

Malibu Creek Watershed draft EWMP Work Plan – detailed comments

1. *Malibu Creek Watershed, EWMP Work Plan, Section 1.1 Watershed 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, EWMP Work Plan, Section 3.1.4 Malibu Creek and Lagoon TMDL for Sedimentation and Nutrients (USEPA), page 7, 1st set of bullets* – The bullet items below are either included incorrectly in the list of EPA Benthic Community Impairments TMDL targets and should be deleted or are not included and should be added.
 - The California Stream Condition Index (CSCI) is missing from the list of numeric targets for Malibu Creek and its tributaries and should be included (TMDL page 3-2). The CSCI is composed of (1) an O/E Ratio (observed over expected) and (2) a predictive multi-metric index (pMMI). These are statewide metrics and not specific to southern California. The two component metrics of the CSCI could also be added to the list as they are listed individually on page 10-2 of the TMDL as biological response targets.
 - There is no Southern California O/E Ratio – this bullet item should be deleted.
 - Benthic community diversity is not a numeric target for Malibu Creek and its tributaries; it is only a target for Malibu Lagoon. It should be deleted from this set of bullets for Malibu Creek.
3. *Malibu Creek Watershed, EWMP Work Plan, Section 3.2, 303(d) Listings, Table 4, page 11* – The 2010 303(d) listing for lead in Westlake Lake is correctly included, but it may be helpful to note that EPA analysis of lead data for the LA Area Lakes TMDL indicated that the lake is in compliance for lead and is achieving numeric targets, so was not included in the final TMDL.
4. *Malibu Creek Watershed, EWMP Work Plan, Section 4, Water Quality Priorities, page 12, second to last and last sentences of first paragraph* – The second to last sentence is unclear. The last sentence is incomplete.
5. *Malibu Creek Watershed, EWMP Work Plan, Section 4, Water Quality Priorities, page 16, Figure 2* – The Los Angeles County Mass Emissions site is hidden under other monitoring points in this map. It may be useful to bring it to the top of the list in the GIS to make it visible.
6. *Malibu Creek Watershed, EWMP Work Plan, Section 5.1.1, page 25* – After listing all the stormwater BMPs each permittee practices, LVMWD's mandatory water conservation measures are included. We appreciate the recognition of our contribution to runoff control through water conservation.
7. *Malibu Creek Watershed, EWMP Work Plan, Section 5.1.3, Existing Structural BMPs, page 26, Table 15* – Item 4 in the table lists the City of Calabasas as the permittee for an existing subsurface flow wetland in Liberty Canyon Creek. This item should be checked, since Liberty Canyon Creek watershed is almost entirely in the jurisdiction of Los Angeles County and the City of Agoura Hills, with only a small portion near the ridgelines in the City of Calabasas.
8. *Malibu Creek Watershed, EWMP Work Plan, Section 5.1.4, Existing Multi-Benefit Projects, page 28* – The EWMP work plan cites the Proposition 50 grant project using the name *The Malibu Creek Watershed Water Conservation Project*. We are the local project sponsor for this grant, which is named in the grant agreement as the *Malibu Creek Watershed Urban Water Conservation and Runoff Reduction Project*.

9. *Malibu Creek Watershed, EWMP Work Plan, Section 5.2.2, Multiple Benefits and Potential Multi-Benefit Regional Projects, first bulleted item, pages 29-30* – This item on water supply/water conservation says “There may be opportunities in the Malibu Creek Watershed to capture, treat and use stormwater and non-stormwater runoff. Initial collaboration with the Las Virgenes Municipal Water District has identified challenges with augmentation of water supply through capture and use in the MCW but also potential opportunities to divert non-stormwater runoff and stormwater runoff into the sewer system, where it can be stored for use as part of the recycled water system.” We request the EWMP’s finding of potential opportunities to divert non-stormwater runoff and stormwater runoff into the sewer system be omitted. Such diversions to the Tapia WRF are precluded by both volume and stormwater quality issues that may hinder our ability to comply with Federal and State regulatory limits and provisions of the NPDES permit for Tapia WRF.

10. *Malibu Creek Watershed, EWMP Work Plan, Section 5.2.3.2, Source Control BMPs, pages 31-32, 2nd bullet and 4th bullet with first three sub-bullets* – We request references to Tapia WRF in this section be deleted. We welcome coordination with MS4 permittees necessary to avoid MS4 permit compliance impacts on Tapia WRF and other JPA facilities, but Tapia WRF facilities and operations are regulated under NPDES permit no. CA0056014.

