

COUNTY OF MENDOCINO
LOCAL AGENCY MANAGEMENT PLAN (LAMP)

PART 3

3.2 Local Agency Monitoring and Reporting Responsibilities

Annual Report. Mendocino County shall submit a report to the Regional Water Quality Control Board (RWQCB) that includes the following information:

- Permitting actions such as installations, replacements, repairs, and waivers.
- Complaints received and associated investigation outcomes
- Septage pumping applications received and permits issued
- Water quality assessment data

3.2.1 LAMP General Requirements

The Mendocino County LAMP applies to OWTS producing flows of less than ten thousand (10,000) gallons per day. If the proposed flow is greater than ten thousand (10,000) gallons per day or the project involves high strength waste the method of treatment and disposal shall be approved by the NCRQWCB. All existing mobile home parks will require approval by the NCRWCB. The County reserves the right to accept projects on a case by case basis while working with the NCRWQCB.

3.2.2 Permit and/or Inspection Requirements

Installation permits records are maintained in address file copies as well as the Environmental Health Access Database. Operational Permits for alternative treatment systems are also maintaining within the Environmental Health Access Database as well as complaints. Permit information can be accessed and available to the RWQCB within 10 working days upon written request.

3.2.3 Water Quality Assessment Program

The purpose of this LAMP is to establish standard and policies for the installation, operation, and maintenance of OWTS in order to protect water quality and public health. The water quality monitoring element is intended to track the impact of OWTS effluent on ground water and surface water as well as the effectiveness of the LAMP in addressing those impacts over time. The County will use data from available sources consistent with LAMP Section 9.2.3 to asses groundwater quality.

In addition to the water systems operated by the cities and special districts, there are a number of smaller public and semi-public water systems operating in Mendocino County. Most of these smaller systems utilize groundwater exclusively and all are required to perform routine water quality monitoring as a

conditions of their Domestic Water Supply Permits. The Division of Environmental Health proposes to utilize this data to measure OWTS impacts on ground water.

3.2.4 Reporting to Regional Water Board/State Water Board

An annual report summarizing all installations, repairs, complaints, and alternative systems monitoring shall be supplied to the RWQCB no later than February 1 of each year. In addition to the annual reporting every fifth year an evaluation of the monitoring program shall be submitted to the RWQCB due no later than February 1. Groundwater or surface water data collected shall be uploaded to the Geotracker, DEDEN, and SWAMP databases.

3.3 Site Evaluation, Design, Construction, and Monitoring

3.3.1 Qualified Professional Requirements. Site evaluations in accordance with this policy shall be performed by individuals who by virtue of their education, training, and experience, are qualified to examine and assess soil, geologic, and hydrologic properties as related to subsurface effluent disposal. Credentials required of such individuals shall include as a minimum, education, training, and license as geologist, soil scientist, registered civil engineer, or registered environmental health specialist.

3.3.2 OWTS Site Evaluation

9.1.1 All designs for new sewage disposal systems require a site evaluation conducted by a qualified site evaluator. It is the intent of each site evaluation to consider site specific soil application rates in the most appropriate soil horizons. Evaluators are required to demonstrate the best available evidence of the highest anticipated groundwater at each site. This may include but is not limited to the presence of soil mottling and or direct observations. Mendocino County has required setbacks to water wells as well as surface waters and potential geotechnical situations. In addition to the stringent requirements of all site evaluations Mendocino County Environmental Health staff review each submittal carefully and may at times confer with the site evaluator to address any concerns that may arise from design proposal. If staff is not confident that the design is protective enough the site evaluation may be revised until adequate protections are in place. All of these requirements are in place to prevent groundwater pollution and protect public health.

9.1.2 High quality waters or other environmental conditions. The Minimum Lot Size in Mendocino County requires in Inland Areas a minimum of 40,000 square feet (a Mendocino Acre) to develop a sewage disposal system with an on-site well. Inland Areas are currently only allowed two residential units per parcel. Coastal areas are prohibited from have second residences on any parcel. The average rainfall for the county is 40 inches a year. Per Table 1 of section 7.8 on the State OWTS Policy development should not exceed half and acre per residential unit which is on par with the county's' lot size requirements.

Existing geographic areas with existing higher densities that predate current code requirements are considered as Tier 0 until a failure is documented. Upon documentation of failure the system will then be repaired per the requirement stated in Tier 2 of this LAMP. These systems will be mapped and reported to the State in the county's annual report.

