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October 19, 2012

Richard Booth  
Chief, TMDL/Basin Planning Unit  
Lahontan Regional Water Quality Control Board  
2501 Lake Tahoe Blvd.  
South lake Tahoe, CA 96150

Dear Mr. Booth:

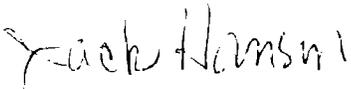
I appreciate the opportunity to share comments on the Triennial Review of the Lahontan Basin Plan particularly the topic of water quality objectives for bacteria. An appropriate and effective water quality standard should adequately protect resources and alleviate risks to human health, provide a viable objective for land use management activities, be clearly linked to beneficial uses of the water, and be scientifically defensible. In this context, Lahontan's current bacteria standard of 20 cfu/100 mL falls short. The standard is far lower than needed to protect beneficial uses, it has been demonstrated by research and monitoring to be unachievable in a number of watersheds, and appears in practicality to be nearly unenforceable in many situations.

I ask that you use the Triennial Review process to shift to either the former EPA standard of 200 cfu/100 mL or the EPA recommended standard for E.coli. The EPA based standards would be more appropriate and would also make Lahontan more consistent with the neighboring Central Valley Region. It seems, for example, difficult to justify why Lassen County waters flowing into the Honey Lake Basin should be held to a 10X more restrictive standard than water flowing into the Feather River or Pit River systems. Or for that matter, why local water bodies which predominantly do not have high contact recreation or municipal uses should be held to a far more stringent bacteria standard than waters that feed directly into the state's largest municipal water districts. Furthermore, while I sincerely appreciate the on-going local collaborations with Lahontan staff, and we take pride in the proactive efforts of the agricultural community to adopt management measures to improve water quality, the current bacteria standard does not itself provide an incentive for good stewardship and/or the further adoption of best management practices, as even waters far upstream of livestock grazing and/or agricultural systems have been shown to commonly exceed 20 cfu/100mL.

Given the lengthy consideration of the bacteria standard and the energy and expense of much data gathering to date, I would also urge the Board to simply adopt a single region-wide standard for agricultural and grazing lands in Lahontan's jurisdiction and to move forward in the most expedient time-frame allowable. Of the three options proposed by staff, Option 2 would appear to provide the simplest and quickest remedy. The current Triennial Review process provides an opportune time to change the bacteria standard and continue forward with effective management of the Region's water resources.

Thank you again, for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Jack Hanson". The signature is written in a cursive style with a large initial "J".

Jack Hanson  
District 5 Supervisor