

SMBRC Responses to Written Comments on the draft Bay Restoration Plan 2013 Update

(Changes are reflected in the November 26, 2013 Draft)

Section/Topic	Comment	Commenter(s)	Response	Change Made
General	My main comment is that you should evaluate carefully the descriptions of what the SMBRC role will be for each milestone, and as much as possible be more explicit about exactly what it will involve. For example, many times SMBRC will be engaged in education and information dissemination, but that isn't even listed as one of its roles.	Richard Ambrose	SMRBC's role falls in one or more of the following five categories (in the order of the level of involvement) : lead, participate, facilitate, promote, and support. The level of involvement for each category is explained in the introduction to this document. In response to this and similar comments from the Governing Board, additional descriptions are added wherever applicable throughout the document to further clarify SMBRC's role in achieving specific milestones.	
	Milestones that are designed to keep on going, are not as effective as a planning and vision document.	SMBRC Technical Advisory Committee	Some programs by design are on-going or continuous without a sunset date. So no specific target date is identified.	
Section A: Water Quality				
General approach	Goal #1 Title - delete regulatory framework, add collaborative, integrated watershed-wide planning and implementation.	City of Malibu	Language suggested by Malibu for the Goal title is added. The reference to regulatory framework was simplified but kept because the focus of milestones under this Goal is regulatory (including TMDL) compliance.	Revision to title of Goal #1

TMDL Implementation	General comment: When this Plan is adopted, almost all TMDLs in the Consent Decree will be in the "implementation phase". The Plan does not address how those are dealt with. Suggested new milestone: For TMDLs in the implementation phase, analyze all monitoring data to ensure that the required pollutant reductions are being achieved and adjust the allocations as necessary by using focused studies to fill in data gaps.	Las Virgenes Municipal Water Districts	The revised Milestone 1.1a and introductory paragraph incorporated the suggested changes.	Revisions to Milestones 1.1a and introduction.
TMDL Implementation	Milestone 1.1a: We do not believe any demonstration has been made that each and every new TMDL, for every waterbody in the SMB watershed, no matter what the pollutant is or what the size or location of the tributary waterbody is, will improve SMB water quality. Therefore listing as a goal to implement new TMDLs for all remaining listings in the watershed, with SMB water quality as the reason, is inappropriate.	Los Angeles County Sanitation District	Development and adoption of TMDLs for all 303(d) listed waterbodies are required by law, unless the condition of water quality and the listing are re-evaluated. Nonetheless, Milestone 1.1a is revised to allow the evaluation prior to development of additional TMDLs ("Determine the need for development of..." instead of "Develop...")	Revision to Milestone 1.1a
TMDL Implementation	Milestone 1.1c: Redundant with 1.1b.	Los Angeles County Sanitation District	Agree with both LACSD and LACDPW's comment.	Original milestone 1.1c is replaced with one addressing education need
TMDL Implementation	Milestone 1.1c: Delete 1.1c since it is redundant of 1.1b and prioritization can be prompted by more parameters than just near-term deadlines, such as feasibility, partnerships, and relative impact of the pollutants being regulated.	County of Los Angeles Department of Public Works	See response above	Original milestone 1.1c is replaced with one addressing education need
TMDL Implementation	Milestones 1.1a-d: As discussed at the Governing Board meeting, the SMBRC should remain neutral with regards to the establishment or revision of specific TMDL limits. It can facilitate discussion amongst its members on these issues and also conduct or support additional research to better understand pollutant impacts. The SMBRC could have a supporting role in the attainment of water quality goals in adopted TMDL's by funding structural and non-structural Water Quality Best Management Practices and assisting with special studies.	County of Los Angeles Department of Public Works	The SMBRC's role is to facilitate and support the development and implementation of TMDLs through all the recommended mechanisms. Additional narrative that further describes the roles of SMBRC is added to the introduction to this section.	Revision to introduction to Objective 1.1

