

Summary of Changes Including Comments Received Post Board of Supervisors Meeting - Rows in green are new.

Topic	Topic Item	Date	Comment (comments for LAMP V2, unless otherwise noted)	Response	Change
01-Corrective Action	1	2/2/2023 7/2/2023 7/28/2023	Page 112 9.3.9-what happens if the owner ignores DEHQ requirements?	Noncompliance with any requirement in the LAMP is a violation of the San Diego Regulatory Code and may be subject to enforcement action as provided for in Title 1 of the code. Additionally, OWTS Owners who are not in compliance with the LAMP or corrective action requirements may lose coverage under the conditional waiver contained in the OWTS Policy and would have to submit a Report of Waste Discharge to the RWQCB.	Comment Noted
02-Definition	2a	2/2/2023 7/2/2023 7/28/2023	The definition of a cut/slope should be changed to 70%. Although 60% is arguable, the historical basis for this lies in a site review of a canyon setback on Stage Coach Road in Fallbrook in the Spring of 1975 or 1976. This came about with a dispute over a layout design and then ,supervisor Gary Stephany and myself made a site assessment and the resultant setback was premised on the 60% canyon slope. This eventually became a prescriptive policy. the actual setback should be based on site specific conditions where the potential of a seep might be argued as linked to dense soil horizons or rock features. Given the actual travel of effluent from a leach line can be contrary to the DEHQ application of soil science by a 5:1 ratio (a broad application of, but not proven by science), the adjustment of a required slope per cent can be argued in the affirmative	The definition of cut/slope and the setback of 5:1 (up to maximum 100') for dispersal fields to a cut/slope are not proposed for change from the original LAMP. The language being retained from the original LAMP also includes an alternative setback of 50' when site evaluation shows no potential for seepage. However, a new setback of 3:1 has been added for drip dispersal up to a maximum of 25'. Additionally, consistent with soil stability language from the OWTS Policy, a provision has been added that a different setback may be proposed if recommended in a geotechnical report prepared by a qualified professional.	Yes
02-Definition	2b	2/2/2023 7/2/2023 7/28/2023	See definition of domestic wastewater - excludes RV and industrial waste streams.	The definition of domestic wastewater was revised to allow some discharge from RV holding tanks to an OWTS if approved and does not contain chemicals prohibited by law.	Yes
02-Definition	2c	2/2/2023 7/2/2023 7/28/2023	The definition of an ephemeral stream should be more clearly defined so that a true ephemeral stream is identified and a fifty-foot setback observed as in the Regional Board guidelines. A good source of information is the Maps used by the County Department of Public Works.	The OWTS Policy definition of a "flowing water body" includes dry areas where it is apparent that when water is present it flows, such as in an ephemeral drainage, creek, stream or river. The current and draft LAMP include the same definition as is found in the OWTS Policy. An alternative standard to the 100' setback standard has not been identified that provides a similar level of protection to this standard in the OWTS Policy for a standard OWTS. However, an alternative setback of 50' was added for OWTS with supplemental treatment.	No

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02-Definition	2d	7/21/2023	<p>The intent of the LAMP (old and new) has always been to provide two different minimums to certain drainage features. In Table 6.6.1 (page 64) the Draft LAMP calls out a 50' setback from a "Drainage Course" to any leach line. Further down in the same table the Draft LAMP calls out a 100' setback from a "Flowing Surface Water Body".</p> <p>The problem is Staff is twisting the current definition of "Flowing Water Body" to mean "Flowing Surface Water Body" thereby including any and all "Drainage Courses" in that definition, effectively eliminating "Drainage Courses" from the discussion. Any little swale or depression on a property is now to be considered the equivalent of a flowing river. Thousands upon thousands of prior approvals are now subject to being revoked if this twisting of the definitions be allowed to continue. This was never the intent of the LAMP.</p> <p>The definition as it exists in the current LAMP and the Draft LAMP is confusing at best and not at all clear. It reads as follows:</p> <p>"Flowing water body" means a body of running water flowing over the earth in a natural water course, where the movement of the water is readily discernible or if water is not present it is apparent from review of the geology that when present it does flow, such as in an ephemeral drainage, creek, stream, or river.</p> <p>I recommend the definition be revised to read as follows:</p> <p>"Flowing water body" means a body of running water flowing over the earth in a natural water course, where the movement of the water is readily discernible.</p>	<p>To clarify the difference between flowing water body (including ephemeral and intermittent streams or drainage courses) and natural surface runoff channels or swales that direct surface runoff over the land surface to the receiving flowing water body, a definition of "Surface runoff channel or swale" was added to the definitions and to the "Stormwater features, man-made ponds and ditches" category in the Setback Table 6.6-1. A depth requirement of 5' or less was also added. The setback distance of 25' was not changed. To provide greater protection for these types of features that are greater than 5' in depth, a new setback category was added with a setback of 50'.</p>	Yes

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02-Definition	2e	7/24/2023	<p>Ephemeral drainage and Flowing water body are two completely different terms and cannot be interchanged. Going back some 50 years plus, all lots were created with the definition of ephemeral drainage or swale was a 50' setback from an edge of flow line after a heavy rain event and would quickly dry up or would carry water for a few days and dry up. Flowing water bodies would be a regular flowing stream and would clearly be discernible by the amount and speed of a flowing stream. Being in San Diego County, we have very few flowing water bodies and many more swales. Plus the back country areas generally get less than 12" of rain per year normally.</p> <p>As an inspector for almost 10 years, I experienced few flowing water bodies and many ephemeral swales. Hundreds of existing lots could be severely impacted if this term of definition is changed. You also need to include ways to reduce the setback from swales or ephemeral drainage like that was done in the past. Tom Lambert, the land use expert for over 30 years taught us that by lining the drainage courses with D-75 ditches was acceptable or 20' deep holes could reduce the 50' setback to 25' setback from the swales. Deep holes was the most preferred method because it demonstrated that water was not flowing below the surface in this area and subsurface water would not be impacted and I would agree with that.</p>	See response to comments 2c and 2d.	Duplicate
02-Definition	2f	8/3/2023	2.3.10 RV holding tank waste vs direct hook ups?	Language was added regarding RV waste for some RV holding tank discharges to be approved only if it does not contain prohibited chemicals consistent with HSC 25210.2. Research shows that RV owners will still use chemicals to control odors and digest solids even when they have a direct hook up but State law now prohibits the use of specified chemicals.	Yes
02-Definition	2g	2/2/2023 7/2/2023 7/28/2023	Page 8 cut slope-should be changed from 60% to 70%	See response in comment 2a.	Duplicate

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02-Definition	2h	7/11/2024	The definition of "Deep Bed Dispersal System" should revert to the original and historical use as reports and correspondence in the DEHQ archives. The name change serves no purpose and retaining the existing identification will also agree with the San Diego Code of Regulatory Ordinances, Chapter 3, Section 68.350 (Requirements for Horizontal Seepage Pits).	The term "deep bed" is used instead of "horizontal seepage pit" to differentiate and clarify that this dispersal type is not a seepage pit, as defined in the OWTS Policy. Section 68.350 of the Regulatory Code is proposed for repeal, as this section is duplicative of standards provided in the LAMP.	No
02-Definition	2i	7/11/2024	The definition of "flowing water body" is very clear. The question remains as to how the DEHQ considers setbacks.	Comment noted. See response in Comment 7m.	Comment Noted
02-Definition	2j	7/11/2023	The definition of soil is excellent and references the "Soil Triangle". The latter will be addressed later in this LAMP response in the context of "no validity for percolation correlation".	Comment noted. See response in Comment 8j.	Comment Noted
02-Definition	2k	7/11/2024	Surface runoff channel or swale. (Same comment as for flowing water body".)	Comment noted. See comment for "flowing water body in Item 7m	Comment Noted
02-Definition	2l	7/15/2024	Definition of drainage course in addition to ephemeral stream?	Comment noted. See response in Comment 7m.	Comment Noted

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02-Definition	2m	9/22/2024	There is no differential definitions of drainage courses. Setbacks are arguable and uncertain as compared to practices these past 50 years or more..	See response to comments 2c, 2d, and 7m. The current and updated LAMP both include the same definition for a “flowing water body”, which includes dry areas where it is apparent that when water is present it flows, such as in an ephemeral drainage, creek, stream or river. The current LAMP setback of 100-feet to a “flowing stream/creek” is not proposed for change. The updated LAMP provides clarification that this setback category includes an ephemeral stream, consistent with the current definition. A new alternative to this setback is included in the updated LAMP, with a reduced setback to 50 feet for OWTS with supplemental treatment. No other alternative to this setback was identified that provided a similar level of protection to surface water. Additionally, new setback categories and definitions are provided for clarity and to differentiate between the flowing water body category and other surface runoff features that channel surface water runoff to a flowing/ephemeral stream. These are a “surface water runoff channel or swale” category and a “Stormwater features, man-made ponds and ditches” category, with setbacks ranging from 25 to 50 feet.	Duplicate
03-Dispersal	3a	2/2/2023 7/2/2023 7/28/2023	A Serial System Commentary: often criticized as “serial failures” because of poorly installed dams and syphons. More competent installers have no problems and the difference is subtle. This matter should be more seriously addressed by the DEHQ with a better construction model.	Serial dispersal system requirements have not changed in the draft LAMP. DEHQ can address installation issues as they occur and through the registration and inspection processes.	No
03-Dispersal	3b	2/2/2023 7/2/2023 7/28/2023	4.2.3.3 Leach Lines in Steep Slopes In my view, this element should be abandoned	This provision is same as in current LAMP and is not proposed for change. Language was added to clarify that one boring to be installed in primary dispersal area and one in designated reserve area.	No
03-Dispersal	3c	2/2/2023 7/2/2023 7/28/2023	Deep Bed” should not be substituted for “horizontal pit”,	The term "deep bed" is proposed for use instead of "horizontal pit" to differentiate from a seepage pit as defined in the OWTS Policy.	No
03-Dispersal	3d	2/2/2023 7/2/2023 7/28/2023	8.1 As before, why would you recommend a return to outdated use of a distribution box ?	Current ordinance provides for the use of a distribution box and this added provision incorporates this ordinance provision for the use of equal distribution as a dispersal option when appropriate.	No

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03-Dispersal	3e	2/2/2023 7/2/2023 7/28/2023	If you want to introduce a different method , why not allow the use of a drop-box as an alternative to the syphon overflow? Dividing a leach field with rotation every year would also be worthy of consideration.	The LAMP provides for the effluent to be delivered from one trench to the next using a crossover pipe, which has been shown to have less construction/placement issues. The OWTS design must provide for the minimum infiltrative area required in the LAMP. Dividing and reducing this minimum area would not be approved. However, a design proposing a double leach field with a valve installed to regulate the wastewater from one dispersal field to the other could be considered if it meets/exceeds the minimum requirements.	No
03-Dispersal	3f	2/2/2023 7/2/2023 7/28/2023	In my view, the last portion of the 8.1 paragraph is utter nonsense.	The specific part of the last portion of paragraph 8.1 that is under question is not clear.	Comment Noted
03-Dispersal	3g	2/2/2023 7/2/2023 7/28/2023	8.5.4.5 Does “most installation restrictions” apply to installation costs?	The language in this section was changed to clarify that the installation required at the time of construction is based on the access limitations or potential access limitations associated with the proposed construction and/or use/conditions of the land. This provision is not based on costs.	Yes
03-Dispersal	3h	2/2/2023 7/2/2023 7/28/2023	It is understood the inflated application rate is a substitute for the previous 200% or less leach line length. In my view, there are instances where this amount of leach line could be less.	Leach Line Trench Length Based on Percolation Test Rate table (Table 8.2-1) was amended to align with the minimum application rates in the OWTS Policy, allowing two square feet of infiltrative surface area per each linear foot. The table retains the minimum leach line length of 200 feet. Application rates in the draft LAMP meet or exceed the requirements of the OWTS Policy.	Yes
03-Dispersal	3i	2/2/2023 7/2/2023 7/28/2023	Why is the ten-foot leach line separation used instead of the UPC six-foot distance.	The setback of ten feet from center of leach line to center of leach line (8.5 feet edge to edge) is not proposed for change from the current LAMP. This distance allows for soil aeration across different soil types, enhancing wastewater treatment in soil. An alternative was added to allow for 6' separation between leach lines under certain conditions.	Yes
03-Dispersal	3j	8/3/2023	8.2-1 lengths of leach lines	See response to comment 3h.	Duplicate
03-Dispersal	3k	8/3/2023	8.6.1 this is referring to the areas west of I-5? Can there be a map?	These are Regional Board excepted areas in the Basin Plan for the MUN (municipal supply) beneficial use and include the areas west of Interstate I-5 and some lagoon areas. Reference to a map has been included in the draft LAMP.	Yes

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03-Dispersal	3l	8/3/2023	9.3.5 Discusses flushing but not how to flush or other guidance.	The flushing and other maintenance and operations activities to support a Supplemental Treatment System is included in the Operations and Maintenance Plan that is required for these systems. This plan will be specific for the system and will address all maintenance requirements and frequencies.	Comment Noted
03-Dispersal	3m	2/2/2023 7/2/2023 7/28/2023	Page 91. 8.1.4.4-low lying areas subject to flooding-should be considered a rare event...	Although this condition may not be applicable to all areas at all times, it is being retained as these areas are not considered appropriate for OWTS usage.	No
03-Dispersal	3n	2/2/2023 7/2/2023 7/28/2023	Page 94 Table 8.3.1 application rates-table has a correction factor of up to 200%. Kudos to whoever did the new tables.	This table is in the current LAMP and is not proposed for change in the draft LAMP. The table comes from the OWTS Policy. Comment noted.	Comment Noted
03-Dispersal	3o	2/2/2023 7/2/2023 7/28/2023	Page 91 can observation pipe at distal ends of system be accepted in lieu of tape? (section 8.1.5)	The draft LAMP (Section 8.4.2) requires ports at leach line lengths of 100' but does not prohibit the use of ports at other points along the leach lines. Although no revision is proposed for this item, an OWTS design with additional port locations may be proposed and approved.	Comment Noted
03-Dispersal	3p	2/2/2023 7/2/2023 7/28/2023	Page 97 8.4.4.3 equal distribution d boxes have long term problems.	The use of newer models and correct installation will eliminate many issues with distribution boxes.	No
03-Dispersal	3q	2/2/2023 7/2/2023 7/28/2023	Page 104 8.6.4.3 and 8.6.4.3.1-pits cannot have equal distribution.	Two or more seepage pits can accept wastewater from a distribution box in many situations. Serial distribution continues to be permitted in the draft LAMP.	No
03-Dispersal	3r	2/2/2023 7/2/2023 7/28/2023	Leach fields should be allowed to be separated in two parts with a diversion valve.	See response to comment 3c.	Duplicate
03-Dispersal	3s	7/12/2023	In most H-pit septic systems there is at least 20' of undisturbed material between parallel pits. If the pits are being abandoned, why can't we use that area for new or future drip lines? With a 2' setback from each pit that still leaves 16' (by what ever the length of the pit) where drip lines may be installed. If this is being considered as a reserve in a new installation you could show the pits with extra depth to provide the needed vertical separation as well.	Language was added to allow reuse of areas formerly used as a dispersal area when demonstrated to have functioning infiltrative capacity and sufficient native soils to accept the anticipated wastewater.	Yes

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03-Dispersal	3t	7/12/2023	Reusing the area over a standard leach line septic system, after a system failure, is probably not a good idea. However, converting a functioning leach line system to a drip system seems like something that would work. While the leach line areas are in fact "disturbed soil", they would in fact add to the surface area available to absorb effluent and increase the potential capacity of the drip system.	See response to comment 3s.	Duplicate

