

October 7, 2015

California Regional Water Quality Control Board – North Coast
Attn: Charles Reed
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403



RE: Draft Action Plan – Russian River Watershed – Proposed Total Maximum Daily Load

Dear Mr. Reed,

The enclosed correspondence is sent on behalf of Northwood Property Homeowners Association (NPOA), a non-profit association, which comprises members whose residences are located near or beside the Russian River near the Monte Rio area. Specifically, these residences surround the Northwood Golf Course along Highway 116, west of Guerneville, CA.

Our concern is the underlying rationale and supporting criteria to justify the implementation of the proposed TMDL for the Russian River watershed, as well as the proposed tiered solutions, "Options 1 - 3" as part of the its approach to achieve the standards and principles of the Board's overall Basin Plan. It's presumed that the categories of Options, and their related stipulations, are to remedy impacted areas of the river and are directly related to the descriptions of a either "high or low" level of impacts for pathogens, or other impacts, to the Russian river. However, we understand that the main stem of the River running through this local area does not exceed the EPA criteria for pathogens, or indicates the OWTS systems for this local area is creating any pathogen, e-coli, or related problems for the river.

The vast majority of residences within the Northwood area were constructed during the 70's and 80's and were required to have permitted and inspected OTWS systems at finished construction. Currently, any failures to these residential systems already would implement present County rules and regulations to upgrade or repair these systems. Thus, this particular residential area would be the least likely to be a contributor for any pathogens, e-coli, or other related impacts to the river and urge the Board to consider that the Northwood area specifically be designated as a "low Impact" area. Also, that this area be subject to Option #3 and that the LAMP program, however defined in the future, is the appropriate designation for this residential area.

We understand the Water Boards concerns, and as well as the thorny issues presented as part of your designated duties to ensure water quality objectives are met as part of the Basin Plan and to keep the Russian River healthy and vibrant. We also urge the Board to be considerate of the impacts presented to residents of the North Coast in order to meet those water objectives and to tailor and design those regulatory requirements to be "fit for purpose" and present pragmatic and reasonable solutions for the implementation of your dedicated efforts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Candace Healy', written over the printed name.

President
Northwood Property Owners Association
PO Box 512
Monte Rio, CA 95462

Cc: Efren Carillo, Supervisor 5th District, Sonoma County