



August 30, 2010

Jeffery Shu  
State Water Resources Control Board  
Division of Water Quality  
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**Subject: Submission for the 2012 303(d) data solicitation**

Dear Mr. Shu,

Humboldt Baykeeper is pleased to submit to the State Water Resources Control Board these data and recommendations regarding the 303(d) List. The following pages outline our recommendations and rationale for the listing of several water bodies for impairments on the 303(d) List.

Humboldt Baykeeper's Citizen Monitoring Program has collected water quality data from sites throughout the Humboldt Bay, Mad River, and Little River watersheds since 2005. In 2005, 10 sites were sampled, and we have increased our monitoring to 35 sites within 15 waterbodies over the past 4 years. Our monitoring efforts are annual Dry Weather and First Flush paired samples. Numerous waterbodies in the Humboldt Bay, Mad River, and Little River watersheds have quite high levels of fecal coliform (*E. coli*), particularly after major rain events.

High fecal coliform levels have resulted in posted closures of several local beaches by the Ocean Monitoring Program of the Humboldt County Division of Environmental Health (<http://co.humboldt.ca.us/hhs/phb/environmentalhealth/oceanmonitoringprogram/>). These beaches include Moonstone Beach County Park (at the outlet of Little River), and Mad River Mouth North (at the outlet of Widow White Creek and Mad River). The County has sampled ocean waters since 2003, and has documented exceedances of fecal coliform and/or *Enterococcus* at both Moonstone Beach County Park and Mad River Mouth North (Humboldt County's data archive is available at <http://co.humboldt.ca.us/hhs/phb/environmentalhealth/oceanmonitoringprogram/waterqualitytestresults-archive.asp>). Moonstone Beach County Park is on the 303(d) list for indicator bacteria, but Humboldt Baykeeper's Citizen Monitoring Program is the only source of water quality data upstream from these beaches where water pollution due to indicator bacteria is of concern.

Countless staff and volunteer hours have been spent collecting this water quality data for over 5 years. We sincerely hope that the NCRWQCB considers these data and recommendations with care.

## **Water Quality Criteria for Listing Recommendations**

According to the Water Quality Control Plan for the North Coast Region (January 2007), the water quality objectives for bacteria are as follows:

The bacteriological quality of waters of the North Coast Region shall not be degraded beyond natural background levels. In no case shall coliform concentrations in waters of the North Coast Region exceed the following: In waters designated for contact recreation (REC-1), the median fecal coliform concentration based on a minimum of not less than five samples for any 30-day period shall not exceed 50/100 ml, nor shall more than ten percent of total samples during any 30-day period exceed 400/100 ml (State Department of Health Services).

According to Title 17 of the California Code of Regulations, 7958. Bacteriological Standards.

(a) The minimum protective bacteriological standards for waters adjacent to public beaches and public water-contact sports areas shall be as follows:

(1) Based on a single sample, the density of bacteria in water from each sampling station at a public beach or public water contact sports area shall not exceed:

- (A) 1,000 total coliform bacteria per 100 milliliters, if the ratio of fecal/total coliform bacteria exceeds 0.1; or
- (B) 10,000 total coliform bacteria per 100 milliliters; or
- (C) 400 fecal coliform bacteria per 100 milliliters; or
- (D) 104 enterococcus bacteria per 100 milliliters.

## **Recommendations**

**Widow White Creek** (tributary of Mad River):

List for indicator bacteria. Rationale: 13 of 21 E. Coli samples exceed 400 MPN/100ml, with a maximum of 30,000 MPN/100ml documented.

**Little River:**

List for indicator bacteria. Rationale: 7 of 20 E. Coli samples exceed 400 MPN/100ml, with a maximum of 8,200 MPN/100ml documented.

**Humboldt Bay:** In addition to waterbodies that have an outlet at public beaches, we have documented exceedances of fecal coliform in the following tributaries of Humboldt Bay. Indicator bacteria have the potential to impact water contact recreation and aquaculture, both beneficial uses of Humboldt Bay (North Coast Basin Plan, 2007).

- **Martin's Slough & Elk River** (tributary of Humboldt Bay):

List for indicator bacteria. Rationale: 16 of 23 E. Coli samples exceed 400 MPN/100ml, with a maximum of 17,000 MPN/100ml documented. Salmon Forever has additional data for Elk River that will be submitted in the near future.

- **Jolly Giant Creek** (tributary of Humboldt Bay):

List for indicator bacteria. Rationale: 20 of 31 E. Coli samples exceed 400 MPN/100ml, with a maximum of 17,000 MPN/100ml documented.

- **Campbell Creek** (tributary of Humboldt Bay):

List for indicator bacteria. Rationale: 13 of 14 E. Coli samples exceed 400 MPN/100ml, with a maximum of 41,060 MPN/100ml documented.

Humboldt Baykeeper believes that the data submitted from the above-mentioned project is complete and accurate for listing purposes. Our Citizen Monitoring Program operates under the QAPP approved in 2004 for Redwood Community Action Agency, our partner in the 2005 First Flush monitoring event. It meets the guidelines detailed in the QAPP. We will be glad to assist the regional board in reviewing the data if there are any questions regarding its development or quality. Thank you for the opportunity to submit our comments on this important issue.

Sincerely,

s/ \_\_\_\_\_

Jennifer Kalt

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Attachments: Excel Spreadsheet with fecal coliform results for 5 monitoring locations  
Data Submission Form