- 9.1.3** Shallow soils requiring a dispersal system installation that is closer to ground surface than is standard. Mendocino County has managed a program for non-standard designs under the regional board for over two decades very successfully. Alternative methods of sewage disposal have been developed to overcome specific constraints imposed by soils, groundwater or other conditions, which would otherwise preclude the installation or proper functioning of a conventional sewage disposal system. Mendocino County Code Section Sec. 16.08.020 - Regulation of Installation or Alteration of Sewage Systems. Mendocino County OWTS Technical Standards requires a qualified professional perform site evaluations. If shallow soils are found an alternative sewage treatment system (ASTS) shall be designed and installed in accordance with Mendocino County OWTS Technical Standards. Mendocino County OWTS Technical Standards require conventional systems to have a minimum of 12" of soil cover which may be acceptable fill material. If unable to provide a minimum of 12" of soil cover over conventional dispersal system due to shallow soil depth and still provide 36" minimum suitable soil below trench bottom, an alternative sewage treatment system is required.
- 9.1.4** High domestic well usage area. Mendocino County staff currently GPS all new well location sites and will continue to do so. If a pattern of areas with high domestic well usage develops, consideration will be given to further study these areas relative to areas identified as having a high incidence of sewage dispersal system failure or potential for soft failures with pathogen transport toward receptor wells.
- 9.1.5** Fractured bedrock. Mendocino County requires a qualified professional perform site evaluations. If shallow soils are found due to fractured bedrock, an alternative sewage Treatment system (Non-Standard) shall be designed and installed in accordance with Mendocino County requirements. A minimum of 2 feet of acceptable soil between the dispersal area and the fractured bedrock is required for the design of any Non-Standard Septic Design. Specific non-standard designs with advanced treatment (mound, aerobic treatment, etc.) are suitable for sites with only 2 feet of soil between the dispersal area and the limiting condition.
- 9.1.6** Poorly drained soils. Mendocino County requires a qualified professional perform site evaluations. If poorly drained soil is identified, limiting the amount of acceptable soil, an alternative sewage dispersal system (Non-Standard) shall be designed and installed in accordance with Mendocino County standards. A minimum of 2 feet of acceptable soil above the poorly

drained soils is required for the design of any non-standard septic system. Specific non-standard designs with advanced treatment (mound, aerobic treatment unit, etc) are suitable on sites with only 2 feet of soil. Other options for improving drainage may be identified during the site evaluation. An example would be the requirement to construct an interceptor drain if located on a sloping site.

- 9.1.7** Vulnerable surface water. Mendocino County Code requires a 200 foot setback to any water supply watershed reservoir. Code will be modified to require a 400 foot setback if the disposal system is located less than 1200 feet to a public water system intake line. The areas around our surface water supplies are sparsely populated except where public sewer is available. We will need to adopt portions of the Basin Plan into this section.
- 9.1.8** Impaired water bodies. The Russian River has a draft TMDL and is expected to be subject to Tier 3 requirements upon adoption.
- 9.1.9** High OWTS density areas. Nitrate has not been identified as a chronic issue in any area of Mendocino County. Should monitoring results (see comprehensive monitoring plan in section (9.3.2) or data analysis show a concerning trend over the next five years for nitrate contamination this LAMP will be reevaluated and updated as needed to consider nitrogen loading per area. Mendocino County include the requirement for total and fecal coliform testing as well as nitrate testing whenever a yield test is required for new development.
- 9.1.10** Limits to Parcel Size. Per Mendocino County Code Sec. 16.08.060 -Minimum Lot Area; No on-site sewage system shall be installed or approved unless it complies with the following minimum lot size requirements:
 - (A) Where a water supply and distribution system and sanitary sewer system are provided, the lot area shall be not less than six thousand (6,000) square feet, and the lot width shall be not less than sixty (60) feet in width on the building line or less than eighty (80) feet in depth.
 - (B) Where a water supply and distribution system is provided, the lot area shall not be less than twelve thousand (12,000) square feet, and the lot width shall be not less than eighty (80) feet.
 - (C) Where neither a water supply and distribution system nor a sanitary sewer system is provided, the lot area shall be not less than forty thousand (40,000) square feet, and the lot width shall be not less than one hundred (100) feet.
 - (D) For lots which are to be used for commercial or industrial purposes or where there are unusual topographical or other special conditions, the Health Department may grant exceptions to this provision.
 - (E) Each and every lot or parcel of a subdivision approved based upon the use of an alternative sewage system shall be a minimum of forty thousand

(40,000) square feet net. Systems proposed for lots less than eighty thousand (80,000) square feet net may be required to complete a cumulative impact survey prior to approval of the subdivision.

