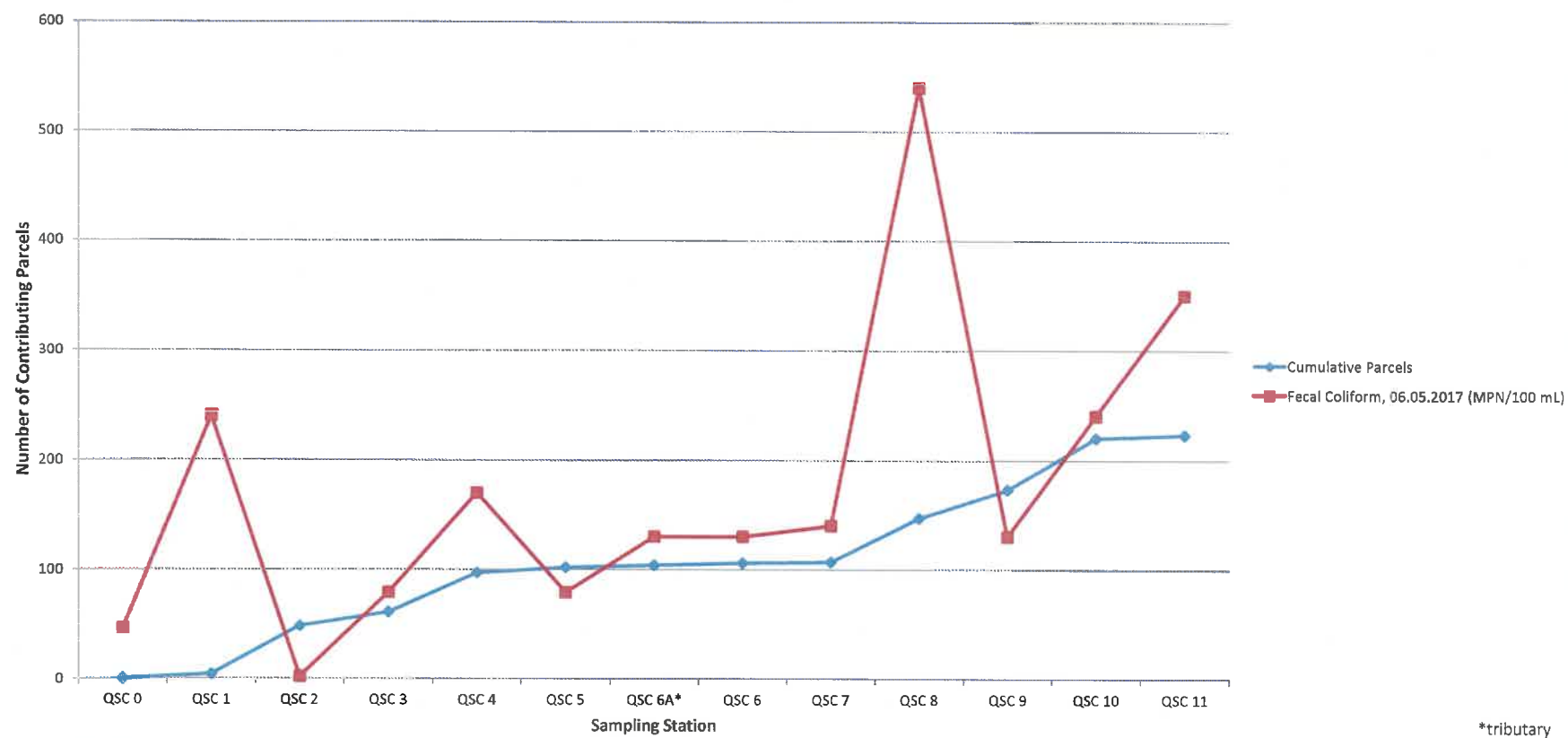
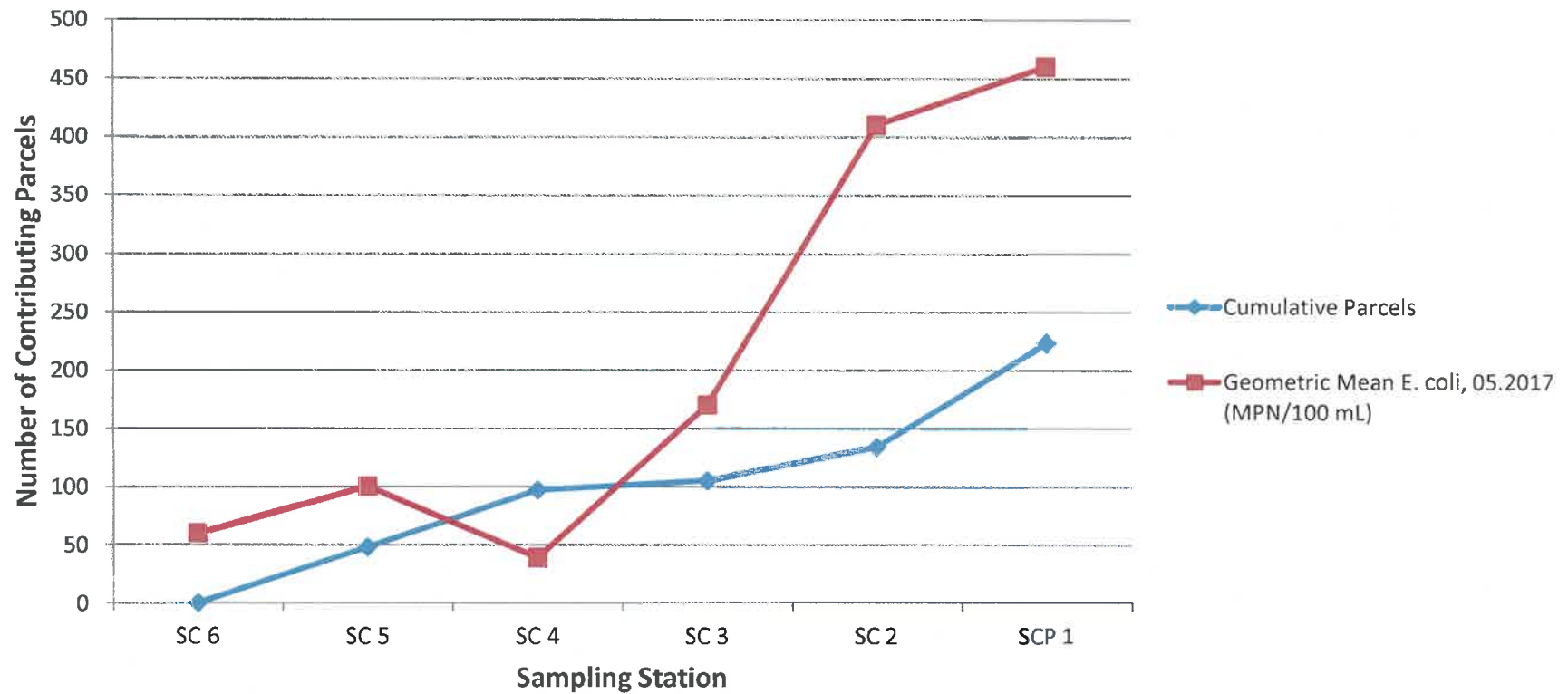
