

Malibu Creek Watershed draft CIMP Work Plan – detailed comments

1. *Malibu Creek Watershed CIMP, Section 1, Introduction and Background, page 1, 3rd paragraph final sentence* – monitoring has also been conducted by the National Park Service and Los Angeles County Sanitation District’s Calabasas Landfill.

2. *Malibu Creek Watershed CIMP, Section 2.1.4 Malibu Creek and Lagoon TMDL for Sedimentation and Nutrients (USEPA), page 12, 1st set of bullets,*

- a. 3rd bullet – “Southern California Index of Biological Integrity (SC-IBI)” and “California Predictive Multi-Metric Index (pMMI)” should be separate bullets. Both are included with numeric targets in the benthic macroinvertebrate TMDL, but they are not related. The California predictive Multi-Metric Index (pMMI) is part of the CSCI index currently being developed by the state and is applicable statewide. The Southern California Index of Biological Integrity (SC-IBI) is an older, regional metric.
- b. Chlorophyll a concentration is missing from this list.

3. *Malibu Creek Watershed CIMP, Section 4.1.1 Mass Emission Station, page 32, Table 8* – There is some confusion in the final two rows of this table.

- a. The second to the last entry has “Predictive Multi-Metric Index (pMMI) – SC-IBI.” But these should be listed as two separate entries. The pMMI is part of the CSCI and is not related to the SC-IBI.
- b. The last entry in Table 8 says “California Stream Condition Index (CSCI) – OE.” This is misleading because the CSCI is composed of the O/E and pMMI in equal measure. The TMDL (pages 3-2 and 10-2) lists the CSCI, followed by text indicating the inclusion of its component parts: the CA O/E and the pMMI. These three indices (CSCI, O/E and pMMI) could be listed in a single entry with mention of all three (as is done in the TMDL), or they could be listed in three separate entries.
- c. Although chlorophyll a is included in the text on page 31 as a constituent to be monitored at the Mass Emission Station for the TMDL regarding benthic macroinvertebrate impacts, it is missing from Table 8.

4. *Malibu Creek Watershed CIMP, Section 4.2.4 Benthic Community Impairments, page 35*– The final sentence lists parameters to be tested for the benthic macroinvertebrates TMDL. Benthic community diversity can be deleted as it is listed as a TMDL target for the lagoon and not the creek. The remaining parameters should be listed as “CSCI, CA O/E, pMMI and SC-IBI” to avoid confusion. The CSCI is composed of the CA O/E and the pMMI indices currently being developed by the state, and are all statewide measures. The SC-IBI is an older regional measure for coastal southern California. All four measures are included in the TMDL. As written, the “pMMI SC-IBI” could be interpreted as a single measure, which is not the case.

5. *Malibu Creek Watershed CIMP, Section 6.1 Permit Requirements, page 50* – The last sentence on the page includes “Error! Reference source not found.” This occurs again in the last paragraph on page 52.

6. *Malibu Creek Watershed CIMP, Section 6.4.2 Monitored Parameters, Frequency, and Duration, Table 17, page 57* – There is a footnote on Dioxin following the table, but there is no footnote indicator in the table.