

4/23/25 Stakeholders Meeting Notes

- Digitization:
 - The county will primarily be using a combination of email and Bluebeam to process SERs until our infrastructure is build up.
 - No printing off SERs to give to clients; copies will instead be emailed directly to the owners/agents/contractors.
 - We are working to secure contracts with Toshiba to scan our files, starting with Fort Bragg.
- Certificates of Completion
 - From now on, please call Environmental Health first before doing the certification of completion yourself.
 - Environmental Health will respond within 24 hours to try and schedule a time to come out and perform a certificate of completion.
- Russian River pathogen TMDL
 - Recommended to go and comment before its finalization.
- Assessment of Old Undocumented Existing Systems
 - What triggers the bedroom addition policy?
 - There is a high burden if an existing, unmodified room is determined to be a bedroom by Environmental Health during a review.
 - The Flowchart is good; the text should be made more explicit to help reflect the flowchart.
 - Focus on the element of expanding/increasing the wastewater flow over the element of “remodeling” in the text.
 - It needs to be clear what is being modified/added in the floor plans.
 - The previous version of the policy stated that old, unknown septic systems needed to match basin plan standards, while the current version states that they need to meet the LAMP standards.
 - This is felt to be unreasonable, as it doesn’t match the old policy and goes back to the issue of increased burden.
 - There should be a distinction between old unused-and-undocumented systems and old used-but-undocumented systems.
 - I.e., a separate policy that applies to systems that are discovered, but that were never attached to a house.
- Issuance of Permits for Guest Cottages and Bedroom Additions.

- Acknowledge the historical purpose of the policy in the text.
- Clarify what is meant by “reasonable capacity”
- State whether the replacement area needs to be explicitly designed or simply identified.
 - Is the intent of the policy that the replacement field is to be used immediately after the initial field fails, or is there an allowance for repairs to the initial field?
 - Should the replacement area be designed to repair standards or LAMP standards?
- There should be an explicit definition of the minimum requirements for replacement design, in general.
 - Currently, there is too much variation between policies.
- Miscellaneous
 - The community has asked for a guide for locating information and resources for projects.
 - Where to go for various kinds of information, who to talk to, et cetera.
 - A checklist for what needs to be done to have the information necessary to move forwards with a project.
 - There is a desire for a policy regarding tiny mobile homes, RVs, camper trailers, et cetera.
 - Extends to FCUs that are based in such structures.
- Bedroom Definition Policy
 - The main changes included language specifying the need to label features of rooms in the building plans, as well as the addition of a room being unconditioned as a condition for not being counted as a bedroom.
 - Included the definition of conditioned vs unconditioned rooms.
 - There is a desire to explicitly codify the allowance of inspector discretion in declaring what constitutes a bedroom.
 - Allow for considerations of size, livability, septic system design, et cetera.
 - Basically, they want more flexibility so that rooms they feel aren’t bedrooms can be counted as such, rather than requiring specific features to be excluded.
 - Legislating for the potential future uses of bedrooms is difficult.
 - Desire to remove the square footage stipulation, or to limit its usage to cases where no information on the historical number of bedrooms in a property is available.
- Expirations for Site Evaluation Reports

- What design trends are being excluded by the update?
 - Old systems that are applied to undeveloped lots.
 - Does it apply to systems that received prior approval?
- Suggestions:
 - Do not apply to projects in progress.
 - If archival records state that there were 24 inches, perform a new site evaluation to confirm this.
- At the site evaluators meeting in 2021, it was stated by the DEH that it was OK if a system had less than 24 inches if it got as close to code as possible.
 - Not the case under the updated policy.
- The new policy renders many properties unbuildable, even if they were previously approved.
 - Disincentivizes designing septic systems for lot splits.
 - Maybe it would be best if there were not strict septic system requirements unless the lot will be developed in the near future?
- The state has won a lawsuit regarding this topic, so it is unlikely that they would back down or change course.
- Groundwater drains installed in bedrock are assumed to be functional for reducing groundwater to below the 24" requirement.
 - Alternatively, they can be tested for a year to prove that they achieve the minimum required depth of soil.
- Questions of whether the state would offer an amnesty period for systems in development at the time of this policy being announced and it going into effect.
 - Unlikely.
- The "Wiggle Room" Is that French drains/curtain drains are assumed to still work if designed correctly, lowering the water level to below 24"
- The Plan Going Forwards
 - The 24" minimum soil depth policy will go into effect on May 1st.
 - The remaining 3 policies will be returned to in the Fall for further inspection and review.