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Truckee River Watershed Council

Collaborative solutions to protect, enhance and restore the Truckee River Watershed

California Department of Fish and Wildlife
California Department of Parks and Recreation
California Department of Water Resources
California Fly Fisher Magazine
Glenshire Homeowners Association
DMB/Highlands Group, LLC
East West Partners
Friends of Squaw Creek
KidZone Museum
Lahontan Regional Water Quality Control Board
Mountain Area Preservation
Nevada County
North Lake Tahoe Resort Association
Northstar California
Placer County
Placer County Water Agency
Sagehen Creek Field Station - UC Berkeley
Sierra Business Council
Sierra County
Sierra Watch
Sierra Watershed Education Partnerships
Squaw Valley and Alpine Meadows
Tahoe Truckee Sanitation Agency
Town of Truckee
Trout Unlimited
Truckee Donner Land Trust
Truckee Donner Public Utility District
Truckee Meadows Water Authority
U.S. Army Corps of Engineers
USDA Forest Service

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



February 18th, 2015

RE: COMMENT LETTER – STATEWIDE BACTERIA OBJECTIVES – SCOPING
COMMENTS

Dear Ms. Townsend,

The Truckee River Watershed Council (TRWC) is grateful for the opportunity to provide comments on the scoping process for updating the Statewide Water Contact Recreation Bacteria Objectives. This is an important process and relates directly to our watershed as water quality is a regional priority and water contact recreation is an important element of our economy. Additionally, most of the Lahontan region is a water-exporting region so preservation of safe drinking water is also a priority.

TRWC was founded to protect and restore the water quality and the biological resources of the Truckee River. We identify, coordinate, fund, and implement restoration and preservation projects related to the health, beauty, and economy of the watershed. As such, we are concerned with water quality standards.

The State Water Resources Control Board is proposing a statewide standard for Bacteria Objectives of 100 colony forming units (cfu)/100 mL of *Escherichia coli* (*E. coli*). We do not believe that this is an appropriate standard for the Lahontan Region and recommend that the current bacteria standard for coliform level in the Lahontan Region be maintained. The current standard is 20 cfu/100 mL for fecal coliform bacteria.

We agree with the proposal by the Lahontan Regional Water Quality Control Board (LRWQCB) to modernize their fecal coliform standard to an *E. coli* standard. Our understanding is that based on recent monitoring of streams in the region, the equivalent to the current fecal coliform standard would be 17 cfu/100mL of *E. coli*.

We do not agree with the proposal for a statewide standard for bacteria levels. We believe that each region should set levels that are appropriate to protect beneficial uses for that region.

There are two primary reasons we believe that maintaining a stricter standard is appropriate for the Lahontan Region.

1. The existing standard is usually met.

LRWQCB completed extensive sampling throughout the region between 2008 and 2013, collecting over 3,500 water samples. The majority (73%) of the water samples contained less than 20 cfu/100 mL coliform bacteria.

In addition to the sampling completed by LRWQCB, TRWC has also monitored bacteria locally since 2001. Our data support that coliform levels are very low in the Middle Truckee River watershed and that meeting the current standard is achievable. We recognize that the LRWQCB standard is based on a log mean for a 30-day period, with a minimum of five equally spaced samples. However in our spot sampling we have only detected coliform levels over 20 cfu 6 times over 100 sampling events (see monitoring reports at www.truckeeriverwc.org. Data can also be retrieved from CEDEN). None of our streams consistently exceeded the 20 cfu/100 mL coliform standard, in fact each of the 6 exceedances recorded was for a different stream and a different year.

The LRWQCB acknowledges that a subset of streams and lakes within the region may not be able to meet the more stringent standard, and standards for these water bodies are set through the 303(d) list.

We agree with LRWQCB that establishing a higher standard for specific water bodies may be appropriate based on land use. The majority of streams and lakes in our region are capable of meeting the standard of 17 cfu/100mL for *E. coli*, however.

2. A lower illness rate for our region is desired.

The current proposed standard of 100 cfu/100 mL of *E. coli* corresponds to an illness rate of 32 per 1,000 water contact recreationists. Water-based tourism is a major economic driver in the Lahontan Region. It is unacceptable to state that of the multitude of people who visit the region to swim, raft, and fish each year, 3% of those will become ill.

We believe that moving to a 100 cfu/ 100 mL standard would be a step backwards for our Region. The Clean Water Act states as a goal "...restore and maintain the chemical, physical, and biological integrity of the Nation's waters". Regional Boards should be allowed to adopt more stringent standards to maintain existing water quality and to protect high value waters.

Thank you for considering our comments.

Sincerely,



Beth Christman
Director of Restoration Program



Lisa Wallace
Executive Director