

**From:** [Bart Deamer](#)  
**To:** [Butkus, Steve@Waterboards](#)  
**Cc:** [Mangelsdorf, Alydda@Waterboards](#); [Reed, Charles@Waterboards](#)  
**Subject:** 9-15-2015 2028430 BART DEAMER, NORTHWOOD 9-15-2015  
**Date:** Tuesday, September 15, 2015 11:03:47 PM  
**Attachments:** [Enterococci Data for Evidence fo Impairment Monte Rio.xlsx](#)

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Steve-

I'm responding to you, per Alydda's suggestion in her email below. (Alydda-many thanks for your prompt response and the spreadsheet of raw data you sent.)

As to enterococcus, I'm naturally focusing on Monte Rio Beach. I therefore deleted other sites from the raw data schedule and analyzed the Monte Rio Beach data only. The attached spreadsheet analysis raises the following questions:

- there appear to be 36 30-day sampling periods at Monte Rio Beach, rather than 46 as stated in the Board's summary schedule.
- there appear to be only 12 30-day sampling periods in which at least 5 samples were taken, the minimum for geomean and STV evaluation, and hence for determining "impaired" status.
- of these 12 sampling periods, only two show exceedances. (These two periods show exceedances of both geomean and STV.) The Board's listing criteria call for listing a site with 12 sampling periods only if five or more periods show exceedances, or **more than twice** the actual number.
- even if all 36 sampling periods are taken into consideration, the number of sampling periods with exceedances is only 5, which is less than the Board's listing criteria for 36 samples—6 exceedance periods.
- the staff's statement in the draft TMDL that there were 9 exceedances at Monte Rio Beach is based on double-counting the four periods in which both the geomean and STV were exceeded. This double-counting is misleading—a high-enterococcus period in the river is one period of excess enterococcus, not two. And in any case, only sampling periods in which at least 5 samples were taken are meaningful for geomean or STV evaluation and determining impaired status.

The bottom line is that the raw data indicates that the Russian River is **not** impaired for enterococcus at Monte Rio Beach.

I look forward to your comments and thoughts.

Regards,  
Bart

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**From:** Mangelsdorf, Alydda@Waterboards [mailto:Alydda.Mangelsdorf@waterboards.ca.gov]  
**Sent:** Tuesday, September 8, 2015 10:47 AM

**To:** Bart Deamer <bart@thedeamers.com>

**Cc:** Reed, Charles@Waterboards <Charles.Reed@waterboards.ca.gov>; Butkus, Steve@Waterboards <Steve.Butkus@waterboards.ca.gov>

**Subject:** Response to comments on Russian River Pathogen TMDL

Mr. Deamer,

My name is Alydda Mangelsdorf. I supervise the Planning Unit here at the North Coast Regional Water Quality Control Board. As of January 1, 2015, the Planning Unit now includes the TMDL development team, as well as basin planners. As such, I have been involved in the development of the Russian River Pathogen TMDL and Action Plan, helping Charles Reed, Steve Butkus, and others complete the draft TMDL so as to put it out for public review. On August 26 and again on September 2, 2015 you sent our office a series of emails regarding the draft TMDL that was posted on our website on August 21. We are grateful for your early engagement in the public review process and value your input. However, please understand that because your emails seeking information regarding the draft TMDL were received after the beginning of the official public comment period, your questions and our responses are now part of the public record. It is our policy to respond to all public comments received on items that will come before the Regional Water Board in a written response to comment document that is released to the public after the close of the comment period and prior to the Board hearing. We feel this is the best way to hear and fairly consider *all* public input on this matter and provide thoughtful and comprehensive responses. You are welcome to submit additional comments, as necessary, prior to the end of the comment period.

We currently are engaged in preparing for a series of public meetings scheduled for September 22, 23 and 24. The public meetings are intended to provide an opportunity for people to learn about the full scope of the draft TMDL and Action Plan and ask clarifying questions, like the ones you raise in your emails. We encourage you to attend one of the scheduled meetings. The times and locations are posted on our website.

In your August 26<sup>th</sup> email you specifically asked for some data, to aid in your review. Please find attached an excel spreadsheet that shows the enterococci bacteria concentration data and the geomean and STV calculation results that have been collected in the Russian River Watershed. We assessed the data using the U.S. EPA (2012) recreational criteria for 32 illnesses/1000 recreators:

Enterococci Bacteria Numeric Targets:

≤ 30 cfu/100 mL as a geometric mean

≤ 110 cfu/100 mL as a statistical threshold value

The Scientific Peer Review Staff Report (now posted on the Regional Water Board website [http://www.swrcb.ca.gov/northcoast/water\\_issues/programs/tmdls/russian\\_river/](http://www.swrcb.ca.gov/northcoast/water_issues/programs/tmdls/russian_river/)) did not include an assessment of enterococci bacteria concentrations even though we (and others) had collected the measurements. In response to peer review comments from Dr. Nicholas Ashbolt, staff included enterococci monitoring data as evidence of impairment and established an enterococci bacteria numeric target for the draft TMDL.

If you have any questions about the attached data spreadsheet, please feel free to contact Steve Butkus. Charles Reed, the project manager, is responsible for compiling all public comments. As such, any other questions and comments on this project should be directed to him.

Thanks again for your interest in this work.

Best wishes,  
Alydda Mangelsdorf

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