Planning Commission Draft EIR public hearing – July 21, 2014
Summary of Oral Comments

Comment No.	Commenter	Comment
D-1	Commissioner Jeffrey D. Jennings	1. Why is use of Winter Canyon allowed for percolation when it's in the Prohibition Zone? 2. Does Phase 1 get reimbursed by Phases 2 and 3? 3. If the critics are correct and the current OWDS systems do not have a deleterious effect on Malibu Creek and Lagoon, then there will be no improvement in the Creek/Lagoon after implementation of Phase 1 and it will be a slam dunk that Phases 2 and 3 will have to be constructed. 4. Is there a decentralized alternative the EIR should be considered that would be less expensive?
D-2	Commissioner Roohi Stack	1. What is the estimated cost per parcel for the various phases?
D-3	Commissioner John Mazza	1. Shouldn't the EIR identify impacts to the lagoon and creek and offshore ocean areas? 2. Is there a baseline of what's in the creek so that when you go to Phase 2 and Phase 3, the MOU requires that it improves 50% or something? Is there a baseline? Doesn't it depend on seasons? 3. Does the residual chlorine add to the TMDL or affect the ocean? 4. In regards to the economic impacts, Phase 1 pays for Phase 1, and Phase 2 pays for part of Phase 1 if it's implemented. What's the probability that Phase 1 will have to pay for Phase 2 (i.e., if additional property needs to be purchased for storage)?
D-4	Commissioner David Brotman	1. The EIR should describe what is meant by the proposed "rural agricultural" architectural treatment of the structures at the plant site.
D-5	Wendi Dunn	1. Pharmaceuticals (e.g., steroids, hormones) and fire retardants and the dilution rate of these pathogens are not addressed in the EIR.
D-6	Sally Benjamin	1. Refer to Comment Letter C-3b which contains oral comments read into the record

Comment No.	Commenter	Comment
D-7	Steve Bobzin	1. He is opposed to the siting, not to the Project. 2. The condominiums are not part of the problem because they are hooked up to the County plant, not individual OWDSs. 3. The bar should not be set at previous existing conditions. 4. DEIR Section 4.1 Aesthetics – Only 7 POVs and 2 of the KOPs have a vantage point that includes the treatment plant. This is an erroneous determination of no impact. 5. DEIR Section 4.2 Air Quality – The Project will be building on the site of a previous septic system and other agricultural uses. The DEIR needs to consider the possibility of contaminated soils and the effects of excavation could have during construction. 6. DEIR Section 4.6 Hazards and Hazardous Materials – The DEIR does not mitigate potential impact of the treatment plant location being within ¼ mile of a school. Hazardous materials (hypochlorite and alum) will be on the site. 7. DEIR Section 4.4 – Hydrology and Water Quality – There is a large storm drain onsite that drains to the ocean. Will spills end up there? 8. DEIR Section 4.10 – Population and Housing – There will be an affordable housing impact as a result of the project that should be evaluated. 9. DEIR Section 4.11 – Public Services – This section covers schools but the DEIR says nothing about health and safety impacts on schools. There are 200 residences and 400 students across the street from the treatment plant site, which will be within 100 yards of the playground. He would like to see precedents of other wastewater treatment facilities located within 100 yards of a school.
D-8	Steve Uhring	1. The DEIR should clearly identify reductions in bacteria and nitrogen that will be achieved by phase. 2. DEIR should also include a measuring mechanism to document what's being achieved relative to the objectives. 3. The DEIR fails to explore other viable options to reduce pollutants. 4. The discharge ban doesn't mandate a municipal system, only discharges from OWDSs. A zero discharge system may achieve the same results, or a combination of a sewer system for the commercial properties and a zero discharge system for the residences.
D-9	Andy Lyon	1. Concerned with old seepage pits being dug up during plant construction and possible impacts on the school. 2. Concerned about the existing storm drain on the treatment plant site that drains to the ocean. 3. Concerned about how the Project will affect home values.