TMDL Implementation	<p>Milestone 1.1a-d: The Commissioner's questioning of staff's recommendation that the SMBRC "support" or "promote" TMDL compliance was an excellent discussion. I encourage the Commission to further pursue a position of educating and assisting cities with CWA compliance. I recommend the Commission reach out to the cities to understand what they have done so far, and what they have planned, to address water quality issues within their particular watershed. The Commission can offer leadership in helping those cities understand the MS4 permitting requirements, share tools as well as technical assistance and encourage Enhanced Water Management Plans. EWMPs should replace disjointed Watershed Area Groups, or at least be allowed to be a subset of the Groups, allowing cities to form agreements within a more realistically manageable shared watershed.</p>	Jim Knight, SBCCOG	<p>For comment regarding SMBRC's "support" or "promote" role in TMDL compliance, see response to LACDPW comment. Comment regarding EWMPs are addressed by revision to Milestone 1.1b. Comment regarding educating and assisting cities with CWA compliance is a great suggestion and Milestone 1.1c is added specifically in response to it.</p>	Revision to Milestone 1.1b, addition of Milestone 1.1c
TMDL Implementation	<p>Milestone 1.1d: One [important] topic is naturally occurring contaminants entering into the watershed. For example, Rancho Palos Verdes is an area with past volcanic activity leaving behind sulfur, zinc and copper compounds. With the aid of lithotropic bacteria, rocks are torn apart freeing minerals and allowing the formation of sulfuric acids that eventually drain into the ocean. The fear of cities with these ambient conditions is that they will be fined for these non-manmade elements under current MS4 water quality regulations. There must be a way to separate out man-made vs. non-manmade "pollutants".</p>	Jim Knight, SBCCOG	<p>Milestone 1.1d is added to facilitate and support additional research that help to inform and address these issues. Identification of man-made vs. non-manmade "pollutants" is also mentioned as a research topic in the introduction to this section.</p>	Addition of Milestone 1.1d and revision to introduction

TMDL Implementation	Milestone 1.1d: The SMBRC may not realize that RPV has a Landslide Abatement District wherein we have dewatering wells that take underground water and pump it directly onto the shoreline. If the above non-manmade elements happen to be in that drainage, it could show up in monitoring data and, without the man vs. natural distinction above, the city could be heavily fined. This goes along with my statements above about understanding any given city's unique circumstances.	Jim Knight, SBCCOG	See response above.	Addition of Milestone 1.1d and revision to introduction
TMDL Implementation	Milestone 1.1d: Suggest adding new milestone: assist responsible agencies in natural source identification research in order to provide more accurate waste load allocations and water quality standards.	City of Malibu	See response above.	Addition of Milestone 1.1d and revision to introduction
TMDL Implementation	Appendix A (Summary of Santa Monica Bay TMDL Targets and Milestones) of the Plan lists Malibu Creek for Nutrients as the pollutant. The effective date is listed as March-21-03 (EPA); targeted for Jan. 2012 (LARWQCB). The correct targeted date is 2005 when it was implemented as part of the Tapia NPDES and again in 2010.	Las Virgenes Municipal Water Districts	Revised the target dates accordingly (EPA) and based on the latest status (LARWQCB)	Revision to Appendix A.
Pollution control in Malibu Creek Watershed	Milestone 1.2a: There would appear to be legitimate scientific questions regarding the impact of brackish water conditions in Malibu Creek on the condition of the benthic community and the fresh water reference conditions that were the basis of the Benthic Macroinvertebrate Bioassessment listing. SMBRC should support these questions being addressed in a satisfactory manner.	Los Angeles County Sanitation District	The comments point out the research needs for several scientific questions and are best addressed by a separate milestone. A new Milestone 1.2c is added to address these research needs.	Replacement of Milestone 1.1c.
Pollution control in Malibu Creek Watershed	Milestone 1.2a-b: Keep Objective of reducing nutrient loads. Keep 1.2b and possibly develop new milestones for decreasing nutrient loads to Santa Monica Bay.	SMBRC Technical Advisory Committee	The objective is kept with reference to point and nonpoint source in general. The original Milestone 1.1b (now re-numbered 1.1a) is also kept with some wording change. The need to decrease of nutrient loads to Santa Monica Bay is addressed under Objective 10.2	None

