

October 8, 2015

Charles Reed

California Regional Water Quality Control Board

North Coast Region

5550 Skyland Blvd, Suite A

Santa Rosa, California 95403

NCRWQCB

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<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"/> Other

Subject: Comments on the Draft Russian River TMDL

Dear Mr. Reed:

Monte Rio Area

As a resident of Monte Rio, recently attending the Russian River Watershed Pathogen Indicator Bacteria TMDL Action Plan Public Workshop in Monte Rio, my understanding was that of bewilderment, confusion, and frankly a lot of bureaucratic jumble of papers and unanswered questions. We were given a two week window to comment on the Draft Staff Report for the Action Plan which I find it difficult to comment since most of what was being said didn't make any sense and a lot of questions from the audience were not answered. There was lots of confusion such as, where exactly does the beginning of the 600' from the River start, middle of the River, edge of the River, during high water or low water episodes? Is there strong evidence that septic tanks in Monte Rio are causing any high counts of bacteria? Is it a blanket statement that all of Monte Rio and all of the septic tanks are causing pollution to the River? Personally, I believe the River needs to be looked at holistically and not piecemealed out in sections to various State, County and Federal Agencies. Not dealing with the River from beginning to end overlooks the major problems that will eventual lead to the Rivers demise, such as low flow, toxins from agriculture, homeless encampment, upstream sewage plants, and the selling off of its water for unchecked development.

Reading over the Options:

Option : 1 Quoting from the Board of Supervisors letter, dated October 8, 2015 in the Sonoma County Supervisors agenda packet to you: "Option 1 appears to assume all OWTS are sources of pathogens without data to support that assumption and without regard to the OWTS type, age, soils or distance to a surface water. Regional Board staff have acknowledged in meetings with County staff that an adequate soil profile will remove pathogens. We believe this should be reflected in all options, including this one. We also suggest that further research may uncover that many OWTS categorically are not of concern and can thus be eliminated from the Implementation Plan, making compliance more feasible." I personal fought for the defeated of the Monte Rio Sewer Project which the County put together and find it very ironic that the County is using the same arguments with CRWQCB that we anti-sewer people questioned the County about but were rebuffed. Thank you county for finally coming around!

Option:2 Connection to a Centralized Wastewater Collection and Treatment System. We've gone down that road already and wasted a lot of time and money with Questa Engineers and County Officials. I'm sure a financial analysis to either connect to Guerneville (for which I would be opposed) or private cluster systems would also be a financial burden on those living in Monte Rio.

Option:3 The Regional Water Board and the County are trying to pass the buck not wanting to be the responsible party to identify and evaluate existing OWTS that are out of compliance. The County doesn't want to have anything to do with this part of Option 3 and states, "pursuant to OWTS Policy 4.7, which requires Regional Water Boards to undertake all enforcement with respect to existing OWTS within their region." LAMP sounds like a new way to **force** property owners living in a high priority area into a new tier of management which is just adding on another bureaucratic layer along with more of a financial burden.

I received an e-mail from Todd Thompson of the State Water Board regarding questions about AB885 in 2005 and would like to know if what he said about local control still exist :

--- On Wed, 8/10/05, Todd Thompson <

> wrote:

From: Todd Thompson <
Subject: Re: AB885 and Sonoma County Officials "Scare Tactics"
To:
Date: Wednesday, August 10, 2005, 4:51 PM

Dear Mrs. Atkinson,

The current draft regulations for onsite wastewater treatment systems (OWTS) propose both of the approaches you discuss in your letter.

It allows repairs of existing OWTS in any manner that is allowed locally so long as it solves the wastewater problem as a result of the failure. It does not require existing systems to meet new standards and does not require adequately functioning systems to meet new standards just because it doesn't match the new regulations.

However, the legislation requires the State Water Board to address water bodies impaired by OWTS - our role is to protect State waters. As such, the draft regulations do prescribe achievable treatment standards for properties within 600 feet of a water body designated as impaired from OWTS operation. This is an issue since the Russian River in your area is currently listed as impaired from Fife Creek down to Dutch Bill Creek. **However, local and regional governments can create a lesser or greater distance as deemed appropriate.** As written in the current draft, all new (new structures) OWTS would have to meet the performance requirements by 2007 and existing OWTS would have to meet the standards by 2009.

Please feel free to email or phone me if there are any questions.

Thank You,

Todd Thompson

As Todd Thompson stated in the above e-mail, "local and regional governments can create a lesser or greater distance as deemed appropriate." there should be wiggle room for both the County and CRWQCB to work without the threat of adding another layer of "local government/LAMP" or threats of loss of property. Monte Rio is an unincorporated part of Sonoma County, our local governance is the County and the PRMD should be the agency in the County that would identify and require repairs on septic systems that are not working properly. LAMP is not needed!

End of comments.

Sincerely,

Doreen and Bill Atkinson

A handwritten signature in cursive script that reads "Doreen & Bill Atkinson". The signature is written in dark ink and is positioned below the typed names.