

From: [Butkus, Steve@Waterboards](mailto:Butkus.Steve@Waterboards.ca.gov)
To: [Reed, Charles@Waterboards](mailto:Reed.Charles@Waterboards.ca.gov); [Mangelsdorf, Alydda@Waterboards](mailto:Mangelsdorf.Alydda@Waterboards.ca.gov)
Cc: [Butkus, Steve@Waterboards](mailto:Butkus.Steve@Waterboards.ca.gov)
Subject: 10-9-2015 2037116 DENNIS O RORKE, MONTE RIO
Date: Friday, October 09, 2015 5:21:11 PM

From: Dennis O'Rorke [daororke@aol.com]
Sent: Friday, October 09, 2015 5:04 PM
To: Butkus, Steve@Waterboards
Subject: Official Comment TMDL

October 5, 2015

North Coast Regional Water Quality Control Board

Attn: Charles Reed

sent via email

northcoast@waterboards.ca.gov

Dear Mr. Reed:

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

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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.

Dennis O'Rorke
20580 River Blvd.
Monte Rio