Pollution control in Malibu Creek Watershed	Milestone 1.2b: Objective 1.2b is marked "in-progress", likely because the benthic macroinvertebrate TMDL draft was not out yet and the time the 2013 update draft Plan was marked up. Others may simply propose changing "Malibu Creek nutrient TMDL:" with "Benthic Macroinvertebrate TMDL". Suggested change: Fully implement the existing Malibu Creek nutrient TMDL to achieve its intended goal. Consider all historical water monitoring data and information on the natural geology to refine the findings.	Las Virgenes Municipal Water Districts	The milestone (renumbered 1.2a) is revised to reflect the latest status of TMDL development. Also, a new Milestone 1.2c is added to address the data needs.	Revision to Milestone 1.2a (Originally 1.2b), addition of Milestone 1.2c.
Pollution control in Malibu Creek Watershed	Milestone 1.2c: Suggest to revise the original milestone 1.2c (implement additional regulatory measures) as follows: Support and facilitate the additional scientific study required to evaluate the various factors affecting algal growth and benthic macroinvertebrate impairments in Malibu Creek.	City of Malibu	The original 1.2c was deleted. The early draft of the new milestone 1.2c was further revised based on the comments.	Replacement and further revision of Milestone 1.1c.
Pollution control in Malibu Creek Watershed	Milestone 1.2c is confusing and unclear as written.	SMBRC Technical Advisory Committee	See response above.	
Discharge to ASBS	Objective 1.4: Split into 2 milestones to match the SWRCB new rule regarding discharge waivers. Add State Parks and Cal Trans to implementation leads. Update target dates.	SMBRC Technical Advisory Committee	Added evaluation of Exceptions to the milestone. Added State Parks and Caltrans as implementation partners. Updated target dates.	Revision to Milestone 1.4a
Discharge to ASBS	Objective 1.4: Park agencies and Caltrans in the ASBS are responsible for ASBS Exception compliance. SMBRC TAC may benefit by reading the SCCWRP natural source Report that shows no evidence of harmful discharges to the ASBS. 1.4b should be amended to follow progress of Regional ASBS Monitoring program to ensure that no harmful discharges occur in ASBS. Park agencies are not participating so they are on their own for monitoring.	City of Malibu	See response above. The purpose of update to the existing policy (Milestone 1.4a) is to ensure no harmful discharges occur in ASBS and it will be based on information collected under the Regional ASBS Monitoring Program.	Revision to Milestone 1.4a
Discharge to ASBS	Objective 1.4: The target dates associated with Milestones 1.4a and 1.4b are the same. We recommend that the target date for 1.4a be in advance of the target date for 1.4b to allow time to take necessary actions.	County of Los Angeles Department of Public Works	Target dates are revised accordingly.	Revision to Milestone 1.4a

County-wide funding mechanism	Revise 1.5a to read, "Support efforts to establish a funding mechanism to implement projects and programs to improve storm water and urban runoff quality".	County of Los Angeles Department of Public Works	This objective was initially developed to promote the passage of the County-wide assessment fee, which is still on the table despite of the delay. Added the word "reliable" in response to EC (LA County representative) comment	Minor revision to Milestone 1.5a.
Non-stormwater runoff	Objective 1.6: Add institutional runoff (hwy. medians, parks, and schools, etc.). Clarify runoff allowed in the NPDES permit.	SMBRC Technical Advisory Committee	The institutional runoff are already addressed under the MS4 permit, which also clarified allowed runoff.	None
On-site wastewater disposal systems	Milestone 1.7b: LARWQCB is responsible for all WDRs for restaurants, large multifamily and commercial sites > 2,000 gpd. LARWQCB has 100s of WDRs that have never been issued for restaurants, large commercial and multi-family in Malibu. RWQCB is the responsible agency.	City of Malibu	Listed LARWQCB as lead implementation agency. Also, added description of the LARWQCB's WDR challenge to the introduction to this section	Revision to Milestone 1.7b. Revision to the introduction.
On-site wastewater disposal systems	Milestone 1.7c: The City of Malibu has fully complied with all terms of the Citywide MOU. RWQCB has not met their obligation to complete the backlog of WDRs. Malibu adopted a new Wastewater Management Plan throughout the City.	City of Malibu	Malibu's progress in adopting the management plan is acknowledged in the introduction. Removed "establish" from the milestone.	Revision to Milestone 1.7c.
On-site wastewater disposal systems	Milestone 1.7d: All Park agencies must meet new state OWTS regulations. Revise language to match new SWRCB OWTS regulations - Delete "Develop." LACDPW: For 1.7d, same comment as 1. above relative to developing new regulations. The SMBRC should facilitate and support research needs.	City of Malibu	The original milestone 1.7d is revised to reflect the new SWRCB OWTS policy. Park management agencies are added to the list of lead implementation agencies.	Revision to Milestone 1.7d.
On-site wastewater disposal systems	Milestone 1.7d: same comment as above relative to developing new regulations. The SMBRC should facilitate and support research needs.	County of Los Angeles Department of Public Works	The Milestone 1.7d in the current BRP was related to more stringent regulation in environmental sensitive areas. It was deleted because the issue is addressed in the newly adopted state-wide OWTS policy. SMBRC's role is to promote local implementation of the state-wide policy	Revision to Milestone 1.7d