Comment No.	Commenter	Comment
D-10	Peter Shellenbarger, Heal the Bay	1. Supports the intent of the Project and compliance with the prohibition mandate. 2. The DEIR needs to address percolation pond discharges which can raise groundwater levels in Winter Canyon. 3. Geology and soils impacts, such as liquefaction, sloughing and onsite wetlands need to be considered. 4. Heal the Bay will be sending additional written comments.
D-11	Ryan Embree	1. Alternative sites were not considered because they did not meet the requirement of 2.5 acres, which is required in order to include Phase 3. 2. The existing site should be reworked to put Phase 3 on the County plant site and the rest of the plant should be reconfigured to be set further back from Civic Center Way to allow full widening of that street or addition of a pull-out bus stop. 3. The 28-foot height exemption should not be included in the LCPA; the building foundations should be dug down so that the structures don't stick up as high. 4. Winter Canyon is not contributing to the problem; as such, Phase 2 and 3 do not belong in the Prohibition Zone. They drain to the ocean. 5. Study the impact of commercial effluent being discharged in Winter Canyon in a residential area. 6. Alternative siting locations were not studied. 7. Flooding and spills are not adequately addressed. 8. Energy costs to pump to and from Winter Canyon were not studied practically and the carbon footprint of the Project was not disclosed or compared to alternatives.
D-12	Rick Margolis	1. Are pump stations in Phase 2 required for Phase 1 to work? 2. Alternatives did not consider keeping the OWDSs in place. Pumping the treated effluent to a central location (versus using the leach fields) was not considered. Alternatives analysis should consider the operation and costs associated with onsite treatment and transfer to a centralized plant. 3. The five year landscape simulation is not adequate to address aesthetic impacts. It should be possible to get better tree cover sooner.
D-13	Michael Toney	1. Basically the Project is trading one form of pollution for another.
D-14	Norm Haynie	1. The solution being recommended is a good solution to meeting the regulatory agency orders. However, the economics associated with project should be analyzed in spite of CEQA.

Comment No.	Commenter	Comment
D-15	Commissioner John Mazza	1. Is the proposed treatment system the same that's being used at Las Virgenes? Will it provide compost? 2. Alternatives analysis should consider hybrid schemes, such as a different treatment system for remote areas like Harbor Vista and the Knolls.
D-16	Wendi Dunn	1. What is the baseline data for Malibu Creek and Lagoon? 2. What will the data be after Phase 1? 3. What kind of monitoring will occur? 4. What are the natural sources contributing to bacteria in the Creek/Lagoon? Modelo rock formation by Tapia is a naturally occurring formation that contributes petroleum and other exceedances from the rock formation that are coming down Malibu Creek. Natural sources of exceedances are ignored by the regulatory agencies and are not addressed in the DEIR.

Response to July 21 Public Hearing Oral Comment by Commissioner Jeff Jennings (D-1)

Response to Comment 1

An existing wastewater treatment facility and OWDSs are currently operating in Winter Canyon that discharge less-effectively treated water the groundwater. The proposed treatment plant would treat and discharge effluent of a much higher quality. Additionally, percolation in Winter Canyon would be covered along with the recycled water injection as part of the Project permitting for disposal of unused recycled water (with the percolation providing additional disposal capacity to the injection wells). Therefore, the proposed percolation in Winter Canyon is considered to be part of the Project and not an OWDS discharge.

Response to Comment 2

Phase 1 will be designed and implemented so that the infrastructure necessary to operate Phase 1 is fully constructed. Through the assessment district process, the Phase 1 property owners would shoulder the cost of the entire plant for several years until a future phase is constructed. Property owners in future phases would be assessed for costs related only to wastewater collection, treatment and management of wastewater that their individual parcels produce. Phase 1 includes some treatment equipment and processing tanks that will eventually benefit Phases 2 and 3. If, and when, subsequent phases are implemented, a reimbursement formula will be calculated by a qualified assessment engineer to allow a cost sharing that results in all property owners, from all phases, paying for only their prorated share of total facilities.

Response to Comment 3

Comment noted; however, the reverse could also be true wherein the Phase 1 and Phase 2 flows are captured and treated, there is no improvement to the Creek and Lagoon, and the question then becomes, why then is Phase 3 needed.

Response to Comment 4

A decentralized treatment alternative was not considered as such an alternative would expand the physical area affected by the proposed Project and would therefore likely expand the impacts associated with this alternative. CEQA requires that feasible alternatives that would meet most of the basic project objectives and would avoid or substantially lessen any of the project's significant effects be considered. A decentralized treatment alternative is unlikely to avoid or substantially lessen any of the proposed Project's impacts; therefore, this alternative was rejected from further consideration.