11. *Malibu Creek Watershed, EWMP Work Plan, Section 5.2.3.2, pages 31-32, 4th bullet, 3rd sub-bullet* – The third sub-bullet lists “enhanced treatment of recycled water used for irrigation” as a potential source control BMP for discharges from Tapia WRF. This bullet should be deleted. First, the quantity and quality of recycled water used for irrigation is regulated under a Water Discharge/Water Reclamation Requirements permit. Secondly, enhanced treatment would pose significant cost to the JPA. The final two source control BMPs listed are reasonable, but should fall under a “landscape irrigation” bullet and not a bullet for discharges from Tapia WRF: “site design and landscape planting” “efficient irrigation.”

12. *Malibu Creek Watershed, EWMP Work Plan, Section 5.2.4.1 Regional BMPs on Public Parcels, page 34, 2nd bullet*: Please see comment number 10, above.

13. *Malibu Creek Watershed, EWMP Work Plan, Section 5.2.4.1 Regional BMPs on Public Parcels, page 34, 3rd bullet: Regional Stormwater Capture and Use Projects* – “... Regional stormwater capture and use may substitute the multiple extraction wells that are currently used by LVMWD throughout the watershed to supply irrigation water to larger residential communities and agricultural landowners.” This last sentence should be deleted because of multiple inaccuracies. The JPA has only two groundwater wells, not “multiple extraction wells,” which are about 1/3 mile apart in Westlake Village, so not “throughout the watershed.” The groundwater has a high iron and manganese content that can stain masonry, so it is blended with recycled water at Tapia and distributed through the recycled water distribution system. Although it is possible that regional stormwater capture and use projects may decrease need for recycled water based on current delivery numbers, the recycled water system is continually expanding, so it is unlikely those two wells will be abandoned.

14. *Malibu Creek Watershed, EWMP Work Plan, Section 5.2.4.2 Distributed BMPs on Public Parcels, page 34, 2nd paragraph* – There appears to be a word missing between the words “through” and “and” in the sentence “Some of these BMPs retain water through and evapotranspiration, as some are vegetated systems, while other systems retain stormwater by using it as a resource for water demands.”

15. *Malibu Creek Watershed, EWMP Work Plan, Section 5.2.4.2 Regional BMPs on Public Parcels, page 35, 3rd bullet* – Among the list of potential distributed retention BMPs is the item “Small-scale low flow diversions divert low flows that occur during the dry season to the sanitary sewer on a distributed basis.” This bullet should be deleted (see comment to Section 5.2.2).

16. *Malibu Creek Watershed, EWMP Work Plan, Section 6.2.1 Evaluation of Regional Projects, Runoff Diversion or Storage, Pages 37-38* – Those portions of this section related to diversion to the sanitary sewer system should be deleted. We have no objections to those portions related to stormwater capture and use that do not involve the JPA.

17. *Malibu Creek Watershed, EWMP Work Plan, Section 6.2.1 Evaluation of Regional Projects, Quantification of Retention, Page38* – Please see comment number 10, above.

18. *Malibu Creek Watershed, EWMP Work Plan, Section 7.3.1.1 Characteristics of specific sources in Malibu Creek Watershed, 2nd bullet, Page 45* – This bullet states “The Tapia Water Reclamation Facility (Tapia WRF) recycles on average 9.5 million gallons per day (MGD) of wastewater and maintains a minimum discharge of 2.5 cubic-feet per second (cfs) in Malibu Creek. Sixty percent of the treated water is distributed for irrigation purposes, and 40 percent is discharged directly into Malibu Creek.” The bulleted text goes on to explain how the information will be used in modelling, and we would not want inaccuracies in the data related to Tapia WRF to introduce error in the model. The quoted text should be corrected and clarified as follows. Tapia WRF recycles on average about 5 to 7 MGD per day, not 9.5. The average was 5.7 MGD for the years 2006-2012. Correction to the statement that discharges from Tapia WRF maintains a minimum discharge of 2.5 cfs. Tapia augments flows to Malibu Creek such that there is 2.5 cfs creek flow, not discharge from Tapia.