Green Infrastructure	Milestone 2.1a-c: Malibu: add Park agencies as an implementation lead.	City of Malibu	Park agencies are not subject to adoption of ordinances (2.1a) and establishment of municipal codes (2.1c). They are responsible for incorporating LID elements into construction and maintenance on their own property (2.1b).	None to Milestone 2.1a and c. Revision to Milestone 2.1b.
Green Infrastructure	Milestone 2.1g: Track increase in LID infrastructure. Tied to water supply goals (O.14). Use GIS system to map and track LID projects. Also connected to strategic monitoring of Prop 84 projects and setting priorities. This may fit elsewhere. (Consider including feasibility condition)	SMBRC Technical Advisory Committee	New milestone is added to address the research priorities recommended by the TAC.	Addition of Milestone 2.1g
Plastics Ban	Objective 2.2: This objective should be goal oriented (i.e. Reduce, not restrict).	SMBRC Technical Advisory Committee	Added "reduce" to the Objective.	Revision to title of Objective 2.2
Plastics Ban	Objective 2.2: The dates for this objective should be updated and the objective should be revised to reflect current work. For example, more cities have chosen to focus on banning plastic bags rather than targeting polystyrene (at least initially). Furthermore, while there are pending statewide bills to ban bags (and fat food containers), there has been more progress at the local rather than state level. So perhaps the Implementation Lead should be the cities.	Heal the Bay	Existing Milestone 2.2a is revised and a new Milestone 2.2b is added accordingly. Although banning of polystyrene may not be the focus initially, it is a the long-term goal and therefore is kept as part of the objective and milestones	Revision to Milestone 2.2a and addition of Milestone 2.2b.
Plastics Ban	Milestone 2.2a-b: Malibu: add Park agencies as an implementation lead	City of Malibu	These milestones do not apply to park agencies.	None
Aerial Deposition	Objective 2.3: This objective should include aerial deposition to the Bay not just the watershed.	SMBRC Technical Advisory Committee	Revised the Objective to say "to the Bay and the Bay watershed"	Revision to title of Objective 2.3
Boating Pollution	Objective 2.4: Modify Objective title to be more all encompassing (pollutant loading doesn't capture monofilament).	SMBRC Technical Advisory Committee	Monofilament is considered a type of marine debris and therefore a pollutant. But changed the word "pollutant loading" to "pollution" in Objective title.	Revision to title of Objective 2.4