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03-Dispersal	3u	9/22/2014	<p>OWTS Sizing. I would opine, few actually know how these lengths are derived. More length is not necessarily better and the relative 200% of actual flow (internal water use) allows a significant safety factor. There could be an argument for less leach field length, but with increased reserve. Most failures are related to root invasion and leaky plumbing (except those for which can be attributed to errors in design constructs). Historically the length of leach lines as related to a percolation rate has not changed since November 1974 when there was a transition from "old code" to "new code" and the publication of the SAN D-14 (revised March 1978). In my recollection since 1970, there have been several discussions about revision (the most notable being the proposed adjustment in 1979 by County Division of Sanitation Engineer. After many <i>pro e contra</i> staff discussions, the sizing has remained the same. However, the derivation of Application Rates with the chart in the LAMP has a fallacy (common with other jurisdictions which were likely used as templates for the LAMP). In my view and as proposed by many sources in the literature). The drip field application rates should be defaulted to a whole number relationship such as 12, 15, 24, 30, 36, 40, 48, 66, 80, and 120. Averages are not hydraulically valid and these singular numbers represent a proposed sizing. Importantly, any adjustment as proposed in the LAMP "Summary of Changes" for application rates used for leach lines to "align" with drip lines has not merit. Application rates for drip lines are a relationship with the size of an emitter, spacing and square footage of the dispersal area. Leach line application rates are derived from a constant divided by the square root of a percolation rate. Although this relationship can be challenged since there is disagreement with bottom area versus sidewall area and the $5/t^{1/2}$ was based on a maximum 40 minute per inch percolation rate with a two-foot trench depth with only four inches of rock, the new code adds a "safety factor". A perspective is any conversion from</p>	<p>See response to comment 3h. In the updated LAMP, all dispersal systems (except vertical seepage pits) have the same infiltrative surface area as those in <i>Table 8.3-1: Application Rates as Determined from Stabilized Percolation Rates</i>. This is the same table that is found in the OWTS Policy (Table3, page 28). Drip dispersal systems must meet the minimum application rates found in this table. Leach line dispersal lengths also meet the application rates of this table, using two square feet of infiltrative surface area for every one foot of leach trench (18 inches bottom and two 3 inch sidewall per linear foot infiltrative surface area). The minimum leach line length of 200 linear feet was retained from the current LAMP. Deep bed dispersal must also have an equivalent infiltrative surface area to Table 8.3-1, calculated using the bottom and sidewall (rock depth) infiltrative surface areas. Consistent with leach lines, the minimum infiltrative surface area is 400 square foot of infiltrative surface area. A shallow bed dispersal also must have an equivalent infiltrative surface area to the table using the bottom surface area only. Although different configurations, the actual infiltrative surface areas are aligned with <i>Table 8.3-1: Application Rates as Determined from Stabilized Percolation Rates</i>.</p>	Duplicate

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03-Dispersal	3v	9/22/2024	Drip dispersal fields with tree or boulder interference. In some instances, it is necessary to either use tight-line or curve a drip line around an object. This results in a variance from the two-foot separation requirement. Recommendation: The design guidelines should be clear in allowance for greater than two -foot drip line separation since the four-square foot dispersal zone with would be unaffected. Examples abound in guidelines.	According to updated LAMP <i>Table 8.7-1: Drip Dispersal System Dimensions and Specifications</i> , a two-foot minimum spacing is required between emitters on an emitter line and between emitter lines. These are minimums and there are no maximums specified, allowing for use of tightline and various configurations in a design.	Clarified
03-Dispersal	3w	9/22/2024	It is important to recognize a drip field and a leach-field are entirely different. I am made to think the set-backs (except to structures and property lines) for dispersal fields were a hurried response to a completion deadline for the LAMP.	It is recognized that there is a difference between drip dispersal and leach line dispersal systems. The setbacks to dispersal systems were given appropriate consideration during this process with some changes being made to setbacks where no impact to the treatment of effluent or reduction of the protection of ground and surface waters and public health were indicated.	Clarified
04-Format	4a	2/2/2023 7/2/2023 7/28/2023	Abandon this draft format and use original LAMP format-too lengthy.	The draft LAMP is a comprehensive document that provides the minimum standards for OWTS contained in the current LAMP, additional or revised standards, information as identified in the 5-Year Evaluation Report, information from related County Regulatory Code and Zoning Ordinance provisions, changes proposed by program staff and stakeholders, and applicable information from the Supplemental Design Manual for OWTS.	No
04-Format	4aa	6/3/2024	Final Draft page 14-update "grease trap" reference.	Reformatted sentence and changed to "oil/grease interceptor" consistent with LAMP and OWTS Policy definitions.	Yes
04-Format	4b	2/2/2023 7/2/2023 7/28/2023	Return to policy that can be rigid when necessary but allows for adjustment at management level.	The San Diego Regulatory Code provides for the standards governing OWTS to be in the LAMP and these standards are consistent with OWTS Policy requirements. The standards are intended to be applied uniformly in a ministerial fashion. Consistent with the OWTS Policy, the LAMP contains provisions for variances when adjustment is warranted.	Duplicate
04-Format	4bb	6/3/2024	Final Draft page 15-reference date for current version of Colorado River Region Basin Plan should be March 30, 2023.	Replaced the amendments reference date from January 8, 2019 to the current reference date for amendments of March 30, 2023.	Yes
04-Format	4c	2/2/2023 7/2/2023 7/28/2023	Put (horizontal seepage pit) in parenthesis by deep bed dispersal for historical reference.	The reference to horizontal seepage pit was included in the definition of "Deep Bed Dispersal".	Yes
04-Format	4cc	6/3/2024	Final Draft page 18-the acronym NPS is not defined in previous pages.	Removed acronym and spelled out non-point sources. Provided a brief description.	Yes

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04-Format	4d	2/2/2023 7/2/2023 7/28/2023	In my view, the terminology of “to scale maps” (sic) is misleading and should be simply identified as a “Onsite Wastewater Disposal Layout”.	Replaced language that referenced "maps" to "OWTS layout design" or "diagram" where applicable to avoid confusion with the site maps required by planning agencies.	Yes
04-Format	4dd	6/3/2024	Final Draft page 34-change "plat" to "plan".	Considered recommendation but retained original language as consistent with County of San Diego planning department terminology.	No
04-Format	4e	2/2/2023 7/2/2023 7/28/2023	3.8-1: Minimum Application and OWTS Layout Plan Elements. It is recommended the “ finished floor elevation” be changed to approximate (unless specified by an architect or verified by a surveyed elevation. “Report” should be substituted for “map” regarding setbacks. The location of all stormwater treatment and retention features is not always known and can be “conceptual”. This can be resolved by revision when it becomes known and is relevant or an “as built” which shows no conflict?	This table was modified to represent minimum requirements for a OWTS layout design elements for repairs. The term "applicable" was added to provide the elevation information when applicable to the specific repair. The term "map" was replaced with "OWTS layout design diagram". The reference to "all" for stormwater features was changed to "known, proposed, or potential" as suggested.	Yes
04-Format	4ee	6/3/2024	Final Draft page 37-specify units in Table 7.3-1.	Added units of acres/single family dwelling unit to Table 7.3-1.	Yes
04-Format	4f	2/2/2023 7/2/2023 7/28/2023	In my view, this nomenclature can be confusing with the site plan required by Planning Development Services (PDS) and the Department of Public Works (DPW). Better to identify these elements with a link to a layout. (not a site plan).	See response to comment 4d.	Duplicate
04-Format	4ff	7/11/2024	The previous suggestion of abandoning this draft document format and return to the one used in the current LAMP has been abandoned.	Comment noted.	Comment Noted
04-Format	4g	2/2/2023 7/2/2023 7/28/2023	The LAMP could be written differently so that each type of system (including the subtleties of interactions in the designs) is in a separate section and its own context.	The specific requirements for dispersal systems are consolidated in Chapter 8.0 and information for each different type of dispersal system is contained in a separate subsection.	Comment Noted
04-Format	4gg	6/3/2024	Add reference to last revision date of the OWTS Policy Final Substitute Environmental Document (SED).	Added the date of the addendum to the SED. SED originally approved June 19, 2012 and an addendum to the SED included in the April 18, 2023 Staff Report for the OWTS Policy update and conditional waiver renewal.	Yes
04-Format	4h	2/2/2023 7/2/2023 7/28/2023	I would recommend a footnote that declares no length credit for the width; just additional storage capacity.	Added footnote to Table 8.4-1 to clarify that no credit for infiltrative area is provided for widths greater than 18 inches when installing a trench width over 18 inches up to the 36 inch maximum width.	Yes

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04-Format	4i	2/2/2023 7/2/2023 7/28/2023	Do you actually want to eliminate discretionary judgement with a check-list.	See response to comment 4b.	Duplicate
04-Format	4j	8/3/2023	2.2 missing numbers.	Number sequence corrected.	Yes
04-Format	4k	8/3/2023	2.2.7 (renumbered 2.2.5) How is this different from 2.1.1.6? Appears to be inconsistent.	Clarifying language was added to both sections (2.2.7 and 2.1.1.7 in draft LAMP) to clarify difference between current LAMP requirement for OWTS with Supplemental Treatment to monitor/inspect biannually versus requirement to sample, test, monitor, and report effluent wastewater to meet/enforce established effluent limitations, such as with WDRS.	Yes
04-Format	4l	8/3/2023	3.8.6.1 typo.	Typo corrected.	Yes
04-Format	4m	8/3/2023	8.8-1 footnotes on table but no footnote referenced.	Removed footnote reference.	Yes
04-Format	4n	2/2/2023 7/2/2023 7/28/2023	Page 47 3.8.2.1-use the term layout or layout design instead of maps and plot plans.	See response to comment 4d.	Duplicate
04-Format	4o	2/2/2023 7/2/2023 7/28/2023	Page 48 3.8.2.3.1 paragraph 4-change language "under a permit and observed by DEHQ staff to "observed or reviewed by DEHQ staff"	Language was added to this section as suggested.	Yes
04-Format	4p	2/2/2023 7/2/2023 7/28/2023	Page 52 table 3.8-1:minimum application: insert "a", approximate or if known a proposed pad grade". Delete map next to layout. Change "all to significant and easily observable.	Revisions were made to address applicability for elevation information for repairs but this information should be provided for new construction/OWTS. "Map" changed to" OWTS layout design". The reference to "all" for stormwater features was changed to "known, proposed, or potential" as suggested.	Yes
04-Format	4q	2/2/2023 7/2/2023 7/28/2023	Page 71: 5.1.2 since state law prohibits supervision of any outsources or subcontracted work. Change term from "or supervised" to observed and concurred".	The Business and Professions Code allows subordinates to work under an engineer or geologist but the licensed individual assumes responsibility and signs/stamps reports. More than one qualified professional can sign a report based on the work they contributed to the report.	No
04-Format	4r	2/2/2023 7/2/2023 7/28/2023	Page 73 table 5.2.2 - map is not practical better to show a diagram or locations on the layout.	See response to comment 4d.	Duplicate

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04-Format	4s	2/2/2023 7/2/2023 7/28/2023	Page 98 8.5.1-gives up on also referencing horizontal pit.	See response to comments 3c and 4c.	Duplicate
04-Format	4t	2/2/2023 7/2/2023 7/28/2023	Page 133-change percolation test to capacity test.	The reference to percolation test was changed to capacity test for vertical seepage pits in Appendix II.	Yes
04-Format	4u	2/2/2023 7/2/2023 7/28/2023	Page 139 3.1 - unlikely a site plan is available.	See response to comment 4d.	Duplicate
04-Format	4v	2/2/2023 7/2/2023 7/28/2023	Page 141 figure 1-is there a better graphic than the min 1200 gallons or remove this reference. Jensen precast have good graphics.	Changed graphic.	Yes
04-Format	4w	2/2/2023 7/2/2023 7/28/2023	Page 143 figure 2 same input as for 5.4 above.	Changed graphic.	Yes
04-Format	4x	5/2/2024	Table 6.1-1 typo.	Corrected spelling error.	Yes
04-Format	4y	6/3/2024	Final Draft pages 3, 14, 17, 19, 70, and 133 spelling, grammar or formatting errors.	Corrected spelling, grammar, formatting errors.	Yes
04-Format	4z	6/3/2024	Final Draft page 3-reference to "Chapter" not defined.	Revised sentence to reference San Diego Regulatory Code.	Yes
05-GW	5a	2/2/2023 7/2/2023 7/28/2023	Page 75-6.3.3- and 6.3.2 - inconsistent.	The requirement in the draft LAMP is for a 2 foot separation to groundwater for an OWTS with supplemental treatment for nitrogen reduction and a 3 foot separation for an OWTS with supplemental treatment for pathogen reduction. These standards are consistent with OWTS Policy requirements.	No
05-GW	5aa	2/2/2023 7/2/2023 7/28/2023	Pg 159 1.5 and 1.6-neat cement - over kill-use native soil.	See response in comment 5n.	Duplicate
05-GW	5aa	7/11/2024	Narrative commentary on Page 54, Section 4.1 -Groundwater Information and Testing Requirements.	Comments noted.	Comment Noted

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05-GW	5b	7/12/2023	Could add \$2-5K to add more monitoring wells.	The minimum boring requirements to be permitted under a percolation test permit are intended to provide a method consistent with the well standards for construction that is protective of groundwater.	No
05-GW	5bb	2/2/2023 7/2/2023 7/28/2023	Page 159 1.7 - prevent unauth access. Unnecessary as pipe can be cut below cap	See response in comment 5n.	Duplicate
05-GW	5bb	7/11/2024	Page 55, Section 4.1 How does the last sentence apply to flood plains and flood ways (FEMA and County Maps.)	Language was added consistent with San Diego Regulatory Code Title 8, Division 11 - Flood Damage Prevention, Section 811.502(b). "or low-lying areas subject to flooding or with a potential for flooding, unless installed in a location or manner to avoid impairment to the OWTS or contamination from the OWTS during flooding.	Yes
05-GW	5c	7/12/2023	Site has shallow groundwater. Started at 10 ft. but then wound up being 2 ft. concerns of efficiencies on whether we can visit these sites during perc testing. Fearful of needing to revisit due to bad monitoring results.	Consistent with the OWTS Policy, the soil depth is measured vertically to the point where bedrock, hardpan, impermeable soils, or saturated soils are encountered or are anticipated to be encountered or an adequate depth has been determined. Staff on-site for the preliminary site evaluation activities can identify issues and should reduce the need for additional testing and resubmittals later on in the process.	No
05-GW	5cc	2/2/2023 7/2/2023 7/28/2023	Page 159 2.0 not necessary if neat cement seal idea was abandoned.	See response in comment 5n.	Duplicate
05-GW	5cc	7/11/2024	Page 55, Section 4.1, paragraph 2-Meeting and scheduling conflicts with DEHQ and the consulting company at the site will likely increase the cost to the homeowner (regardless of the permit).	DEHQ staff will work with Qualified Professional on issues with scheduling as much as possible. Please also see response to Comment 7n.	Comment Noted
05-GW	5d	7/12/2023	The groundwater data we have is bogus. hydrostatic pressure.	See response to comment 5c.	Duplicate
05-GW	5dd	7/11/2024	I have found mottling is a very rare observation. Local soils do not have the chemistry for observable reduction.	Although mottling may not be observed at all sites, it is an indicator of previous groundwater rise in that area and may be applicable at some sites.	Comment Noted
05-GW	5e	7/12/2023	Hasn't seen groundwater this bad in 25 years.	Comment noted.	Comment Noted

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05-GW	5ee	7/11/2024	The permit for a test boring or monitoring well will increase the cost of a project and passed on to owner. More so for multiple borings determined after the fact of project work. (Negated if allowed to drill more than one boring under the umbrella of a single permit.	It is understood that the number and locations of test holes are proposed for the issuance of the permit and can be relocated or revised during the site evaluation, based on site specific conditions, as long as the minimum number of test holes are installed. Multiple test holes can be drilled under one permit.	Comment Noted
05-GW	5f	7/12/2023	Is there a provision for a customer to hire a hydrologist?	This comment is related to groundwater investigations. Any Qualified Professional can be used to show groundwater separation but the information submitted must meet the LAMP minimum requirements.	Comment Noted
05-GW	5ff	7/11/2024	The 72 hour interim for observing hydrostatic groundwater rise is nonsense. Sources of groundwater can "disappear" during dry parts of the year and during years of less precipitation (especially with confined aquifers). This is resolved by not accepting conditional findings unless representative of a basin condition representative of average rainfall (with at least a year of past rainfall to make a judgment on the basin condition.	The 72-hour period after drilling the test hole to check for groundwater has been the standard under the current LAMP and is not proposed for change. In areas of high groundwater where ongoing groundwater monitoring is warranted, Section 4.1.3.4 requires the monitoring to be conducted during a period of average or above average rainfall, as suggested.	Clarified
05-GW	5g	7/12/2023	Upgrade of monitoring well requirement.	Requirements for test borings are intended to be permitted under the percolation test permit, unless a well permit is required.	Comment Noted
05-GW	5gg	7/11/2024	Page 69-Table 6.3-1-I fail to understand this Table. Hopefully, someone else will evaluated it in context and explain to me as to what kind of dispersal system is the application.	Table 6.3-1 provides the minimum separation depths to groundwater and minimum soil depth from the bottom of the dispersal system based on percolation rates. These separation depths apply to all types of dispersal systems, except septic effluent from an OWTS with supplemental treatment. This table is the same table that is found in the OWTS Policy (Section 8.1.5) and provides for a greater separation for faster percolation rates, allowing more soil treatment before groundwater.	Comment Noted
05-GW	5h	7/12/2023	An inspector made comments (re: shallow ground water)..wouldn't it be great if we could wait to see this with rain? This monitoring is getting out of hand, 2023 is the highest our groundwater will get and you don't have staff to watch the perc testing...Big concerns that more monitoring will require many more staff.	The provisions for groundwater monitoring in the draft LAMP are the same as those required in the current LAMP and are needed to ensure compliance with the groundwater separation requirements only in areas of high groundwater. Provisions in current LAMP require this monitoring to be performed and this is not proposed for change.	No

