

NCRWQCB

October 5, 2015

North Coast Regional Water Quality Control Board  
Attn: Charles Reed  
sent via FAX 523-0135

OCT 6 - 2015

Dear Mr. Reed:

|                                  |                                   |                                |
|----------------------------------|-----------------------------------|--------------------------------|
| <input type="checkbox"/> EO      | <input type="checkbox"/> WMgmt    | <input type="checkbox"/> Admin |
| <input type="checkbox"/> AEO     | <input type="checkbox"/> Timber   | <input type="checkbox"/> Legal |
| <input type="checkbox"/> Reg/NPS | <input type="checkbox"/> Cleanups | <input type="checkbox"/> Date  |

Subject: Proposed Basin Plan Amendment for the Russian River Watershed Pathogen Indicator Bacteria  
Total Maximum Daily Load

I am a property owner (resident) of property potentially located in a high priority area for onsite wastewater disposal systems as designated in the proposed Basin Plan amendment.

The options proposed for existing onsite wastewater disposal systems in the Basin Plan amendment are unnecessarily burdensome, poorly substantiated by the study and not a cost effective solution for reduction of bacterial load on the Russian River from onsite septic systems.

The TMDL study did not adequately identify bacterial pollution from properly functioning septic systems versus failing or inadequately constructed septic systems. It is inappropriate to propose a broad - brush condemnation of all septic systems in the high priority areas when a significant number of the systems are modern, fully functioning systems. There should be a detailed examination of which septic systems are contributing to the bacterial pollution of the river and your efforts should be focused onto those systems.

In addition, there needs to be adequate financial support in the form of grants, tax credits and government support to individual property owners for the three options proposed. The outline of funding sources in the document is vague. Most funding sources mentioned in the staff report are only available to public entities and most are in the form of loans. Property owners in the lower river area cannot afford to pay back loans for the extremely expensive septic system upgrades that are proposed. We need to have a program that allows individual property owners to obtain direct financial support (not in the form of a loan) for septic system upgrades. Without this, there will be severe financial hardships that will result in difficulties in compliance with the standards.

Additionally, a tiered approach to septic system compliance as outlined in the AB885 statewide standards for septic systems is a more reasonable solution and will mitigate unnecessary financial impacts to owners of compliant septic systems.

Overall, it appears that there is a rush to adopt and implement a plan that has potentially severe ramifications, and which may not lead to the desired outcome. Please consider removing the TMDL from the November meeting calendar and engage further with the communities and the County to develop a TMDL that we all can support. I look forward to seeing a reasonable, effective and affordable plan for reduction of pathogens in the Russian River.

Signed:

*Madeline Good*  
DUNCANS MILLS