced, but the long-term sustainability of OWTS as a component of a healthy rural lifestyle in our County cannot be assured.

2. **Improvements in treatment technology.** Current County regulations provide the flexibility to incorporate new OWTS technology as it emerges. Since Tier 1 standards are prescriptive, there is no mechanism available to adopt technological improvements in OWTS design and construction.

Attachment 3
Wastewater Facts

Report to the Humboldt County Board of Supervisors

Wastewater Facts

Humboldt County Department of Health and Human Services,
Division of Environmental Health (DEH) Land Use Program

Our daily wastes

3,530,000 gallons per day (gpd) - Estimated volume of household wastewater discharged into OWTS daily (based on household average of 200 gpd).

17,663 - Approximate number of households in Humboldt County dependent on OWTS.

52% - Percentage of households in unincorporated Humboldt with on-site disposal.

3,267,600 gpd - Estimated daily volume of household wastewater discharged into unincorporated community sewers (household average of 200 gpd).

2,000,000 gallons every year - Approximate volume of septage pumped from septic tanks.

Who's watching?

654 Annual number of site visits (inspections) by DEH staff relating to OWTS.

878 Number of OWTS permits issued in past 10 years (new, repair, destruction).

1 Composting/experimental toilet permits applications received past 10 years.

0 Pit privy permit applications received past 10 years.

804 Number of non-standard OWTS with operating permits.

55 Number of rural non-sewer parcels created per year (10-year average).

795 Number of water well permits past 10 years.

Flushing out the costs

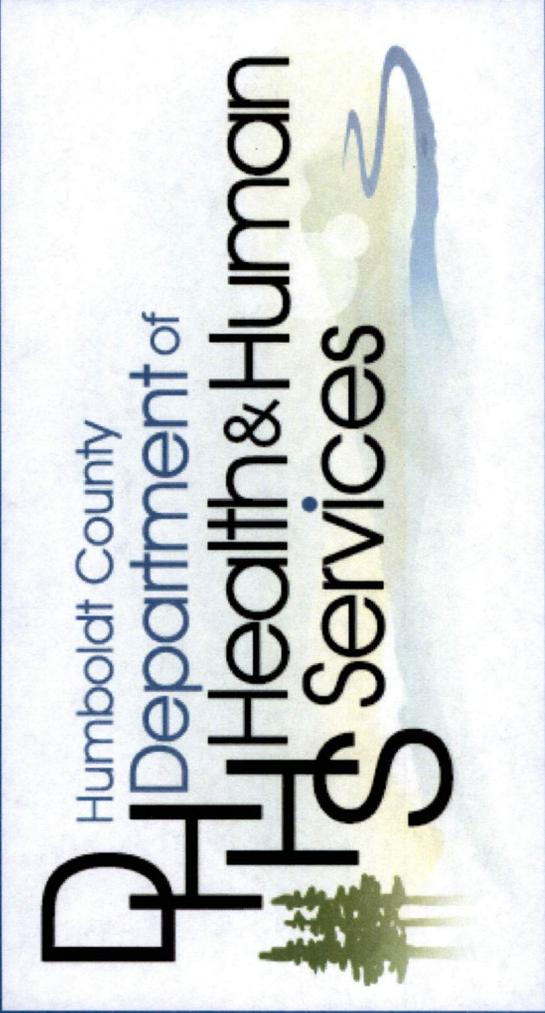
Average cost of septic tank cleaning per dwelling - \$525 (every 7 years).

Cost range for construction of a standard OWTS - \$6,000 - \$10,000.

Cost range for non-standard OWTS - \$12,000 - \$25,000.

Fee range (excluding contractor costs) for connection to sanitary sewer - \$2000 (Eureka); \$6,070 (Humboldt Community Services District).

Cost range for monthly sewer bill (200cu ft) - \$10.00 (Eureka); \$36.00 (Arcata); \$70.00 (Rio Dell).



Division of Environmental Health

Board decision:
To LAMP or not to LAMP



“OWTS”
On-site Wastewater Treatment System



Background/history

- AB 885 ordered the State Water Resources Control Board:
 - To provide statewide consistency in regulating on-site wastewater treatment systems (OWTS)
 - To provide better protection of public health and the environment from sewage pollution
 - To improve oversight of local programs and permit processes



The new State OWTS policy

- 5 policy tiers
 - Tier 0: Existing, properly functioning systems
 - Tier 1: Prescriptive standards for the siting, design, operation and maintenance of OWTS
 - Tier 2: Minimum standards for Local Agency Management Programs (LAMP) for OWTS
 - Tier 3: Standards for new and existing systems near impaired water bodies
 - Tier 4: Policies relating to failed or polluting OWTS



County options

- Tier 1: Accept statewide prescriptive standards
- Tier 2: Develop a “LAMP” which assures Regional Water Quality Control Board of:
 - Local siting, operation and design standards providing equivalent or better protection than Tier 1
 - Sufficient, well-trained county staff
 - Inspection, monitoring and reporting system

Major Impacts, Tier 1 (default option)

- Less development in rural areas
- Maximum average residential density: 1 house per acre
- Minimum water table depth: 8 feet
- No allowance for OWTS with enhanced treatment
- Lower EH program costs
- Slightly lower construction costs (smaller system size)
- Substantial modification of existing ordinance
- Will freeze or reduce development



Major Impacts, Tier 2

local standards option

- Greater potential for development
- Standards specific to Humboldt County geology and rainfall conditions
- Substantial modification of existing ordinance
- Minor adjustments to current county regulations
- Wider scope of responsibility
- Increased monitoring and data management costs
- Higher costs: increased fees/new revenues



Proposed timeline

June 2014– OWTS policy adopted by RWQCB

May 2016- Deadline for submittal of draft LAMP

May 2017- Deadline for RWQCB approval of LAMP

May 2018- Final implementation deadline for either Tier



Facts

- **17,663** - approximate number of households in Humboldt with OWTS (52% of total unincorporated)
- **3,530,000 gallons every day** - Estimated volume of household wastewater discharged into OWTS
- **200 years** - predicted lifespan of a typical home built today in Humboldt County
- **Almost zero** - probability that most rural homes in Humboldt County will ever be served by a centralized sewer



Recommended BOS Actions

- Approve the Departmental recommendation to choose Tier 2; authorize LAMP development
- Direct the Department to include stakeholder input in development of the LAMP
- Direct the Department to notify the RWQCB of the County's intent to proceed with a LAMP