From:	Sarah Sikich
To:	Cindy Lin/R9/USEPA/US@EPA; Sarah Abramson
Cc:	Mark Gold
Subject:	RE: Comments on State of the Malibu Creek Watershed Report
Date:	10/05/2011 09:15 AM

Thanks Cindy! I'm at a marine debris meeting in Portland, but look forward to reading through your comments when I return. I will let you know if I have any questions.

Thanks,
Sarah

From: Lin.Cindy@epamail.epa.gov [mailto:Lin.Cindy@epamail.epa.gov]
Sent: Tuesday, October 04, 2011 4:21 PM
To: Sarah Abramson
Cc: Mark Gold
Subject: Comments on State of the Malibu Creek Watershed Report

Hi Sarah,

Here are some of my comments. Please let me know if you'd like to chat about any of my comments. I would have liked to add more content to some of the comments, but wanted to make sure I get this to you sooner than later. Please call if you have questions.

Cindy
(858)699-1255

General:

It might be helpful to provide a map of all the sampling sites in the beginning, including a short description for each. That way, it's easier to go back to and figure out the context during the discussion sections for the sampling sites.

I think the report did a fantastic job of providing the very detailed and comprehensive information. There are so many critical nuggets in the report that is would be great to highlight for the public.

Have you thought about including an Executive Summary for those who won't go through the entire report?

I also think it might be great to include a section on the top critical stressors. In one section at the end, the report describes that water quality and imperviousness are the top 2 stressor providing the biggest impact. It would be nice to have this in the beginning for those who want to get at the critical points of the report.

Specific Sections:

p5, last paragraph: In the middle of the paragraph, starting with, "Waters on the list must be issued an enforceable action plan with pollution limits to facilitate water quality improvement, called a TMDL." TMDLs are not self-implementing or self enforceable. It would be better to say something like, "Water on the list must complete a TMDL, an in depth technical and comprehensive assessment of the problem that also sets pollution limits, to facilitate enforceable actions and water quality improvement."

p12, Section on Land Use and Impervious Cover: It would be helpful to describe how pervious grounds is helpful and advantageous for limiting pollution runoff. Currently, the section describes why imperviousness is bad, but could benefit from 1-2 sentence on why perviousness is important.

p16, pop out: would it be possible to include some data with the assertion that Malibu Valley Farms is leading to increased bacteria concentrations, etc?

p18, last parag on Unstable Banks: I'm still not clear on why the 100 ft buffer zones may be inadequate. Is this section suggesting that unpaved roads and trails is a significant problem?

p19, Figure 2e: It might be nice to have a column that shows the % bank miles that are unstable to give immediate perspective.

p22, top parag: Where did the 987 stream bank modifications come from? Was this described earlier?

p22, 2nd parag: It can be helpful to your point if the actual data is presented for "mean SA of erosion decreased as distance from discharge point increased.

p30, 1st parag: The TMDL for sedimentation for Malibu Creek is currently due by March 2013. The other creeks have not been slated for a time.

p33, 2nd parag: The mileage provided is set with 2 significant digits. Is it to that accuracy on the mileage?

p39, 3rd parag: In the last sentence, it states that US EPA states.....In footnote 32, I don't see EPA reference of that statement. Can you clarify?

p39-44: Can you show that Tapia is causing the increase in TN levels with some data? Or perhaps, some of these sites are representative of Tapia. It would be clear to clarify that. I think that a more detailed case should be made for Tapia. Perhaps, you can bring together all the evidence specifically for Tapia into one section.

p44, The pop out on Robert's property and the failing septic is a great example. It does seem that this could be a major problem. It would be nice to have a little more discussion in the overall text on this issue of failing septic and how much it's impacting the nutrient levels flowing downstream and in the watershed.

p48, 1st parag: You might want to explain a little more about the fact that an EPA established TMDL does not allow for an implementation plan; the state has not issued an implementation plan with actions to meet the pollution limits for Phosphorus.

p50, 2nd parag: Typo in mid paragraph, starting with, "Tapia contributes approximately 48% of the P loading in the watershed annually despite the fact that ....."

p51, the discussion mentions that the Monterey formation may lead to increased phosphate levels of 0.5 mg/L. Can you ref this or describe more how this came about?

p87, last parag: I think the discussion on the impact of impervious area on the biological condition should be expanded; specifically, it seems strange that more than 80% of the watershed is undeveloped, and yet, the impact is still so pervasive. Perhaps some more discussion on the point about density of impermeable area in specific places should be expanded.

p89, Figure 5c: The R square is 0.58; can you explain why this is considered a strong correlation? In this case, only 50% of the variation is explained by the relationship between WQ Score and IBI score.

p89, Figure 5d. It's not clear how the decision to remove sites with PEI > 12% was determined. Also, more discussion of this significance should be provided. It would be helpful to have a concluding sentence or paragraph on these critical points about WQ and IBI scores.

p90-91: In your discussion on SHI, it would be critical to include the assumptions made in developing these indices. It's not clear what the role of a SHI would be besides getting a single number for all the indices. But, this would imply that all of them are equally weighted at this point. And, it's not clear that having this overall index provides additional insight. Perhaps, more discussion is warranted to help the reader understand the critical conclusions.

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