

Written Comments on Draft CCMP and Responses

Commenter	Organization	Email	Written Comment(s)	Response to Comment(s)
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #2 Paragraph 1 - Replace "black" sea bass with "giant" sea bass	Incorporated
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #2 Paragraph 1 - Add "or burial" to (excessive erosion or deposition from landslides)	Incorporated
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #2 Paragraph 1 - Last sentence add "of these anthropogenic stressors" to "As a result"	Incorporated
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #4 Paragraph 1 - Add "and invertebrates" to "nursery habitat for marine fishes"	Incorporated
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #24 Paragraph 2 - Replace "more than 60 acres of artificial reef" with "a 69 acre restoration reef habitat"	Incorporated
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #24 - Collaborating Partners add Vantuna Research Group	Incorporated
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #24 - Next Steps Replace "artificial" with "restoration" Change Timeline to 2020	Incorporated
Daniel J. Pondella, II	Southern California Marine Institute	<a href="mailto:pondella@oxy.edu">pondella@oxy.edu</a>	Draft Action #24 - Next Steps Annual Monitoring - Change Timeline to 2025	2025 is outside the scope of CCMP timeline; next step wording adjusted
Bryant Chesney	NOAA	<a href="mailto:bryant.chesney@noaa.gov">bryant.chesney@noaa.gov</a>	Draft Action #4 - Question and potential recommendation. I fully support the action, but wasn't sure if the action is intended to broadly cover all seagrass species within the Bay and adjacent aquatic resource areas, or just <i>Zostera pacifica</i> . Could you clarify? As I read the narrative, it begins with general seagrass related goals and statements and then appears to narrow its focus on offshore <i>Zostera pacifica</i> . I support that as a focus if that's of most interest to the collaborating partners, but there are other seagrass species that could be assessed along with their restoration potential (e.g., <i>Z. marina</i> and <i>Ruppia maritima</i> in MDR, Ballona Lagoon, and Ballona wetlands; <i>Phyllospadix</i> along the open coast rocky shores). Again, I support the SMBNEP's next step focus on <i>Z. pacifica</i> in the open coast Bay, but I recommend that the SMBNEP consider expanding the narrative in the action history and summary to account for other seagrass opportunities. This would expand the potential scope of your actions, yet would still retain your implied priority as laid out in next steps. Make sense? I do not believe it a critical change to make, as I support what is already drafted and appreciate the value of focus/prioritization, but, if you're interested in expanding the narrative scope, I'd be more than happy to help your staff with specific edits.	Incorporated

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Bryant Chesney	NOAA	<a href="mailto:bryant.chesney@noaa.gov">bryant.chesney@noaa.gov</a>	Draft Action #4 - As it relates to top seagrass priorities for your area, I personally have a tough time choosing between your proposed next steps and similar analogous steps for Phyllospadix as priority number one. Regardless, it appears our top seagrass priorities generally align; if your team already has proposals in place and are in need of funding, I encourage you to share them with me, so that I may put them in the mix of proposals we put forward internally for habitat assessment and conservation funding. We certainly are not flush in funds, but over the years we have been successful in getting some limited funding to support similar work in the general region (e.g., eelgrass surveys of Malibu coastline and Channel Islands, Anacapa Island Frenchy's Cove Eelgrass Restoration). My next priority would be evaluating restoration potential of <i>Z. marina</i> in the bay/harbor/wetland complex, followed by an action to better understand habitat requirements and functions of <i>Ruppia maritima</i> . All the above seagrasses are considered habitat areas of particular concern for a variety of federally managed fish species, and federally threatened green sea turtles are known to utilize seagrass as foraging habitat. In fact, there has been a recent increase in the number of green sea turtle observations in the SM Bay area. Unfortunately, some of these observations have been strandings, but one necropsy examination revealed that a stranded turtle found in MDR had an abundance of seagrass in its stomach (it appeared to be <i>Ruppia maritima</i> , but difficult to ID by picture).	Incorporated