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05-GW	5hh	7/11/2024	Page 70, Section 6.4-"The build-up of nitrogen in groundwater is potentially the most significant long term consequence of OWTS usage". Factoid; there is very little nitrogen in soil except when released to the atmosphere by strict aerobic bacteria.	This sentence specifically refers to the soil underlying an OWTS dispersal system. The discharge of nitrate to the soil and groundwater from OWTS is well known. According to the State Water Resources Control Board, Final Substitute Environmental Document (SED) for the OWTS Policy (approved June 19, 2012), Section 6.2.5, Direct Impacts from Nitrogen Contamination from Operation of OWTS Statewide- most of the nitrogen compounds in OWTS effluent will be nitrified as the effluent passes	Comment Noted
05-GW	5i	7/12/2023	Can we consider data from a hydrogeologist?	See response to comment 5f.	Duplicate
05-GW	5ii	7/15/2024	Concerns with El Cajon – on traditional leach lines – when the water table doesn't currently reflect averages can additional modifications be made. Sometimes there is perched water.	The separation from bottom of the dispersal to groundwater is to the highest known groundwater (Section 6.3.1), including perched groundwater. This is consistent with OWTS Policy Section 8.1.5 which references minimum depth to the anticipated highest level of groundwater.	Clarified
05-GW	5j	2/2/2023 7/2/2023 7/28/2023	Not to make light of current rigid reviews and a demand for reference to a ten-year +/- average high groundwater level.	See response to comment 5h.	Duplicate
05-GW	5jj	7/15/2024	What is the county doing to retest data to reflect current water table levels.	Depth to groundwater is part of the site evaluation process and is a site specific determination looking at data for an average or above average rain season or seasons. However, the data currently being collected may be used in a mapping application at some later date, especially with an increased confidence in data from uniform monitoring well construction and methodology.	Comment Noted
05-GW	5k	2/2/2023 7/2/2023 7/28/2023	In my view, true groundwater is when the actual seepage or weeping is encountered and the seasonal variation is merely related to exposure after the soil is removed and is impacted by hydrostatic pressure	See response to comment 5c.	Duplicate

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05-GW	5l	2/2/2023 7/2/2023 7/28/2023	<p>The mention of a >20 foot boring is nonsense because it would be rare that a C-57 contractor would be able to access with a drill rig (although a C-57 contractor might be able to outsource to a non-commercial; drill rig for a > 20 foot boring. There then remains the issue of decommissioning such a boring so as to comply with the Bulletin 74-90 and related work done by a C-57 contractor.</p> <p>Better to delete this context as a need to drill deeper than 20- feet is arguable and certainly not practical</p>	<p>The groundwater separation requirements in Table 6.3-1 are consistent with the requirements of the OWTS Policy and, as no alternative standard was identified that provided a similar level of protection, this table is being incorporated into the draft LAMP. As the minimum depth to groundwater for areas with percolation rates equal to or less than 5 MPI is 20 feet, a boring of sufficient depth may be needed to identify the depth to groundwater or other soil separation conditions. A provision was added to the draft LAMP for a reduction of the 20 foot separation to 8 feet for leach lines and 10 feet for seepage pits if the site does not overlie groundwater protected for drinking water supplies and is located more than 2,500 feet from an impaired water body or drinking water reservoir or tributary.</p>	No
05-GW	5m	2/2/2023 7/2/2023 7/28/2023	<p>This context cites the need for a monitoring well permit. This is not only impractical construction, but also a very substantial burden of cost on the owner. The current method of maintaining a deep boring converted to an observation well has a long-standing record of reliability and is not costly.</p>	<p>All borings and wells must meet the minimum requirements of the San Diego Regulatory Code, Division 7, Chapter 4-Wells, including for obtaining a permit and meeting construction standards. The boring construction standards proposed in the draft LAMP are for borings not addressed in the well code and provide for consistent construction requirements intended to protect groundwater. These borings are proposed to be covered under the percolation test permit.</p>	No

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05-GW	5n	2/2/2023 7/2/2023 7/28/2023	<p>Test Boring Construction Standards</p> <p>1.2 The use of 2 inch pipe as an option should be tempered with the knowledge of the actual hydrostatic rise of groundwater will be higher than in a three inch pipe. The soil physics reasons are in the text of this LAMP input as related to soil friction and the invasion of the water bearing formation when exposed to the atmosphere.</p> <p>1.4...transition seal of bentonite” In former times, my company added bentonite above the pea gravel pack, but concluded it made no difference in the internal rise of groundwater and ceased the practice. (After all, we are not drilling wells purposed to confine the invasion of the formation and prevent the entry of contamination).</p> <p>If this is followed by a neat cement seal...one might ask “why”.</p>	The standardization of the construction requirements included in the draft LAMP should eliminate or reduce these types of differences in the data. The purpose of the bentonite is to keep the neat cement from infiltrating into the pea gravel of the test boring. These standards, including the installation of a neat cement annular seal, are intended to prevent the entry of contamination to protect groundwater.	No
05-GW	5o	2/2/2023 7/2/2023 7/28/2023	<p>I would recommend the following procedure:</p> <p>1) Drill the boring to 15-20 feet or less (or to the depth of refusal and/or the discovery of a groundwater seep). 2)Clean out the boring with reversal of the rotary drill and if dry, add water to collect the spoils and remove with insertion of the auger. 3) Insert 3 inch PVC pipe which has hand-sawed 1/8 inch perforations on the pipe to be three feet from the bottom. 4) Insert pea gravel to approximately six inches or more above the perforations and backfill with native soil or spoils. 5) If desired, 6 inches or so of bentonite can be added, but the benefit is questionable. 6)Extend the pipe above grade two feet. 7)Mound up the spoils around the pipe so that when the boring settles and recedes, an area remains which allows for drainage around the boring to an outside perimeter</p>	This recommendation was considered but no changes are proposed to the draft LAMP.	No
05-GW	5p	2/2/2023 7/2/2023 7/28/2023	<p>There is no need to construct “monitoring wells” to a standard which can add a <u>very substantial cost</u></p>	See response to comments 5m and 5n.	Duplicate

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05-GW	5q	2/2/2023 7/2/2023 7/28/2023	Current practices allow the borings to remain and are very challenging to remove...but cause no harm. They are easy to cut off near the surface and backfill.	See response to comments 5m and 5n.	Duplicate
05-GW	5r	2/2/2023 7/2/2023 7/28/2023	Page 10-groundwater-concern about groundwater that is encountered at one depth and then rises in the borehole.	See response to comment 5c.	Duplicate
05-GW	5s	2/2/2023 7/2/2023 7/28/2023	Page 17-soil separation of 2' and 3' does not make sense (2.2.9.)	See response to comment 5a.	Duplicate
05-GW	5t	2/2/2023 7/2/2023 7/28/2023	Page 57-58 4.1 last paragraph relating to groundwater separation.	The language in this paragraph, with a few no substantive changes, is the same as is provided in the current LAMP.	No
05-GW	5u	2/2/2023 7/2/2023 7/28/2023	Page 60 4.1.3.2 min depth of test boring.	The minimum depth of a test boring to 15' or 10' below the required soil separation is consistent with the current LAMP requirements.	No
05-GW	5v	2/2/2023 7/2/2023 7/28/2023	Page 75-6.3.1-same issue with groundwater separation as before.	See response in comment 5l.	Duplicate
05-GW	5x	2/2/2023 7/2/2023 7/28/2023	Page 133 5.0 groundwater check-same comment on hydrostatic pressure in sedimentary soils versus fractures and seeps	See response in comments 5c.	Duplicate
05-GW	5y	2/2/2023 7/2/2023 7/28/2023	Page 159 1.2 - diam of pipe should be 3"-commentary on depth to water.	See response in comment 5n.	Duplicate

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05-GW	5z	2/2/2023 7/2/2023 7/28/2023	Page 159 1.4 - min 6" transition seal-bentonite will dry out and not be a seal.	See response in comment 5n.	Duplicate
05-GW	5kk	9/22/2024	Required construction of monitoring wells with costly cement annular seals, new permitting requirements, decommissioning costs and additional portal to portal will nearly double the cost of a septic disposal layout in some cases and in some rare cases, could add as much as \$10,000 to a home permitting process. The question is; where is the value in changing from the current practice?	See response to comments 5m, 5n, and 8u. This provision does not impact the test borings conducted as part of the initial site investigation required for most projects, but addresses only those monitoring wells used for ongoing groundwater monitoring projects over a period of months or years, representing only a small portion of the total projects. These wells must meet the requirements of the San Diego Regulatory Code, including obtaining a permit and meeting minimum construction standards. These wells are included in the Percolation Test Permit, which is a simpler and less expensive permitting process than the Well Program permit process. The construction standards are consistent with minimum requirements that are protective of groundwater for longer-term, ongoing groundwater monitoring wells.	Duplicate
05-GW	5ll	9/22/2024	Minimum Soil Depth. I presume the 30 minute rate is a typographical error. Percolation rates less than five minutes per inch do occur in rare instances with our local soil character. In my experience, at least half the testing for horizontal seepage pits fail the 30 minute maximum as in many cases the soil is too dense. It is likely even more will be reported as failures if the soil depth is increased to more than five-feet below a horizontal pit depth. A ten-foot separation has long been a regulatory construct but ignored in the practical application. In my experience, there is no evidence of significant mounding with horizontal seepage pits and the long term record of performance has sustained the effectiveness of these designs (not including the inferior redwood boxes with only one test hole).	See response to comment 5l. The minimum soil depth requirements in <i>Table 6.3-1: Minimum Separation Depths to Groundwater and Minimum Soil Depth from the Bottom of the Dispersal System</i> of the updated LAMP are consistent with the requirements of the OWTS Policy and, as no alternative standard was identified that provided a similar level of protection, this standard is incorporated into the updated LAMP. The 30 minute per inch maximum percolation rate for a deep bed dispersal system (horizontal seepage pit) is the same as in the current LAMP and is not proposed for change. The 10-foot separation from groundwater to a vertical seepage pit is also a current standard and is not proposed for change. This separation requirement is also mandatory for LAMPs pursuant to the OWTS Policy Section 9.4.8.	Duplicate

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05-GW	5mm	9/22/2024	Groundwater Separation. This important regulatory element is very subjective and should be given new attention. Recommendation: The San Diego Regional Board (9) and Department of Environmental Health Quality should convene a round-table discussion with industry stakeholders. Input from this session would allow a definitive and practical approach to this construct. The discussion should center around the professional contribution of <i>pro e contra</i> as seen from the private sector and compared with public sector observations. The result would likely dispel many arguments.	See response to comment 5I and 5II.	Duplicate
06-Land Use	6a	7/12/2023	Will DEHQ honor the years old certification? Please add some clarifying language into the LAMP about honoring the old cert.	Previous certifications were issued based on conditions and/or standards in effect at that time, may not reflect current minimum requirements, and may exceed the limits of DEHQ's current permitting authority. To be provided coverage under the conditional waiver of waste discharge requirements found in the OWTS Policy, proposed OWTS must meet the current requirements at the time of application for an OWTS Installation Permit and have percolation testing/soil profile data to support the proposed OWTS design. Backhoe soil verification may be used in lieu of percolation testing where appropriate. Although is a currently practice, language was added to the draft LAMP to clarify backhoe excavation as an option.	Yes
06-Land Use	6b	2/2/2023 7/2/2023 7/28/2023	This section ignores the application of density impact of expansion of flow on existing lots which are merely infilling of the area. It seems logical the addition of infilling would make little to no discernable difference to the basin nitrate concentration other than the technical nitrate calculations related to the area of the of the infilling lot. Why ruin the dream of an owner who has an infilling lot with an arguable true impact? (See a contradiction inferred by section 3.7.5.2).	Language was added in section 3.7.5.2 to address the minimum density of dwelling units allowed for the parcel as shown in Tables 3.7-1 and 3.7-2 and Sections 3.7.9.1 and 3.7.9.2. Additional units are addressed in section 3.7.9.3 and must meet minimum density requirements. Section 3.7.9.4 addresses Accessory Dwelling Units (ADU's), which are allowed outside of the density requirement if the primary and ADU have a maximum total number of bedrooms of six or less for a standard OWTS and a maximum total number of bedrooms of 10 or less for OWTS with supplemental treatment for nitrogen reduction (based on a low risk to groundwater). In addition to the minimum density requirements in the OWTS Policy, density of OWTS is also a focus condition that DEHQ must address and is the basis for these density requirements.	Yes

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06-Land Use	6c	2/2/2023 7/2/2023 7/28/2023	Why is five lots the number of lots for referral to the Regional Board instead of more than five. Does this mean a four-lot parcel map (minor subdivision) cannot have a remainder parcel without review by the Regional Board?	This provision was originally proposed to refer subdivisions of land to the Regional Board to address the cumulative impacts (nitrate loading), as required in the San Diego Basin Plan. However, the minimum density requirements in the draft LAMP now address cumulative impacts for subdivisions of land. Proposed OWTS for subdivisions of land that do not meet the density requirements are not covered under the scope of coverage of the LAMP and may be reviewed by the Regional Board.	Yes
06-Land Use	6d	8/3/2023	2.5.1.9 Comment on small parcels and that current standards are protective. Are there maps?	The parcel size/density focus condition must be considered in developing LAMP alternative standards. Data show higher variance rates in areas of small parcels, but these parcels are mainly served by public water using surface water sources. Maps were provided in the 5-year evaluation report and are reevaluated every 5-yrs (not annually). These areas are priority candidates for sewer as supplemental treatment systems are not affordable or feasible for most homeowners.	No
06-Land Use	6e	8/3/2023	3.7.3.3.4.3 why is the limit 900 gallons and not 3,500?	The 900 gallons maximum is a provision providing an alternative to the density requirement for primary dwellings and ADUs up to a total of 900 gallons per day per parcel maximum wastewater flow. This provisions allow flexibility for ADUs to move forward with minimal requirements based on risk. OWTS must still meet LAMP standards.	Comment Noted
06-Land Use	6f	2/2/2023 7/2/2023 7/28/2023	Page 40 -model used has contrasts with other models-particularly runoff calculations.	The Hantzsche and Finnemore model takes rainfall runoff into consideration with the input parameter for deep percolation rainfall (rainfall less runoff and less evapotranspiration).	No
06-Land Use	6g	7/11/2024	Section 3.7.9.2. These lot sizes cannot be validated by a nitrate mass balance study. Where did these numbers for lot sizes come from?	As referenced in the notes for Table 3.7-2 , the lot sizes were calculated using the Hantzsche and Finnemore nitrate loading mass balance equation. The mass balance input data is also provided in these notes.	Comment Noted

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06-Land Use	6h	9/22/2024	Lot size restriction ignores the science of mass balance. A "one-size, fits all" chart results in oversized lots. This can be proven by the application of a nitrate mass "mass-balance study". Unfortunately, the new LAMP does not allow that option.	See response to comments 6b, 6c, and 6g. The Average Allowable Densities for Subdivision Lots table (Table 3.7-1) in the updated LAMP is the same as in the current LAMP (page 17) and is not proposed for change. However, the updated LAMP does provide an alternative table with reduced lot sizes for OWTS with supplemental treatment. DEHQ is obligated to consider cumulative impacts from OWTS discharges for development projects, including subdivisions of land (OWTS Policy, Section 9.1.10 and Water Quality Control Plan for the San Diego Region, page 4-26). The lot size/OWTS density tables are based on nitrate loading analysis and are suitable for most projects, eliminating the need for costly nitrate loading studies. While not specifically mentioned, the submittal of a nitrate loading study for a subdivision of land project is not prohibited in the updated LAMP and can be considered on a case-by-case basis.	Duplicate
06-Land Use	6i	9/22/2024	There is no consideration of "infilling" with lots which can be proven to make no difference in the basin nitrate objectives (Even in areas served by imported water from a municipal supply).	See response to comments 6b, 6c, and 6h. Most "infill" housing projects are Accessory Dwelling Unit (ADU) projects. According to guidance from the State Water Resources Control Board, the applicable Regional Board provides approval of OWTS serving ADUs unless ADUs are specifically addressed in the approved LAMP. To keep approval of ADUs local while still addressing cumulative impacts, the updated LAMP now includes provisions for ADUs that provide an alternative to the OWTS density requirements for low volume systems (up to 900 gallons per day for conventional OWTS and 1500 gallons per day for OWTS with supplemental treatment). This provision covers most ADU projects submitted for review. Recent legislation providing for urban residential lot splits also provide for lots to have adequate wastewater facilities, to not have a specific, adverse impact upon the public health or safety, and to not result in violation of state or federal law. Parcels of land with OWTS proposed for an urban lot split must meet the LAMP standards to meet these residential lot split requirements.	Duplicate

