

# Response to Editorial on “Risk of Recreational Water Use in Southern California”

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**W**e are responding to the commentary regarding our investigation of the health risk of recreational water contamination in Southern California published in the fall 2008 issue of this journal.<sup>1,2</sup> The commentator dismisses the findings of our large-scale study with two unsubstantiated theories that lack scientific creditability and echo claims made by sewage industry representatives and their associated researchers. These theories were directly addressed in the original manuscript; however we will provide greater detail in this response.

First, the commentary suggests that US EPA and California water quality criteria are not relevant to Southern California “because ocean outfalls do not impact the shoreline with any frequency or regularity.” Decades of research directly refute this claim. Southern California’s coastline is dotted with offshore sewage outfalls (Figure 1). The regions’ 20 million residents generate an enormous waste stream that results in 1.4 billion gallons of treated wastewater being discharged into the coastal waters every day. The region contains some of the largest treatment facilities in the country and their discharges can produce pollution plumes miles long, affecting local beaches. Beaches closest to outfalls (Huntington, Santa Monica, Doheney) consistently have elevated bacteria levels compared to beaches removed from these point sources (Crystal Cove, Zuma, Blacks). Sewage discharge plumes have been tracked and studied—a striking example presented by the University of California is an animated model of the Orange County waste plume shown to waft, wane and blow back onto Huntington Beach, which incidentally is the most highly attended beach in all of California. (<http://www.sccoos.org/data/tracking/OCSD/>.)

In addition, large volumes of tertiary treated sewage (>200 m/g/d) are discharged daily into rivers that drain onto

recreational beaches. The two largest rivers in the region (*Los Angeles River* and *San Gabriel River*) have no natural perennial source of flow; 80% of the river water is treated sewage and the rest is comprised of untreated urban runoff and other permitted discharges.

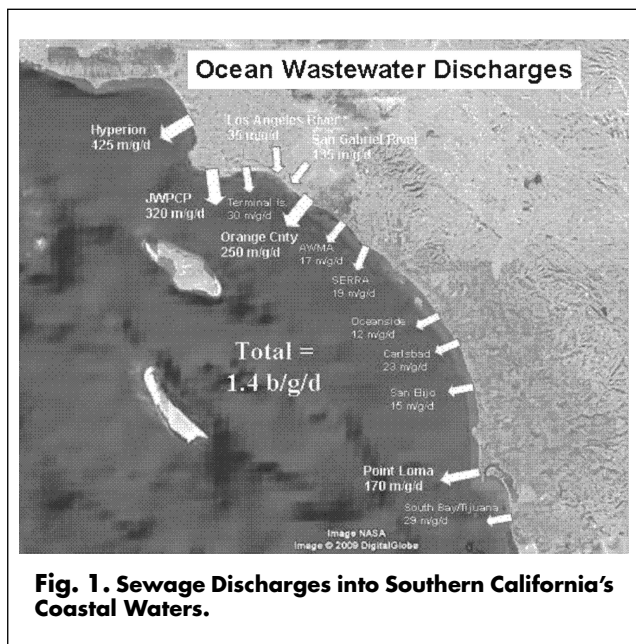
The editorial argues that complete “disinfection” of sewage is achieved by current treatment regimens, eliminating any health risk from these discharges. While this laudable goal is certainly shared by all interested parties, it unfortunately remains unrealized. Millions of gallons of sewage are discharged each day into Southern California’s coastal waters at substandard treatment levels according to federal criteria (receiving only primary treatment). Sanitation officials have represented chlorination as an excellent disinfection tool, which several treatment facilities employ. However, the lead scientist and primary author of US federal water quality guidelines and others reported that chlorination is very effective at killing the indicator bacteria but not the pathogenic viruses, thus masking the public health risk.<sup>3,4</sup>

However, the primary source of coastal water contamination in Southern California is from untreated runoff waters discharged onto recreational beaches. The region is one of the most highly urbanized and densely populated areas of the county, and consequently, large quantities of pollution are generated daily. The sources of contamination found in urban runoff are many and varied, including aging sewage infrastructure, illegal discharges, spills, and permitted discharges. Ironically, the author of the commentary in question can be viewed discussing a long list of sources of sewage contamination found in urban runoff. (<http://video.google.com/videoplay?docid=-2210882608482859627>).

Several investigations of urban runoff in Southern California have confirmed: the presence of human pathogens

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**Fig. 1. Sewage Discharges into Southern California's Coastal Waters.**

in urban runoff;<sup>5-8</sup> that urban runoff contaminates recreational coastal waters;<sup>9-14</sup> and that exposure to contaminated coastal waters in this region is associated with illnesses in swimmers.<sup>15-18</sup>

The second erroneous accusation states that our investigation assumes “all of the measured bacterial densities of enterococci or fecal streptococci originate from human sources.” The commentary’s theory rests on an assumption that indicator bacteria originate in the natural environment, and thus Southern California represents a unique setting where *enterococci* found in beach waters do not correlate with health risk. The validity of *enterococci* as an indicator of risk in recreational marine waters has been recognized by a worldwide body of epidemiologic research, four meta-analyses,<sup>19-22</sup> and by scientists at the US EPA, the European Union, and the World Health Organization.<sup>23,24,25</sup> More directly, three epidemiology studies have been conducted at open ocean beaches in Southern California and they all report *enterococci* concentrations in the water were a statistically significant predictor of health risk in swimmers.<sup>15,26</sup>

We disagree with the commentator and researchers who claim the high levels of *enterococci* found in Southern California’s coastal waters originate from non-human sources. Alleged environmental sources of indicator bacteria (which are not indigenous to the marine environment) include: (1) Sand and soil; however, beach sand is clean where the water is clean; and the vast majority of sand beaches have low levels of waterborne bacteria. Polluted waters contaminate the sand, not visa versa. (2) Wildlife that are concentrated in wetlands and their presence, even in high densities, does not correlate with contamination of open ocean beaches (wetlands degrade biological pollutants—the water draining out is cleaner than the inputs). (3) Kelp—These photosynthetic brown algae have no association with enteric bacteria, and

ironically, they are considered an indicator species of clean water. These theories divert attention from the massive volumes of human waste discharged daily and blames the natural environment for the contamination.

There is no epidemiologic evidence for any of these theories and thus no scientifically appropriate rationale for adjusting federal and international health risk models used in our analysis. In fact, all previous epidemiology studies have been conducted in the natural environment, so any confounding variance potentially contributed by non-human sources would have been accounted for in their models.

The commentary also extrapolates to open ocean beaches the findings of a single epidemiological investigation<sup>18</sup> conducted at a highly modified embayment and based on those results then disregards the scientific relationship underlying US and California water quality criteria. This exact type of inference was explicitly warned against by both the investigators of the study, as well as by the journal editors.<sup>27</sup> We defer to the site-specific qualifications best articulated in those articles in regards to the inapplicability of the results to open ocean beaches.

Our analysis is founded on the most comprehensive sets of coastal water quality and human exposure data that have been presented in the scientific literature. The analysis used the two recognized equations that are the basis for Federal and international water quality criteria. The equations were applied to data for every beach in Southern California over 5 years to model health risk estimates generated over time.

Two important findings of our investigation remain uncontested. The first observation is beach attendance is the strongest determinant in the magnitude of the public health burden, not water quality. The second observation is that current recreational water quality criteria (that define 1.9% gastrointestinal illness rate as acceptable) results in a significant disease burden for the 56 million Southern California beach swimmers. It is our sincere interest that the scientific discourse moves beyond attributing coastal water contamination problems to the environment, and focuses on developing a solution to the large burden of illness from the pollution.

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