Response to July 21 Public Hearing Oral Comment by Commissioner Roohi Stack (D-2)

Response to Comment 1

The City is sensitive to the costs the Project would impose on residential property owners and is seeking available grant and low interest loan funds to help reduce these costs. However, because CEQA does not require an analysis of Project costs, they are beyond the scope of this EIR.

Costs for individual property owners in each phase would be determined through the establishment of an assessment district for each phase of the Project. This public process studies and derives costs based on the detailed design prepared for each phase. At this time, only the assessment district process for Phase 1 is underway as the detailed design of the facilities for Phases 2 and 3 (which affect primarily residential properties) has not been completed; however, preliminary estimates have been made.

Property owners would be assessed for costs related only to wastewater collection, treatment and management of wastewater that their individual parcels produce, and for a residence, this would also be affected by factors such as type of parcel and size of house. For a typical three bedroom, two bathroom house, costs may be on the order of $500 to $1,000/month for as long as the house is generating wastewater. Again, these are preliminary estimates that only include assessment costs, not operation/ maintenance fees or connection fees. Also, it will be the responsibility of the individual property owner to make the connection from the residence to the collection and distribution lines in the street.

Response to July 21 Public Hearing Oral Comment by Commissioner John Mazza (D-3)

Response to Comment 1

This Project would intercept OWDS discharges and treat the wastewater so that the bacteria that currently travel through the upper aquifer to Malibu Creek and Lagoon would no longer reach them. The Project is in response to the Prohibition on the discharges and associated bacterial and nutrient impacts on the Creek and/or Lagoon as determined by the LARWQCB. As such, the Project is designed to address the studies that formed the basis for the Prohibition.

Possible impacts to Malibu Creek and Lagoon and the offshore ocean areas that could result from the Project are identified in various sections of Chapter 4 of the EIR, including Section 4.3 – Biological Resources and Section 4.7 – Hydrology and Water Quality, as well as Appendices C (Habitat Assessment) and G-1 through G-5 (Water Quality Supporting Documents).

Response to Comment 2

A baseline monitoring program will be established later this year to determine current conditions in Malibu Creek and Lagoon to establish the baseline from which to monitor for water quality improvements resulting from Project implementation. This baseline monitoring program would capture seasonal variations in surface water quality. Furthermore, a surface water and groundwater quality monitoring program are mandated by the City's MOU and would be detailed in the Project's permit requirements established by responsible agencies, such as the WDR/WRR to be issued by the LARWQCB.

Response to Comment 3

There would be a low level of residual chlorine in the injected water and its potential effects on the ocean were investigated as part of the water quality analyses presented in this EIR. In summary, the studies indicate that no significant impacts would occur.

The TMDL for Malibu Creek and Lagoon is for bacteria and nutrients; chlorine is not covered by the TMDL. Additional analyses were conducted to evaluate the potential impacts of residual chlorine on the ocean. These analyses can be found in Appendix G1. Based on this analysis, near-shore ocean quality could have approximately 7.6 ug/L of residual chlorine (the Ocean Plan water quality objective for residual chlorine is 8 ug/L for a daily maximum concentration). However, this analysis was extremely conservative and did not account for the additional decay of chlorine in the distribution system and in the groundwater system as the injected water moves over a period between 5 and 15 years to the ocean, nor did it consider the additional mixing that would occur in the ocean environment as a result of density differences and wind and tidal-related mixing influences.

Response to Comment 4

The amount of recycled water storage to be built in the future will be dependent on what the community wants to do with the recycled water in the future. If there is an increase in recycled water demand that would, for example, require additional storage, the City would have to make a policy decision as a community to determine how those costs be distributed.

Response to July 21 Public Hearing Oral Comment by Commissioner David Brotman (D-4)

Response to Comment 1

The EIR does not describe the architectural treatment of structures at the proposed treatment facility site as being either rural or agricultural; however, the Project design consultant's presentation from the July 21, 2014 Planning Commission public hearing used the term "rural agricultural theme" to describe the architectural treatment of buildings (see Slide 30 at: http://www.malibucity.org/documentcenter/view/6877). The FAQs dated July 21, 2014 on the City's website (#5 at http://www.malibucity.org/DocumentCenter/View/6800) use similar terminology, stating that new onsite buildings would be "treated with neutral rural architectural style that is compatible with the site and surrounding area." These terms are meant to convey that the intention to cover and/or screen the treatment equipment and facilities will be covered and screened in a way that respects Malibu's rural character and is sensitive to the surrounding land uses.