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06-Land Use	6j	9/22/2024	Revision of nitrate policy. Currently the regulation of nitrate mass balance results in lots less than two acres not meeting the requirement for rainfall dilution between 16-18 inches per year (or less). There are instances where an owner desires to split his property for estate or other purposes and cannot do so. Assessment often concludes such "development" is merely an infilling or an area which already exceeds the mass balance goals. The addition of lots in these dense areas argue for a variance. A second area constraint occurs when the owner wants to construct an "Accessory Dwelling Unit" (essentially nearly doubling the nitrate concentration from the lot. Why is this allowed with no dispensation for a Parcel Map. If you recall, the original controls for nitrate concentration only applied to developments of 25 or more lots. Did the writer of the LAMP fail to understand the basis for that Regional Board guideline and merely apply restrictions to infilling lots. Recommendation: Remove the necessity of a nitrate mass balance when the surrounding density is already non-conforming and the new construction would arguably make no difference in the basin. If there is a contra to this, the owner has the option of making an arguable case.	See response to comments 6b, 6c, 6h, and 6i. It is also important to note that the Water Quality Control Plan (Basin Plan) for the San Diego Region provided limitations on the density of new lots using OWTS with a chart (Chart 4-1) from 1994 up until the time the OWTS Policy was adopted into the Basin Plan in 2015, at that time its density table (Table 1) superseded this previous table. As noted above, the Basin Plan requires DEHQ to consider cumulative impacts of development projects so that the water quality objectives for established beneficial uses can be achieved. Allowing additional and cumulative impacts would be inconsistent with these Basin Plan requirements and would not be appropriate to incorporate into a LAMP.	Duplicate
07-Other	7a	7/12/2023	Recycled water - people using purple pipes -then tapping into them, pump lines. Can we or should we prohibit this in the lamp?	Use of this pipe in an OWTS or tapping into this pipe would not be approved. Any work conducted without a permit or in violation of the standards is a violation of San Diego Regulatory Code and is subject to corrective action and/or enforcement action.	No
07-Other	7b	7/12/2023	Home transferspeople don't know they have a supplemental treatment system. Can this be a requirement to disclose? Having every supplemental treatment system have something file at the Assessor's office on the parcel.	The draft LAMP includes a provision for the recording of a document with the County Recorder's Office for parcels with an OWTS with supplemental treatment.	No

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07-Other	7c	7/12/2023	Reduced Pressure devices- with Supplemental treatment systems, advanced treatment.....concerns for cross connection. Is there a requirement for cross connections?	San Diego Regulatory Code Section 68.360 prohibits an interconnection between a drinking water supply and any equipment or connection of any kind, class or description which may contain water or any liquid or substance that is unfit for human or domestic consumption. Any unapproved work, work without a permit, or prohibited cross connection is a violation of the regulatory code and subject to corrective action and/or enforcement action.	Comment Noted
07-Other	7d	7/12/2023	Coordination w/ building department. Need to ensure final inspections are set to have power and not temporary power source.	DEHQ will work with the building department to avoid this issue.	Comment Noted
07-Other	7e	7/12/2023	Recommend Septic Hauler driver needs to be certified (like a food handler).	The provisions of Title 6, Division 8, Chapter 6-Sewage Collection, Transport and Disposal are not part of this update at this time.	Comment Noted
07-Other	7f	2/2/2023 7/2/2023 7/28/2023	The solution: require all pump truck companies to have their operators be certified by the DEHQ by passing a test which demonstrates their competency. The DEHQ should provide a study guideline for the test preparation. Any "turn-over" of operators should be communicated to the DEHQ so as to confirm their training.	See response to comment 7e.	Duplicate
07-Other	7g	2/2/2023 7/2/2023 7/28/2023	10.3.5 Why should the owner be required to do this regulatory matter? Should not the DEHQ communicate with the Regional Board?	Owners of OWTS have responsibility under the OWTS Policy, are discharging under the integrated conditional waiver, and must report to the Regional Board if not in compliance with the waiver conditions. This requirement is found in section 2.6 of the OWTS Policy. In practice, DEHQ will likely refer to these cases to the Regional Board and provide assistance.	Comment Noted
07-Other	7h	2/2/2023 7/2/2023 7/28/2023	Rigid "regulations also deprive a consultant of an argument for a "case by case" variance.	No changes to variances in the draft LAMP. Variances continue to be an option when needed.	No
07-Other	7i	2/2/2023 7/2/2023 7/28/2023	Hopes DEHQ does not face potential disagreement at RB hearing.	Comment noted.	Comment Noted
07-Other	7j	8/24/2023	No specific comments on standards but a request that DEHQ provide OWTS records on line for easy access.	The current practice of records handling includes the scanning of records and providing online in the Document Library. Land use-subdivision records that may have OWTS related information are currently in process of scanning to Document Library.	Comment Noted

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07-Other	7k	7/11/2024	The LAMP should advise the "rigid application" of the LAMP can be addressed contra by the Director. Reference to the San Diego County Code of Regulatory Ordinances, Chapter 3, Section 68.351 (Director May Modify Requirements).	The Final LAMP includes a Section 10.3 related to variances. Variances are applied when repairs to existing OWTS cannot meet new or existing standards. The language from section 68.351 of the Regulatory Code, which provides the basis for a variance has been included in this section.	Comment Noted
07-Other	7l	7/11/2024	Page 65, Section 5.2.1-Table 5.2.1-Elevation points can only be approximated without a surveyed validity.	The requirement for elevation points is an existing requirement (Page 13) in the current LAMP and is not proposed for change.	Clarified
07-Other	7m	7/11/2024	Page 65, Section 5.2.1-Table 5.2.1-Location of drainage ways. There is much confusion of when to demand a 100-foot setback versus 50 feet and even more disagreement with how the DEHQ advises how a drainage course is defined or identified at a site (especially when compared to an ephemeral stream). The San Diego County requirements differ greatly from many other jurisdictions (including the Regional Board. And it seems this confusion is the result of current rejection of time-honored policy.	DEHQ has received many comments relating to the setbacks to drainage courses and ephemeral streams. No specific clarifying definition of a "drainage course" was found as this term is typically used as a general reference to drainage areas (drainage area, drainage basin, drainage divide) or is used as an adjunct to a water body type with "ephemeral drainage course". To provide clarity, ephemeral stream was consolidated with the "Springs, Flowing Surface Water Bodies, Streams, Creeks, Rivers, Intermittent Water Bodies" setback category as is included in the description of a flowing water body in the current and Final LAMP, and the setback category in the Final LAMP of "Ephemeral Stream or Drainage Course" was removed. The setback for the "Springs, Flowing Surface Water Bodies, Streams, Creeks, Rivers, Intermittent Water Bodies" category remains the same at 100 feet. This setback is consistent with the OWTS Policy and the requirements of the Regional Board, who has adopted the OWTS Policy into the Basin Plan. The surface runoff features that drain precipitation to an ephemeral, intermittent, or continuous flowing stream or to a lake or pond, have been included in two new setback categories ("Stormwater Features, Surface Runoff Channels, Swales, Man-made Ponds, Ditches) with a setback of 25 feet for those features 5 feet or less in depth and a setback of 50 feet for those greater than 5 feet in depth. An alternative was also provided in Footnote 9 that allows a reduction in the setback to an ephemeral stream to 50 feet when an OWTS with supplemental treatment is used. With the surface water body setback category, all surface water types have been addressed.	Yes

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07-Other	7n	7/15/2024	Larry stated: Challenge to selling to BOS – can show how these things will significantly increase the cost of permits - Explained difference of cost recovery and LAMP project.	While the requirement for a percolation test permit will increase upfront costs, it is expected to result in less resubmittals and staff reviews later in the process, likely reducing costs at this point in the process. Costs for DEHQ services and permits are approved during the cost recovery process each year and are based on the time it takes to complete the services being provided (using collected time data) plus departmental costs.	Clarified
07-Other	7o	7/15/2024	All kinds of matter not addressed in this presentation that will increase costs?	See response in Comment 7n.	Duplicate
07-Other	7p	9/22/2024	What is the hurry? The County DEHQ has been laboring with this document for two years. One more meeting for discussion and input seems reasonable.	The revision to the LAMP and public participation process has been ongoing for over two-years with all comments and suggested changes received given careful consideration. DEHQ held 16 total meetings on the LAMP update over a two-year period, including 6 stakeholder meetings with onsite wastewater treatment system consultants and installers. In addition, many individual meetings and phone conversations were also conducted during this time, including a one-on-one meeting with this commentor on August 8, 2024. DEHQ received and considered over 280 comments during this process, with 49% of the comments received that included a suggested change incorporated into the updated LAMP. Some of the suggested changes could not be incorporated, mainly because the proposed alternative standard did not provide an equal level of protection to groundwater or public health.	Clarified
07-Other	7q	9/22/2024	Given that the Department of Environmental Health Quality (DEHQ) has extended the courtesy of granting input from the private sector, it begs the question of why there was never a response or inquiry about previous recommendations contained herein.	The comments received have been documented in the <i>Summary of Comments</i> table, which is available on the DEHQ website (https://www.sandiegocounty.gov/content/dam/sdc/deh/lwqd/summaryofcommentfinal.pdf). The <i>Summary of Comments</i> includes the all the comments received, whether a suggested change was incorporated into the updated LAMP, and the DEHQ response. It is this table that documents and responds to all the comments received. A <i>Summary of Comments</i> table was provided to stakeholders with each version of the draft LAMP released for public comment (Version 1-7/2023, Version 2-3/2024, and Final 9/2024).	Clarified

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07-Other	7r	9/22/2024	Public Sewer. This is a huge problem with sewer districts who charge connection fees on the basis of parcel size. Most sewer connections are extremely costly. Some of my clients are thrilled to find out they are not in the district (even though the sanitary sewer is next to their front yard). Very Costly! On the other hand, the sewer is a good fix. The ability to use Supplementary Treatment Systems" have been helpful as an option (also, costly).	The consideration of the connection and construction costs related to the requirement for a connection to public sewer are retained in the updated LAMP (Section 3.6.2) and has been incorporated into the Sewage Ordinance update (Section 68.310).	Clarified
07-Other	7s	9/22/2024	Variance from Regulations. During this past adherence to the LAMP, the refrain from the regulator has been..."We can not vary from the lamp" as it must be strictly enforce [sic]. Many regulations allow for a variance and where so permitted it should be authorized in the LAMP. Prescriptive codes should likewise have an allowance for variance on the merits of a "case-by-case". A competent professional can make these distinctions and consult with senior staff. The County Administrative Code, §68.351 allows for variance as do appeals to the Board of Supervisors. However, both bodies typically respond with an advisory that the LAMP is in agreement with the Regional Board and the County can be more "strict" than the State. That ends dialogue for comparison with State guidelines. Recommendation: Include language in the LAMP that allows a case by case variance from "rigidness". In my experience having written policy, the intent was to provide guidance and discipline with field decisions. Variance was after consulting with a supervisor. Arguably, it makes for challenges to the line staff judgement, but at least there is an argument other than the LAMP "declares"	See response to comment 4b, 7h, and 7k.	Duplicate
08-Percolation Testing	8a	7/6/2023	Percolation testing (already expensive) is going to go up five times in cost with all the permits, inspections, and micro-managing.	The cost of the permit will be based on work flow evaluation and will be balanced with the savings of time and money for the project by early involvement of DEHQ in the project and reduction of need for additional intervention and resubmittals.	No

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08-Percolation Testing	8b	7/7/2023	I also do not support the pre-inspection fee and site visit when conducting perc testing. Coordinating this effort will be disastrous and if you think your staff will be available on short term notice guess again. Just try calling any of them and see if they answer there phone!	See response to comment 8a.	Duplicate
08-Percolation Testing	8c	7/12/2023	What will the cost be of the new pre-review meeting?	See response to comment 8a.	Duplicate
08-Percolation Testing	8d	2/2/2023 7/2/2023 7/28/2023	There are negative aspects of a permit to conduct a percolation test and I expect my colleagues to rail on this ridiculous regulatory requirement with commentary. No benefit for an inspector to visit a site and advise where to conduct a percolation test as there is too much flux and potential changes when actually doing the field work.	See response to comment 8a.	Duplicate
08-Percolation Testing	8e	2/2/2023 7/2/2023 7/28/2023	Page 60 top paragraph-permit costly onerous, not practical.	See response to comment 8a.	Duplicate
08-Percolation Testing	8f	2/2/2023 7/2/2023 7/28/2023	Page 61 last paragraph of 4.2-permit and reference to Appendix V Test Boring Construction Standards to be addressed in that section.	See response to comments 5m and 5n.	Duplicate
08-Percolation Testing	8g	2/2/2023 7/2/2023 7/28/2023	Page 61 4.2.1 "all test holes" -does not want soil descriptions-too costly with no benefit. Eliminate soil triangle idea. Use perc testing only-no soil profiling.	The OWTS Policy and LAMP provide for a description of soil based on the various combinations of particles that differentiate specific soil textures identified in the USDA textural triangle. The use of the soil texture classes identified in the USDA textural triangle is consistent with the OWTS Policy and provides an accepted, consistent methodology for describing soil. Describing soil in test holes and deep borings is a requirement in the current LAMP and is in addition to the percolation testing. The only proposed change in the draft LAMP is to describe the soils using the USDA methodology consistent with the OWTS Policy instead of the ASTM methodology referenced in the current LAMP.	No
08-Percolation Testing	8h	7/12/2023	Sometimes, there's a delay in scheduling and efficiencies because of other factors. Worried about inefficiencies. What is on the submittal? What happens if we make changes in the field-happens all the time.	See response to comment 8a. Changes in the field will be documented during the site visit.	Duplicate

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08-Percolation Testing	8i	7/11/2024	It is presumed the percolation test fee is combined with the "layout fee" when the percolation test is already documented or waived. Otherwise, it could increase the cost to the property owner. Please clarify.	The percolation test fee is required at the time of the site evaluation percolation tests and soil profile work after the effective date of the updated LAMP. Percolation testing already conducted is submitted with the layout information with the layout fee only.	Clarified
08-Percolation Testing	8j	7/11/2024	Page 57, Section 4.2.1-This will add a substantial and significant cost to a project which will be passed on to the property owner. I see little if any value in this requirement beyond what is already provided in a reliable percolation test report. The soil triangle is intended to assist the agricultural community. The soil triangle does not allow for bulk density nor cementation. There is a genuine fallacy in predicting a percolation rate as some jurisdictions claim or utilize.	<p>The provision in Section 4.2.1 to describe the soil of test holes is a requirement in the current LAMP and is not proposed to change. The change is related only to the methodology used to describe the soils. The description of the test hole soils is intended to augment the understanding of the site conditions and not replace the percolation testing. The current LAMP requires soil to be described according to the American Society for Testing and Materials (ASTM) Unified Soil Classification System (Page 22). The Final LAMP requires soil to be described according to the USDA Soil Survey Manual, Handbook 18. This change is consistent with the soil description methodology in the OWTS Policy and is a methodology to describe soils for many purposes, in addition to agricultural.</p> <p>From <i>The Soil Survey Manual</i> , "The Soil Survey Manual, USDA Handbook No. 18, provides the major principles and practices needed for making and using soil surveys and for assembling and using related data. The term "soil survey" is used here to encompass the process of mapping, describing, classifying, and interpreting natural three-dimensional bodies of soil on the landscape."</p> <p>Also from <i>The Soil Survey Manual</i> "Purpose-The Manual is intended primarily for use by soil scientists engaged in the work of making soil surveys. Resource specialists, such as wetland scientists, foresters, and agronomists, and others who use soil surveys in their work, can refer to the Manual to better understand how soil surveys are made and how to interpret the technical information they provide. Parts of the Manual, especially those concerning the description of soils in the field and the soil properties considered when predicting soil behavior under a specific use, have been adopted by private-sector soil scientists as standards. The Soil Survey Manual has proven to be an important source of information for government agencies,</p>	Clarified

