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Public Comment
Bacteria Provisions
Deadline: 8/16/17 by 12 noon

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

GRACE ROBINSON HYDE
Chief Engineer and General Manager

August 14, 2017
File No. 31-370-40.4A



VIA ELECTRONIC MAIL

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Letter 17

Dear Ms. Townsend:

Comment Letter – Bacteria Provisions

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the Amendments to Water Quality Control Plans for Inland Surface Waters, Enclosed Bays and Estuaries and Ocean Waters of California for Statewide Water Contact Recreation Bacteria Objectives (Bacteria Provisions). The Sanitation Districts are a confederation of 24 independent special districts that provide for the wastewater treatment and solid waste management needs of approximately five million people in 78 cities and unincorporated areas of Los Angeles County, CA. The Sanitation Districts own and operate 11 wastewater treatment plants, including eight that discharge to inland surface waters, one that discharges to the Pacific Ocean, and two whose effluents are completely recycled (without discharge to receiving water bodies).

17.01 The Sanitation Districts have followed and worked with State Water Resources Control Board (State Water Board) staff on bacterial objectives over the years and are appreciative of their efforts and their willingness to accept stakeholder input throughout the process. In general, the Sanitation Districts are supportive of State Water Board's efforts to ensure that the most effective bacteria indicators are used and to adopt statewide standards conforming to United States Environmental Protection Agency's (US EPA) recommendations. However, we do have some comments on the proposed Bacteria Provisions, as detailed below:

Comment 1 - Support Enterococcus as the single indicator for marine waters

17.02 Based on decades of experience monitoring the coastal ocean, the Sanitation Districts concur with the US EPA and State Water Board staff report findings that Enterococcus is an appropriate single indicator for marine waters.

Comment 2 – Support inclusion of the LREC-1 and suspension of REC-1 where appropriate

17.03 The Sanitation Districts support the inclusion of the LREC-1 and suspension of the REC-1 beneficial use designation during periods when recreational water conditions are unsafe or access is restricted. The provision should clarify that existing LREC-1 designations and suspensions of REC-1 beneficial uses currently adopted into Basin Plans shall remain in place.

Comment 3 – Procedures and allowances to adjust the geometric mean should be incorporated when natural bacteria levels contribute to an exceedance**17.04**

The Sanitation Districts agree that a reference system/antidegradation approach is a reasonable approach to quantify the non-anthropogenic contribution to fecal indicator bacteria (FIB) levels. However, the Sanitation Districts are concerned that where natural bacteria levels contribute to exceedance of bacteria standards, the current proposal only allows for adjustment of the statistical threshold value (STV). If a waterbody has a confirmed natural source of FIB, then an adjustment of the geometric mean (GM) should also be considered.

Comment 4 – Requiring control of all anthropogenic sources before allowing for consideration of a natural source exclusion is inappropriate**17.05**

As currently proposed, the natural source exclusion approach can only be utilized after all anthropogenic sources of bacteria have been identified, quantified, and controlled; any anthropogenic loadings, no matter how slight, would prevent a Regional Water Board from considering a natural source exclusion. However, there are likely instances where minor anthropogenic sources have been identified but are not significantly contributing to the water quality exceedances due to overwhelmingly large natural loadings. In these instances, it seems wasteful and inefficient to require complete control of all anthropogenic sources before allowing for a natural source exclusion. This provision should instead permit a natural source exclusion unless an anthropogenic source is demonstrated to be significantly contributing to the water quality exceedance.

If you have any questions or need additional information, please contact Naoko Munakata at (562) 908-4288, extension 2811, or at nmunakata@lacsd.org.

Very truly yours,



Ann T. Heil
Section Head
Reuse and Compliance

ATH:AS:nm