Pollution Reduction from Commercial Areas	Objective 2.5: How does this relate to 2.2 which is also includes trash? Reconfigure 2.2, 2.5, & 2.6 but remove the reference to commercial areas. Objective relates to a type of pollution. Or have one Objective related to trash & marine debris and another Objective related to oil, grease, etc.	SMBRC Technical Advisory Committee	Clarified by having Objective 2.2 focus on reducing generation of trash and Objective 2.5 on reducing discharge of trash and other pollutants. Reference to commercial and other high density areas is needed as they are the priority area of concern.	Revision to title of Objective 2.5
Pollution Reduction from Commercial Areas	Milestone 2.5a-d: Park agencies and Caltrans must meet the trash and marine debris TMDL regulations too.	City of Malibu	Although park agencies and Caltrans must meet the trash and marine debris TMDL regulations too, milestone 2.5a does not apply to park agencies. Milestone 2.5b-d do.	Revisions to Milestones 2.5b-d
Contaminants of Emerging Concern	Objective 3.1: Match new SWRCB CEC policy language for all 3 milestones	City of Malibu	SWRCB CEC policy is still under development	None
Contaminants of Emerging Concern	Milestone 3.2a: Include objective to increase public awareness through education and involvement (e.g. through give-back programs and no drugs down the drain programs).	SMBRC Technical Advisory Committee	Added no drug down the drain as another example.	Revision to Milestone 3.2a
Contaminants of Emerging Concern	Section 3.2b: We believe SCCWRP's key role in identifying emerging contaminants of concern for prioritized monitoring in the marine environment should be acknowledged.	Los Angeles County Sanitation District	Added SCCWRP as an implementation partner.	Revision to Milestone 3.2b.
Section B. Natural Resources				
Natural Stream Protection	Objective 4.1: This objective should be to enhance, restore and protect streams. Goal should be more than just protection too (restore, enhance). Check hydromodification policy (4.1c) Urban streams don't need protection, but rather restore. Some cities already have stream protection ordinances. Education about value of natural streams is more appropriate in Goal 7. Malibu: Add park agencies as implementation partners. Malibu has a stream protection regulation for City permitted projects. All agencies in Malibu do not have the same setback standards.)	SMBRC Technical Advisory Committee	Although both protection and restoration are important, the primary aim of this objective is to enact stream protection policy and ordinances for protecting remaining natural streams. Ordinance is not a primary tool for restoration. Restoration is the focus of Objective 7.4.	None.

	Milestone 4.1a: Add park agencies as implementation partners. Malibu has a stream protection regulation for City permitted projects. All agencies in Malibu do not have the same setback standards.)	Malibu	Park agencies do not enact ordinances. They also already all have stream protection as part of their mission. On the other hand, they can be advocate and partners in local stream protection activities.	Revision to Milestone 4.1a
Climate Change Adaptation	Milestone 4.5b-c: Other solutions beside "soft" ones may be needed or acceptable. For example, there are stretches of PCH in Malibu that cannot be "retreated" and would be lost if only used "soft solutions" Consider rewording. Minimize negative environmental impacts of other solutions, when used. SMBRC role in adaptation planning for SMB watershed scale, integrate and coordinate plans for the Bay cities and other agencies (Beaches and Harbors, Parks, etc.) Especially because the Coastal Commission is inconsistent in how it deals with residential vs commercial vs agencies.	Malibu	Added adaptation plan integration to milestone 4.5b. Reworded milestone 4.5c to include other solutions with minimum negative environmental impacts.	Revisions to Milestones 4.5b and c.
Subwatershed Management Coordination	Objective 4.6: Ballona and Malibu creek can contribute to science of benthic and algal assessments (i.e. how do you assess impacted streams?) Where does this fit in BRP? This is more about development, not implementation.	SMBRC Technical Advisory Committee	A new milestone (4.6b) is added in response to the comment	Addition of Milestone 4.6b.
Comprehensive Monitoring	Objective 4.7: Address additional research monitoring needs, such as bio-assessment development needs. Monitor fracking? Important element so TAC should spend more time discussing this. LID evaluation and mapping would fit in here too. What is scope of this objective? Existing plan does not include watershed component. Opportunity to add milestone to update CMP or create watershed monitoring plan. Habitat health assessment development. Implementation lead for 1st milestone regarding BIGHT program should be SCCWRP not SMBRC. Mas suggested that this milestone has been accomplished.	SMBRC Technical Advisory Committee	Added CMP update to milestone 4.7d. Bio-assessment and habitat health assessment needs are already incorporated in 4.7d. Added milestone 4.7e to address research need on emerging issues. LID evaluation and mapping are incorporated separately under Objective 2.1. Retain milestone 4.7a as the SMBRC should also participate in future Bight program.	Revision to Milestone 4.7d and addition of Milestone 4.7e.

