



# bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission ✂ 320 west 4<sup>th</sup> street, ste 200; los angeles, california 90013  
213/576-6615 phone ✂ 213/576-6646 fax ✂ www.smbrc.ca.gov

January 25, 2013

Dr. Cindy Lin  
U.S. Environmental Protection Agency  
Southern California Field Office  
600 Wilshire Blvd., Suite 1460  
Los Angeles, CA 90017

Via email: [lin.cindy@epa.gov](mailto:lin.cindy@epa.gov)

RE: Comments on the draft Total Maximum Daily Loads (TMDLs) for Sedimentation and Nutrients to address Benthic Community Impairments in Malibu Creek and Lagoon

Dear Dr. Lin:

Thank you for the opportunity to comment on the Draft TMDLs for Sedimentation and Nutrients to address Benthic Community Impairments in Malibu Creek and Lagoon (Draft TMDL). The SMBRC strongly supports EPA efforts to protect and enhance water quality in the Malibu Creek watershed and finds that the TMDLs as drafted are generally scientifically sound and implementable. We have the following specific comments on the proposed TMDLs:

### Section 3.1: Malibu Creek and Tributaries Numeric Targets

**SC-IBI:** *“The SC-IBI scores at stations MC-1, MC-12, and MC-15 should obtain a median value of 40 or better, consistent with at least a “Fair” ranking (Ode et al., 2005).”*

**Comment:** This target is the lowest end of the “fair” value, and represents little improvement over current conditions. SMBRC recommends a minimum target of 60, consistent with the minimum “good” value in the SC-IBI. This is protective of Malibu Creek water quality and more likely to achieve the beneficial uses of Malibu Creek as specified in the Los Angeles Regional Water Board’s Basin Plan, including coldwater habitat. **Comment 2-1**

**Nutrient Concentrations:** *“Based on the analyses described above, nutrient targets in Malibu Lagoon were established for several specific parameters based on the reference system approach: total nitrogen (organic plus inorganic nitrogen) targets are 0.6 mg/L in the summer and 1.0 mg/L in the winter; and total phosphorous targets are 0.1 mg/L in the Creek, major tributaries and in the Lagoon throughout the year.”*

**Comment:** We find no scientific basis for a higher winter target for total nitrogen and recommend the 0.60 mg/L for total nitrogen be a year-around target. **Comment 2-2**

our mission: to restore and enhance the santa monica bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the bay's benefits and values





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## Section 3.2: Malibu Lagoon Numeric Targets

**Benthic Community Diversity:** “Achieve a goal of increasing species richness in Malibu Lagoon with multiple functional groups. USEPA believes that by setting a target of species richness of 35 in 15 years will lead to a healthy community of benthic invertebrates.”

**Comment:** EPA has reviewed available data from Malibu Lagoon over a 15 year time span (1995-2010) and concluded that the average taxa richness was 16 taxa. Additionally, EPA has reviewed data from Los Peñasquitos Lagoon and San Dieguito Lagoon and concluded that “The best indication of the expected increase in benthic infaunal richness was the observed data before and after extended mouth closure due to anthropogenic activities. Los Peñasquitos Lagoon saw approximately three-fold increase of taxa richness (from around 11 to 34). Similarly, San Dieguito, although a much larger estuary, saw a six-fold increase in taxa richness after more natural tidal flushing actions were implemented (from 7 to 42).” Based on these data, SMBRC recommends the target for species richness in Malibu Lagoon be increased from the recommended 35 to a minimum of 48, which is a three-fold increase in average taxa richness stated above. Additionally, the recommended 15-year time frame for reaching target species richness should be reduced to ten years, which would be consistent with the results from wetlands cited above. **Comment 2-3**

### 11.1 Malibu Lagoon Restoration Plan

**Text:** “In addition, the East Lagoon will be enhanced with an altered channel to provide for a new avian island and additional mudflat habitat. It will remove accumulated sediment and replace non-native vegetation with appropriate native species. ....A new underpass will be constructed to improve riparian habitat access north of the Pacific Coast Highway.”

**Comment:** These activities are not occurring during the current lagoon restoration and the reference should be deleted from this section. **Comment 2-4**

#### Additional Comment:

A major restoration project in Malibu Creek that includes the eventual removal of Rindge Dam is currently in the planning stage, and may be implemented during the terms of these TMDLs. The implementation of this plan may have temporary impacts on sediment loads in Malibu Creek. We recommend that the EPA consult with the California Department of Parks and Recreation (State Parks) to address this issue prior to adopting the sediment TMDL. **Comment 2-5**

We appreciate USEPA’s work in developing the TMDLs for Sedimentation and Nutrients

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to address Benthic Community Impairments in Malibu Creek and Lagoon, and look forward to working with Malibu Creek stakeholders to successfully implement these important regulations.

Sincerely,

Shelley Luce, D. Env.  
Executive Director  
Santa Monica Bay Restoration Commission

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