



Keeping Northwest California wild since 1977

Sent to katharine.carter@waterboards.ca.gov on date shown below

April 18th, 2014

Katharine Carter
North Coast Regional Water Quality Control Board
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403

Re: EPIC Comments regarding the Public Review Draft—Staff Report for the 2012 Integrated Report for Clean Water Act Sections 305(b) and 303(d) and Staff Recommendations

Dear Ms. Carter and Water Board Officials:

The Environmental Protection Information Center (EPIC) presents the following comments regarding the Public Review Draft of the Staff Report for the 2012 Integrated Report for the Clean Water Act sections 305(b) and 303(d). EPIC appreciates the opportunity to provide comments on this report.

Comments provided herein are narrowly focused on the proposed new 303(d) listings of North Coast watersheds for bacteria, most notably *E-coli*.

Summary

EPIC supports Regional Board staff s' proposal to list numerous North Coast streams as impaired due to bacteria. The existence of these impairments is of serious concern to EPIC and its membership, many of whom live, work, and recreate on the North Coast and utilize North Coast streams for recreational purposes. The dangers to humans from excessive amounts of *E-coli* are well-documented and well-understood. EPIC therefore encourages the Regional Board to act to list the proposed streams as impaired under Section 303(d) of the federal Clean Water Act.

Who We Are

EPIC is a non-profit community-based and membership-driven environmental advocacy non-profit. EPIC works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in Northern California. EPIC uses an integrated, science-based approach, combining

public education, citizen advocacy, and strategic litigation. Consistent with our mission, EPIC advocates for clean water and healthy streams throughout Northern California.

Listing under Section 303(d) for Bacteria Will Benefit EPIC Members and Water Quality

EPIC is a membership-based organization, with members strewn through the North Coast, across the country, and indeed, even across the globe. The majority of our members live, work, and recreate on the North Coast. Waters of the North Coast are a major source of recreation for our membership. Such recreational activities include fishing, boating and kayaking, swimming, and other direct surface-water contact activities.

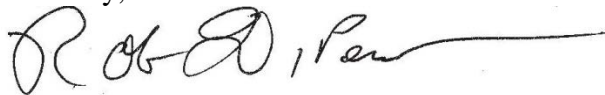
The available evidence present in the report and in the Humboldt Baykeeper's 9-year monitoring study suggests that many North Coast streams warrant listing as impaired due to *E-coli* as a result of excessive amounts of this bacteria being detected and documented. Listing the streams recommended under Section 303(d) of the Clean Water Act will benefit both EPIC membership, and the quality and beneficial uses of water generally.

Conclusion

EPIC supports the listing of the North Coast streams under Section 303(d) as proposed by Regional Board staff due to bacteria, most notably *E-coli*. Once again, we appreciate the opportunity to comment and engage the Regional Board on this important matter.

Please do not hesitate to contact me at the number provided below if there are any questions or if there is a desire to discuss this or any other matter of mutual interest.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob DiPerna", with a long horizontal flourish extending to the right.

Rob DiPerna
California Forest and Wildlife Advocate

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