



# City of Watsonville

“A Community of Opportunities”

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

August 7, 2017

State Water Resources Control Board  
Attn: Jeanine Townsend, Clerk to the Board  
1001 I St., 24<sup>th</sup> Floor  
Sacramento, CA 95814



**SUBJECT: Comment Letter-Bacteria Provisions**

The City of Watsonville is a State recognized economically disadvantaged community (DAC) based on population and median household income. The City has been implementing pathogen TMDL requirements for compliance with the State Water Resources Control Board Small Municipal Separate Stormwater System Phase II permit (MS4 permit). This permit has been extremely challenging to implement given the level of service and requirements needed to stay in compliance with the program.

Small DACs such as Watsonville simply do not have the revenue to comply with such extensive unfunded regulatory programs, and it puts undue financial burden on communities already struggling to meet basic public health and safety needs. **It is critical that economic feasibility be considered as part of permit regulations.**

The City kindly requests the State Water Resources Control Board to consider the following comments on the DRAFT provisions.

The bacteria provisions do not specify attainment of pathogen reductions for natural (birds and wildlife) and other uncontrollable sources, which account for the vast majority of contributions of fecal indicator bacteria (FIB). These uncontrollable sources in urban runoff and receiving waters may make attainment of waste load allocations and water quality objectives nearly impossible, particularly in urban areas. The proposed REC-1 variance is not attainable in sloughs. **A reasonable variance needs to be considered for TMDL impacted water bodies that have a WAAP for pathogens.**

The LREC-1 standard could be applied to the TMDL impacted slough system. However, there are no numeric criteria associated with LREC-1 designation. **Numeric water quality objectives for LREC-1 need to be established and defined in the bacteria provisions.**

Thank you for your consideration. If you have further questions on these comments, please contact: Jackie McCloud, Sr. Utilities Engineer at (831) 768-3172.

Sincerely-

Steve Palmisano  
Director of Public Work and Utilities