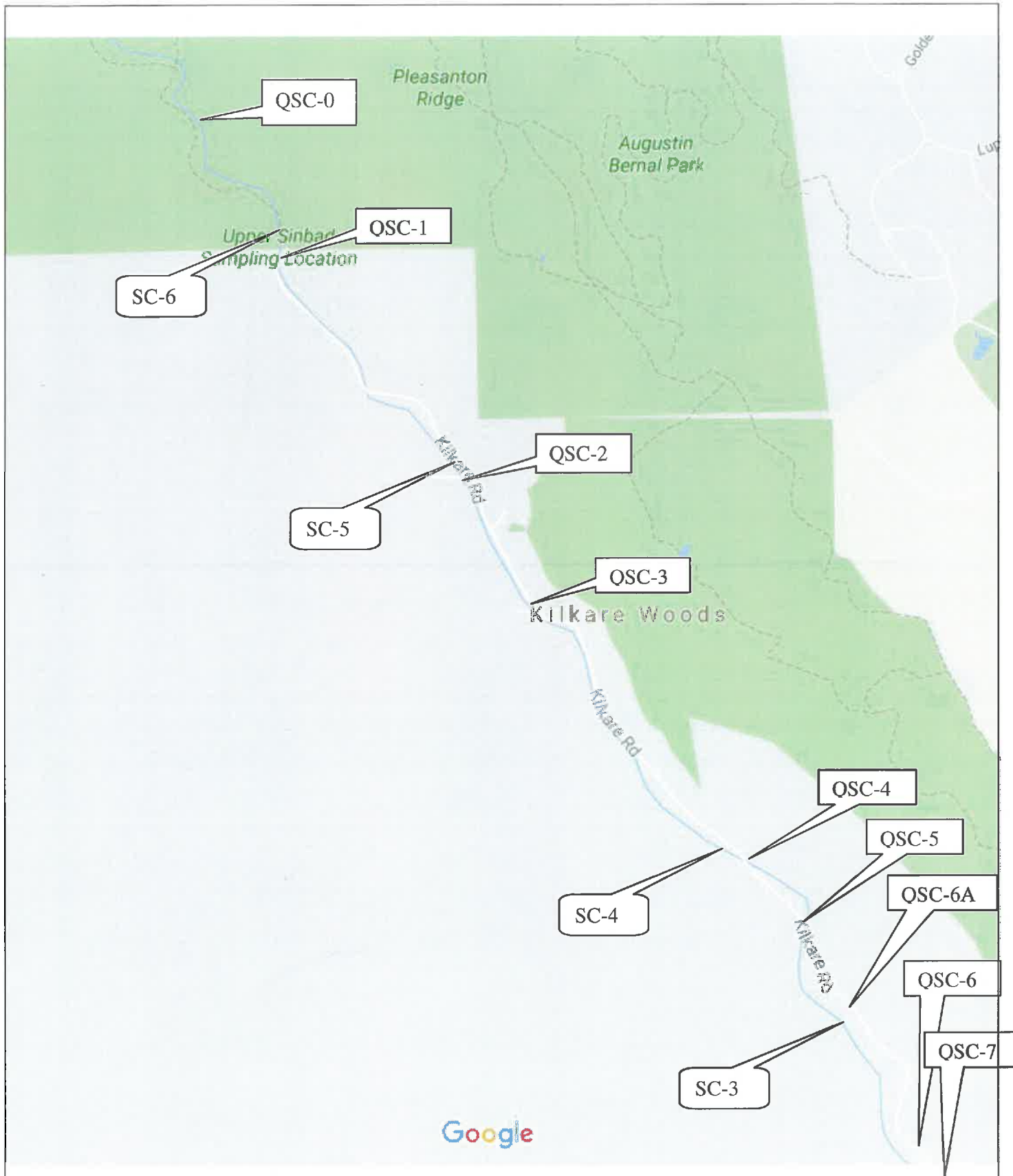


