

Buena Vista Coalition
Kaweah Basin Water Quality Association
Kings River Water Quality Coalition
Kern River Watershed Coalition Authority
Tule Basin Water Quality Coalition



August 16, 2017

Via email to commentletters@waterboards.ca.gov

Re: Comment Letter - Bacteria Provisions

The above named Central Valley Irrigated Lands Regulatory Program (**ILRP**) Coalitions (**Coalitions**) appreciate the opportunity to comment on the proposed changes to the Water Quality Control Plan for Inland Surface Water, Enclosed Bays, and Estuaries of California – Bacteria Provisions and Water Quality Standards Variance Policy (**Bacteria Provisions**). The proposed changes authorize the State and Regional Water Boards to adopt water quality standards and variances consistent with federal regulation. The State Water Board recommends establishing a risk protection level based on a statistical threshold value of colony forming units. The above Coalitions support the proposed changes in the State Water Quality Control Board, Draft Staff Report dated June 30, 2017.

Additionally, the above Coalitions support the proposed new bacteria water quality objectives for the protection of Water Contact Recreation (**REC-1**). The proposed revisions allow for the adoption of seasonal suspension of the REC-1 beneficial use as well as the establishment of a definition for Limited Water Contact Recreation (**LREC-1**). LREC-1 would allow for a new beneficial use designation, where contact recreation is limited due to restricted access or very shallow depth. This designation is critical for Coalitions who monitor indicator bacteria in areas where traditional REC-1 use is not realized due to physical barriers.

The proposed revisions enable the Coalitions to utilize a reasonable approach which appropriately reflects monitored water ways and exposure risks. Additionally, the Bacteria Provisions allow the Coalitions to utilize resources to appropriately address potential impacts to water quality using an appropriate scientific basis. The Coalitions are committed to working together with the State and Regional Water Quality Control Boards to improve water quality by working with member growers to implement management practices considered protective of water quality. If you have any questions, please contact me at (559) 302-1620 or by email at dikemiya@kawahbasin.org.

Respectfully,

A handwritten signature in blue ink that reads "Donald Ikemiya".

Donald Ikemiya
Executive Director
Kaweah Basin Water Quality Association