Response to July 21 Public Hearing Oral Comment by Wendi Dunn (D-5)

Response to Comment 1

Oral comments presented during the public hearing were also included in written comments submitted to the City on July 21, 2014. Please see response to comments contained in Letter C-7.

Response to July 21 Public Hearing Oral Comment by Sally Benjamin (D-6)

Oral comments presented during the public hearing were also included in written comments submitted to the City on July 28, 2014. Please see response to comments contained in Letter C-3b.

Response to July 21 Public Hearing Oral Comment by Steve Bobzin (D-7)

Oral comments presented during the public hearing were also included in written comments submitted to the City on July 28, 2014. Please see response to comments contained in Letter B-6.

Response to July 21 Public Hearing Oral Comment by Steve Uhring (D-8)

Oral comments presented during the public hearing were also included in written comments submitted to the City on July 28, 2014. Please see response to comments contained in Letter C-8.

Response to July 21 Public Hearing Oral Comment by Andy Lyon (D-9)

Response to Comment 1

Redevelopment of wastewater treatment plant sites, including OWDS sites, is fairly typical. Investigations at the property were conducted to confirm the presence or lack of presence of hazardous materials in the areas that would be disturbed by construction of the treatment plant. A Phase I Environmental Site Assessment was prepared to assess the potential for soil and/or groundwater contamination from past site use. This is described starting on page 4.6-8 under Hazardous Waste/Materials. There have been no reported releases from the current project site, and therefore there are no reasons to expect contaminated soil at the site. This analysis is supported by geotechnical borings and cone penetration test (CPT) samples collected at the Project site, none of which showed signs of soil contamination. Therefore, there is no evidence to suggest hazards associated with airborne contaminants to affect nearby schools or any other surrounding uses. Nevertheless, the EIR recognizes that construction of the Project would involve use of some materials regarded as hazardous. While the risks associated with routine transport, use and storage of these materials is relatively small, mitigation measures MM HM-1, HM-2 and HM-3 have been included to further reduce the potential for an accidental release of hazardous materials during construction, and therefore further minimize the small likelihood that workers and the public, including nearby schools, would be exposed to health hazards. These measures require an environmental training program to teach appropriate work practices, such as spill prevention and emergency response measures, as well as a Hazardous Substance Control and Emergency Response Plan, and observations of soil during excavation and grading.

Response to Comment 2

The plant site has been designed such that all stormwater runoff is captured at a designated collection point and routed back to the treatment plant's headworks. This design will prevent any untreated liquids from leaving he site by way of the storm drain or as runoff. Please see page 4.7-22, first paragraph of Section 4.7 – Hydrology and Water Quality for more details.

Response to Comment 3

Property valuations and Project cost analysis are beyond the scope of this EIR and are not required by CEQA. Analyses of Project costs will be prepared in conjunction with assessment district formation for each phase of Project implementation. The latest preliminary information on the assessment district formation for Phase 1 may be found by contacting the City Public Works Department. Response #5 to the FAQs at http://www.malibucity.org/DocumentCenter/View/6800 also addresses the issue of effects on property values.

Response to July 21 Public Hearing Oral Comment by Peter Shellenbarger/Heal the Bay (D-10)

Oral comments presented during the public hearing were also included in written comments submitted to the City on July 28, 2014. Please see response to comments contained in Letter B-3.

Response to July 21 Public Hearing Oral Comment by Ryan Embree (D-11)

Oral comments presented during the public hearing were also included in written comments submitted to the City on July 28, 2014. Please see response to comments contained in Letter C-4.

Response to July 21 Public Hearing Oral Comment by Rick Margolis (D-12)

Response to Comment 1

The pump stations that would be installed as part of the Phase 2 project are not required for the Phase 1 project to operate.

Response to Comment 2

A decentralized treatment alternative was considered and dismissed. At present, individual OWDSs within the Prohibition Area provide varying levels of performance. The ability to upgrade and regulate these systems (approximately 600) would be difficult and costly, would result in tremendous energy demand, and would not necessarily ensure that the resultant treated effluent would meet discharge standards. The ability of the City to achieve this is speculative.

