

From: [Sarah Yardley](#)
To: [Reed, Charles@Waterboards](mailto:Reed.Charles@Waterboards)
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Subject: 10-8-2015 2036897 SARAH YARDLEY, FORESTVILLE
Date: Thursday, October 08, 2015 11:27:44 AM

Dear Mr. Reed,

The Regional Water Quality Control Board has published a draft TMDL for pathogens in the Russian River. Comments are being accepted through October 8, 2015. As a resident of the Hacienda neighborhood in Forestville and as a concerned citizen, I support the comments submitted by the Hacienda Improvement Association, the OWTS Residents of the Russian River Committee, Bart Deamer, Rich Holmer, and the County of Sonoma.

Residents of the High Priority Areas view Option 3, regulation under Local Agency Management Programs (LAMPs), as having the potential to allow creation of site-specific, data-responsive, incremental and flexible solutions to preventing pathogens from on-site wastewater treatment systems (OWTS) reaching the Russian River. Regional Board staff has encouraged this expectation in private and public meetings. However, the draft TMDL Option 3 text is not reassuring. The text states only that "the LAMP could include standards and requirements that differ from the requirements in Option 1." Please consider adding words such as "site-specific, data-responsive, incremental and flexible" to the description of Option 3.

Further, the draft TMDL states, "Local agencies are required to submit their LAMPs for approval to the Regional Water Board no later than May 13, 2016." This deadline does not provide time for a realistic schedule. The Regional Board has expressed an expectation that, in Sonoma County, the Permit and Resource Management Department (PRMD) will serve as the Local Agency responsible for developing a LAMP for the Russian River watershed area. However, the County of Sonoma states in its comments on the TMDL, "The County will not commit to pursuing Option 3 at this time..." This is a reasonable stance for the County to take, given the uncertainties and staggering costs associated with implementation of a LAMP for High Priority Areas. If the County eventually determines that it will not undertake preparation and implementation of a LAMP for the High Priority Areas, will these areas have lost Option 3? What is the reason for requiring LAMPs be completed in such a short time? How is it reasonable that citizens who are without existing agencies specific to their communities could comply with this deadline? Why is the time for developing a LAMP so much shorter than for selecting Option 1 or 2?

River residents and County staff have reviewed the draft TMDL and supporting documents. Comments have been submitted in sincerity. Please consider the comments carefully and take the time, in collaboration with citizens and the Counties, to develop an implementation plan that will lead in a cost-effective way to achieve river water that meets scientific standards for human pathogen concentrations.

Thank you,
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