



East Bay Regional Park District (EBRPD)
Comments Regarding:
The Statewide Bacterial Objective for Water Contact Recreation
in Fresh Waters of California.

Element 1: Bacterial Indicators

EBRPD supports the adoption of a single statewide bacterial indicator (either *E. coli* or enterococcus). It is EBRPD's opinion that sampling and analyzing for total and fecal coliform provides little value as tools to accurately assess risk to human health and safety. In addition, there will be cost savings in having to only analyze for one indicator (*E. coli* or enterococcus) as opposed to three (total/fecal/enterococcus as currently practiced for AB 411 and AB 1876 beaches).

Element 2: Level of Protection for Water Contact Recreation

EBRPD supports adopting risk levels no more stringent than eight to ten illnesses per 1,000 swimmers. Due to the inherent arbitrary nature of current bacterial indicator analyses and methodologies to assess human health risk, more stringent risk levels may result in increased frequency of advisory posting or closure while not necessarily providing proportional added protection to bathers.

Element 5: Averaging Periods

EBRPD does not support the use of rolling geometric means to establish compliance with proposed bacterial objectives or triggering the posting advisories or closure of a beach. Because it is a rolling average, one sampling event resulting in an exceedance can cause subsequent sampling events to be over standard thresholds even though current water quality could be drastically improved since the original exceedance sampling. EBRPD supports the use of a rolling average as a diagnostic tool to identify trends or "hot-spots" and determine if a beach is being impacted by pollution sources.

Element 7: Analytical Methods

EBRPD believes more funding should be provided to conduct epidemiological studies to identify better analytical methods and indicator organisms than is currently available or routinely used to improve the accuracy of assessments regarding human health risk due to recreational water exposure.

Element 8: Implementation of Bacterial Objectives in Regards to TMDLs

EBRPD supports allowing a reference system/antidegradation approach or natural sources exclusion approach.