

LAS VIRGENES UNIFIED SCHOOL DISTRICT  
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January 17, 2013

Ms. Cindy Lin (WTR-2)  
U.S. Environmental Protection Agency  
Southern California Field Office  
600 Wilshire Blvd., Suite 1460  
Los Angeles, CA 90017

**RE: PROPOSED TMDLs for Malibu Creek**

Dear Ms. Lin:

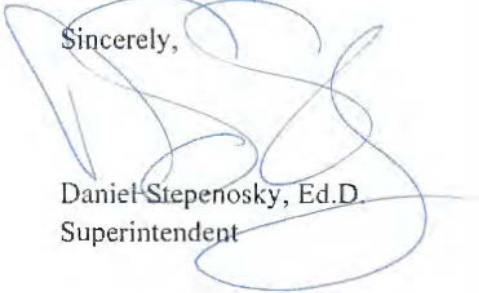
Las Virgenes Unified School District has concerns regarding the proposed Total Maximum Daily Load (TMDLs) standards being proposed for the Malibu Creek Watershed.

Las Virgenes is located entirely within the watershed and operates several campuses in the subject area. While we support responsible environmental standards, we are very concerned with the uncertainty that the new standards will achieve the desired goals, given the experience with those established in 2003. We are significantly impacted when sewer service costs escalate; water and wastewater treatment represent significant expenses to our school district and the uses of those funds have a direct impact on the level of instruction we are able to provide to our students in the classroom.

We are well aware of the many steps that have already been taken in attempts to improve conditions in Malibu Creek. We understand that previous standards, which were intended to reduce or eliminate the presence of algae in Malibu Creek, have not met expectations. Has it occurred to EPA that the science or reasoning behind the previous standards are in some way deficient? Nevertheless, those shortfalls have come at a very high cost to the community in terms of the resources lost to costly and failed strategies, for a creek where algae may be an entirely natural occurrence.

Before any new standards for Malibu Creek are adopted, EPA needs to assure the community its science is sound, its methods will be effective and the costs for attaining compliance with these standards will be proportional to the benefits derived, especially when those costs have a direct impact on the quality of education delivered to each student in our school system.

Sincerely,

  
Daniel Stepenosky, Ed.D.  
Superintendent