Bryant Chesney	NOAA	<a href="mailto:bryant.chesney@noaa.gov">bryant.chesney@noaa.gov</a>	General - Although my comments only focused on Draft Action #4, we're clearly supportive of the kelp and abalone work given the ongoing collaboration between SMBNEP partners, our abalone recovery team, and Restoration Center. In addition, many of your proposed actions in the watersheds should also benefit steelhead recovery. In summary, please know you have a long list of actions that I expect will have meaningful and lasting beneficial impact on our trust resources, and the larger Santa Monica Bay ecosystem and community.	Comment noted
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #2 – Restore Kelp Forests. We recommend that projects (such as the sea urchin removal and relocation) be required to quantify restoration success spatially and temporally, evaluate the carbon footprint of the restoration efforts, and outline actions to reduce GHG emissions generated by them. For instance, we recommend a quantitative evaluation of restoration success, such as area restored and permanence, including information on whether the restoration has continued to serve its purpose over time, if the sea urchins have been shown to return, or if the kelp forest area shows significant changes in coverage not associated with restoration efforts. Further, we suggest that projects estimate the carbon footprint associated with restoration activities such as transportation and infrastructure, and outline actions to reduce the GHG emissions generated. For other restoration projects for kelp beds damaged by sedimentation, such as artificial reefs, enhancement of nature reefs with quarried rock, we recommend that projects estimate the duration of the restoration effect, conduct cost benefit analysis, and consider addressing point-sedimentation sources. How long, if at all, do researchers estimate it will be before the restored reef is again covered by sedimentation – particularly in the face of increased storm activity? A cost benefit analysis would help to evaluate if: restoration is the best investment strategy, potential disturbances to the natural environments, and carbon footprint associated with restoration efforts. In addition, consider identifying and addressing anthropogenic point-sedimentation sources, and researching solutions to reduce sedimentation rates by addressing these sources. Estimate the carbon footprint associated with restoration activities such as transportation and infrastructure, and outline actions to reduce the GHG emissions generated.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #3 – Recover Abalone Populations. Using green and pink abalone as proxies for white abalone is reasonable in terms of infrastructure and technology development and implementation. Abalone do show habitat differentiation by depth with blacks found in most shallow waters, followed by greens, pinks and then whites which are generally found in deeper, colder waters. Lessons learned in terms of out planting greens and pinks may not apply to whites and should be considered. There is the possibility that the wild populations may not recover in our lifetime to a level where they can sustain a viable commercial or recreational fishery. The role of aquaculture, thus, should be considered in not only restocking wild populations, but also as a seafood source and livelihood alternative for displaced fishers. Ocean acidification and abnormally high water temperature trends should also be considered when evaluating the application of this action – given that it could diminish success. In this case, aquaculture of pinks and greens may not only serve to restock wild populations, but also as a source of seafood that can be protected from climate change stressors. Aquaculture research of these species can also contribute to a better understanding of stress and survival thresholds, particularly as climate and non-climate stressors compound and affect these species.	Comment noted
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #4 – Seagrass Assessment and Restoration. Consider including an evaluation of the GHG emissions generated through the assessment and restoration activities, and actions to reduce them. This is suitable given that seagrass beds are becoming more important in increasing resilience against climate change caused by GHG emissions.	Comment noted

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Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #5 – Beach Restoration We recommend a cost benefit analysis to understand how long term beach restoration will be affected by sea level rise and increased erosion rates in the future. Will beach restoration work require inland retreat to provide enough room for migration of the beach in response to sea level rise?	Long-term studies are being informed by the pilot projects in our region. The beach restoration projects are being studied as opportunities to increase the resilience of the beach and adjacent infrastructure to SLR and other climate change impacts for a minimum of 10 years post-implementation. Comment noted.
