

**Malibu Surfing Association**

**A nonprofit organization**  
Federal Tax ID 95-4459007

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msasurfing.org

January 21, 2015

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
POB 100  
Sacramento, California 95812-0100



**RE: COMMENTS TO A-2236(a)-(kk)**



Dear Ms. Townsend,

Formed in 1961, MSA is one of California's oldest surfing clubs. Our home surf break is world-famous Malibu Surf Rider Beach, one of surfing's few 'perfect waves,' and dedicated in 2010 as the first World Surfing Reserve for its contribution to the history and culture of the sport.

Our members, who collectively represent over 800 years of surfing, value living near the coast, value surfing as their primary recreational activity, and value Malibu and other Los Angeles County beaches as those coastal resources where most of their surfing takes place.

All of which is a way to say that we are a face of your decisions. We directly receive the benefits of improved treatment of stormwater and dry weather runoff. And the converse is true, the value of our recreation experience, if not our own health, is compromised with poor water quality.

And so, with this link between our recreational experience and water quality, the link between ourselves and the MS4 permit, we ask for the following:

**ONE:** Maintain strict compliance with water quality standards in the 2001 permit;

**TWO:** Seek and support multi-benefit solutions to stormwater pollution;

**THREE:** Seek green infrastructure / low-impact development, multi-benefit solutions;

**FOUR:** Continue to value stormwater as an asset; and

**FIVE:** Clearly separate the rights, responsibilities, and benefits between watershed and enhanced watershed management programs.

We commend permittees for their effort, including significant investments, as they work toward attainment. We recognize, as they do, that the Draft Order builds upon new approaches to stormwater management programs.

These efforts notwithstanding, we urge strict accountability throughout the MS4 permit as a salient means to achieve water quality objectives. Building along cannot ensure attainment. A house unoccupied stands as

structure only, not shelter.

Thank you for the opportunity to provide these comments. Please contact me at your convenience with any questions.

Regards,

Michael Blum  
Stewardship Chair  
Immediate Past-President  
Malibu Surfing Association