Cumulative Parcels Tributary to Sampling Station Sinbad Creek



Comulative Parcels Tributary to Sampling Station Sinbad Creek



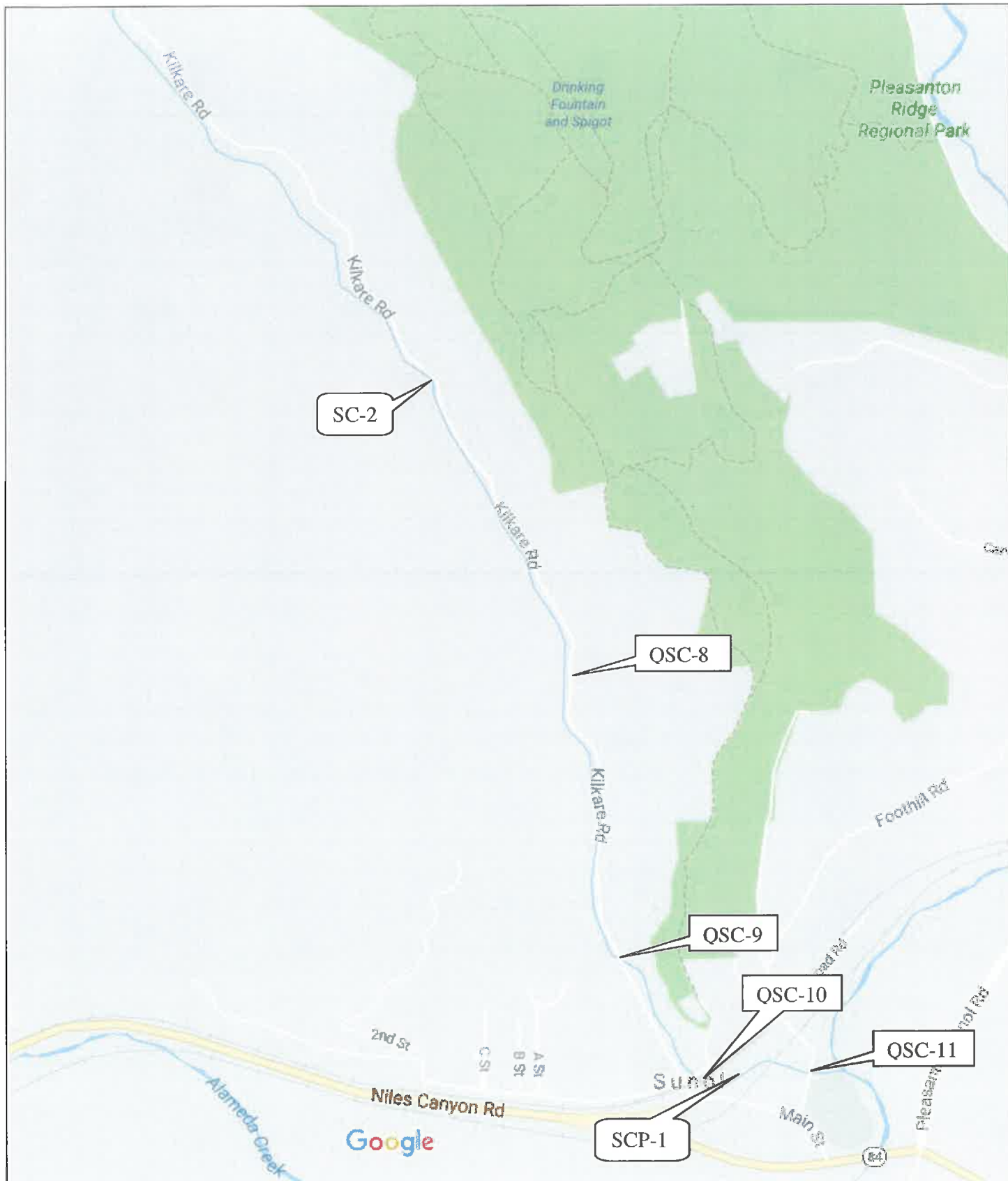


DATE:	7/11/2017
PROJECT:	Alameda County LAMP
PROJECT NO.:	1500042
DRAWN:	MF
APPROVED:	NH



Upper Sinbad Creek Sampling Locations

FIGURE
1-1



DATE: 7/11/2017
 PROJECT: Alameda County LAMP
 PROJECT NO.: 1500042
 DRAWN: MF
 APPROVED: NH



Lower Sinbad Creek Sampling Locations

FIGURE
1-2

TABLE 1
Woodacre/San Geronimo Creek
Microbial Source Tracking

Sponsored by SFRWQCB
 Lab Analysis: Cel Analytical

Marker	Woodacre Creek above Confluence with San Geronimo Creek				San Geronimo Creek above Confluence with Woodacre Creek				San Geronimo Creek under Meadow Way			
	12/16/16	2/15/17	5/22/17	7/20/17	12/16/16	2/15/17	5/22/17	7/20/17	12/16/16	2/15/17	5/22/2017	7/20/2017
Human	Positive	Positive	Positive	Positive	Positive	Positive	Detected	No Detect	Positive	Positive	Detected	Positive
Horse	No Detect	Detected	No Detect	Positive	No Detect	Detected	Detected	Positive	No Detect	Detected	Positive	Positive
Ruminant	No Detect	No Detect	No Detect	Detected	Positive	Positive	No Detect	Detected	Detected	Detected	Detected	Detected