In addition to the Minimum Lot size Code all new site evaluations for sewage disposal systems are required to account for an area for 100% replacement of the current level of use on that parcel.

9.1.11 Areas with OWTS that predate adopted standards are dispersed throughout the County. Existing conditions are allowed to continue as is under Tier 0 until or unless a failure is identified. These failures will be captured in a data base and in the future mapped to a GIS layer. If a particular area with OWTS that predate adopted standards is identified during the 5 years between LAMP assessment reports as being one with a significantly higher number of failures, the LAMP will be updated as needed to address and include special considerations for continued protection of groundwater and the environment.

9.1.12 Areas with OWTS either within prescriptive, Tier 1 setbacks, or within setbacks that a Local Agency finds appropriate. There are no areas in Mendocino County with known multiple, higher density developments with existing OWTS that are within the prescriptive setbacks set forth in Tier 1. Those that may exist are limited and dispersed throughout the County with no known concentrations of systems of this type.

9.2 SITING DESIGN AND CONSTRUCTION REQUIREMENTS

The Mendocino County LAMP shall cover the following types of Onsite Wastewater Treatment Systems (OWTS): domestic residential and commercial wastewater systems producing flows of 10,000 gallons-per-day or less. The LAMP shall provide regulations and guidelines for the local site evaluation conducted by a qualified professional, siting, design, construction monitoring and maintenance requirements (see Mendocino County OWTS technical standards). It additionally covers each of the following:

9.2.1 Installation and inspection permits. The LAMP provides requirements for OWTS inspection, monitoring, maintenance, and repairs, including procedures to ensure that replacements or repairs to failing systems are done under permit from Mendocino County Environmental Health Division (see Chapter 13.32 of County Code related to repairs and variances). Refer additionally to Mendocino County OWTS technical document. All new installations require a plan review, installation permit and construction inspections. Additionally all new Non-Standard sewage disposal systems require semi-annual operating permits and routine inspections by either County staff and/or a service provider. A standard operation and maintenance manual (O&M) will be provided by the County for conventional sewage disposal systems. All Non-Standard systems will have an O&M manual prepared by the design professional.

- 9.2.2** The NCRWQCB and the State Water Resources Control Board (SWRCB) have a draft to the Water Quality Control Plan (Basin Plan) for the North Coast Region to establish a Russian River Watershed Pathogen Total Maximum Daily Load (TMDL) and Implementation plan. The draft TMDL proposes to designate Mendocino County, specifically the Division of Environmental Health as the responsible party for implementing actions related to OWTS and may require a plan and implementation schedule be submitted to the NCRWQCB. Existing, new and replacement OWTS near the Russian River will be addressed with the implementation of this TMDL. The draft TMDL report data indicated that failing OWTS may be contributing to creek contamination therefore Mendocino County proposes: All parcels with septic systems bordering the main stream Russian River, Commisky Creek, Dry Creek, Feliz Creek, Forsythe Creek, Pieta Creek, York Creek, and Mill Creek are flagged in the Divisions current septic permit tracking system as being adjacent to an impaired water body. This will trigger extra diligence from County staff in reviewing and septic system related permit or inquiry. Should any parcel near the impaired creeks be identified as having a failing septic system, the County will expeditiously use all tools at its disposal to immediately remedy the situation.
- 9.2.3** The LAMP recognizes that not all new, replacement, or repair OWTS will be able to meet minimum required setbacks, soil depth, groundwater separation, and/or additional minimum requirements and has therefore provided for a variance section to address such circumstances. Variances will not be permitted for cesspools or seepage pits of any kind or size or for new, replacement, or repair. The variance process will not authorize any of the prohibited items in Section 9.4 of the Policy.
- 9.2.4** The LAMP provides educational, training, certification, and/or licensing requirements that will be required of OWTS Service Providers, Site Evaluators, Installers, Maintenance Contractors, and any other person relating to OWTS.
- 9.2.5** The LAMP provides a plan for an education and outreach program including informational materials to inform OWTS owners about how to locate, operate, and maintain their OWTS. Additionally see section 9.2.2 above. Property owners are further advised to visit Mendocino County's Public Website (<http://www.co.mendocino.ca.us/hhsa/chs/eh/landuse.htm>) as well as the State Water Board website for publications (e.g. Basin Plan prohibitions) regarding OWTS restrictions within its jurisdiction. Regarding education related to ongoing operation and maintenance, alternative OWTS designers must provide the homeowner with an operation and maintenance manual specific to the type of system installed. Verification of delivery of a copy of the operation and maintenance manual must be documented. The County will retain a copy of the operations manual for future replacement needs. The operation manual

