

## SWQSTF STRAWMAN

### Recommendation #1

I would remove “where ingestion of water is likely..” and leave the current wording of “reasonably possible” in its place. Reasonable possible is more protective of the beneficial use, would apply to more waters, and would be more protective of REC 1 users like children. “where ingestion of water is likely” could be interpreted as waters where people are swimming and jumping off rocks into pools (i.e., full immersion), waters that aren’t common in our Region and leave out waters that are common in our Region. We have many waters that are shallow but may have children wading in them and where there is a reasonable possibility of ingesting water.

### Recommendation #2

I would make this definition more broad. The current definition will not help us add many waters as just REC 2. I would change “but not normally involving body contact with water where ingestion of water would be reasonably possible” to “not normally involving body contact with water where ingestion of water would be likely (or ingestion of water would be incidental)”.

How would the Regional Board add a water like Mystic Lake to the Basin Plan (which we are working on now) with just the REC 2 and not REC 1? It should have a sub Rec BU, because the only body contact recreation are duck hunters who wade into the lake to move decoys. There is a reasonable possibility that a hunter who falls into the lake could get a snootful of water however it is not likely. So now we might have to give it a REC-1 classification which it will likely never achieve.

### Recommendation #3

On page 3-2 of the Basin Plan we have an existing footnote concerning REC1 and 2 about “beneficial use designation assigned to surface waterbodies in this Region should not be construed as encouraging recreational activities”. Maybe we could tie the Recommendation #3 statement into the existing footnote. In that footnote we state “the designations are intended to indicate that the uses exist or that the water quality of the water body could support recreational use”

Are we supposed to consider legal restrictions when determining beneficial uses. So maybe we should emphasize that we consider a suite of factors and not just legal restrictions.

#### Recommendation #4

Maybe add to "On-going epidemiological research may demonstrate that there are even better surrogate indicators available" **or a direct analysis of pathogens that is practical to use may become available.**

#### Recommendation #6

The existing REC-2 objective is an **average** not a geomean. The existing objective says "Fecal coliform: **average** less than 2000 organisms/100 ml and .... in a 30 day period"

There is a big difference between an average and a geomean. The geomean flattens out the extremely high numbers while the average is affected greatly by them. For example, a water may meet a much lower geomean standard while exceeding the 2000 average value. This happened with recent sampling for bact at Mystic Lake. At one sampling location the 200 FC geomean was met but the 2000 FC average was exceeded. In addition, at all the sample locations the REC 2 FC average of 2000 was exceeded but the 5x 126 e coli or 630 e. coli geomean was not exceed (with MTF (MPN) the e. coli and fecal coliform numbers are the same). So there is a big difference between average and geomean.

In the rationale, it was stated that the current fecal coliform objective was expected to provide a level of risk protection equal to 10 illnesses in every 1,000 swimmers (e.g. 1%). **This is incorrect.** The 1986 Ambient Water Quality Criteria for Bacteria by EPA says on page 9 that fecal coliform at the geomean of 200 would cause an estimated 8 illness per 1,000 swimmers (.08 risk level) at fresh water beaches.

As you remember Regional Board 4 as a rationale in their economic analysis for their amendment to add e. coli for fresh water stated that they were not changing the risk level by going from fecal coliform at 200 geomean to e. coli at 126 geomean and so that there should not be extra expenses for stakeholders.

To get away from the use of fecal coliform for Rec 2 how about we use a 10 times the e. coli REC 1 objective for REC 2 instead of the 10 times the fecal coliform. So that would be 10 times 126 e coli which would be a REC 2 objective of the average of 1260 e. coli collected as 5 samples in 30 days.

Also how are we going to treat Bays and Estuaries? Bays and Estuaries are not included in the Ocean Plan. We could use AB 411 / Ocean Plan objectives (fecal coliform, enterococcus, total coliform, and the ratio of fecal to total coliform). Since estuaries have varying percentages of freshwater maybe just one of the indicators should be used. Maybe we should discuss this with the Newport Bay Fecal Coliform tac.

*not intended to be arithmetic average*

*footnote to define geomean for logarithmic distributed data*

### **Recommendation # 9**

“The REC1 and/or REC2 use designation is temporarily suspended when high flows, caused by stormwater runoff, preclude safe water contact recreation in the waterbody.”

How do we determine what is high flow? I think that we need some sort of determination of what is high flow. We could use LA's method for the concrete channels, another measurement for our dirt lined channels, and then another for our rural streams or maybe don't have a high flow suspension for totally naturally streams (i.e., Mill Creek, upper Santa Ana River).

OC  
impact  
on diversion

### **Recommendation #10**

The section of Temescal Creek from the confluence of the SAR to Lincoln is natural isn't it. (also this reach is now part of the Prado Management Zone as identified in our basin plan and not identified as part of Temescal Creek. So start the reclassification from Lincoln to upstream.

### **Recommendation #12**

Should we extend the reclassification above Deer Creek channel to maybe Foothill Blvd. ?

### **Recommendation #13**

Concerning the Greenville-Banning Channel, its not in our Basin Plan yet. However, we could add it along with other waters that we are considering adding in the next several months (Triennial review issue #10).

### **Recommendation #14**

How about leaving the Delhi channel and its tidal influence section as part of the Newport Bay and from the tidal influence area (below Mesa street) to Warner street and include the Santa Ana Gardens channel as one reach. In footnotes we could describe the unique characteristics of the reach such as note that underground areas would have no BUs and other information. We are planning on adding more footnotes to the Table 3-1 and Table 4-1 to be able to be more descriptive of waters (like we plan on doing for Lytle, Mill, and upper SAR).

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