

## Department of Health and Human Services, Division of Environmental Health Comments on General Plan Ch 11 Water Resources Element

**POLICY WR-P6.** Subdivisions Water Supply. Any subdivision of land approval shall be conditioned to require evidence of sufficient water supply during normal and multiple-dry years drought conditions to meet the projected demand associated with the proposed subdivision. Sufficient water supply shall include the requirements of the proposed subdivision and existing and planned future uses. Written service letters from a public water system written in conformance with this policy is sufficient evidence. Subdivisions to be served through on-site water supplies or private water systems must provide evidence of sufficient water supply to the County Department of Environmental Health.

Recommend: County Department of Health and Human Services, Division of Environmental Health to replace the highlighted portion (above).

**WR-Px4. Well Permit Applications.** Information regarding the historic uses of the project site and contiguous lands and a map showing known contaminated sites within 500 feet of the property based on data available from the SWRCB Geotracker or successor website shall be included as part of well permit applications, as well as evidence of compliance with State water rights law. (Alternative A Policy)

This Policy refers to applications for water well permits which the Department of Health & Human Services, Division of Environmental Health (DHHS DEH) issues. DHHS DEH supports compliance with state water rights. The proposed policy would increase the amount of information the public would be required to submit to the Department. It is unclear which entity would be the enforcement agency. DHHS DEH is unfamiliar with practices and approvals to verify water rights compliance. The policy would impact the county's existing Well Ordinance, application procedure, and would result in increased permit costs.

**WR-Px6. Greywater and Alternative Disposal Systems.** Support programs and ordinance revisions that modify the permit process for greywater and other alternative disposal systems to make such systems more accessible to individual households. (Alternative

The Department of Health and Human Services, Division of Environmental Health supports the the Policy regarding graywater.

The Department agrees that "Alternative Disposal System" should be defined in the GPU. It is currently not in the Glossary.

If "alternative disposal system" refers to composting, the Department supports this in concept. If the policy is implemented as stated, the Department has concerns for promoting composting as a common practice to treat human waste. The Department cautions that the science and operation behind composting human waste is complex and can lead to far-reaching public health risks.