June 14, 2011

Ms. Jeanine Townsend, Clerk to the Board
California State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Comments Regarding the Basin Plan Amendment to Remove Fecal Coliform as a Water Quality Objective

Dear Ms. Townsend:

As a regulated agency, the City of Thousand Oaks appreciates the State Water Board's efforts to bring Water Quality objectives into agreement with scientific evidence such as the removal of Fecal Coliform as a pathogenic indicator. Furthermore, we support the proposal to remove Fecal Coliform as a REC-1 and LREC-1 Water Quality Objective, given that studies have shown that it fails to correlate with incidents of swimmer illness or other public health criteria.

The City is concerned that there is no procedural link to update the numerical bacteriological objectives in the Malibu Creek Watershed Bacteria TMDL once the Los Angeles Basin Plan modification for removing a fecal bacteria indicator is adopted. Being a trustee of public funds striving for efficiency in meeting regulatory requirements, we urge the State Water Board to address this concern and to request the Regional Water Quality Control Boards to change applicable bacteria TMDLs to be consistent with this ruling.

Thank you for the opportunity to comment. If you have questions, please call Bob Carson at (805) 449-2424 or myself at (805) 449-2444.

Sincerely,

Jay Spurgin
Deputy Public Works Director

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