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08-Percolation Testing	8k	7/11/2024	Page 60, Section 4.3.5-It is possible to not only accurately measure a 1/4 inch fall over a thirty-minute time interval, but also observe the fall during a time interval for an inch or more for comparison. The notion a 120 inch percolation area is "impermeable" is an embarrassment to whomever suggests this limit. All rates should be rounded up to the 30 minute interval.	Percolation rates over 120 minute per inch demonstrating impermeable soil that should not be considered suitable for an OWTS is a standard in the current LAMP and is not proposed for change. While this percolation rate can be measured, it is generally accepted to not be suitable for OWTS usage. This limit is also consistent with minimum requirements in the OWTS Policy (Section 7.4). The water drop measurements should be taken at the interval required by the appropriate case test method as provided in the current LAMP and in the Final Draft. This standard is not proposed for change.	Clarified
08-Percolation Testing	8l	7/11/2024	Page 60, Section 4.3.6.2-this would be costly to home owner with no likely value. It is not easy or practical to do more than six test holes within the time parameters of testing.	The requirement for two additional test holes for soils showing a percolation rate of 60 minutes per inch or slower is no longer necessary with the changes made to the number of test holes (from four to six) and has been removed from the Final LAMP.	Yes
08-Percolation Testing	8m	7/11/2024	Page 63, Section 4.3.13.2.3-This would increase the cost of drilling and testing for the additional site work. Regardless, a proposal typically advises this construct in certain areas.	This requirement that additional test holes may be necessary depending on site specific conditions, including soil conditions that are variable or inconsistent, is an existing requirement in the current LAMP (Page 21) and is not proposed for change. The Qualified Professional may also propose additional test holes, based on the site conditions and judgement.	No
08-Percolation Testing	8n	7/11/2024	Page 63, Section 4.3.14.3-This will eliminate the use of sending a report by scanning or can a scanned signature be accepted as "original".	Scanned original signatures and signed stamps are accepted now and will continue to be accepted. This language is the same as is provided in the current LAMP and is not proposed for change.	Yes
08-Percolation Testing	8o	7/11/2024	Page 64, Section 4.4.2-Given the requirements of this type of report, I would not wish on anyone. Even though there have been numerous leach fields installed on 34-40% slopes (some hand excavated) in San Diego County and documented systems on 50% slopes in National Parks, and of course no observance of trees falling over on 60% slopes with avocado groves, I would not want the liability of what the DEHQ requires. Speaking with a competent geologist, a study should cost more than \$10,000.	The requirement for a slope stability study is an existing requirement in the current LAMP (Page 47) and is not proposed for change. This is also a mandatory requirement for every LAMP per the OWTS Policy (Section 9.4.4). However, a screening for slope stability was added to the site evaluation process and only those slopes with observed instability conditions are required to conduct a full slope stability study, eliminating the need for this study in most cases.	Comment Noted

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08-Percolation Testing	8p	7/11/2024	Page 118, Section 1.1.2-Six test holes (possibly seven) is the typical limit for logistics and four hour marathon of time for a reliable percolation test. An eighth test is a physical "stretch" over a typical dispersal area.	See response to comment 8l.	Duplicate
08-Percolation Testing	8q	7/11/2024	Page 119, Section 1.3.1-Soil types and Soil Triangle have been previously addressed. My copy of the USDA Soil Survey Manual, Handbook 18 clearly points to the intended use in Agriculture.	See response to Comment 8j.	Duplicate
08-Percolation Testing	8r	7/11/2024	Page 122, Section 3.4.6-A better method (except with fast rates) would be to not bother with a reading for the first hour or two (but add water to maintain 6 inches above the pea gravel) and then begin to take readings after 1 1/8 or two hours for the duration of the test. Experience will dictate exceptions and also whether the presoak achieved good saturation.	This procedure provides an industry accepted standard and consistent methodology for percolation testing and is the same methodology provided in the current LAMP. This methodology is not proposed for change.	No
08-Percolation Testing	8s	7/11/2024	Page 123, Section 4.3.1-Measurement has been addressed previously. Any timed measurement should be rounded up to the 30 minute reference as a reading at 29 minutes is no difference in fall than at 30 minutes. Otherwise, the mathematical conversion is corrupt.	See response to Comment 8k.	Duplicate
08-Percolation Testing	8t	7/11/2024	Page 126, Section 5.0-The 24 hour response is appreciated as there is significant liability for an exposed pit.	This comment refers to the groundwater level check 24-hours after drilling. Comment noted.	Comment Noted
08-Percolation Testing	8u	7/11/2024	Page 141, Sections 1.4, 1.6, and 2.0-The neat cement annular seal is an over-reach. We are not trying to prevent the invasion of volatile organics and backfilling of spoils has proven to be effective after 3-5 years or more as observed on my projects. It is important to recognize the requirements set forth in this LAMP for monitoring well construction as it will significantly and substantially increase the cost to the property owner.	Soil in the annular space of a monitoring well is not an effective seal and does not prevent the migration of surface runoff, which can contain bacteria and chemicals from the land, into the annular space, potentially polluting groundwater. The construction of monitoring wells used for ongoing groundwater monitoring must be consistent with the County ordinance and the California Well Standards. The term "monitoring well" is defined in Section 13712 of the California Water Code as: "...any artificial excavation by any method for the purpose of monitoring fluctuations in groundwater levels, quality of underground waters, or the concentration of contaminants in underground waters." Although there is some additional cost associated with a neat cement seal, soil is not a recognized alternative standards offering an equal level of protection to groundwater.	Clarified

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08-Percolation Testing	8v	7/15/2024	How can they submit the perc test paperwork before they know what they are needing to do?	The information provided for the percolation test permit is tentative and can be changed by the Qualified Professional based on conditions found in the field as long as the new locations are consistent with LAMP setback requirements.	Clarified
08-Percolation Testing	8w	7/15/2024	How do we feel about Increased costs that are passed on to homeowner? How did we come up with the cost for the permit that will be passed along to the operator?	Layout Submittal - \$1700?Perc Test is notification or work to be done - \$900 (**Look into what went into the project determination)	Clarified
08-Percolation Testing	8x	7/15/2024	Can't hold back project if perc test is being done on the weekend.	See response to Comment 5cc.	Comment Noted
08-Percolation Testing	8y	7/15/2024	How do we make systems better by adding cost that comes from additional steps – perc testing costs not required so why put it in there as part of the LAMP?	See response to Comment 7n.	Clarified

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08-Percolation Testing	8z	9/22/2024	Having written the "Percolation Test Guidelines" (there are dozens of methodologies) at the request of the Division Chief so as to achieve consistency in methods, the result did not result in reports as recommended. Previously some tests were done by the "Henry Ryan" method and others done by the four-hour option. My guidelines were directed to the latter. It already recommends six test holes. Having done thousands of test holes over the years, I took ten test reports and randomly crossed out some of the tests and did a new average. Results were not predictable and no statistics were done to determine any relationship...just a curiosity. However, findings did show how field judgement with only four test holes would fail to identify a true application rate. I would agree that six are likely more reliable. It is a skill-set that requires knowledge of soils and observations of the tailings, rate of advance and sound from the drill rig. Arguably an average is a good measure of percolation for the randomness of a leach field. Even so, occasionally, there is an occurrence of an anomaly and a "little clay" will ruin your day. A reliable percolation test also requires a pre-soak to saturate the wetted boundary and after cleaning out the test holes and scouring the sites to negate the auger compression of the sidewall, it remains then to develop a percometer for measurements (not a tape measure to reflect a ripple if deeper than three feet). It is a chagrin to observe reports which do not follow the guidelines. There is no such thing as a 56.4 percolation rate or other such fractional examples. Is there really a difference in a percolation rate measured at 28-29 minutes versus 30-31? The guidelines advise rounding up to a whole number. Where is the common sense? Arguably, it requires a skill-set to judge how many deep borings are a good measurement of subsurface conditions and, in my opinion, this construct is often neglected.	See response to comments 8m and 8r. The comment regarding increased reliability of six percolation tests is noted. Other than the change from four to six percolation test holes, the percolation test method in the updated LAMP is the same as in the current LAMP and is not proposed for change.	Duplicate
08-Percolation Testing	8aa	9/22/2024	In my opinion, a drip field should be tested with at least 6-8 borings so as to define and/or discover an area that could have a high percolation rate and therefore not have hydraulic over-load if averaged. The technical approach, in my opinion, is to default to the highest percolation rate unless it can be excluded from the design area.	The updated LAMP provides for six percolation test holes for a drip dispersal and for the highest percolation rate to be used as the drip dispersal design rate, as you suggest.	Clarified

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09-Qualified Professional	9a	7/6/2023	I also agree that all "Qualified Professionals" be permitted to perform all aspects of testing and design, residential and commercial.	The scope of work for specific qualified professionals are governed by the Business and Professions Code for engineers and geologists and the Health and Safety Code for REHS.	No
09-Qualified Professional	9b	7/7/2023	I strongly support that qualified professionals like myself can make evaluations on steep slopes, commercial projects, and Supplemental Treatment Systems.	See response to comment 9a.	Duplicate
09-Qualified Professional	9c	7/11/2024	Page 77, Section 6.8.2-There is no objection to this design construct be delegated to a civil engineer. However, there are other professionals and licensed contractors who have done this in the past and in accordance with DEHQ guidelines. I have consulted with a civil engineer the few times this has been done in my practice over a total of 40 years. Traffic control and engineered road repair is a prime concern.	Comment noted. The requirement of Section 6.8.3 relating to the design of effluent piping crossing roadways or easements is intended to be consistent with the scope of practice of a civil engineer according to the Business and Professions Code, Sections 6701 and 6731.	Comment Noted
09-Qualified Professional	9d	7/11/2024	The sentence on page 29 section 3.2.2.5 "Qualified Professionals shall only express professional opinions that have a basis in fact, are within the scope of the professional's own experience or knowledge and are generally accepted principles." Does this mean one cannot question guidelines and codes which are not factual?	The requirements for Qualified Professionals to use data and facts within the scope of their experience and knowledge in submittals to DEHQ is an accepted industry standard. The opportunity to question and provide comments for the minimum standards in the LAMP is through this stakeholder process. All comments received in this process are thoroughly considered. In addition, a should a Qualified Professional disagree with a determination made by staff may request a review by supervisory staff as part of the informal review process.	Clarified
10-Review	10a	7/12/2023	Feedback for how to get a repair permit is great. Don't change it. Submit at counter and get response quickly.	Comment noted.	Comment Noted
10-Review	10b	7/12/2023	KUDOS: For longest it was 4-5 months. Just this week, received a review within 45 day turnaround time! I don't know why. Client was elated.	DEHS is working on staff development and tracking work loads daily. Staff are working OT for reviews. Looking at ways to be more efficient, including reducing the number of resubmittals.	Comment Noted
10-Review	10c	7/12/2023	KUDOS: We are not slow compared to other parts of the area.	Comment noted.	Comment Noted
10-Review	10d	7/12/2023	Staff has gotten back quicker. Phone/verbal contact would be great.	Comment noted.	Comment Noted

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10-Review	10e	7/15/2024	The OWTS Layout approval expiration date should be five years.	The approval date was changed from one year in the current LAMP to two years in the Final LAMP to align better with the building permit process for most projects. Projects taking more than two years for building permit approval will likely have changes and any changes to the project scope would require the submittal of a layout revision, regardless of the previous approval time period. In addition, the Qualified Professional for projects proposing OWTS with supplemental treatment are required to participate in the design, installation, and final approval of the system so the timeliness of the approval is warranted.	No
11-Scope	11a	8/3/2023	2.1.1 Is DEHQ aware that Tier 2 can be up to 10,000 gallons (Tier 1 is 3500)?	DEHQ is aware of the ability to regulate up to 10,000 gallons per day OWTS under Tier 2 but is proposing to limit regulating OWTS at 3,500 gallons per day based on need for OWTS over 3,500 to be engineered, more complex systems.	Comment Noted
11-Scope	11b	8/3/2023	2.1.1.6 Clarify that LAMP not addressing existing OWTS that are impacting groundwater. Why addressing OWTS in Borrego Springs?	Only new and replacement OWTS are addressed in the LAMP, consistent with the minimum requirements of a Tier 2 program of the OWTS Policy. The current and proposed LAMP standards for new and replacement OWTS are sufficient to protect water quality. Existing OWTS are not included in the scope of coverage of the LAMP unless have surfacing sewage or part of a building permit or other development project proposal. The draft LAMP provides an additional standard, an alternative dispersal design for a shallow bed, for new and replacement OWTS that may reduce impacts to groundwater, including those in Borrego Springs.	Comment Noted
11-Scope	11c	8/3/2023	2.2 Regional Board cannot grant deviations but will issue waste discharge requirements.	Language referencing deviations to be referred to the Regional Board was removed from draft LAMP.	Yes
11-Scope	11d	8/3/2023	2.3.7 Regional Board has adopted low threat waivers. Can these be added here or allowed here?	The COSD stormwater ordinance addresses the Regional Board conditional waiver for low threat discharges to land and allows some discharges into stormwater conveyance system. These types discharges to an OWTS would be in conflict with provisions in OWTS Policy and LAMP, which allow only domestic wastewater into an OWTS. Estimating the volume and character of the wastewater would be problematic and would impact the adequate sizing and design to safely accommodate the discharges.	No
11-Scope	11e	5/2/2024	Would the DEHQ consider allowing some other types of wastewater to be received by an OWTS under a waiver?	See response to comment 11d.	Duplicate

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11-Scope	11f	9/22/2024	Why can not the DEHQ have the competence to deal with the less than 10,000 gallon limit. Can the Regional Board do these small projects with timely attention and competence? Will such a change trigger more regulatory compliance with a Waste Discharge Report, California Environmental Quality Act review, Form 200 reports and make these small projects even more costly? How would public health and safety be served? Fortunately, these referrals to the Regional Board will not likely exceed more than a few projects since multiple lot subdivisions are not likely to be a factor anymore because of regulations and cost. Having written exhaustive reports to the Regional Board, I can hardly imagine the impact on addressing issues related to "proving" no harm to groundwater. Why and/or what is the motive for such a change? Is it lack of training? One example of neglect in design review of engineered proposals is the need to more rigorously review of high strength Biological Oxygen Demand (BOD) and also fats, oils and grease separators. It is to the sorrow of the industry that this factor has been long ignored in many cases.	See response to comment 11a. These larger systems are not very common and typically require more complex sewage treatment "works". The staff at the Regional Board are qualified to the review these complex, engineered sewage treatment "works" systems, including the experience and knowledge with treatment plant engineering methodologies and calculations.	Duplicate
12-Septic Tank	12a	2/2/2023 7/2/2023 7/28/2023	7.1.10 Changing the fall from the inlet to the outlet from two inches can significantly decrease the actual volume of a septic tank	This standard is the same as in the current LAMP (Chapter 4, item 9) and has not been proposed for change.	No
12-Septic Tank	12b	2/2/2023 7/2/2023 7/28/2023	7.1.15 Why must a traffic rated septic tank be required if you are five feet from vehicle traffic? In my view, 10 feet is overkill.	The setback requirement for a traffic rated septic tank has been changed to 5' to be consistent with the setback from septic tank to driveway.	Yes
12-Septic Tank	12c	2/2/2023 7/2/2023	7.4.7.3 The tight-line from the surge tank to the disposal system should NOT be perforated .	This section does not reference the tight-line but the portion of the outlet pipe located within the surge tank. Added clarifying language to draft LAMP.	Yes
12-Septic Tank	12d	8/3/2023	7.1.11-Why not specify a percent grade here?	The language in this section is the same as in the current LAMP (Chapter 4, Item 10) with no issues identified and so is not proposed for change.	No
12-Septic Tank	12e	8/3/2023	7.1.13 Why not require risers on all tanks.	Section 7.1.12 requires all tanks with more than 6" of soil cover to have risers.	Comment Noted
12-Septic Tank	12f	8/3/2023	7.2.3 Why are separate tanks needed? Inconsistent language here before and after table.	Language corrected to clarify two separate tanks are not required.	Yes

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12-Septic Tank	12g	8/3/2023	7.4.1 Effluent filter-not a requirement but can be used.	An effluent filter can be used but is not required. Other options to meet the solids requirement in the OWTS Policy are increasing tank size or pumping regularly (minimum every 3 yrs./owner to retain records).	Comment Noted
12-Septic Tank	12h	2/2/2023 7/2/2023 7/28/2023	Page 83-7.1.10-tank outlet elevation 6" too much will result in 25 gallon less tank capacity. Why do it?	See response to comment 12a.	Duplicate
12-Septic Tank	12i	2/2/2023 7/2/2023 7/28/2023	Page 84 7.1.15 septic tanks near vehicle traffic. Why the change from 5' to 10'?	See response to comment 12b.	Yes
12-Septic Tank	12j	2/2/2023 7/2/2023 7/28/2023	Page 87 7.4.4.5 should surge tanks have same certification as septic tanks?	Surge tanks and other tanks used for an OWTS must have the same certification as septic tanks.	No
12-Septic Tank	12k	2/2/2023 7/2/2023	Page 89 7.4.7.3-verticle outlet pipe perforation - why is this pipe perforated?	See response to comment 12c.	Duplicate
12-Septic Tank	12l	2/2/2023 7/2/2023 7/28/2023	Page 141 5.4 -actual dimension are available from manufacturer.	Language was added to this section as noted.	Yes
12-Septic Tank	12m	7/11/2024	Page 79, Section 7.1.14.3-There is no reason to require a three-year interval pumping interval for all septic tanks. There are instances when less frequent removal of sludge and inspection of components are applicable. Three years is a good recommendation when the sludge and scum layer approaches 30% of the septic tank volume; however, some low flow residences should be able to extend this interim time in context of the conditions following the paragraph.	The language in this section does provide an alternative by requiring pumping every three years or at a different frequency based on the thickness of the sludge and scum layers and distance to the outlet tee.	Clarified
12-Septic Tank	12n	9/5/2024	I just wanted to clarify that there is a new requirement that septic tank manufacturers must submit their designs to the county for approval for use in the county.	The added provision was for concrete septic tanks to ensure they meet minimum industry standards and would apply to a concrete tank that does not have IAPMO certification. Concrete tanks with this certification do not need a subsequent review by DEHQ.	Clarified