Additionally, an alternative which would keep the OWDSs in place and collect and dispose of the treated effluent from the individual OWDSs would still require the design and construction of a collection and disposal system, including pipelines, pump stations and injection wells, seepage pits and/or percolation ponds. This alternative would expand the physical area affected by the proposed Project and would therefore likely expand the resulting impacts.

CEQA requires that feasible alternatives that would meet most of the basic project objectives and would avoid or substantially lessen any of the project's significant effects be considered. A decentralized treatment alternative is unlikely to avoid or substantially lessen any of the proposed Project's impacts; therefore, this alternative was rejected from further consideration.

Response to Comment 3

The City's intention is to minimize the visual aesthetic impacts of the Project via design and landscaping. In determining site landscaping, several factors are considered, including fire hazard and fuel modification requirements of the Fire Department, climate, water use and rate of growth. Fire Department requirements and restrictions preclude large trees and shrubs that would overhand buildings and also dictate issues like spacing and species that make screening facilities more challenging. Furthermore, when planting trees for maximum growth and coverage, planting larger trees at the outset is not always best as, in order to get maximum tree screening in the shortest amount of time possible, smaller trees must be planted following construction (that is, in a large number of tree species, smaller transplanted trees grow faster than larger transplanted trees). These factors, together, can limit tree screening five years post-construction.

Response to July 21 Public Hearing Oral Comment by Michael Toney (D-13)

Response to Comment 1

The comment was unclear as to what pollutants are being traded. In any event, the Project would improve the quality and effectiveness of wastewater treatment over that which is currently provided by existing OWDSs and package treatment plants operating in the Prohibition Area.

Response to July 21 Public Hearing Oral Comment by Norm Haynie (D-14)

Response to Comment 1

Project cost analysis is beyond the scope of this EIR and is not required by CEQA. However, minimizing costs to property owners in the Prohibition Area is one of the Project objectives and the City is seeking the most cost-efficient Project to address its obligations under the MOU. Other alternative treatment systems have been considered and rejected, in part due to cost, and therefore, were not analyzed in this EIR.

Cost analyses would be prepared in conjunction with assessment district formation for each phase of Project implementation as a parallel public process. The latest preliminary information on the assessment district formation for Phase 1 may be found by contacting the City Public Works Department.

Discussion of alternative systems considered and rejected, at least for Phase 1, is summarized as follows:

Vacuum System

In nearly all of the Phase 1, 2, and 3 areas, there would be sufficient depth to groundwater to allow use of conventional gravity sewer and pump stations for wastewater collection and conveyance to the treatment plant. Nearly all of the planned pump stations would have static lifts greater than the 13 foot static lift generally achievable with vacuum pump stations. The widespread use of a vacuum sewer system would require more vacuum pump stations than conventional pump stations, which would increase the capital and operational costs of the system.

A vacuum sewer system could be a viable alternative in the Malibu Colony area, where the groundwater level is a few feet below the ground surface, the ground is relatively flat, and poor soil conditions result in difficult trenching conditions. This area is within Phase 2 and Phase 3 of the Prohibition Area and has not yet been designed in detail. When these phases of the Project are undertaken, project-level CEQA document(s) describing the proposed type of collection system for this area would be prepared. These project-level EIR(s) would tier off this programmatic EIR. A vacuum sewer was determined to be infeasible for Phase 1 due to the additional capital and operational costs.

STEP/STEG System

STEP/STEG collection systems use a septic tank at each property to attenuate the peak flow rate from the property and to settle the solids out in the tank prior to delivering wastewater to the public sewer line or other location for treatment. For this Project, the septic tanks would need to be water-tight to ensure that brackish (i.e., salty) groundwater does not enter the system. A small degree of brackish water intrusion would increase the salt concentration (TDS) in the recycle water, limiting its usability. Even in areas where brackish groundwater is not an issue, the septic tanks of a STEP/STEG system would need to be water-tight to prevent rainwater infiltration in order to minimize the amount of collected water to be treated. Most of the septic tanks currently in place in Malibu are likely not water-tight as they were constructed for use

with an associated leach field, and water-tight construction is not typically required for that application. Therefore, most property owners would have to replace their existing septic tanks if a STEP/STEG system were used in the proposed Project. This cost would be borne by the private property owners, and thus would increase the (preliminary) estimated total cost of the Project to each property owner even further. Additionally, because a STEP/STEG system settles sewage solids in the individual septic tanks, it would reduce the amount of organic carbon that would be received at the treatment plant. However, organic carbon is needed at the treatment plant to achieve the denitrification that would be required by the LARWQCB. Thus, use of a STEP/STEG system would increase the amount of supplemental carbon that would have to be purchased and added at the treatment plant, thereby increasing the operating cost of the plant. For these reasons, a STEP/STEG system was determined to be infeasible and was not recommended for this Project.

