

From: [Tom Wackerman](#)
To: [NorthCoast](#)
Subject: 10-6-2015 2035445 TOM WACKERMAN, VILLA GRANDE
Date: Tuesday, October 06, 2015 5:09:06 PM

TO: North Coast Regional Water Quality Control Board
ATTN: Charles Reed

Dear Mr. Reed,

I am the owner of a small, vacation cabin in Villa Grande, which appears to be 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. In 2013 I replaced my septic system with a new Class III septic system (Permit #SEP10-0017) which was approved by the Sonoma County Permit and Resource Management Department. 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 such as mine are modern, fully functioning systems.

Your proposals would create severe financial hardships on property owners, many of whom may not be contributing to the bacterial pollution of the river. There certainly will be difficulties in compliance with the standards. A tiered approach to septic system compliance as outlined in the AB885 statewide standards for septic systems may be a more reasonable solution and might mitigate unnecessary financial impacts to owners of compliant septic systems.

It appears that there is a rush to adopt and implement a plan that would have 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 would have broader support. I look forward to seeing a reasonable, effective and affordable plan for reduction of pathogens in the Russian River.

Sincerely,

Tom Wackerman