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13-Setback	13a	7/24/2023	I also agree with allowing the option to reducing the setback from wells to 50' when deeper annular seals are installed because it does not contaminate the water aquifer.	The language in this section is the same as in the current LAMP with no issues identified and is not proposed for change. A proposal for a needed reduction in setback standard to a well would be subject to the variance process.	No
13-Setback	13aa	7/15/2024	Can we further reduce the 5:1 setbacks with deep testing or borings and demonstrate horizontal movement won't impact setback?	Already allowed in footnote 8 cut slope setback vertical and deep beds - cap depth credit deeper into ground reduce setback - based on deeper boring data, faster percolation rates.	Clarified
13-Setback	13b	2/2/2023 7/2/2023 7/28/2023	Ephemeral streams and the use of blue line, brown line and other drainage information.	The draft LAMP references three sources for determining surface water and drainage information: 1) The National Map (USGS); 2) The San Diego Basin Plan Map (SDRWQCB); 3) Site specific observations of drainage patterns.	No
13-Setback	13bb	7/15/2024	Need something else besides USGIS map to use for determination of streams/drainage/ephemeral stream.	The Final LAMP does not specify which dataset must be used to determine streams or other drainage. However, the National Hydrography Dataset included in USGS's The National Map provides an acceptable, comprehensive set of reference data. In addition to data sources, the site evaluation should identify any drainage, streams, or surface water bodies, including those that may have been altered, graded or filled, as these may still provide a preferential pathway for wastewater to travel.	Clarified
13-Setback	13c	2/2/2023 7/2/2023 7/28/2023	Table 6.6.1 The setback to public water mains should be foot-noted for a variance if the water line is upslope or no utility easement exists to make the existing water line closer to the boundary.	The minimum setback from dispersal field to a public water main is 25 feet in the current LAMP and is not proposed for change. This setback is consistent with public water system requirements in the California Code of Regulations: California Water Works Standards. The table provides for a minimum 25 feet to the water main with at least 10 feet to the edge of the easement, or more if needed to meet the minimum 25 foot distance.	No
13-Setback	13cc	7/15/2024	No numerical basis to identify what each definition means. Does this make sense if there is no data.	This comment is in reference to the flowing water bodies and stormwater features setback categories and the definitions of the terms used within these setback categories. The definitions cited are based on USGS, EPA, or local ordinance definitions and none reference a numerical basis for these definitions. This is different than designs required for to meet stormwater drainage and flood management facility requirements of the Department of Public Works Hydraulic Design Manual.	Clarified

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13-Setback	13d	2/2/2023 7/2/2023 7/28/2023	The setback to a drainage course (and an ephemeral stream should not be from the centerline. It should be where the typical flow pattern can be made a matter of visual judgement. (Typically on the order of 3-10 feet from the center line).	The reference to the centerline for this setback description was removed. This change is consistent with the OWTS Policy which references 100' from where the edge of that water body is the natural or levied bank for creek and rivers.	Yes
13-Setback	13dd	7/15/2024	Can you use a topographical map to delineate the lines.	Using topographical lines would likely be an insufficient tool to identify an ephemeral stream.	No
13-Setback	13e	2/2/2023 7/2/2023 7/28/2023	Table 8.7.1.4 I would suggest four feet to any structure with footings. The two foot setback can remain, but the setback to an existing leach line should be reduced from ten feet to only six feet.	The setback to structures is the same as in current LAMP and is not proposed for change.	No
13-Setback	13ee	7/15/2024	Can you mitigate 5:1 setback by lowering cap depth and put in Presby-install within 4 feet. Any way to mitigate 5:1 setback? Deeper holes, deep test, certain perc test.	See response to Comment 13aa.	Duplicate
13-Setback	13f	2/2/2023 7/2/2023 7/28/2023	The maximum five foot cap depth is not a valid construct. There are instances where a 5:1 setback to a canyon or a cut-bank can require a very deep cap. (Forty feet more or less is uncommon, but not unusual).	Table 8.6-1 requires a maximum 5 feet of soil cover but this standard is footnoted and permits more soil cover where justified.	No
13-Setback	13g	2/2/2023 7/2/2023 7/28/2023	The Table for setbacks should be written in a categorical manner so as to be directed to a specific type of disposal system	This comment was considered but no change is proposed.	No
13-Setback	13h	2/2/2023 7/2/2023	Ephemeral streams should return to a fifty-foot setback from leach lines and pits.	See response to comment 2c and 2d.	Duplicate
13-Setback	13i	2/2/2023 7/2/2023 7/28/2023	Maximum cut bank setbacks to drip lines should only be 25 feet. (An argument could be made for less on a case by case basis.).	See response a comment 2a.	Duplicate
13-Setback	13j	2/2/2023 7/2/2023 7/28/2023	The setback to a steep slope should be reduced to a 5:1 application, but not to exceed fifty-feet	The setback in the draft LAMP is the same as in the current LAMP and has not been changed: 5:1 to 100' maximum. The setback can be reduced to 50' when the site evaluation demonstrates adequate site characteristics to prevent sewage surfacing on the face of the bank or slope. This provision retains the 100' setback but allows for a reduction when appropriate.	No

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13-Setback	13k	2/2/2023 7/2/2023 7/28/2023	Unless studies can show no capillary attraction with a vertical pit when filled to the cap depth, the existing setback should remain.	The setbacks for a seepage pit are the same as in the current LAMP and are not proposed for change.	No
13-Setback	13l	2/2/2023 7/2/2023	Unstable land mass-What is the basis for this new regulation?	The unstable land mass setback is an OWTS Policy standard that is being incorporated into the draft LAMP.	Comment Noted
13-Setback	13m	2/2/2023 7/2/2023 7/28/2023	Being a desert locality argues for less stringent setbacks since drainage is temporary and can be measured in hours or a few days.	Although rainfall can be low in some areas of the county, data from studies conducted as part of the regional stormwater permit show that defective OWTS may contribute pathogens to surface water runoff during a storm event under certain conditions. The setbacks to flowing surface water bodies, including ephemeral drainage, reduce impacts to surface water bodies from defective OWTS.	No
13-Setback	13o	2/2/2023 7/2/2023 7/28/2023	It is recognized the current two-foot setback should not apply to a lot line if the neighbor has a leach field and therefore, the two-foot setback should be adjusted to five-feet. The two-foot setback to a structure should also be increased to a distance of four-feet if the structure has footings. Otherwise, arguably, the two-foot setback could impact the footing stability. A structural engineer could address this matter with fact-finding if there is a controversy.	The current LAMP provides for a 5 foot setback to a property line from a septic tank and leach lines and 10 feet from a seepage pit. These setbacks are not proposed for change. The provision for a drip dispersal to be 2 feet from a property line or a structure is removed in the draft LAMP.	No
13-Setback	13p	2/2/2023 7/2/2023 7/28/2023	The 100-foot setback to a 20 foot length of a 60% slope is too much.	See response to comment 13j.	Duplicate
13-Setback	13q	2/2/2023 7/2/2023 7/28/2023	Where a detention pond is only 2- 2½ feet deep, the setback could be reduced to 10-15 feet	A footnote was added to the setback table for stormwater features to allow a reduction of the 25 foot setback to 10 feet under specific conditions.	Yes
13-Setback	13r	2/2/2023 7/2/2023	A ten-foot setback to a road easement has variable constructs that often defy the conditions.	Language was added to section 6.8.3 to provide for OWTS tightlines crossing roadways and easements, when allowed per easement documentation.	Yes
13-Setback	13s	2/2/2023 7/2/2023 7/28/2023	I would also recommend the DEHQ make sure any such well be located upslope from a leach field as recommended in the State Water Well Standards.	DEHQ implements the provisions of the California Well Standards, including the provision to locate a well up the groundwater gradient from a source of pollution or contamination when possible. This provision may provide an extra measure of protection keeping in consideration the gradient near a well can be reversed by pumping or other influences.	Comment Noted

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13-Setback	13t	8/3/2023	6.6-1 setback table - setback for septic tanks for springs flowing, ponds should be consistent with OWTS Policy-100' to septic tank. The Regional Board strongly supports keeping the 100 foot setback to ephemeral streams.	The recommendation to keep the 100 foot setback to ephemeral streams is noted.	Comment Noted
13-Setback	13u	2/2/2023 7/2/2023 7/28/2023	Page 79 table 6.6.1 setbacks: water main - wants 10' if upslope; wants to ignore any road easement on parcel maps as not likely to occur.	See response to comment 13c for water main standard. DEHQ has no legal basis for ignoring road or other easements.	No
13-Setback	13v	2/2/2023 7/2/2023 7/28/2023	Page 80 footnote 5-same as cut slope comment.	See response to comment 2a.	Duplicate
13-Setback	13w	6/9/2024	The setback to drainage features is concerning. These are subjective judgements. The 50' setback should be used for drainage that carries water only during and shortly after a rain event, and the 100' setback for drainage carries water most of the year. Many existing undeveloped lots may not be buildable with the 100' setback. The LAMP essentially labels any sloping property as a drainage course. Is there evidence that the additional setback is needed.	See response to comment 2c and 2d.	Duplicate
13-Setback	13w	2/2/2023 7/2/2023 7/28/2023	There is no basis for a ten- foot setback from a leach line to a dripline. Five feet would be more appropriate. The setback to a leach field and a drip field should be changed to a conservative five- feet since the leach field would be abandoned if the drip field was engaged.	The draft LAMP proposes 6 feet from leach line to a drip line.	Yes
13-Setback	13x	7/11/2024	The argument for slope per cent has been abandoned.	The previous related comment suggested changing the definition of a "Cut/Slope by increasing slope from 60% to 70%.	Comment Noted
13-Setback	13y	7/11/2024	Page 72, Table 6.5-1- The setback description for "Ephemeral Stream or Drainage Course is arguable in that an "ephemeral stream" should not be identified as a drainage course.	See response to Comment 7m.	Duplicate
13-Setback	13z	7/15/2024	How can we reduce drainage course set back from 50ft down to 25ft with addition of additional deep holes?	Since these setbacks are also intended to protect surface water bodies from potential surfacing sewage, this minimum setback is not proposed for change.	No

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13-Setback	13ff	9/22/2024	The use of a "US Geological Survey Map" for septic layout review has erroneous interpretation and according to the source, such use cannot be defended in court.	See response to comment 13b. The updated LAMP references two map sources to aid in determining surface water and drainage information: the National Map (USGS), The San Diego Basin Plan Map (SDRWQCB). The updated LAMP also provides for site-specific observations of drainage patterns. While map references are a useful tool, the information they provide should always be confirmed by site-specific observations as part of the site evaluation process.	Duplicate
13-Setback	13gg	9/22/2024	The proposed 100-foot setback to an unstable land mass has an interesting pro e contra. Presuming the DEHQ has an engineering basis for the potential phenomenon of a rogue earth slide of a meaningful depth of instability, it can be argued this new regulation might have merit. On the other hand, a 100-foot setback is extreme and arguably an overreach for minor earth movements. What is the basis for this new regulation? Science related to soil character?	See response to comment 3l. The setback to an unstable land mass is an OWTS Policy standard that was not previously addressed in the current LAMP. An alternative to the 100-foot setback was not identified that provided the same level of protection for this specific condition and the OWTS Policy standard was incorporated into the updated LAMP.	Duplicate
13-Setback	13hh	9/22/2024	Can it be understood the DEHQ will reduce and rewrite a codified basis to change setbacks to less than 100 feet to canyons and drainage courses and define an ephemeral stream as different than a drainage course.	The current and updated LAMP both include the same definition for a "flowing water body", which includes dry areas where it is apparent that when water is present it flows, such as in an ephemeral drainage, creek, stream or river. The current LAMP setback of 100-feet to a "flowing stream/creek" is not proposed for change. The updated LAMP provides clarification that this setback category includes an ephemeral stream, consistent with the current definition. A new alternative to this setback is incorporated into the updated LAMP, with a reduced setback to 50 feet for OWTS with supplemental treatment. Additionally, new setback categories are provided for clarity and to differentiate between the flowing water body category and other surface runoff features that channel surface water runoff to a flowing/ephemeral stream: "surface water runoff channel or swale" and Stormwater features, man-made ponds and ditches. These setbacks range from 25 to 50 feet. See also response to comments 2c, 2d, and 7m.	Duplicate

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13-Setback	13ii	9/22/2024	Being a desert locality argues for less stringent setbacks since drainage is temporary and can be measured in hours or a few days. Is there a basis of science or is it a paranoia fear related to groundwater protection. Does it contain the same arguable errors often discovered for the definition of a wet-land and/or a FEMA boundary?	See response to comment 13m.	Duplicate
13-Setback	13jj	9/22/2024	<p>The ten-foot (some inspectors have preferred a prescriptive fifteen foot) separation from a drip line to a leach line makes no sense. The emitters and the drip lines are designed to disperse over a four-square foot area. Field observations concur there are no wet zones beyond two feet from an emitter when correctly designed in accordance with reliable percolation rates. Moreover, it makes no sense to require a ten-foot setback to a leach line when we allow a dispersal line within two-feet of a property line which therefore makes it a potential seven-feet from a neighboring leach line.</p> <p>Recommendation: Revise the guidelines and allow separation from a leach line and a drip line to be only five feet ad the same to a residential structure (or any structure which has footings). The safety factor is merely a comfort for the regulators as actual wet zone and effluent travel does not exceed more than a nominal foot to a maximum or less of two feet from a drip line. The logic of a two-foot separation for drip line underscores this recommendation.</p>	See response to comment 13w. Additionally, the setback to a property line has been revised consistent the with other dispersal system types and is now 5-feet. The setback to a structure has not been changed as it is not certain an alternative reduced setback would offer sufficient protection from wastewater, including surfacing wastewater from a system experiencing failure.	Duplicate

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13-Setback	13kk	9/22/2024	Setback separation between a leach line and a horizontal seepage pit. In my opinion, there should be no objection to allowing a horizontal seepage pit to be only ten-feet from a leach line. The zone of capillary attraction is nullified since one or the other systems would be abandoned. There is also a dispersal factor related to cap depth of a horizontal seepage pit. Further discussion with the DEHQ can result in an agreement.	See also response to comment 15tt. Based on a previous stakeholder suggestion, the setback from a leach line to a deep bed (horizontal seepage pit) was changed from 15 feet to 10 feet. The setback from a deep bed to a deep bed was changed from 20 feet to 10 feet.	Duplicate
13-Setback	13ll	9/22/2024	Reduction of setbacks to a cut bank from a drip dispersal line. A 5:1 setback to a 6-12 inch drip field trench makes no sense and is argued as an simply not considering the difference between leach lines and drip line time of travel. Visual observation of wet zone travel around an emitter will confirm the wet zone does not extend very much beyond 12 inches. Recommendation: Reduce the setback for a drip dispersal line to a cut back to only ten-feet when the soil can be demonstrated as being homogeneous. If this construct is arguable, then it can be considered on a "site specific" basis and increased to more than a 2:1 ratio. Disagreement with this option can be addressed by consulting with a geologist or a geotechnical engineer.	See response to comment 2a. Based on a previous stakeholder suggestion, a new setback of 3:1 has been added for drip dispersal up to a maximum of 25'. Additionally, consistent with soil stability language from the OWTS Policy, a provision has been added that a different setback may be proposed if recommended in a geotechnical report prepared by a qualified professional.	Duplicate