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #6 – LAX Dunes Restoration We recommend that a consideration of how dune restoration can be tied into coastal resiliency plans in terms of sea level rise be included.	See above
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #7 – Restore Coastal Bluffs Consider including information on how or whether the bluff restoration work will affect or tie in to the Ballona wetlands restoration project.	Comment noted
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #8 – Malibu Creek Ecosystem Restoration To the Next Steps section, we recommend adding in “support lead agencies in identifying and obtaining funding for the project”. Clarify the role of TBF/SMBRC – they are listed as a collaborating partner but then only as “support” in the SMBNEP role. This seems confusing since TBF/SMBRC are not explicitly listed in other actions as collaborating but are as support.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #9 – Remove Stream Barriers Reference is made to the 2006 Santa Monica Mountains Steelhead Habitat Assessment study by SMBRC – wasn’t this study done by CalTrout? Also consider referencing the 2005 study by Abramson and Grimmer on “Fish Migration Barrier Severity and Steelhead Habitat Quality in the Malibu Creek Watershed” <a href="http://www.cityofcalabasas.com/pdf/documents/environmental-services/Steelhead-Barrier-and-Habitat-in-Malibu-Creek-Watershed-062305.pdf">http://www.cityofcalabasas.com/pdf/documents/environmental-services/Steelhead-Barrier-and-Habitat-in-Malibu-Creek-Watershed-062305.pdf</a> . We recommend that any barriers in Malibu Creek Watershed be removed before Rindge Dam is removed in order to minimize impacts to steelhead that are currently only found below Rindge Dam. Have specific barriers been identified? If so, we recommend identifying them in the Draft Action. The performance metric of 3 miles of habitat seems specific given that the specific barriers were not identified.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #10 – Restore Urban Streams We recommend that this plan identify areas or criteria for prioritization given the extent of urbanization. For instance, we might recommend areas where other restoration efforts are underway, such as Ballona Creek Watershed restoration of urban streams to tie in to Ballona Wetlands restoration. Or prioritizing areas near where natural resources currently exist (soft bottom sections of channelized streams for instance).	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #11 – Restore Small Coastal Lagoons Will the final post-restoration report for the Malibu Lagoon Restoration and Enhancement project be the 6-year report? Please clarify. Will monitoring stop in Malibu Lagoon after this? Heal the Bay encourages and recommends monitoring to continue for additional time post-restoration in order to understand successes and lessons learned as well as to be able to communicate results to the public. We would like to see annual monitoring and reporting for 10 years post-restoration with continued monitoring after that as well, at less frequent intervals.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #12 – Restore Ballona Wetlands Ecological Reserve We recommend adding in a Next Step of “Support and help lead agencies identify and obtain funding for restoration” post 2020. We suggest adding Heal the Bay as a Collaborating Partner since we have been and plan to continue to champion the restoration and the proposed next steps.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #14 – Support Activities to Achieve TMDLs Prioritizing nature based solutions is mentioned in other sections. We recommend that it be added to this Action too, in order to emphasize its importance and by keeping the message consistent throughout the document. Many of these draft actions focus on areas right on the coast, so it might also be good to mention distribution of projects in this section (regional, neighborhood and residential scales, as well as placement throughout the watershed). While neither “nature-based” nor “distributed” are requirements to comply with TMDLs, including this language would keep consistency with other goals in the document, and with the overall goals of sustainability.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #16 – Implement and Study Runoff Capture Projects In the “Action History and Summary” section, “beautification of the urban landscape” is mentioned. We recommend focusing on increasing green/open space, or increasing natural space to connect it to Draft Action 22, where open space is connected to improved mental health. One of the Next Steps is a master’s thesis to look at metal fate and transport within one of these stormwater capture projects. It would also be interesting and fruitful to conduct or support a cross-discipline project that also looks at the costs (a financial student looking at capital and O&M costs), while also looking at the benefits (metals fate and transport might be part of this, but also the community benefits – maybe some sort of social science major?) We need more cost/benefit case studies for these kinds of multi-benefit projects.	Incorporated