Dog	Positive	No Detect	No Detect	No Detect	No Detect	Detected	No Detect	No Detect	Detected	Positive	No Detect	No Detect

Positive	Results above the Limit of Detection (LOD)
Detected	Results Detected Below Level of Detection (DBLOD) or Detected but Not Quantifiable (DNQ). Non-zero signals below LOD
No Detect	Not Detected, no detectable amplification for the sample

10/24/2017

TABLE 2
Woodacre/San Geronimo Creek
Microbial Source Tracking Summary Results

December 16, 2016

February 15, 2017

May 22, 2017

July 20, 2017

	Woodacre Creek above Confluence with San Geronimo Creek (201LAG300)		San Geronimo Creek above Confluence with Woodacre Creek (201LAG350)		San Geronimo Creek under Meadow Way (201LAG260)	
Marker	Positives	Detected	Positives	Detected	Positives	Detected
Human	100%		50%	25%	75%	25%
Horse	25%	25%	25%	50%	50%	25%
Ruminant		25%	25%	25%		100%
Dog	25%			25%	25%	25%

Positive	Results above the Limit of Detection (LOD)
Detected	Results Detected Below Level of Detection (DBLOD) or Detected but Not Quantifiable (DNQ).
No Detect	Not detected; no detectable amplification for the sample

