



This comment relates to the recommendation of the North Coast Regional Water Quality Control Board against delisting the Russian River mainstem from Fife Creek to Dutch Bill Creek for indicator bacteria. My wife and I are homeowners on this portion of the Russian River (19431 Redwood Drive, Monte Rio), with a conventional, regularly-inspected and properly-operating septic system.

As you know, the North Coast Board's recent sampling of the Russian River mainstem for E. coli exceedances has shown that no exceedances were detected anywhere on the mainstem. E. coli is the scientifically-preferred indicator bacteria for pathogens in fresh-water bodies, as recommended by the EPA following extensive epidemiological studies. The E. coli standard replaced earlier standards based on total coliform and/or fecal coliform bacteria, which were found to be unreliable indicators of pathogens.

The earlier coliform standards had indicated that the Fife Creek-Dutch Bill Creek portion of the Russian River mainstem, among others, was impaired by indicator bacteria. The more recent sampling using E. coli has shown that, based on current scientific standards, no portion of the mainstem is actually impaired by indicator bacteria, and therefore should be delisted for indicator bacteria.

The North Coast Board's recommendation against delisting the Fife Creek-Dutch Bill Creek portion of the mainstem acknowledges the existence of their own E. coli studies, citing 8 lines of evidence. The recommendation also cites a single line of evidence based on the discredited fecal coliform criteria. The North Coast Board's recommendation against delisting was based solely on the single line of evidence using the discredited fecal coliform criteria, and ignored the overwhelming contrary data provided by 8 lines of scientifically-supported E. coli evidence. The single line of fecal coliform evidence provides no credible support for the recommendation in light of the 8 lines of contrary E. coli evidence, and the recommendation against delisting should therefore be rejected by the statewide Board. The North Coast Board's recommendation is completely unscientific, if not anti-scientific.

Thank you for considering this comment.

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