



# City of Malibu

23825 Stuart Ranch Road · Malibu, California · 90265-4861  
Phone (310) 456-2489 · Fax (310) 456-3356 · [www.malibucity.org](http://www.malibucity.org)

February 19, 2015

Sent via email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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



RE: Comments on Statewide Bacteria Objectives – Scoping Document

Dear Ms. Townsend:

The City of Malibu (City) has prepared this comment letter in response to the scoping document for Statewide Bacteria Objectives issued by the State Water Resources Control Board (SWRCB). We appreciate the effort SWRCB has made to address water quality concerns regarding pathogenic microorganisms in waters of the State of California. The Pacific Ocean and coastal streams are vital resources in our community. The following comments are offered by the City:

- **Element 3 (Address Natural Sources):** The City supports the staff recommendation to allow reference system or natural sources exclusion approaches, but also requests SWRCB add a provision to allow development of site specific objectives for predominantly non-human fecal sources. The 2012 United States Environmental Protection Agency (USEPA) Recreational Water Quality Criteria document identifies site specific objectives as a compliance option, and Technical Support Materials for this approach currently are under development by USEPA. The City notes that the project scoping document is essentially silent on site specific objectives and quantitative microbial risk assessment (QMRA), and we hereby request that the project scope be amended to include a project alternative that includes a recreational water quality compliance option for bacteria incorporating site specific objectives with QMRA.
- **Element 4 (High Flow Suspension of Objectives for Fresh Water):** The City supports the staff recommendation to allow high flow suspension of objectives for engineered and non-engineered channels.
- **Element 11 (Allow for a Variance, Seasonal Suspension or Limited REC 1):** The City supports the staff recommendation to allow the use of a variance, seasonal suspension or Limited REC 1.

The City of Malibu appreciates the opportunity to provide comments on the Statewide Bacteria Objectives scoping document. If you have any questions about these comments, please contact Dr. Andrew Sheldon, Environmental Health Administrator, at (310) 456-2489 ext. 364, or by email to [asheldon@malibucity.org](mailto:asheldon@malibucity.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Thorsen', with a stylized flourish at the end.

Jim Thorsen  
City Manager

cc: Christi Hogin, City Attorney  
Vic Peterson, Environmental Sustainability Director  
Andrew Sheldon, Environmental Health Administrator  
Jennifer Brown, Senior Environmental Programs Coordinator