TABLE 3
Woodacre/San Geronimo Creek
Microbial Source Tracking

December 16, 2016

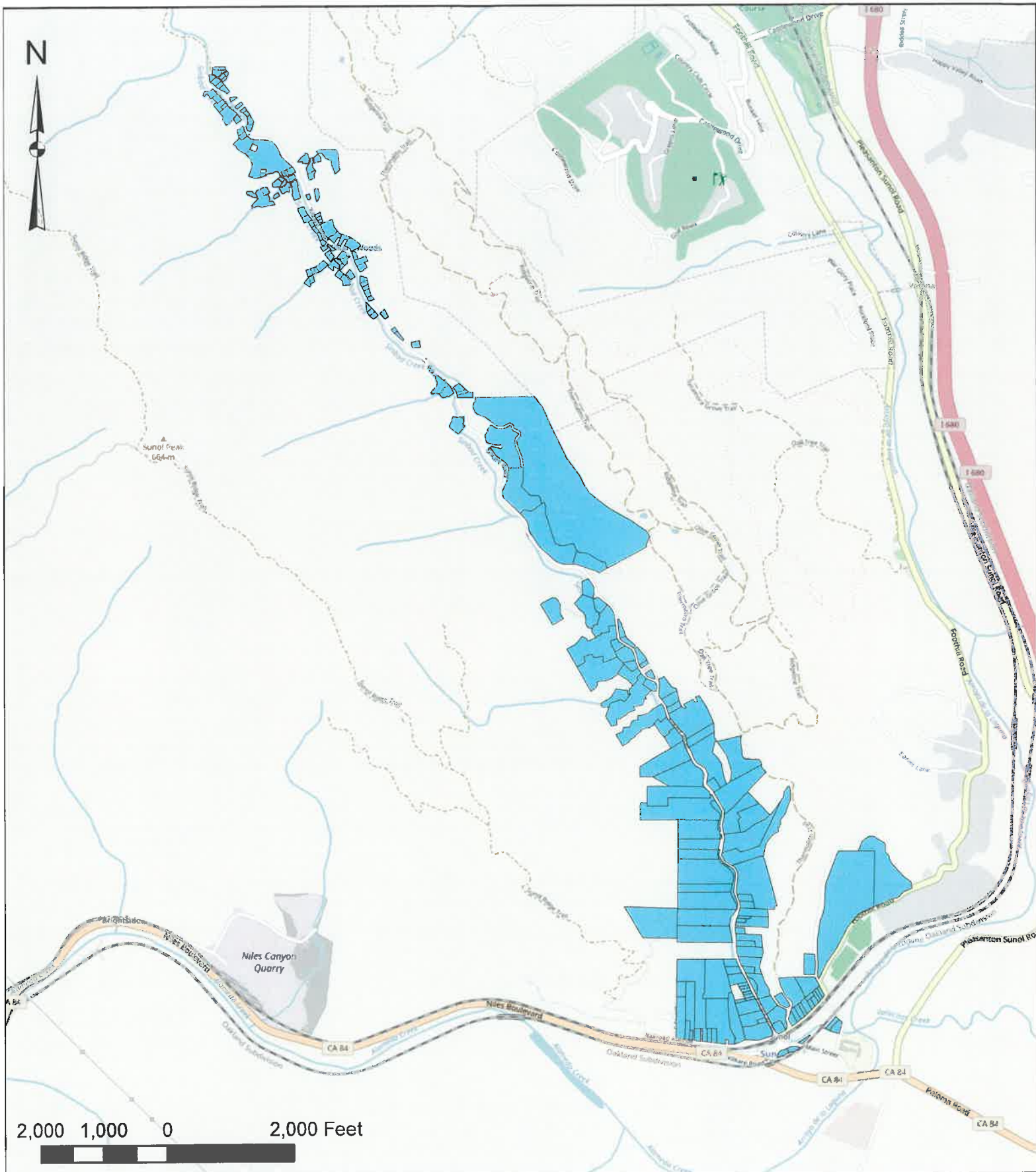
February 15, 2017

May 22, 2017

July 20, 2017

This table presents positives as any signal greater than zero; this includes results Detected Below Level of Detection and Detected but Not Quantifiable.

	Woodacre Creek above Confluence with San Geronimo Creek (201LAG300)	San Geronimo Creek above Confluence with Woodacre Creek (201LAG350)	San Geronimo Creek under Meadow Way (201LAG260)
Marker	Percent positives	Percent positives	Percent positives
Human	100%	75%	100%
Horse	50%	75%	75%
Ruminant	25%	75%	100%
Dog	25%	25%	50%



DATE:	03/13/2018
PROJECT:	ALAMEDA LAMP
PROJECT NO.:	1500042
DRAWN:	DD
APPROVED:	NH



PARCELS

**FIGURE
1**

San Francisco Bay Regional Water Quality Control Board

PUBLIC NOTICE OF WRITTEN COMMENT PERIOD ALAMEDA COUNTY DRAFT LOCAL AGENCY MANAGEMENT PROGRAM

March 13, 2018

The San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Regional Water Board) is seeking written comments on Alameda County's submittal of a draft Local Agency Management Plan (Plan), as described herein. Parties wishing to comment on the Plan must submit comments no later than April 16, 2018. Subsequent to receipt of comments, the San Francisco Bay Regional Water Board Executive Officer may request revisions, approve the Plan, or bring the Plan before the Regional Water Board for its consideration.

Alameda County LAMP Submittal

Per the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (OWTS Policy), local agencies wishing to regulate onsite wastewater treatment systems are required to submit a local agency management plan to the Water Board for approval. Alameda County has submitted a Plan to the San Francisco Bay Regional Water Board. The Plan consists of three documents (Attachments 1-3):

1. March 9, 2017, Revised Draft Local Agency Management Program for Onsite Wastewater Treatment Systems, Alameda County, California
2. March 9, 2017, proposed County of Alameda Onsite Wastewater Treatment Systems Ordinance
3. March 2017 Revised Draft Onsite Wastewater Treatment Systems Manual.