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Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #18 – Eliminate Biological Impacts from Water Intake Facilities. Desalination as a supplement to traditional water supplies should be considered as a last resort. We suggest that entities such as the State Water Board explore all other alternatives (including stormwater capture and increased use of recycled water) before resorting to desalination. We recommend that these points be added to the Next Steps.	Comment noted; see also Action #16, 20, and 31
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #19 – Eliminate OWDS Non-Point Pollution. The State and Regional Boards refer to these as Onsite Wastewater Treatment Systems (OWTS) rather than OWDS; we recommend consistency in terminology. While the Regional Board does oversee the identification and monitoring of remaining OWTS, they really have no idea where they all are until something goes wrong. Is there anything that can be done through SMBNEP to help identify where remaining OWTS are throughout the watershed?	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #20 – Support Policies to Reduce Reliance on Imported Water In draft action #20, there is a reference of using recycled water as an important resource for non-potable uses. Heal the Bay recommends changing this to “non-potable and potable uses.” There are references later in the page that allude to this, such as groundwater replenishment and seawater intrusion barrier wells, so it should be stated clearly. This becomes especially relevant when we are looking at future goals, where direct potable reuse may be more feasible.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #22 – BMPs, Public Access, and Improved Trail Systems - We recommend emphasizing that natural coastal area is good for people’s mental health, such as restored wetlands with public access, or natural beaches/riparian zones. We suggest specifying that any new infrastructure should be limited and should be nature-based. This section also focuses on beach access, but any open/green space has been shown to improve mental/physical health. We recommend that there should be an effort to increase public access to open space throughout the watershed.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #23 – Develop and Adopt Stream Protection Ordinances - We recommend that the language be updated; for instance it is stated that “recently, the LA City Department of Public Works has spent several years working on a stream protection ordinance...” Is this referring to the effort in around 2009? We suggest specifying the year rather than saying “recently.” Also, given that the City of L.A. has already done a lot of work, we recommend a more ambitious timeline, such as adoption in 2022.	Incorporated, in part
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #24 – Evaluate Options for Offshore Artificial Reefs - Heal the Bay recommends that artificial reefs be carefully evaluated. We particularly have concerns about siting artificial reefs in and near areas that have historic contamination, such as off of the Palos Verdes Peninsula. We do not support encouragement of fishing in areas with contaminated fish and we have concerns that artificial reefs could suspend and redistribute contaminated sediments. Further, we would like to see proposed artificial reefs carefully discuss likely outcomes of success, relying on the outcomes of previous projects to develop the most likely to succeed project. We have concerns that siting artificial reefs in areas subject to contamination, high-turbidity, and landslides does not set the reefs up for success. We recommend that these factors, as well as impacts of climate change, be considered and added to the Draft Action.	Comment noted
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #25 – Include Coastal Resilience into LCP Updates - We recommend adding Heal the Bay as a collaborating partner because we track LCP updates through the Coastal Commission and advocate for nature-based approaches to coastal resiliency. In addition, we recommend addition of implementation or coordination of a program of coastal land acquisition that can be used to expand the total area of open coastal space – this program could focus on the acquisition of developed property that under sea level rise predictions would be expected to be increasingly damaged by storm or high tide flood waters.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #26 – Invasive Species Research and Outreach - Heal the Bay should be removed as a collaborating partner because our current work does not entail invasive species monitoring or surveys; we no longer conduct biological assessments of the Malibu Creek watershed.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #27 – Marine Debris Reduction - Please add Heal the Bay as a collaborating partner. Heal the Bay has been working on the plastic pollution issue since its inception as a grassroots movement in the Santa Monica area. We continue to engage in the plastic pollution issue through legislation at the local and state levels. For example, we have supported state legislation such as SB 1335 and AB 1884 that aim to systematically reduce pollution at the state level. Locally, we have participated in the revision of the City of Santa Monica Polystyrene ordinance this past summer. During the next months and years we will focus our efforts on passing more comprehensive legislation in other L.A. area municipalities to reduce plastic pollution – including micro and macro-plastics.