



FORT BRAGG MUNICIPAL IMPROVEMENT DISTRICT NO. 1

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April 8, 2019

Cathleen Goodwin
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

The Fort Bragg Municipal Improvement District appreciates the opportunity to respond to the draft permit.

1. The District is concerned about the use of the Colony Forming Units (CFU) method for counting Enterococci instead of Most Probable Number (MPN). The District Laboratory is not able to complete the CFU method nor is Alpha Analytical Laboratories in Ukiah. Would it be possible to use the MPN method in this situation?
2. Is it possible to test for E coli instead of fecal coliforms? The Environmental Protection Agency provides the following from their website:

Fecal coliforms, a subset of total coliform bacteria, are more fecal-specific in origin. However, even this group contains a genus, *Klebsiella*, with species that are not necessarily fecal in origin. *Klebsiella* are commonly associated with textile and pulp and paper mill wastes. Therefore, if these sources discharge to your stream, you might wish to consider monitoring more fecal and human-specific bacteria. For recreational waters, this group was the primary bacteria indicator until relatively recently, when EPA began recommending *E. coli* and enterococci as better indicators of health risk from water contact. Fecal coliforms are still being used in many states as the indicator bacteria.

E. coli is a species of fecal coliform bacteria that is specific to fecal material from humans and other warm-blooded animals. EPA recommends *E. coli* as the best indicator of health risk from water contact in recreational waters; some states have changed their water quality standards and are monitoring accordingly.

3. Attachment F on page F5 describes the current and future disinfection system as utilizing gaseous chlorine and sulfur dioxide. In December of 2015, the District completed installation of equipment to begin use of sodium hypochlorite to chlorinate treatment plant effluent and sodium bisulfite for dechlorination.

Best Regards,

A handwritten signature in blue ink, appearing to read 'John Smith', is written over the typed name and title.

John Smith
Assistant Director of Public Works