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13-Setback	13mm	9/22/2024	Reduction of setbacks to drainage. Currently the regulation of drainage setbacks to a drainage course is inconsistent with industry and regulatory standards and definitions. At the very least, they should be consistent with the Regional Board guidelines and not more strict. Recommendation: The DEHQ should consult with the Regional Board and revise their definitions of drainage types and setbacks. The professional and technical literature abounds.	See response to comments 2c and 7m. It should also be noted that the OWTS Policy, including the requirement for a 100 foot setback to a flowing stream (which includes an ephemeral stream) has been adopted into the Water Quality Control Plans (Basin Plans) for both the Colorado River Basin and San Diego Regional Boards and has been codified in the California Code of Regulation. This is the regulatory framework and associated standards to be referenced for OWTS . DEHQ has consulted with Regional Board staff and understands this setback is important to protect surface water bodies.	Duplicate
13-Setback	13nn	9/22/2024	Well Setbacks. The State Water Well Standards allow for a local regulatory agency to reduce a well setback on an onsite disposal system. *Bulletin 74-81, page 27) and subsequent updates. Why would the Department of Environmental Health and Quality not allow a reduction of the well setback to a leach field or a drip field to 50 feet if the well was sealed to a minimum of 50 feet below grade and at least ten feet extended to competent rock or an aquitard. It makes no sense to disallow such construction when a hundred-foot setback is acceptable with a twenty-foot seal and it is unknown if a competent formation exists below the landing intersect.	See response to comment 13a.	Duplicate
14-Soil Description	14a	7/12/2023	USDA soil profile....this was not referenced? Soil texturing- should be used to determine where to place. Some use in lieu of perc testing which is bogus. What is the value?	See response to comment 8g.	Duplicate
14-Soil Description	14b	7/6/2023	The soil triangle. That is utterly is useless information and only serves to drive costs up with no real benefit other than "Making work". OK, let's say you have a filled out soil triangle with an application; what are you going to do with that information? Put it in a file?	See response to comment 8g.	Duplicate
14-Soil Description	14c	7/12/2023	Should we delete all soil texturing. Use the USDA nomenclature instead of ASTM. DPW has soil maps.	See response to comment 8g.	Duplicate

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14-Soil Description	14d	2/2/2023 7/2/2023 7/28/2023	4.2.1 The use of the soil triangle is NOT reliable with soil fractions for a correlation with percolation because of bulk density and other factors such as cementation. There is a plethora of technical literature related to agriculture (the real purpose of the soil triangle) which argues against percolation tests. Moreover, a percolation rate for sizing a leach field is based on an average of multiple sites over an area.	See response to comment 8g. The draft LAMP provides clarification on the calculation of the design percolation rate from the percolation test hole results at a site.	Duplicate
14-Soil Description	14e	2/2/2023 7/2/2023 7/28/2023	The question is simply: what is the value of the information? Answer: no practical value because a reliable percolation test is more definitive and the use of soil character can be misleading for actual percolation capabilities.	See response to comment 8g.	Duplicate
14-Soil Description	14f	2/2/2023 7/2/2023 7/28/2023	Page 66 4.3.8.1-should be rewritten -reason soil texture (same comment as 4.2.1)	See response to comment 8g.	Duplicate
14-Soil Description	14g	2/2/2023 7/2/2023 7/28/2023	Page 123 1.3.1 same comment relating to USDA soil texture naming methodology.	See response to comment 8g.	Duplicate
15-Standards	15a	2/2/2023 7/2/2023 7/28/2023	Document should address the 2008 DEHQ OWTS Design Manual.	All OWTS-related elements within the authority of DEHQ in the 2008 Design Manual were incorporated into the draft LAMP. Where possible, a reference was added to denote the authority for other elements not OWTS-related or not within DEHQ authority.	Yes
15-Standards	15aa	2/2/2023 7/2/2023 7/28/2023	Page 63 4.2.4.2 be aware this will limit the horizontal pit depth as related to sidewall options and cap depth. Will terraces be allowed? Removal of overburden?	This requirement is the same as in the current LAMP and is not proposed for change. The site specific design of terraces or removal of overburden for the purposes of installing an OWTS must be proposed in a grading plan to be submitted with the OWTS Layout Report for review and approval.	No

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15-Standards	15b	2/2/2023 7/2/2023 7/28/2023	SWRQB Order WQ 2014-0153-DWQ can be cited as a reference.	The OWTS Policy is the regulatory framework applicable to OWTS regulated by a local agency and not the SWRCB Order WQ 2014-0153-DWQ, <i>General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems</i> (General Order). OWTS are either regulated under individual waste discharge requirements (WDRs) implemented by the Regional Board, under the general WDR in the General Order implemented by the Regional Board, or under the conditional waiver integrated into the OWTS Policy, implemented by the Regional Board or an approved Local Agency. Item 4 in the Background Information section of the General Order provides that small domestic systems that use subsurface disposal may be regulated by a local agency consistent with the OWTS Policy. The OWTS Policy provides the regulatory framework for a Tier 2, or LAMP, local agency program.	No
15-Standards	15bb	2/2/2023 7/2/2023 7/28/2023	Page 64 4.3.3-inserted narrative should exclude rock filled pits (horiz and vert).	The areas specified in Section 4.3.3 were moved to Section 8.1.4 to reduce redundancy. Language was added to Section 8.1.4.2 in the draft LAMP to permit rock-filled deep bed or vertical seepage pits under paved areas if no other area is available/feasible.	Yes
15-Standards	15c	2/2/2023 7/2/2023 7/28/2023	The "high strength wastewater" narrative should also refer to the Regional Board definitions (including RV Parks).	The definition of "high-strength wastewater" in the current draft is the same as that in the OWTS Policy and is not proposed for change in the draft LAMP.	Comment Noted
15-Standards	15cc	2/2/2023 7/2/2023 7/28/2023	Page 72: Table 5.2-1 all rock outcroppings- change to significant and relevant; change stormwater to "known, proposed, or potential". Methods and results of all soils testing-same information is on the percolation test report.	See response to comments 15m. Language for stormwater features was changed from "all" to "known, proposed, or potential" as suggested. Percolation test results to be submitted with the OWTS Layout Report.	Yes
15-Standards	15d	2/2/2023 7/2/2023 7/28/2023	Because of environmental concerns, existing dump stations should not be allowed to discharge to an onsite wastewater disposal system.	The LAMP addresses new or replacement OWTS, which are not permitted to accept wastes from RV holding tanks unless approved by DEHQ and with no added prohibited chemicals. Existing dump stations are not covered under the scope of coverage of the LAMP and the Regional Board would be lead for these discharges.	Comment Noted
15-Standards	15dd	2/2/2023 7/2/2023 7/28/2023	Page 75-6.2.3 Owners should have right to put in any system as long as it meets requirements.	This language in this section was revised consistent with language in the existing regulatory code.	Yes

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15-Standards	15e	2/2/2023 7/2/2023 7/28/2023	Commentary on nitrates.	Drinking water standards and other water quality standards for nitrate are not determined by DEHQ but by the appropriate State agencies. DEHQ local requirements must be consistent with State requirements.	No
15-Standards	15ee	2/2/2023 7/2/2023 7/28/2023	Page 65 wastewater flow determination-let it be.	This information was incorporated from the 2008 Supplemental Design Manual for OWTS with some minor changes. Wastewater flow for residential is standardized at 150 gallons per bedroom. Wastewater flows for commercial OWTS are consistent with current practice and is needed to determine if the OWTS is within scope of LAMP.	No
15-Standards	15f	2/2/2023 7/2/2023 7/28/2023	Holding Tanks - there are instances where sewer is planned and financially provided, but does not get installed . An example is a subdivision in Ramona near Archie Moore Road which was approved with temporary disposal, but the sewer was never constructed.	The provisions for holding tanks was incorporated in the draft LAMP based on existing authority and provisions provided in the ordinance code and is not proposed to change.	No
15-Standards	15ff	2/2/2023 7/2/2023 7/28/2023	Page 139 and 140 4.1-add pressurized water probing as is typical location method.	Pressurized water probing was added to this section as suggested.	Yes
15-Standards	15g	2/2/2023 7/2/2023 7/28/2023	Slope Stability study-this requirement should be nixed as there is no evidence of any problems in this county as is evident in Los Angeles and Ventura Counties.	The slope stability study is an OWTS Policy requirement (Section 9.4.4) for LAMPs for slopes over 30%. The draft LAMP provides for screening to be conducted during the site evaluation process, with a slope stability study to be performed only if the initial screening finds instability issues.	No
15-Standards	15gg	2/2/2023 7/2/2023 7/28/2023	Page 140 4.3 hand augured boring 3" minimum-boring by drill rig or nix the concept. Unless they are increasing flow why require this? Non-conforming systems in county do not pose a problem.	Language was added to this section to include a drilled boring in addition to hand-augured and to limit this requirement only to those dispersal systems that may not meet current separation to groundwater requirements. Some OWTS have been identified to potentially pose a problem. For example, the Rainbow Creek Total Maximum Daily Load has identified existing nonconforming OWTS as contributing to the total nitrogen impairment of Rainbow Creek through the groundwater to surface water pathway.	Yes
15-Standards	15h	2/2/2023 7/2/2023 7/28/2023	3.8.5.3 Installation. The potential for rain damage is always a concern. Even if judgement of imminent rain is in error, the dilemma remains. Should the trenches be covered with protective plastic or is the potential damage to the trenches actually a factual occurrence ?	Language was added to Section 3.8.5.6 that allows for backfilling prior to the inspection, only upon prior approval by DEHQ.	Yes

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15-Standards	15hh	9/26/2023	How are the updated LAMP standards applied to existing septic systems.	<p>The standards for septic systems in the LAMP are applied to applications to install a new septic system and applications to replace or repair/ modify an existing septic system. Applications for the replacement or repair of existing septic systems are typically in response to the following:</p> <ul style="list-style-type: none"> -To correct a failing or unsafe septic system: Example-a septic system would require corrective action (repair or replacement) when it can no longer keep wastewater underground, it requires ongoing pumping to keep wastewater underground, or it has a broken/unsafe septic tank or other component. -For proposed changes to a structure or property associated with a building permit and/or grading permit: Example-additional septic capacity would be required if the proposed changes result in an increase in wastewater volume (like an addition of a bedroom or an accessory dwelling unit) or the relocation of an existing septic system or components would be required to meet setback standards to a new proposed addition or swimming pool. Grading plans are reviewed to make sure the proposed grading does not impact to an existing septic system, including setbacks to slopes and soil cover requirements. -For proposed development projects (use permits, lot line adjustments, subdivisions of land). Example: a new proposed septic or the reuse of an existing septic system to serve a proposed development project must be designed for the specific proposed development and must meet LAMP minimum standards. 	Comment Noted
15-Standards	15i	2/2/2023 7/2/2023 7/28/2023	3.8.6.1 Can this be included with a repair or an installation permit?	Yes, the destruction of a septic tank or cesspool can be included with a repair or installation permit.	Yes

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15-Standards	15ii	1/29/2024	Why is the minimum setback for septic tank to public well changing from 100 feet to 150 feet? Is there a scientific reason? Please consider maintaining the current setback of 100 feet.	The standards for OWTS in the LAMP must conform to the requirements for a Tier 2 local management program in the OWTS Policy. The OWTS Policy provides some minimum requirements/standards that must be included in a LAMP and for which no alternative minimum standard can be proposed (Section 9.4). The setback distance from a septic tank and dispersal field to a public water well is one of those minimum standards (Sections 9.4.10.1 and 9.4.10.2). However, the OWTS Policy also provides that when a replacement OWTS cannot meet this setback, it must meet the setback to the greatest extent practicable and utilize supplemental treatment. The requirement for supplemental treatment may be waived if a finding is made that the previous system was not adversely affecting the public water source and there is limited potential that the replacement system could impact the water source based on topography, soil depth, soil texture, and groundwater separation (Section 9.4.11). These setbacks are intended to protect the water well source from OWTS discharges and are evaluated as part of a septic installation permit application.	No
15-Standards	15j	2/2/2023 7/2/2023 7/28/2023	?3.8.2.2 Wastewater Sources, Flows and Characteristics How much more difficulty and cost do you want to impose on a property owner and for what gain? One can use theoretical BOD, TDS and so on from the literature, but an accurate “snapshot, if you will, requires an operating system and costly sampling.	Language was added to this section clarifying that residential domestic wastewater is considered to be low strength wastewater by default, unless other types of wastewater generating activities occur in the building. Wastewater flows for residential have been standardized at 150 gallons per bedroom. Wastewater flows and characterization for commercial projects can be through direct sampling, sampling of a similar facility, or from published data sources.	Yes

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15-Standards	15jj	1/29/2024	If an existing OWTS is in Tier 0, what are the setback requirements? Are they under the LAMP or State?	<p>An existing OWTS is regulated under Tier 0 of the OWTS Policy and are not subject to any requirements if the OWTS meets the requirements of Section 6.0 of the OWTS Policy. An existing OWTS under Tier 0 that met setback standards at the time the OWTS was installed but does not meet the current standards is considered an existing, non-conforming OWTS. It is still in Tier 0 and no action is required unless one of the following apply:</p> <p>-LAMP Action: The OWTS has surfacing sewage or is unsafe, then it falls into Tier 4-Corrective Action. After the OWTS is repaired or replaced under Tier 2-LAMP standards, it will move back into Tier 0-Existing OWTS. It is important to note that the LAMP provides a process to consider a variance for existing OWTS that need repair but may not be able to meet a specific standard.</p> <p>-LAMP Action: A development project is proposed for the parcel. At that time, it would be evaluated to ensure the development does not expand the existing non-conformity of the OWTS. The OWTS would need to meet Tier 2-LAMP repair or replacement standards, if needed for the development project. After the repair or replacement, it would move back to Tier 0-Existing OWTS.</p> <p>-Regional Board Action: The Regional Board has determined the existing OWTS is impacting groundwater, or is requiring some other action that is not related to surfacing sewage or an unsafe OWTS, such that some corrective action is required (an action that is outside the scope of the LAMP). The OWTS will move into Tier 3-Impaired Water Bodies, if the action is part of an impaired water body requirement, or to Tier 4-Corrective Action, if corrective action is required. This activity is conducted by the Regional Board and may require the submission of a report of</p>	Comment Noted
15-Standards	15k	2/2/2023 7/2/2023 7/28/2023	In my view, the slope stability study should be abandoned.	See response to comment 15g.	Duplicate
15-Standards	15kk	1/29/2024	In OWTS Policy 9.4.10.1 and 9.4.10.2 it refers to the dispersal field, so why is the septic tank setback changed in the updated LAMP?	The specific setback is determined by the depth of the dispersal system in Sections 9.4.10.1 and 9.4.10.2. However, the term "OWTS" in Section 9.4.10 includes all the OWTS components, including the septic tank and the dispersal system. This is the same requirement for Tier 1 that is found in Section 7.5, where it details OWTS treatment component and dispersal systems	Comment Noted

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15-Standards	15l	2/2/2023 7/2/2023 7/28/2023	Microbial Travel Time -Question: what is the basis or need for this variable since no estimate of time of travel can be accurate nor reliable ?	The Microbial Travel Time study is an OWTS Policy Tier 2 (section 9.4.10.3) and LAMP requirement when dispersal systems greater than 20 feet in depth are located within 600 feet of a public well.	No
15-Standards	15ll	1/18/2024	Is there a new LAMP requirement for separation of a public water well from a septic tank of 150 feet? If that is correct, when will the new separation distance go into effect?	The draft LAMP proposes to add a setback from a public well to a septic tank of 150 feet. This is consistent with the requirement in the OWTS Policy for a public well to be 150 feet from any OWTS treatment component and dispersal system less than 10 feet in depth. This will go into effect for new and replacement/repair OWTS installation permits when the San Diego Regional Board approves the draft LAMP.	Comment Noted
15-Standards	15m	2/2/2023 7/2/2023 7/28/2023	The requirement to show "all" rock outcroppings is a challenge. Why not merely ask for the location of significant rock features?	The language in Tables 3.8-1 and 5.2.1 for rock outcroppings was changed from "all" to "significant" as suggested.	Yes
15-Standards	15mm	7/11/2024	Page 87, Table 8.2-1-This is an interesting change from historical requirements which varied from what was in the San D series of the early 1970's, the 1979 policy and the current guidelines. Moe interesting , because there is no consensus with how to calculate actual absorption area (sidewall versus widths) and has been a pro e contra argument for decades. One must go back to the Henry Ryan era of design in order to be informed. This is a good reference and reflects a lot of work by the DEHQ and recognition of the sidewall. It allows for a mathematical agreeable basis.	Comment noted.	Comment Noted
15-Standards	15n	2/2/2023 7/2/2023 7/28/2023	"Location of all stormwater treatment and retention features" This can seriously delay a submittal as the design engineer may be waiting for feed-back from the DPW and often find it necessary to make changes to the subjective demands of the County.	The language in Tables 3.8-1 and 5.2-1 for stormwater features was changed from "all" to "known, proposed, or potential" as suggested.	Yes
15-Standards	15nn	7/11/2024	Page 90 and 91, Table 8.4-1 footnote and Section 8.4.4.3.1-The foot-note regarding "equal distribution" is a fallacy. The concept of "equal distribution" would be unlikely in most soils. Back in the day when D-boxes were abandoned because of unequal distribution, failures were observed because of hydraulic overload to one of the equal length distribution lines. There were findings of unequal distribution because of minor subsidence and resultant tilting of the D-box.	As with serial distribution, equal distribution is a common and effective distribution method when installed correctly. Equal distribution is not replacing serial distribution but is an option when site conditions are amenable. Also see response to Comment 15kk.	Duplicate

