



**One mountain, one river, one community.  
Serving Fitch Mountain since 1979**

May 22, 2018

Good morning,

My name is Dave Henderson. I am the Chair of the Wastewater Systems Committee of the Fitch Mountain Association, a group that since 1979 has represented the interests of this unincorporated area's approximately 340 homes between the city of Healdsburg and the Russian River. Our committee has been working for 5 years now with the goal of ensuring mitigation of any impairment of the Russian river in a manner that will be fair and equitable for our property-owners, as well as for those in the general area of the middle reach of the river. Other members of our committee, and of our community, are here in the audience, and I would ask then to stand.

We feel that the draft County LAMP and OWTS Manual which PRMD has submitted for this meeting [note: the latest draft is actually dated April 27] is needlessly draconian in many of its provisions for property-owners. Many of the lots on the slopes of Fitch Mountain and generally along the river are quite small and many are very steep, which presents site challenges for cesspool replacements and improved or new septic systems. We have continually asked for regulation options that can bring significant improvements, are sympathetic to such space-challenged lots, and that encourage adoption of various types of multi-lot, shared OWTS. We do not yet find such measures in the current LAMP version.

Further, the provisions for waivers for those with irremediable sites are excessively complex, involving processing by both the Water Board and PRMD. We urge review and mitigation of these unreasonable provisions.

We urge you, then, to extend the effective deadline for the County OWTS Manual so that its revision and final approval can proceed more in tandem with the Water Board's TMDL Action Plan and in order to provide PRMD with time for more open, public, and considered consultation than has hitherto been the rule.

And finally, funding. The Fitch Mountain area is not technically a financially-disadvantaged community, and therefore we are not eligible for currently-approved programs of grant-type financial assistance to that type of community. However, we have a significant number of residents with low and fixed incomes, who simply cannot afford conversions and upgrades. This Board, in its September 29, 2017 comments to the Regional Water Board stated: "(...) it will be critical (...) that support be provided for individual homeowners and/or communities for construction. The County of Sonoma

is concerned that solutions may become out of reach financially. This could impede implementation as well as make it difficult for homeowners to remain in their communities. As such, Sonoma County strongly recommends that **grants be available** for construction of appropriate solutions.”

**We applaud that commitment, and we urge the Board to ensure that such grants are in place and available to individual property-owners in communities such as ours before any of the provisions of the TMDL Action Plan or the LAMP Manual take effect.** Anything less will cause significant hardship to many members of our community.

Thank you.

Dave Henderson

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