

Main issues in Sonoma OWTS Manual

- ❖ Continue the “best practical” standard (Class II OWTS) for replacement systems, per the current Manual (September 2016); this is crucial for the many small and/or steep lots along the Russian River. Possibly define “practical” by reference to a cost cap, such as 20% of residence fair market value or the present value of the monthly sewer charges that connected homeowners pay.
- ❖ Treat properly-functioning non-conforming systems the same as permitted non-conforming systems; PRMD admits that its permit records are incomplete.
- ❖ Adopt a practical, defined procedure to verify that an existing system is functioning properly, such as a hydraulic test. Do not use the “Finding Report” required for new construction. The verification procedure should be:
 - consistent with the procedure which the TMDL will require every five years
 - performable by a licensed septic contractor (engineer not required)
- ❖ Hardship permit (based on low income) should not prohibit building permit; being poor doesn’t mean that you don’t need a building permit.
- ❖ De minimis work on building perimeter (e.g., less than 5-10%) should be treated the same as an interior remodel (i.e., no OWTS review except absence of cesspool/current system failure).
- ❖ New systems and replacement systems using standard technology should be designable by a septic-licensed contractor, as has been Sonoma County practice for decades; the demand for design services is about to be multiplied many times by the TMDL, and requiring engineers for standard systems will cause a huge logjam.
- ❖ Continue the administrative variance procedure for defined minor variances, per the current Manual; the burdens on PRMD are about to be multiplied many times by the TMDL
- ❖ Manual should be operationally consistent with TMDL; APMP Area covers most of Sonoma County. Revisions to current Manual should not be made before the Regional Water Board adopts a TMDL action plan.
- ❖ Manual should be open to alternative and experimental systems which are accepted in other jurisdictions, particularly for difficult lots, unless PRMD specifically finds them to impose an unreasonable risk to public sanitation.
- ❖ Sonoma County must designate a local agency to administer loans under the Clean Water State Revolving Fund, and, with Board of Supervisors assistance, establish funding of loans for Russian River OTWS in the State Water Board’s 2019-20 intended use plan. (The 2018-19 intended use plan has \$0 for OWTS upgrades.)
- ❖ If the State Water Board is unwilling to grant Sonoma County a six-month extension for submission of the LAMP, direct PRMD to submit the version adopted by PRMD in September 2016 (a compilation of existing practices) as an interim LAMP.
- ❖ PRMD should clarify what will happen with the 16 existing variance prohibition areas once a revised Manual and/or the TMDL are adopted.
- ❖ The revised Manual must be the subject of widely-announced public workshops and public comments before adoption, and must be approved by the Board of Supervisors.