shall cite homeowner or Service Provider procedures to ensure maintenance, repair, or replacement of critical items within 48 hours following failure.

9.2.6 There are currently three septage receiving facilities within Mendocino County. The City of Willits Waste Treatment facility, the H-H septage site in Point Arena, and the Tunzi Ranch in Comptche. Future septage treatment sites are of interest and benefit to the county.

The Division of Environmental Health maintains records and permits of septage haulers operating in this county. See Mendocino County Code Chapter 9.12 Regulation of Sewage and Septage Pumpers for the detailed requirements. All pumpers must submit quarterly reports of their monthly pumping and dumping locations to the division. DEH also conducts annual inspections of all vehicles hauling sewage in the county. DEH will continue to maintain the records in our current database and conduct inspections.

9.2.7 Presently there are no onsite wastewater maintenance districts in Mendocino County and currently none are under consideration. Mendocino County Code Sec. 16.08.070 prohibits the development of subdivisions using Innovative Sewage Systems. Mendocino County Code sections 16.12 & 16.16 prohibit any development utilizing onsite septic with the Ukiah and Meadowbrook Manor Sanitation Districts and can be connected to an existing public sewer system. County Code further restricts the creation of small lot subdivisions (by minimum parcel size requirements) which geographically restricts the possibilities for an onsite wastewater maintenance district. Should a proposal be submitted in the future for any onsite wastewater maintenance district and/or community type wastewater solution in a particular area, feasibility studies would have to include, as project alternatives, consideration of such formation in accordance within the provisions of Health and Safety Code.

9.2.8 Mendocino County does not anticipate developing or implementing a Regional Salt and Nutrient Management Plan. Mendocino County will consider collaborating with regional efforts on a plan if asked to participate in the future.

9.2.9 The County will work with the Resource Conservation District, which conducts watershed activities in the area, to determine if their activities identify any septic system issues near local water ways or issues specifically pertaining to the draft Russian River TMDL.

9.2.10 The LAMP includes procedures for evaluating the proximity of public sewer systems to new or replacement OWTS installations (See County Code Sections 16.12-16.16). Currently sewer district boundaries are mapped and if a property is close to a boundary, staff will consult with the district prior to issuance of any permits. Parcels within designated service areas will not be issued a permit until or unless the district issues a waiver based on specific conditions (see County Code Chapter 13.20).

9.2.11 The County will notify the owner of a public water system/NCRWQCB prior to issuing an installation permit for any new, replacement, or repair OWTS in such cases that the OWTS is; within 1200 feet of an intake point for a surface water treatment plant for drinking water, is in the drainage area catchment in which the intake point is located, and is located such that it may impact water quality at the intake point such as upstream of the intake point for a flowing water body, or if the OWTS is within a horizontal sanitary setback from a public well. Mendocino County staff will record GPS data for such systems.

9.2.12 The LAMP outlines policies and procedures to be followed when a proposed OWTS dispersal area is within the horizontal sanitary setback of a public well or a surface water intake point. These policies and procedures establish best available technology and siting practices which shall mitigate the potential adverse impact to the public water source (County Code section 13.28.040 and 13.32.050).

New or replacement OWTS shall meet a minimum horizontal setback of 150 feet from a public water well where the depth of the effluent dispersal system does not exceed 10 feet in depth. Mendocino County does not allow any OWTS with effluent dispersal deeper than 10 feet.

