North Coast And Regional Water Quality Control Board

October 6, 2015

5550 Skyline Boulevard, Suite A

Santa Rosa, California 95403

Regarding: Russian River Watershed Pathogen Indicator Bacteria TMDL Action Plan

Public Comment Submittal

Dear Board Members,

I want to applaud the huge undertaking this study represents...the technical staff time required, the field testing conducted, the consultant time needed and all other incidental supporting staff efforts made given the magnitude and the complexity of the subject matter placed before them.

I'll present my thoughts, hopefully sequentially, in a manner that simplifies their consideration.

What is the stream's edge-of-water from which the 600 feet is measured?

This question was raised in Monte Rio outreach meeting. It is a question that applies to all affected water courses, not just the Russian River. Should it be the stream's edge while the stream is at a particular unspecified in the Action Plan flood stage or during its June flow level? My suggestion is that it should be the edge-of-water during the January to May period while the water is flowing relatively clear, silt free not during or within a few days following a storm. The water could be called "fishable" clear. Yes, it is subjective...but it is easily understood. Any differences of opinion as to what is "relatively clear" should only amount to a few vertical feet in the Russian River and a few horizontal feet in creeks. Yes, it requires a little field time be spent and an edge of water judgment be made during creek related site reviews. The River's edge for the purposes of the Action Plan could be established by the Water Agency in Sonoma County.

Minimum Requirements For OWTS Inspections - 9.2.7.3 item 4 Tank Leakage Test

This section speaks to information that should be gathered about each septic tank.

If the septic tank is located within the distribution field or between the distribution field and the nearby stream this program could assume that the tank leaks and it simply, in effect, should be considered to be part of the distribution field. Why test it? It will cost at least two hours of a professional's time to ascertain if there is "leakage". If the test results (How many gallons per 24 hours constitutes too much

leakage?) are to enable the owner to be better informed as to whether or not to replace the tank, does that replacement decision require knowledge of "any" leakage or would a visual inspection of the tank's interior wall condition after being pumped suffice?

In the event the septic tank lies further from the stream than the distribution field does, from the perspective of possible stream contamination, the most significant feature at issue remains to be the distribution field ...whether or not it has "failed". What if the septic tank is 50 feet away from the distribution field, on the opposite side the distribution field from where the stream lies? Is it really necessary for the homeowner to pay the professional to conduct the leakage test when a replacement decision could easily be made based on a visual inspection? Again, if the leakage information is not needed to make a replacement decision why should the testing expense be required of the owner?

Small Seasonal Drainage Courses That Flow Into The Action Plan Listed Impacted Creeks

Pathogen indicator bacteria testing was conducted in numerous creeks tributary to the Russian River. The testing showed that some creeks contained evidence of human waste contributions. Small side streams, small minor tributaries, that flow only seasonally (3 to 6 months of the year) may be a contributing factor as well. In the event the testing that showed human contamination was conducted during the wintertime while small, seasonal side streams were flowing, then properties along the side streams should be reviewed as a part of this Plan also. If the contamination is a wintertime event then properties along those wintertime side streams should be included in the study area as well. Or, the small seasonal side streams could be individually tested to demonstrate they are not a contributing factor to the main creek's human sourced contamination. If found to be contaminant free they would be exempted from individual site review and monitoring.

The Municipal Sewerage Collection Trunk Lines Installed Within 600 Feet of Impacted Streams

Conducting leakage tests on collection lines would provide more useable information than testing individual tanks would. Public agencies who have wastewater collection pipeline facilities buried within 600 feet of impacted streams should be required to conduct "leakage tests". Collection lines are enveloped in a very porous bedding material. The porous material conveys leaked wastewater along outside the pipe in the same way an OWTS's distribution field is designed to do. The decision to whether or not to slip line pipes leaking near streams could then be made.

What if a large collection trunk was installed near impacted stream, possibly even crossed under the stream, and was found to be a "leaking", most especially during the winter months...possibly even flowing under surcharged conditions? How should this repair be prioritized in relation to conducting septic tank systems reviews along the impacted stream? What agency coordinates the prioritization?

Are the agencies operating/owning such facilities subject to similar review and action timelines that the Action Plan places on septic system owners?

Should the agencies have an TMDL Action Plan imposed timelines to guide their LAMPs?

Phased Implementation Of Septic Tank Reviews Along Creeks

Can the LAMP residential onsite wastewater treatment system reviews along a creek be phased to enhance LAMP's effectiveness? For example, could Mark West Creek and Santa Rosa Creek be segmented lengthwise and site review work begun at the most upstream segment first? This principle would be applicable to any of the water courses listed in the Action Plan. First, test below the uppermost segment. If the water is not contaminated, move down to the next segment. Test above and below it for the presence of human contamination. If it is contaminated, conduct the on-site reviews; make whenever professionally recommended changes are in order; and retest the creek segment. Once the contamination has successfully been removed then move downstream to the next segment. If the segment remains contaminated continue with more investigations and corrective measures until the contaminants are no longer evident via testing. Continue so forth down the stream. This way the public's resources would be focused on contaminated segments first and in doing so not cause properties which are not contributing to the problem unnecessary expense.

Thank you for considering these ideas while preparing the Action Plan's final draft.

Sincerely,

David Wallace

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