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15-Standards	15o	2/2/2023 7/2/2023 7/28/2023	Why eliminate a layout on 8 1/2 X 11 sized paper?	This provision is not eliminated in the draft LAMP.	Comment Noted
15-Standards	15oo	7/11/2024	Page 98, Section 8.5.4.4.1-By definition, "equal distribution" is not equal absorption. Given the observation of horizontal seepage pit performance, the use of a distribution box could be argued as a good thing because flow to a deep bed by serial overflow may not occur for many years. This same conclusion is applicable to vertical pits.	Comment noted.	Comment Noted
15-Standards	15p	2/2/2023 7/2/2023 7/28/2023	Table 5.2.1 The requirement for volume, character and strength of wastewater with supportive calculations, data and sources of information is theoretical for a food establishment unless it is an existing facility so sampling can be done. This construct should only apply to high strength projects and as a foot-note in the table with a discussion of applications.	The draft LAMP provides for wastewater characterization through direct sampling, sampling of a similar facility, or from published data sources. A footnote was added to the table providing that residential domestic wastewater is considered low strength wastewater and so this provision applies to high-strength wastewater projects. The wastewater characteristics are needed to determine that the OWTS is within the scope of the LAMP.	Yes
15-Standards	15pp	7/11/2024	Page 101, Table 8.7.1-How can DEHQ justify a maximum slope of 40% if manually installed. There is no limit on 1 1/2 and 2:1 drip irrigated slopes for construction. Moreover, how can the DEHQ justify the need for a slope stability study when landscape irrigation systems already provide observational evidence of no arguable problems.	The maximum slope for drip dispersal in the current LAMP is 40% (Page 42) and this standard is not proposed to change. Also see response to Comment 8o.	No
15-Standards	15q	2/2/2023 7/2/2023 7/28/2023	The "all setback distances shown on the layout" should be changed to "relevant setback distances."; otherwise the layout can become too busy for clarification.	Changed language to all "applicable" setback distances as all applicable setbacks are needed for review.	Yes
15-Standards	15qq	7/11/2024	Page 102-A paragraph should be inserted following 8.7.4.6 which requires loops to be raised in accordance with Geoflow Guidelines. This is easy to do by placing soil under the loop so it is raised "slightly" and "helps" prevent drain-back.	Comment noted but this is not the only option for drip configuration. However, Section 8.7.3.1 requires the drip dispersal to be installed in accordance with the manufacturer's recommendations, which would include any recommendations provided by Geoflow.	No
15-Standards	15r	2/2/2023 7/2/2023 7/28/2023	Location of all stormwater treatment and retention facilities is often unknown and not communicated to a designer. Once determined, a revision can be submitted to the DEHQ.	See response to comment 15n.	Duplicate

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15-Standards	15rr	7/11/2024	Page 103, Section 8.8.4.4-The argument to not require a distribution box has been addressed in context of other distribution systems. Again, there is no such thing as "equal distribution".	See response to Comments 15kk and 15nn.	Duplicate
15-Standards	15s	2/2/2023 7/2/2023 7/28/2023	It is suggested the "...list of all supplemental treatment components" should remove the word "all" ; otherwise, the list is exhaustive, project specific and sometimes require a field change.	This comment was considered but no changes are proposed. A comprehensive list is needed for review.	No
15-Standards	15ss	7/11/2024	Page 111, Section 10.3.6-Does this infer that drip lines can be used for the same type or repair?	The section referenced allows for the area between individual leach lines to be used for a repair when the parcel has no other applicable area for a repair. This would apply to drip lines if the conditions of this section are met and this dispersal type is appropriate for the location.	Clarified
15-Standards	15t	2/2/2023 7/2/2023 7/28/2023	The requirement of a "map" showing "all supplemental components on the parcel should be removed from the list. A layout should suffice which shows relevant components.	This comment was considered but no changes are proposed. A diagram of all components is needed for review.	No
15-Standards	15tt	7/19/2024	Please consider reducing the setback from 20 feet to 10 feet from horizontal pit to horizontal pit. If the setback is currently 10 feet to a structure it should be 10 feet from each pit using the same rationale. The requirement should be a 5 foot setback to a property line.	The setback from a deep bed (formerly horizontal pit) to deep bed has been revised to 10 feet edge to edge as suggested. However, the setback to property line of 5 feet is not proposed for change.	Yes
15-Standards	15u	2/2/2023 7/2/2023 7/28/2023	Moreover, the area in which a vertical pit is acceptable has no groundwater to protect.	The OWTS Policy requires a minimum of a 10 foot separation to groundwater from a seepage pit. OWTS Policy Section 9.4.8 provides a LAMP cannot be authorized with a different standard than this.	No
15-Standards	15uu	7/15/2024	Ewan asked about: Nitrate Testing – special circumstances – Can nitrate loading studies be added back into LAMP to address sites that allow for more options?	The minimum standards are intended to address most site conditions and remove the need for comprehensive and costly studies. For those rare instances where an applicant proposes OWTS that is outside the scope of the LAMP, the applicant may seek approval by the Regional Board.	No
15-Standards	15v	2/2/2023 7/2/2023 7/28/2023	The recommended daily flows should be weighed carefully with comparisons of similar establishments.	The draft LAMP provides that actual site specific data may be use, or the data from the table, or other data sources, including from similar facilities, if approved by DEHQ.	Yes
15-Standards	15vv	7/15/2024	No need for infilling on a lot – Why does a nitrate load even need to be conducted.	See response to Comment 15uu.	Clarified

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15-Standards	15w	2/2/2023 7/2/2023 7/28/2023	Equally important are the many singular guidelines with no authorization in the LAMP which are in other documents and guideline policy such as how to cross an aqueduct, a road, swimming pool backwash discharge and many others.	See response to comment 15a.	Duplicate
15-Standards	15ww	7/15/2024	Allow presby under driveways – helps with small lots	These types of systems are not appropriate for use under a driveway and may be damaged from vehicular traffic.	No
15-Standards	15x	2/2/2023 7/2/2023 7/28/2023	I would argue the reliance on the link to U.S. Geological Survey's (USGS) drainage information is not reliable for local conditions	See response to comment 13b.	Duplicate
15-Standards	15xx	7/11/2024	Page 71, Section 6.5.1-It is understood the 75 gal./day/person water use is a typical code requirement and not necessarily factual except if cited by a defined default to typical codes in a design report. <i>Id esta</i> defined as factual.	Comment noted.	Comment Noted
15-Standards	15y	2/2/2023 7/2/2023 7/28/2023	Page 43 3.7.7.2.2-does not believe nitrate should be a primary drinking water standard	See response to comment 15e.	Duplicate
15-Standards	15yy	7/11/2024	Page 72, Table 6.5-1- It is recommended to show a foot-note for churches referenced to 5 gal/seat wastewater flow. Designs should be based on meter readings and /or comparison with similar churches.	The Final LAMP provides flexibility when determining wastewater volumes at commercial facilities. Section 6.5.2.1 provides for the use of actual data to determine wastewater flow. If no actual data exist, then the references in the Table can be used or other data sources, if approved by DEHQ.	No
15-Standards	15z	2/2/2023 7/2/2023 7/28/2023	Page 48 3.8.2.3.2-unsaturated soil interval-wants deleted or a reference to a revised guideline.	This overview section provides a reference to Section 4.2-Soil Information and Testing and Section 6.3-Groundwater Separation Requirements for details relating to the unsaturated soil interval.	Duplicate
15-Standards	15zz	7/11/2024	Page 79, Section 7.1.10-There is no reason to allow more than 2 inches of fall. Six inches can decrease the volume on the order of 50-100 gallons as determined by the volume of the septic tank divided by the distance of the liquid line to the bottom. The increase, although making it easier for the installer, can invite inferior or less careful installation of an inlet and outlet.	The standard is the same as is provided in the current LAMP and, as no issues have been documented, it is not proposed for change.	No

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15-Standards	15aaa	7/11/2024	Page 85, Section 8.1-Reading the informative dialogue begs the question of "why use a distribution box"?	Current ordinance provides for the use of a distribution box and is incorporated to include the use of equal distribution as a dispersal option when appropriate.	Clarified
15-Standards	15bbb	7/11/2024	Page 86, Section 8.1.4.4-This paragraph should be expanded to explain informative issues related to a flood plain, flood way, FEMA Flood Zone and a County Flood Zone. Public Works can be consulted where applicable.	See response to Comment 5bb.	Duplicate
15-Standards	15ccc	9/22/2024	Effluent filters. This is not a new element of design as it is a conditional construct in the approval letters of the subdivisions reviewed during my tenure. I would recommend the DEHQ heed to and listen to the experience of pumping contractors who service these devices. Some are good and some are not. In my opinion, the DEHQ should maintain a list of devices that are peer reviewed for maintenance and effectiveness.	The use of effluent filters remain optional based on feedback from contractors/consultants relating to practical issues with filter maintenance. If they are used, they are required to meet the minimum standards of NSF/ANSI 46.	Clarified

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15-Standards	15ddd	9/22/2024	Ironically, the 25% slope limitation was based on an error of confusion between a 20% and 4:1 slope. Because steeper slopes were often proposed and were installed by hand excavation, terracing or even the risk of back-hoe mounts high in the air on extended supports was impetus for the DEH (DEHQ) "steep slope" policy. Much of it was ignored for many years (including a certification of slope stability. It too was originally written with no input from the private sector nor with regard to observable systems on slopes of nominal 40% and with no record of failure on steep slopes. Existing systems abound and can be pointed out by :old school contractors". Nevertheless, the policy is strict and defiantly prescriptive as there is no proof of its worth. Even avocado groves which typically receive 44,000 gallons of water each month per acre stand firm with no evidence of failing slope stability. Recommendation: Delete the policy from the LAMP. Practicality, liability and grading permit regulations are ample controls. A competent designer and "Environmental Health Specialist" professional can challenge a site which has rock lenses, outcropping features and arguable constraints. This would be more of a challenge if the design is merely reviewed by an "inspector".	See response to comments on slopes and slope stability 8o, 15q, and15pp. Consistent with the OWTS Policy requirements, the updated LAMP revised a steep slope from that of 25% or greater slope to 30% or greater slope, thereby eliminating the need for steep slope and slope stability requirements for many projects. Additionally, the requirement for a slope stability study has been reduced in the updated LAMP as it is now only a requirement where evidence of instability is found during the screening that is not part of the initial site evaluation process.	Duplicate

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15-Standards	15eee	9/22/2024	Drip lines between leach lines. In my opinion, there should be no objection to a drip line installed between existing leach lines. There would still be a nominal five-foot setback to the abandoned leach line trench. An argument could even be made for installing a drip line in the backfilled leach line trench. As you know, some jurisdictions allow drip lines in fill soil. In my view, the only objection would be if the "fill area" was not in a confined or contained area. Since drip dispersal lines are designed for a distribution of four-square feet, why would we hold to the same constructs as for leach line? Recommendation: Allow drip lines to be installed between leach lines since the 10-foot separation is arguably more than adequate for separation of a dry zone and wet zone? Of course, this would disallow a non-conforming repair of a leach line installed between two leach lines. On the other hand, a drip system should be allowed because there really is no reason for a drip dispersal line to ever fail unless an emitter ceases working, the trench is invaded by roots or a mechanical issue.. (All easily fixable).	See response to comment 15ss.	Duplicate
16-Supplemental Treatment Systems	6n	7/11/2024	Commercial designs for supplemental treatment should not be limited to a civil engineer. A competent professional should be allowed to do the same.	The language was changed to reflect any design for supplemental treatment for flows over 1500 gallons per day to be by a Civil Engineer based on need for engineering design additional to that provided by the pre-engineered treatment systems.	Yes
16-Supplemental Treatment Systems	16a	7/12/2023	DEHQ staff have said 1500 gallons for clarifying tank for STS. Manufacturer says differently. Needs verbiage on whether or not it's a requirement to meet or not.	Language was added to the draft LAMP to clarify a septic tank is required before a supplemental treatment system.	Yes
16-Supplemental Treatment Systems	16b	7/12/2023	Also question about vegetation. "Required to be maintained" not "before occupancy".	Language was added requiring the installation of the required vegetation prior to the final of the OWTS Installation Permit. This is typically required before final occupancy is allowed.	Yes

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16-Supplemental Treatment Systems	16c	2/2/2023 7/2/2023 7/28/2023	3.7.3.2.3 Is this a contrary condition or a near redundancy?	The sections relating to land use applications have been renumbered and grouped by land use application types with the same OWTS requirements. The language in the subdivision of land section (3.7.7 in the draft LAMP) was modified to remove redundancy and to be consistent with the language in the County Regulatory Code for subdivisions of land.	Yes
16-Supplemental Treatment Systems	16d	2/2/2023 7/2/2023 7/28/2023	6.3.2 and 6.3.3 There is an inconsistency (2' and 3') with the groundwater separation in these two sections?	See response to comment 5a.	Duplicate
16-Supplemental Treatment Systems	16e	2/2/2023 7/2/2023 7/28/2023	9.2.1.1 The requirement for a Supplementary Treatment System (not to be confused with an engineered package treatment plan) is stipulated to be designed by a Civil Engineer. In my opinion, a system marketed and manufactured with a long standing history of acceptance should be allowed to	The Business and Professions code requires "fixed works" to be designed by a California licensed Civil Engineer.	No
16-Supplemental Treatment Systems	16f	2/2/2023 7/2/2023 7/28/2023	9.2.2.2 and 9.2.2.3 In my view, these opposing constructs make no sense. ? ? ? Why not allow 2 feet separation as 2/3 more or less of the treatment is evapotranspiration after the vegetation cover is established and literature advises sterile soil one foot below a dispersal system.	The numbering in these sections has changed in the current draft. However, the OWTS Policy and the draft LAMP requires a minimum three foot separation from groundwater (soil interval) and a minimum soil cover of 12 inches for supplemental treatment for pathogen reduction. This groundwater separation is different from the	Duplicate
16-Supplemental Treatment Systems	16g	2/2/2023 7/2/2023 7/28/2023	9.2.7 What is they basis for abandoning the two foot separation and the conflict with 9.2.8?	See response to comment 16f. The two foot separation has not been changed for OWTS with supplemental treatment for nitrogen reduction. A three foot separation has been added for OWTS with supplemental treatment for pathogen reduction, consistent with the requirements in the OWTS Policy.	Duplicate
16-Supplemental Treatment Systems	16h	2/2/2023 7/2/2023 7/28/2023	Page 109 9.2.1.1-why allow a RCE to design high flows STS? Criteria should be competent.	See response to comment 16e.	Duplicate
16-Supplemental Treatment Systems	16i	2/2/2023 7/2/2023 7/28/2023	Page 109 9.2.2.2 no reason to extent depth beyond 2'.	See response to comment 5a.	Duplicate

Summary of Changes Including Comments Received Post Board of Supervisors Meeting - Rows in green are new.

Topic	Topic Item	Date	Comment (comments for LAMP V2, unless otherwise noted)	Response	Change
16-Supplemental Treatment Systems	16j	2/2/2023 7/2/2023 7/28/2023	Page 110 9.2.7 this redundancy has been addressed in section 5, pg. 17 and 9.2.2.2	The redundant language in Section 9.2.2.2 was removed as already addressed in Section 9.2.7.	Yes
16-Supplemental Treatment Systems	16k	7/11/2024	Page 67, Section 5.2.2- Table 5.2.2-The term "all" will add many more pages of graphics of no relevant value. Most important components are submitted with the design report. Realize, the package shipped to the installer has a manifest list for all components. As an option, what if the designer merely added a "foot-note" or other mention of the web-site where all components can be observed as graphics. On the other hand, if the DEHQ requires "all", then so be it. It is not a problem to add an additional 6-10 pages of graphics since some can be reduced in size and used on a collaborative page.	The list of all components should be provided with the layout design. This is needed for a full review of the proposal and will archived with the layout information for future reference. Links to websites may change over time and may become unavailable as a reference.	No
16-Supplemental Treatment Systems	16l	7/11/2024	Page 68, Section 6.1-The requirement of being certified by the National Sanitation Foundation (NSF) excludes equivalent third parties such as Golf Coast Testing LLC (GCT). Keep in mind the American National Standards Institute (ANSI) sets parameters to be met and third parties such as NSF and GCT among others to the testing to certify compliance with ANSI.	The language relating to the certification of supplemental treatment systems was changed to be consistent with the OWTS Policy for clarity on third party testers.	Yes
16-Supplemental Treatment Systems	16m	7/11/2024	Page 105, Section 9.2.1.2-An ANSI 245 standard for an NSF certification excludes other testing companies such as Gold Coast who reports test results in accordance with the ANSI "Standards".	See response to Comment 15ww.	Duplicate