For replacement OWTS that do not meet the above horizontal separation requirements, the replacement OWTS shall meet the horizontal separation to the greatest extent practicable. In such case, the replacement OWTS shall utilize supplemental treatment and other mitigation measures, unless the permitting authority finds that there is no indication that the previous system is 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

For new OWTS, installed on parcels of record existing at the time of the effective date of this Policy that cannot meet the 150 horizontal setback to a public water supply, the OWTS shall meet the horizontal separation to the greatest extent practicable and shall utilize supplemental treatment which may include disinfection for pathogens and other mitigation measures as described in the LAMP and County Code Chapter 13.32.

9.2.13 Cesspools are not permitted in Mendocino County and any Cesspool discovered shall be properly abandoned and a repair or replacement system installed as soon as practicable.

9.3 MANAGEMENT RESPONSIBILITIES FOR LAMP

9.3.1 Records Maintenance

9.3.2 Water Quality Assessment

Inspection data. All ASTS systems are inspected by either a service provider, fore department, or County staff. Information from the inspections is maintained the Environmental Health Access Database as well as the State CERS database. Should a site fail an inspection the site will be identified in the annual report.

Complaints. All complaints are currently logged into the Environmental Health Access Database. As a part of the LAMP all complaints will be reported to the RWQCB in the annual reports. Upon receipt of a complaint in investigation will be conducted and a permit may be issued for a repair or replacement.

Failures. There are several ways in which a failure is identified. Property owners may hire a contractor to or site evaluator to works with the county on a repair. In other cases failures may be identified as a result a complaint received. All repair permits issued will be maintained in the Environmental Health Access Database as well as associated complaints.

Monitoring Well Sampling. There is currently no County sampling of monitoring wells in addition to those required by the RWQCB. There are currently no plans to conduct County sampling of monitoring wells. All sampling reports are available on the States Geotracker site.

State Small Water Systems. Currently the County performs the inspections of all State Small Water Systems. A quarterly water sample is taken at each inspection for total fecal coliform as well as E.coli. The other quarter sampling results are also reviewed during each inspection. When a sample is positive for either Environmental Health log the violation and include this information in the annual report.

State Maintained Databases. The RWQCB has stated that they will make available additional datasets that the State maintains. This will include the GAMA and Drinking Water Program databases in addition to Geotracker. The County will utilize this additional information as needed.

Domestic Well Sampling including new well development. Currently domestic well sampling occurs during the subdivision process or when new water source is added to a State Small Water System. There is current legislation that may require additional testing that will be incorporated into the County LAMP.

Real estate transactions. No information is captured at this time and there are no plans to require this in the future.

Ocean Beach Monitoring. The County currently performs Ocean Beach Monitoring from April 1st to October 31st. The data collected from this program will be submitted in the annual report as well as utilized in the five year assessments.

In the future it is the intention of the County to maintain a GIS layer for LAMP Monitoring program with in a data management program. No such program currently exists, but as the technologies become available GIS layers for all permits issued and sampling data will be utilized.

9.3.3 Annual Reporting Process

An annual report shall be submitted to the NCRWQCB no later than February 1st of each year. This report will summarize the following items:

1. All housing, water, or septic complaints Environmental Health received with locations and status.
2. Applications and permits issued to Septage Pumping operators.
3. New and Replacement Permits issued by location and status.
4. All Variance and or Repairs Shall be identified with location and justification.
5. Water Quality Assessment Program data shall be submitted annually.

The five year water quality assessment report. Every 5 years the annual report will be accompanied by water quality assessment evaluation report that summarizes the information and findings. The report will provide an analysis of any evidence of water quality impacts from OWTS as well as any appropriate changes to the LAMP developed to address the identified impacts.

The RWQCB is expecting to issue a guidance document o how this information should be gathered and organized for submittal. Upon receipt of this guidance document all pertinent requirement will be incorporated into this section of the LAMP. The being said it is understood that any water quality data generated or collected by the County from monitoring activities will be submitted in a an electronic data format as requires.

9.4 Prohibitions

- 9.4.1** Projected flows greater than 10,000. The Mendocino County LAMP applies to OWTS producing flows of less than ten thousand (10,000) gallons per day. If the proposed flow is greater than ten thousand (10,000) gallons per day or the project involves high strength waste the method of treatment and disposal

shall be approved by the NCRQWCB. All mobile home parks will come under the jurisdiction of the NCRWCB. The County reserves the right to accept projects on a case by case basis while working with the NCRWQCB.

