

Exhibit F: Coordinated Integrated Monitoring Program (CIMP) For the North Santa Monica Bay Coastal Watersheds EWMP Group

The Natural Resources Defense Council (“NRDC”), Heal the Bay, and Los Angeles Waterkeeper (“LAWK”) (collectively, “Environmental Groups”) have identified several concerns with the Draft Coordinated Integrated Monitoring Program (“Draft CIMP”) for the North Santa Monica Bay Coastal Watersheds EWMP Group, submitted by the City of Malibu, County of Los Angeles, and County of Los Angeles Flood Control District,¹ which we discuss below.

This discussion, however, is not intended to provide an exhaustive list of deficiencies of the Draft CIMP. Nor does it, in general, address concerns with the Enhanced Watershed Management Program (EWMP) Work Plan for the North Santa Monica Bay Coastal Watersheds EWMP Group.² For Environmental Groups’ comments in response to the North Santa Monica Bay EWMP Work Plan, please see Environmental Groups’ September 16th letter to the Los Angeles Regional Water Quality Control Board (“Regional Board”), submitted under separate cover.

I. Specific Comments to the Draft CIMP for the North Santa Monica Bay Coastal Watershed

A. Maps

The Draft CIMP depicts the entire watershed management area in a single map, which contains land use, HUC-12 watersheds, creeks, and monitoring locations.³ However, the scale of the map renders it difficult to comprehend the distribution of proposed monitoring locations with respect to drainage areas and land uses; the map is in general hard to read and the watershed management area should be broken into two or more sections to be displayed in more detailed and clearer maps. Furthermore, no map in the North Santa Monica Bay EWMP Work Plan or the North Santa Monica Bay CIMP fully depicts the MS4 as required by the 2012 Permit. (2012 Permit, Attachment E, at VI.B.1.b.) Detailed maps including outfalls, catch basins, culverts, and all components of the MS4 within the watershed area must be included in the CIMP as required and defined by the 2012 Permit. (2012 Permit, Attachment A, at A-12).

B. Proposed Receiving Water Monitoring is Insufficient

The North Santa Monica Bay watershed area includes portions of six HUC-12 watersheds, (broken into 18 further sub-watersheds) and 28 freshwater coastal streams, all tributaries to the

¹ Coordinated Integrated Monitoring Program (CIMP) for the North Santa Monica Bay Coastal EWMP Group (“North Santa Monica Bay CIMP”).

² Enhanced Watershed Management Program (EWMP) Work Plan for the North Santa Monica Bay Coastal Watersheds EWMP Group (“North Santa Monica Bay EWMP Work Plan”)

³ North Santa Monica Bay CIMP, at 4-5.

Santa Monica Bay. Only three additional receiving water monitoring locations beyond existing shoreline monitoring conducted under AB 411 and beach advisory monitoring are proposed in the draft CIMP to cover these six HUC-12 watersheds.⁴ This is inadequate to cover the full watershed management area, since at minimum, the six HUC-12 coastal watersheds should be assigned a receiving water monitoring location and be monitored for all priority pollutants.

Furthermore, permittees disregard dry weather monitoring entirely at one of the three receiving water monitoring locations proposed. Table 2-2 of the Draft CIMP, titled, “EWMP Area Receiving Water Monitoring Locations” indicates the Malibu Legacy Park outfall upstream of the Malibu Creek receiving water monitoring location (NSMBW-RW2) “only discharges during very large storm events. However, this approach is unjustified and permittees neglect to follow the minimum dry weather receiving water monitoring requirements clearly laid out in the 2012 Permit, which states:

The receiving water shall be monitoring a minimum of two times per year for all parameters, or more frequently if required by applicable TMDL Monitoring Plans. One of the monitoring events shall be during the month with the historically lowest instream flows, or where instream flow data are not available, during the historically driest month.

(2012 Permit, Attachment E, at VI.D.1.a) Dry weather monitoring of receiving water is not contingent on outfall discharges. Permittees should include an *additional* outfall monitoring location at Malibu Legacy Park outfall that will be monitored during storm events and other times of discharge; the Malibu Creek receiving water monitoring location must be monitored at minimum two times per year in dry weather regardless of MS4 discharges, as the Permit explicitly requires.

C. Stormwater Outfall Monitoring

Permittees identify only two stormwater outfall monitoring locations in the entire EWMP area. Again, the North Santa Monica Bay watershed management area includes six HUC-12 watersheds, 18 additional sub-watersheds, 28 freshwater coastal streams, and over 27 miles of coastline. Two stormwater outfall monitoring locations are entirely inadequate to assess the contributions from the extensive MS4 system contained in the permittees’ EWMP area. The Permit requires, at minimum, one outfall monitoring location per HUC-12 watershed, per permittee, in the North Santa Monica Bay EWMP area.⁵ (2012 Permit, Attachment E, at VIII.A.2.a.). Further, no stormwater outfall monitoring location was identified in the Topanga Canyon Creek watershed. Given that this watershed is the only watershed impaired for lead and is a HUC-12 watershed, stormwater and non stormwater monitoring should be conducted in the

⁴ North Santa Monica Bay CIMP, at 22.

⁵ North Santa Monica Bay CIMP, at E-21.

Topanga Canyon Creek watershed to identify sources and determine the quality of discharges affecting water quality impairments.