Land Acquisition for Preservation	Objective 5.1 and 5.2: How do you prioritize parcels to be purchased? Suggest using objective reasoning - like areas with highest diversity or areas that would connect wildlife corridors or areas most threatened - be specific. NPS may have priority maps for land acquisition.	Heal the Bay	Suggested specifics is added to the introduction. NPS is added as an implementation partner. SMBRC will look into and utilize existing priority acquisition maps developed by implementation leads and partners	Revisions to Milestone 5.1a (originally 5.1b) and introduction to Objective 5.1 and 5.2.
Land Acquisition for Preservation	Objective 5.2: Consider conservation easement in lieu of outright purchase, if property owner is not willing to sell or if funding is limited.	City of Malibu	The word "purchase" has been replaced by "acquire" throughout the document when applicable partly because acquisition is more broader and may include easement. Also, added reference to easement as a useful tool in the introduction to this section.	Revision to the introduction
Manage Invasive Species	Objective 6.2: Expand to other invasive species - not just mudsnails. Would be good to specifically name crayfish, vinca arundo.	Heal the Bay	Milestone 6.2b under this Objective addresses invasive species in addition to mudsnails. Specifically named crayfish, vinca, and arundo in the introduction.	Revision to the introduction
Manage Invasive Species	Milestone 6.2a: Add QR codes to signage so people can access video and information by their smart phones on site. Post signs at all entry points. (Sorry, that might not be an objective.)	SMBRC Technical Advisory Committee	Comment noted. These suggestions will be considered at the development stage of specific projects.	None
Manage Invasive Species	Milestone 6.2b: Educate and ensure that hikers, horses, and dogs are not carrying invasive species from one watershed to another via backbone or coastal slope trails. Possibly need to bridge every creeek crossing.	City of Malibu	Comment noted. These recommendations will be considered at the development stage of spedific project. Buidling bridge at every corossing is a good idea but deemed not realistic at this time.	None
Manage Invasive Species	Objective 6.4: Add Vinca to this list of invasive plants	Heal the Bay	Vinca is added to the list.	Revision to Milestone 6.4a and the introduction
Malibu Lagoon restoration	Objective 7.2: Update to indicate that Malibu lagoon restoration is done and work will be to remove invasive weeds and monitor	Heal the Bay	The Objective and Milestones are revised accordingly.	Revision to Milestone 7.2a and introduction.
Stream restoration	Milestone 7.5c: This is really vague - can they give specifics?	Heal the Bay	There is no specific project identified at this time. As a first step, SMBRC will facilitate in developing new project ideas and designs.	Revision to Milestone 7.4c (originally 7.5c)

Beach bluff/dune restoration	Objective 8.1: There should be some effort to connect the dunes to nearby sandy beach restoration so that connectivity is restored between these habitats for animals that may migrate between them. I'm not sure this is possible at El Segundo but it may be at Ballona or elsewhere. Ideally there should be a location where the ocean meets the sandy beach with direct access to dune habitat.	SMBRC Technical Advisory Committee	Comment noted. A description to make this point is added to the introduction.	Revision to the introduction
Protect sandy beach habitat	Milestone 8.2b: a certification program for beach management is a great idea but implementation will take a lot of organization and collaboration. This is worthwhile especially considering the amount of turnover of people in these positions but will take CONCERTED effort by a group of highly motivated people to make this happen. The idea of continuing education and refresher courses would be something that could be done working with existing groups, but the structure and the quality of the program would need to be carefully evaluated and implemented with great sensitivity. (again) Of course BMPs would be part of this and new BMPs could be developed, again with the effort and collaboration of a group so there is agreement and trust. This is actually an ongoing effort that is separate from the certification idea and it's also a big project. Some areas that still need to be addressed include sand conservation (erosion prevention) and kelp wrack management, both controversial and huge.	SMBRC Technical Advisory Committee	Comment noted. Added "certification program" to the milestone and further discussion of the challenge to the introduction.	Revision to Milestone 8.2b and the introduction
Protect sandy beach habitat	Milestone 8.2c: Well we have tried! Funding is still pending. It can't be done without funds. On the other hand a small number of beaches in SM Bay are being monitored as part of the MPA Monitoring Enterprise.	SMBRC Technical Advisory Committee	Comment noted. The existing effort is further acknowledged in the Introduction.	Revision to the introduction
Protect sandy beach habitat	Objective 8.2: Develop a public education program about the importance/benefits of natural, ungrooved beaches.	Malibu	A new milestone (8.2d) is added for developing and implementing an education program	Addition of Milestone 8.2d

