

Submitter: Christina Brow
On Behalf Of:
Committee: Senate Committee On Natural Resources and
Wildfire
Measure, Appointment or Topic: HB3814

My name is Dr. Christina Brow. I am a licensed Professional Engineer (PE) with 15 years of experience as a consultant, including for the seafood processing industry. Molecular biology and microbiology were a large component of my Master's and PhD research. I fully support HB 3814, which would allow allocation of mixing zones for bacteria in seafood processing effluent. The "indicator bacteria" in question are not themselves pathogenic, are common in the human gut, and have long been monitored as a proxy for other human enteric bacteria and viruses that do cause human gastrointestinal illnesses. However, these same "indicator bacteria" grow and proliferate in other environments as well, so their utility as a gauge of risk to human health is drastically diminished when not associated with a human fecal source. This has been demonstrated in numerous scientific studies over the last 20 years and has been recognized by the EPA (EPA 822-R-24-013 "Technical Support Materials: Developing Alternative Recreational Criteria for Waters Contaminated by Predominantly Non-Human Fecal Sources." July 2024). It should be noted that many other states, including Washington and Alaska, allow mixing zones for bacteria, even those of human-fecal origin.