Alameda County lies in the jurisdiction of two Regional Water Quality Control Boards: the majority of the County lies in the San Francisco Bay Regional Water Board's jurisdiction, with a smaller portion of the county in the Central Valley Regional Water Quality Control Board's jurisdiction. Per the OWTS Policy, the designated Regional Water Board for approving Alameda County's Plan is the San Francisco Bay Regional Water Board.

Required Modifications

Per the OWTS Policy, the San Francisco Bay Water Board solicited comments on Alameda County's proposed LAMP from both the Central Valley Regional Water Board and the State Water Resources Control Board Division of Drinking Water. In their June 28, 2017, letter (Attachment 4), the Division of Drinking Water determined that the Alameda County LAMP meets the minimum drinking water source protection measures and had no additional comments or recommendations.

The Central Valley Regional Water Board required minor edits to the proposed LAMP. These edits are outlined in the June 16, 2017, memo (Attachment 5). The San Francisco Bay Regional Water Board intends to require one modification to Alameda County's proposed LAMP:

In the March 2017 Revised Draft Onsite Wastewater Treatment Systems Manual, page 43-9, Section 43.4: [Remove strike through text and replace with bold text.]

A. SYSTEMS WITHOUT OPERATING PERMITS

1. For standard OWTS that do not require an operating permit, the property owner ~~will be asked to~~ **shall** submit a homeowner's questionnaire to the Department once every five (5) years with the information on the System to assist the County in complying with State reporting requirements.

Public Notice

Per the OWTS Policy, Plan approval must follow a noticed hearing with opportunity for public comment. The public hearings conducted by Alameda County have met this requirement. This public notice provides an additional opportunity for written comment.

The public comment period runs from March 13, 2018, through April 16, 2018, at 5 pm. Comments may be submitted by email to Christine.boschen@waterboards.ca.gov or by mail addressed to Christine Boschen, San Francisco Bay Regional Water Quality Control Board, 1515 Clay Street, Suite 1400, Oakland, CA, 94612.



EDUARDO G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

June 28, 2017

Mr. Blair Allen
Water Resources Control Engineer
SF Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Re: Transmittal for Review and Comment – Local Agency Management Plan for Onsite Wastewater Treatment Systems in Alameda County.

Dear Mr. Allen:

The State Water Resources Control Board – Division of Drinking Water (DDW) has reviewed the County of Alameda's Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems (OWTS) revised draft document, dated March 9, 2017, prepared by the County's Department of Environmental Health.

The revised draft document presents the proposed LAMP pertaining to the oversight of onsite wastewater treatment systems (OWTS) within the County of Alameda. This document, along with its partner documents the Onsite Wastewater Treatment System Manual and the Onsite Wastewater Treatment System Ordinance (hereinafter referred to collectively as the LAMP) are the major components of Alameda County's LAMP, prepared in accordance with the requirements of the State Water Resources Control Board's (SWRCB) *Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems*, dated June 19, 2012, also referred to as the "State OWTS Policy".

The proposed LAMP is intended to apply to all OWTS within Alameda County having wastewater design flows up to 10,000 gallons per day (gpd). Any OWTS with a design flow exceeding 10,000 gpd and/or where the wastewater includes industrial process wastewater, or a community system serving multiple discharges under separate ownership would be regulated jointly by Alameda County and the respective California Regional Water Quality Control Board (RWQCB), San Francisco Bay or Central Valley Region.

The State OWTS Policy requires the RWQCB to forward a copy of the LAMP to, and solicit comments from DDW, particularly regarding the LAMP's proposed policies and procedures, including notification to local water purveyors prior to OWTS permitting.

Mr. Blair Allen
Alameda County LAMP
June 28, 2017

- 2 -

DDW hereby determines that the Alameda County LAMP meets the minimum drinking water source protection measures established by the State OWTS Policy and adequately proposes best management practices for the protection of public water system supplies in Alameda County. DDW has no additional comments or recommendations to SF Bay RWQCB regarding the proposed LAMP.

If you have any questions or concerns, please contact me at (510) 620-3454 or at Marco.Pacheco@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Marco Pacheco', with a stylized flourish at the end.

Marco Pacheco, P.E.
Senior Water Resource Control Engineer
San Francisco District
Division of Drinking Water

Central Valley Regional Water Quality Control Board

TO: Blair Allen, P.E., Region 2

FROM: Eric Rapport, C.H.G., C.E.G. &
Robin Merod, Ph.D., P.E., Region 5

DATE: 16 June 2017

SIGNATURE: Original signed by

SUBJECT: REVIEW REQUEST FROM REGION 2, ALAMEDA COUNTY LAMP

INTRODUCTION

The State Water Resources Control Board (State Board) *Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems* (OWTS Policy, or Policy) in part allows Local Agencies to propose Local Agency Management Programs (LAMPs) for Regional Water Quality Control Board (Regional Board) approvals. Under OWTS Policy Tier 2, LAMPs can propose alternative local standards to those in Tier 1; however the standards should meet the same overall purpose to protect water quality and human health.