Protect sandy beach habitat	Milestone 8.2e: do you want areas here, or habitat for species of concern, as targets? Access to beaches is hard to restrict. It may be worth considering a designation of certain areas for natural habitat, and continued recreational use of appropriate types, similar to national parks, where the presence of nature is a plus. "Certified Natural Shorelines" of the Great Lakes is a program that emphasizes the value of the natural shoreline.	SMBRC Technical Advisory Committee	Added description to the introduction accordingly. Added "designation" project to the milestone.	Revision to Milestone 8.2e and the introduction
Protect sandy beach habitat	Objective 9.2: Milestones 9.2a and b will have to be coupled with public education especially of teachers and schoolchildren for changes to "tidepool trips".	SMBRC Technical Advisory Committee	A new milestone (9.2c) is added to address the education need.	Addition of Milestone 9.2c
Harmful algal bloom	Objective 10.2: The milestone of establishing a coordinated HAB alert network has already been done and is in existence now. Should we include another objective that pertains to assessing hypoxia in deeper SMB waters?	SMBRC Technical Advisory Committee	Added deep water hypoxia to Milestone 10.2a. Revised Milestone 10.2b from developing to maintaining and enhancing the alert system.	Revisions to Milestones 10.2a and b
Section C: Benefits and Values to Humans				
New pathogen ID tools	Objective 11.2: Consider developing a new target for water quality instead of total coliform bacteria, as techniques improve, so that only likely pathogens trigger human health concerns. It's not the amount of the bacteria, it's the type.	SMBRC Technical Advisory Committee	Revised to emphasize pathogen-specific in milestone 11.2a and added water quality objective in milestone 11.2b.	Revision to Milestones 11.2a and b
New pathogen ID tools	Milestone 11.2a: Add a new milestone to support natural source identification studies.	City of Malibu	Comment noted. Human pathogen-specific indicator is the key tool needed for natural source identification.	None

Seafood Contamination	Milestone 11.3a: Add California Grunion to the seafood advisory for this area, with appropriate recommendations based on proximity to the Montrose outfall site. Sister species topsmelt and jacksmelt are already on the list, and grunion are higher on the food web. Grunion are pure carnivores (zooplankton) as opposed to topsmelt which are omnivores and jacksmelt which may be herbivores in seagrass beds. Plus a major area where people catch them is Cabrillo Beach, right on PV Peninsula. From Seal Beach to Santa Monica Beach are MAJOR grunion hunting areas. (Horn MH, Gawlicka AK, German DP, Logothetis EA, Cavanagh JW, Boyle KS. 2006. Structure and function of the stomachless digestive system in three related species of New World silverside fishes (Atherinopsidae) representing herbivory, omnivory, and carnivory. Mar Biol 149(5):1237-1245.)	SMBRC Technical Advisory Committee	Revised milestone 11.3a by adding expanded fish survey. Also added description to the introduction.	Revision to Milestone 11.3a and the introduction
Wastewater recycling and reuse	Objective 14.1: Add a new milestone - increase recycled water storage.	Las Virgenes Municipal Water Districts	A new milestone 14.1d is added accordingly.	Addition of Milestone 14.1d.
Wastewater recycling and reuse	Objective 14.3: Add a milestone to increase the use of recycled water from the Tapia Water Reclamation Facility through expansion of the distribution and transmission system, regional partnerships for the sale of recycled water, and construction of a seasonal storage facility for recycled water by 2030.	Malibu	Milestone 14.3c is added accordingly.	Addition of Milestone 14.3c
Wastewater recycling and reuse	Objective 14.3: Add a milestone - Conduct studies on direct/indirect potable water reuse.	Las Virgenes Municipal Water Districts	Milestone 14.3d is added accordingly.	Addition of Milestone 14.3d
Wastewater recycling and reuse	Objective 14.3: Add a milestone to support investigation and study of opportunities for direct and indirect potable reuse by 2020.	Malibu	Milestone 14.3d is added accordingly.	Addition of Milestone 14.3d