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To: [NorthCoast](#); [Reed, Charles@Waterboards](#)
Cc: [Smith, Preston](#)
Subject: 10-8-2015 2036510 PRESTON SMITH, RESIDENT
Date: Thursday, October 08, 2015 4:50:41 PM
Attachments: [TMDL-Basin Plan Comments-10-8-2015.pdf](#)

Mr. Reed:

Thank you for taking the time to hold the public hearings to inform us about the TMDL Study and the Draft Basin Plan Amendment.

Please see attached for my suggested change to your Draft Basin Plan Amendment dated August 31, 2015.

If your true purpose is to assure the highest water quality in the Russian River and want it to occur as quickly as possible, then I believe your goal will be best served by implementing my suggested changes. My changes will allow existing property owners to immediately implement upgrades to their existing septic systems without fear of additional, and very expensive, "Supplemental Treatment" components being required of them at a later date.

My changes simply allow a property owner, who can meet the minimum standards established by the County of Sonoma, for a "Class-I" septic system to be exempt from installing the "Supplemental Treatment" component to their system. If the property owner has, or can develop a "Class-I" system on their site, then they have accomplished what you are looking for, i.e. proper and sanitary disposal of wastewater that will not leach waste into the Russian River. Unfortunately, there may only be a handful of properties in the lower Russian River area that will be able to meet the "Class-I" standards but for those that can, they should not be penalized with an excessive mandate to install "Supplemental Treatment" that is not required anywhere else in the State. Feel free to add language requiring inspections every 5 years to make sure everything is working properly. You could even add language that would require the property owner to sign an agreement that, should their system not pass future inspections they would either add the "Supplemental Treatment" or connect to a sewer system if one is available.

If you do not implement my suggested changes, or some similar language exempting those who can meet the "Class-I" requirements from Option 1, I am sure that County of Sonoma, under any LAMP program, will require installation of "Supplemental Treatment" on ALL septic systems just to make sure they are in compliance with your Basin Plan. This would be grossly unfair to those who can meet the standards for a "Class-I" system.

Thank you for your consideration of my suggestion.

Preston Smith

Senior Managing Director

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