Local Agencies, largely county environmental health agencies, in some cases span multiple Regional Board jurisdictions. In these cases, Policy §4.3 and Attachment 3 designate one Regional Board to review and approve LAMPs. Policy §4.3.1 nonetheless requires Regional Boards to work cooperatively and assure adequate water quality protection in each region.

On 1 June 2017, Region 2, OWTS Policy Designated Region, requested our staff's general opinion on a LAMP from Alameda County. The following summarizes our review of; proposed notifications, commitment to submit reports, technical adequacy to protect water quality, scope of coverage, compliance with prohibitions and setbacks, and other pertinent standards. Note that our review covers only key Policy Sections, and does not replace your complete and detailed review.

LAMP REVIEW

Proposed Notifications

Within 30 days of receiving a proposed LAMP, Policy §4.3.2 requires Designated Regions to solicit comments from Division of Drinking Water (DDW) on proposed notifications of water purveyors prior to OWTS permitting. State Board Guidance requests our focus on Policy §§3.5, 9.2.11, and 9.2.12. On 1 June 2017, Region 2 staff solicited comments from DDW. Nonetheless, we find that the LAMP does not meet some minimum standards for notifications.

Policy §3.5 generally requires a Local Agency to notify public water well or water intake owners and DDW as soon as practicable, but no later than 72 hours upon discovery of a failing OWTS (Policy §§11.1 and 11.2) within setbacks in Policy §7.5.6 through 7.5.10 [sic, should be through 7.5.8]. We find that the LAMP does not address the notification requirements for a failing OWTS. We searched LAMP Section 4 under the subsection titled *OWTS Notification to Public Water System Owner(s)*, pages 40-41, and found no time limit for notification of water purveyors

and DDW upon discovery of an OWTS failure. We searched the total document for the County's definition of a failing system, (e.g., pooling effluent and baffle failures) and found none.

Policy §9.2.11 generally requires a Local Agency to notify public water system owners of pending installation and repair permits within 1,200 feet of a surface water intake, within its drainage area catchment, and located such that it might impact water quality. We find that LAMP Section 4, Item (3) under the subsection titled *OWTS Notification to Public Water System Owner(s)*, page 40, meets these standards.

Policy §9.2.12 generally requires a Local Agency to propose procedures when a dispersal area would be within a horizontal setback of a public well or surface water intake, either supplemental treatments for nitrogen and pathogens (Policy §§10.9 and 10.10), or alternative siting and operational criteria. We find that LAMP Section 4, Item (3) under the subsection titled *OWTS Notification to Public Water System Owner(s)* and the complete subsection titled *Procedures for Dispersal Field Located Within Public Well/Intake Setback*, pages 40-42, meet these standards.

Commitment to Submit Reports

Policy §§3.3 and 9.3.3 cover Annual, and Water Quality Assessment Reports. Policy §3.3 generally requires Local Agencies to submit annual, spreadsheet format reports on OWTS complaints, applications and registrations as part of the local septic tank cleaning program, and permits for new and replacement OWTS (see Policy §§3.3.1, 3.3.2, and 3.3.3). Annual Reports are due 1 February every year following LAMP implementation, beginning 13 May 2018. The fifth annual report should include an evaluation of the Water Quality Assessment Program (Policy §9.3.2). We find that the LAMP Section 6 under the subsection titled *Reporting to Regional Water Board*, page 48, meets general requirements for reporting.

Technical Adequacy to Protect Water Quality

OWTS Policy Tier 1 provides largely prescriptive standards for siting and construction standards; key summaries are in Policy §§7.8 (Table 1), 8.1.5 (Table 2), and 8.1.7 (Tables 3 and 4), respectively; allowable OWTS densities based on average annual rainfall; minimum depths to shallowest groundwater and bottom of soil below dispersal trenches; and long term application rates based on percolation rates and soils descriptions. For Tier 2, Policy §9.1 et seq. requires Local Agencies to consider appropriate conditions to ensure that the LAMP is overall as protective of water quality and public health as Tier 1. We find that LAMP Appendix A, *Supporting Rationale for Alameda County OWTS Siting and Design Criteria*, compares Alameda County's siting requirements and those of Tier 1; the County's requirements are consistently more conservative. Appendix B, *OWTS Usage and Loading Estimates for Alameda County*, Section titled *Potential Areas of Concern*, pages B-5 and B-6, Figure B-4, Tables B-4 and 5, and *Focus Area Maps*, identify areas of concern and focus (two of which are either near or within Region 5 jurisdiction, Focus Area 9, Tesla Avenue/Greenville Road and Focus Area 11, Mines Road). In general, the LAMP adequately considers Policy §9.1 et seq. and is generally more protective than the minimum requirements of the OWTS Policy.

