



City of Watsonville Comment Letter -Statewide Bacteria Objectives –Scoping Comments

The City of Watsonville appreciates the opportunity to comment on the Statewide Bacteria Objectives.

Element 1: The City supports Option 3- Use only E. coli as an indicator organism

Element 2: The City supports Option 1 –No action – If the State Water Board does not take action, Regional Water Boards will continue to specify water quality objectives for bacteria in their basin plans.

Regional Water Boards need to have the flexibility to adopt criteria based on relevant sources of information such as seasonal dynamics of the water body, site specificity, local knowledge of beneficial uses, and weight of evidence supported public health risk levels.

Element 3: The City supports Option 2 - Allow reference system/antidegradation or natural sources exclusion approaches.

This amendment is particularly pertinent to wetland ecosystems with large, seasonal avian populations. In the document “Development of Regional Nutrient Criteria (1998)” EPA developed technical guidance manuals for four types of waters: lakes and reservoirs, rivers and streams, estuaries and coastal waters, and wetlands. It seems logical and reasonable that bacterial water quality objectives and sampling methodologies would also discriminate between these four types of receiving waters.

Element 4: The City supports Option 2 - Allow high flow suspension of objectives for engineered and non-engineered channels and would like to offer an amendment.

The City would like to propose the suspension include high water flows and flooding events. While wetlands typically do not experience the high flow velocities present in rivers, seasonal flooding of wetlands often creates natural conditions when the current bacterial objectives are temporarily unattainable.

Element 5: The City supports Option1. - No action – This option would result in compliance schedules and interim requirements being established by Regional Water Board permit writers in accordance with the Compliance Schedule Policy (Resolution No. 2008-0025)

Element 6: The City supports Option1. No action – Allow Regional Water Boards to specify the permit limits based on CDPH guidelines for total coliform.

Element 7: The City supports Option 1. – No action – With no statewide policy, existing Regional Water Board policies and procedures will apply.

Element 8: The City supports Option 3. – Specify the appropriate averaging period. Potentially using a minimum number of samples over a maximum period of time.

Element 9: The City supports Option 1. – No action – Currently none of the Regional Water Boards have specific requirements for bacteria monitoring in their basin plans. Monitoring frequency could continue to be specified by their permit requirements

Element 10: The City supports Option2. - Specify analytical methods for receiving waters and various effluents. The statewide plan would list methods that are acceptable for measuring bacteria concentrations. To accommodate subsequently developed methods or a change in methods based on new information, the State Water Board would require an amendment to the statewide plans. The possible analytical methods that could be considered are:

- a) U.S. EPA approved methods
- b) Rapid Indicators, quantitative polymerase chain reaction (qPCR) on a site specific basis using U.S. EPA method 1611.

A requirement to utilize an approved standard method when monitoring effluents or ambient waters for bacterial contamination would ensure comparability amongst monitoring data sets.

Element 11: The City strongly supports Option 3 Allow the use of a variance, seasonal suspension or Limited REC 1

The City of Watsonville is located next to ~800 acres of wetlands. These shallow waters have limited public access and provide little opportunity for contact recreation. Located on the Pacific Flyway, they provide vital habitat for large numbers of migrating and resident waterfowl. They frequently exhibit natural, non-anthropogenic spikes in bacteria levels, often in excess of current Rec standards. Option 3 would provide Regional Water Boards with the flexibility to develop bacterial objectives that do not identify Mother Nature as non-compliant.

Sincerely,

Robert Ketley

Senior Utilities Engineer