- 9.4.2** Cesspools. Cesspools are not permitted for new construction in Mendocino County. Any Cesspool discovered shall be properly abandoned and a repair or replacement system installed as soon as practicable.
- 9.4.3** Pit Privies. Pit Privies are not permitted for new construction in Mendocino County. Any Pit Privies discovered shall be properly abandoned and a repair or replacement system installed as soon as practicable.
- 9.4.4** Holding Tanks. The use of holding tanks shall be prohibited except where the County determines that:
1. It is necessary to abate an existing nuisance or health hazard; or
 2. The proposed use is within a sewer service area, sewers are under construction or contracts have been awarded and completion is expected within two years, there is capacity at the wastewater treatment plant and the sewer agency will assume responsibility for maintenance of the tanks; or
 3. It is for use at a campground or similar temporary public facility where a permanent sewage disposal system is not necessary or feasible and maintenance is performed by a public agency.
- 9.4.5** OWTS with surface discharge. Mendocino County will NOT allow any surface discharge of sanitary wastewater. All proposed surface disposal of sanitary effluent shall be under the jurisdiction of the NCRWQCB.
- 9.4.6** Supplemental treatment without Monitoring and Inspection is not allowed. All systems with supplemental treatment (Non-Standard) require annual permitting and monitoring as well as inspection by either a service provider or County or both (Mendocino County Code Sec. 16.08.090).
- 9.4.7** Significant Waste from R.V. Holding Tanks. Mendocino County defines domestic wastewater to include only incidental RV holding tank dumping but does not include wastewater consisting of a significant portion of RV holding tank wastewater such as a RV dump station.
- 9.4.8** Installations near existing sewers. For any property where the installation of a new, expanded or replacement OWTS is proposed, Mendocino County Code Section 16.12 and 16.16 require connection to a public sewer when the nearest building proposed on any lot or parcel is no more than 200' from a public sewer and will not require the installation of a pump station which is not maintained by the sewer district. Upon the creation of new State permitted sanitation districts it is assumed that any development within 200' of the district will require connection to that sanitation district.

- 9.4.9** Supplemental Treatment, New OWTS That Do Not Meet Minimum Setback Requirements. For new OWTS on parcels created prior to the effective date of the LAMP that are unable to meet the horizontal setback requirements of 9.4.10.1- 9.4.10.5, the new dispersal field shall meet the setback requirements to the greatest extent practicable. Per County Code Chapter 13.32, an alternative sewage treatment system with supplemental treatment shall be required and shall be sited to meet the required setback to the maximum extent possible. Supplemental treatment with disinfection may be required when deemed necessary by the administrative authority for protection of the water supply. In no case shall a new sewage system that is a result of new construction be installed any closer than 100 feet to a public water supply well or public surface water intake point.
- 9.4.10** The replacement dispersal field shall meet the setback requirements to the greatest extent practicable as set forth in County Code Chapter 13.32 and shall incorporate supplemental treatment and other measures, as appropriate, unless there is no evidence of an existing or potential threat of impact to the public water source by the OWTS based on topography, soil depth and composition, and ground water conditions. When the established horizontal setbacks cannot be met, in no case shall a repair sewage system be installed any closer than the existing system to a public water supply well or public surface water intake point.
- 9.4.10** Minimum setbacks identified in 9.4.10 (9.4.10.1-9.4.10.5 and County Code Table 13.28.040) shall be maintained unless authorized through the repair/variance process (9.4.11, 9.4.12 and Mendocino County Code Chapter 13.32).
- 9.4.11** Sizing reduction and decreased leaching area for International Association of Plumbing and Mechanical Officials (IAPMO) certified dispersal systems using a multiplier less than 0.70 not allowed. (Mendocino County OWTS Technical Standards).
- 9.4.12** Installations on slopes greater than 30% are prohibited without a registered professional's report or approval from the Division of Environmental Health (Mendocino County OWTS Technical Standards).

9.5 Technical Support of LAMP. The LAMP including all technical documents includes adequate detail, to support how all the criteria in this local program work to protect water quality and public health.

9.6 The NCRWQCB will consider past performance of local programs to protect water quality based on reviews of annual status and evaluation reports. Should deficiencies be identified, the County and the NCRWQCB will work together to make programmatic improvements.