Policy §9.3.2 describes minimum standards of a Water Quality Assessment Program. Based on several discussions with the California Conference of Directors of Environmental Health, in Region 5 a reasonable minimum data scope would be; state small community water systems, Geotracker GAMA-Secure, monitoring wells from permitted facilities, and private domestic wells; but only if a Local Agency routinely requires sampling, for example as proof of potable water or

to settle a dispute between a landlord and tenant. We find that LAMP Section 6, Item (4) under the subsection titled *Water Quality Assessment*, page 47, meets the minimum scope of data compilation for Water Quality Assessment Reports.

While beyond Region 5 jurisdiction, a preliminary review of Geotracker GAMA Secure shows wells with nitrate above maximum contaminant level within the last ten years near Livermore, a hydrogeologically vulnerable area.

Scope of Coverage

Policy §9.2 et seq. describes scope of coverage. We consider Policy §§9.2.1 through 9.2.10 generally beyond the scope of this review; our key consideration is maximum authorized projected flows. LAMP Section 1: *Introduction and Background, Introduction*, page 1, shows that the LAMP covers OWTS with projected flows up to 10,000 gallons per day, consistent with OWTS Policy standards (see also OWTS Policy Preamble and §9.4.2).

Compliance with Prohibitions and Setbacks

Policy §9.4 et seq. prohibits some authorizations in LAMPs, and gives minimum horizontal setbacks for new and replacement OWTS from public supply wells and surface water intakes. We find that the LAMP conforms with Policy prohibitions and setbacks. LAMP Section 5, *Prohibitions*, pages 44 through 45, addresses OWTS Policy §9.4.

FINDINGS AND CONCLUSIONS

Except for the notification requirements for failing OWTS, we find that the subject LAMP appears to meet minimum standards in key portions of the OWTS Policy.

If you would like to schedule a teleconference or meeting to discuss Alameda County's LAMP, please contact either me, or Eric Rapport, our Regional OWTS Policy Implementation Program Lead.



March 13, 2018

Tentative Schedule for BOS Meetings and Adoption

Date TBD	BOS T&P Meeting
March 13, 2018	Start of Regional Water Board 30 Day Public Comment Period
March 27, 2018	BOS Regular Mtg, 1 st Ordinance Reading
March 29, 2018	OWTS Commission Mtg, CV Library
April 16, 2018	End of Regional Water Board 30 Day Public Comment Period
April 17, 2018	BOS Regular Mtg, 2 nd Ordinance Reading and Adoption
May 17, 2018	LAMP Effective Date
Date TBD	BOS T&P Meeting

Connie De Grange Report on the Sunol Septic Work Group meeting of March 13, 2018:

The Sunol Septic Work Group met March 13. The workgroup had not met since Summer 2017 because of the need to apply resources to the LAMP and illnesses.

The County's consultant reviewed the fecal coliform results from the water samples collected from Sinbad Creek by two independent groups. The Alameda Creek Alliance collected 6 samples. The sample collected in Pleasanton Ridge Park, upstream of Kilcare Woods indicated about 60 MPN/100 ml fecal coliform. The results show increasing contamination as the creek flows to the end of Kilcare Road where the fecal coliform results were about 460 MPN/100/ml. Questa Engineering's 11 samples were collected on a different date and ranged from about 50 MPN/100ml fecal coliform above Kilcare Woods to about 550 MNP/ml fecal coliform near the base of Kilcare Road. Alameda County noted that this level of contamination means that Lower Sinbad Creek is considered an impaired waterway.

The County's consultant is beginning Phase I of the Feasibility Study. They need some homeowners to volunteer to participate in the study and allow their septic system to be reviewed so that the study can include planning-level cost estimates of future septic maintenance. Phase I of the Feasibility Study will also include cost estimates of different community systems. The Feasibility Study will give the community of Sunol the information to decide whether or not to pursue a community solution to septic systems in Sunol.

There was very good news, the Alameda County LAMP was accepted by the Regional Water Quality Control Boards with one change: the 5-year self-reporting questionnaire for standard OWTS will be mandatory rather than voluntary. The public comment period for the LAMP ends April 16, 2018. After the various Board of Supervisor meetings, the LAMP will become effective on May 16, 2018. With the approved LAMP, more septic systems will now be allowed closer to water sources under stringent regulations and at a high cost where in the past such systems would not be allowed.

The next meeting of the Sunol Septic Work Group will be on April 10th. At that meeting Questa Engineering will discuss the scope of work and schedule for Phase 1 of the Feasibility Study. This first phase was paid for by the Sunol Improvement Fund and Alameda County.