Decentralized System

A decentralized treatment alternative was considered and dismissed. At present, individual OWDSs within the Prohibition Area provide varying levels of performance. The ability to upgrade and regulate these systems (approximately 600) would be difficult and costly, would result in tremendous energy demand, and would not necessarily ensure that the resultant treated effluent would meet discharge standards. The ability of the City to achieve this is speculative.

Additionally, an alternative which would keep the OWDSs in place and collect and dispose of the treated effluent from the individual OWDSs would still require the design and construction of a collection and disposal system, including pipelines, pump stations and injection wells, seepage pits and/or percolation ponds. This alternative would expand the physical area affected by the proposed Project and would therefore likely expand the resulting impacts. A decentralized treatment alternative is unlikely to avoid or substantially lessen any of the proposed Project's impacts; therefore, this alternative was rejected from further consideration.

Response to July 21 Public Hearing Oral Comment by Commissioner John Mazza (D-15)

Response to Comment 1

Las Virgenes Municipal Water District is using composting for odor scrubbing. The proposed treatment facility would use a similar system for odor scrubbing. Used compost from the odor scrubbing facilities will not be available for public reuse.

Response to Comment 2

A decentralized treatment alternative was considered and dismissed. At present, individual OWDSs within the Prohibition Area provide varying levels of performance. The ability to upgrade and regulate these systems (approximately 600 of them) would be difficult and costly, would result in tremendous energy demand, and would not necessarily ensure that the resultant treated effluent would meet discharge standards. The ability of the City to achieve this is speculative.

Additionally, an alternative which would keep the OWDSs in place and collect and dispose of the treated effluent from the individual OWDSs would still require the design and construction of a collection and disposal system, including pipelines, pump stations and injection wells, seepage pits and/or percolation ponds. This alternative would expand the physical area affected by the proposed Project as potential impacts at each OWDS site must be considered, and would therefore likely expand the resulting impacts.

CEQA requires that feasible alternatives that would meet most of the basic project objectives and would avoid or substantially lessen any of the project's significant effects be considered. A decentralized treatment alternative is unlikely to avoid or substantially lessen any of the proposed Project's impacts; therefore, this alternative was rejected from further consideration.

Response to July 21 Public Hearing Oral Comment by Wendi Dunn (D-16)

Response to Comment 1

A baseline monitoring program will be established later this year to establish the baseline conditions of Malibu Creek and Lagoon from which to monitor for water quality improvements resulting from Project implementation. This program has not yet been implemented; therefore there are no baseline data currently available for this Project.

Response to Comment 2

A surface water and groundwater quality monitoring program are mandated by the City's MOU and would be detailed in the Project's permit requirements established by responsible agencies. Analyses as to what the anticipated water quality impacts would be as a result of Project implementation are included in the EIR, including in Appendices G1 and G2.

Response to Comment 3

As noted above, a surface water and groundwater quality monitoring program are mandated by the City's MOU and would be detailed in the Project's permit requirements established by responsible agencies, such as the WRR/WDR to be issued by the LARWQCB. Locations to be monitored and required laboratory analyses would be documented in this monitoring program. Monitoring would be conducted before Project operations (baseline) and during project operations.

Response to Comment 4

There are multiple sources of bacteria contributing to the bacterial loading of Malibu Creek and Lagoon. These have been studied by others; for example, please see *Sources of Fecal Indicator Bacteria to Groundwater, Malibu Lagoon and the Near-Shore Ocean, Malibu, California, USA*, by John A. Izbicki et al. (United States Geological Survey, 2012).

In regards to the Modelo Formation, the proposed Project is being implemented to address OWDS contribution of bacteria and nutrients to Malibu Creek and Lagoon. Inorganic rock formations, such as the Modelo Formation, do not naturally contribute these organic-related constituents to water chemistry.

RMC Water and Environment-ICF International. 2014. Malibu Civic Center Wastewater Treatment Facility Project. Draft Final Environmental Impact Report. October. Prepared for City of Malibu, Malibu, CA