



February 6, 2015

Felicia Marcus,
Chair, State Water Resources Control Board
and Members
c/o Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Proposed Changes for the Statewide Water Contact Recreation Bacteria Objectives

Dear Chair Marcus and Members:

Thank you for the opportunity to provide comments for the scoping process for updating the Statewide Water Contact Recreation Bacteria Objectives. This is an important process to ensure that waters in the state are safe for all users of the water. These comments are submitted on behalf of Sierra Club California and our more than 380,000 members and supporters around the state. We offer some points that we think the Board and staff should consider before adopting the update.

Current proposed standards for *e. coli* are 100 cfu/100 mL, however some regions are requiring stricter standards to maintain higher quality water and to lower health risks. For example, the Lahontan Regional Water Quality Control Board has set a standard of 20 cfu/100 mL for fecal coliform bacteria. While the Lahontan Board is modernizing its fecal coliform standard to an *e. coli* standard, observed *e. coli* levels are consistent with observed fecal coliform levels, with both levels far below existing and proposed standards.¹ These higher bacteria standards are necessary as water sources in the region are used for a variety of purposes, such as drinking, swimming, and wading and are an exceptionally clean and clear water source.

Current proposed standards should be amended to allow the Regional Water Quality Control Boards to set stricter standards for bacteria so that they can adapt to local needs. Additionally, allowing this flexibility will prevent conflicts between adopting the proposed standards and complying with the Anti-Degradation Policy as Regional Boards can maintain their existing water quality standards.

The highest standards possible should be applied to our water quality standards. We believe that by amending the proposed standards to reflect our comments, statewide overall water quality can improve without restricting higher local standards and risking degradation of existing water quality.

Sincerely,

Kyle Jones
Policy Advocate

¹ Lahontan Regional Water Quality Control Board Bacteria Water Quality Objectives Fact Sheet, http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/docs/bacwqo_factsheet.pdf