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #30 – Reduce Health Risks to People - We recommend including freshwater swimming and recreation areas in this section. Freshwater swimming areas have largely been ignored for public notification in the SMB. However, we know there are popular swimming holes in Malibu Creek State Park. Heal the Bay has been monitoring these locations weekly during summer months since 2014 in order to provide information to the public. We recommend that freshwater swimming areas be added and addressed and that efforts be advanced to provide better public notification, through signage and online information, with the collaboration of State Parks.	Incorporated

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Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #31 – Engage Community in Water Conservation and Reuse - We recommend listing Heal the Bay as a collaborating partner through the existing educational work we do around Know the Flow ( <a href="http://www.knowtheflow.la">www.knowtheflow.la</a> ).	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #34 – Monitor Harmful Algal Blooms - We recommend that an additional Next Step should consider public outreach and education on HABs. Heal the Bay could be a future collaborator in this effort based on our work on coastal water quality, MPA monitoring, and our Beach Report Card which alerts beachgoers to current water quality conditions.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #37 – Monitor Rocky Intertidal Habitats - Draft action #37 proposes to expand the existing exclusion zones of rocky intertidal habitat. This action should be carefully considered given that the residents of Los Angeles County, which holds about 25% of the population in the State of California, already have very limited access to the coastal area surrounding the Santa Monica Bay. While some critical coastal rocky areas may merit expanded exclusion, the SMBRC may want to consider working with the California Coastal Commission and other agencies to improve public access to the coast in other rocky or non-rocky areas that are currently inaccessible or difficult to access due to existing coastal development, as mandated by the California Coastal Act. This may include, but may not be limited to, ensuring that access points along the coast that are required to be open to the public through Coastal Development Permit requirements, are in fact open to the public; and that those that are not, receive the resources and legislative support to ensure that they become accessible to the public.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #39 – Monitor and Inform MPAs, FMPs, and Local Fisheries - Please add Heal the Bay as a collaborating partner. Heal the Bay continues to work on MPA issues. As a member of the L.A. MPA Collaborative, Heal the Bay raises awareness about MPAs; develops and distributes educational materials such as site signage, brochures and posters; and holds MPA focused educational public events such as the Honor the Ocean event. Heal the Bay is also a member of the MPA Watch program, which trains volunteers to collect socioeconomic data on the California MPAs. Heal the Bay conducts surveys in the Malibu and Palos Verdes MPAs, and our volunteers have conducted over 25% of the total MPA Watch surveys in the state. In addition, Heal the Bay continues to engage in fisheries management issues to ensure that commercially and ecologically important species in Southern California are a priority for the development of effective and efficient management tools such as FMPs or Enhanced Status Reports. In the future we plan to conduct research on the effects on climate change on the socioeconomic aspects of the halibut fishery in L.A. County to inform management and increase understanding of the challenges and local solutions faced by stakeholders.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #42 – Improve Understanding of Emerging Contaminants - We recommend adding to the first Next Step that a better understanding of CECs will also protect human health. We recommend a consideration of impacts of pesticides as well as implications of vector control measures on water quality and ecology.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #43 – Inform Non-Point Source Pollution - The intended outcome of this Draft Action is not clear. We recommend that the goal should be to identify non-point sources to facilitate source reduction. That would give the improved understanding of non-point sources a clear objective.	Incorporated
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #48 – Clean Water and Clean Beach Funding Mechanism - For the performance metrics on the second 'Next Step' item ('Participate in advisory board and support implementation of projects from the new funding mechanism'), we recommend adding tracking project progress/completion and the projects' impacts on water quality and water supply (in addition to what else is listed). Also, the timeline for that item is listed as 2024, but Measure W funds will first be available in 2020 and the vetting process for eligible projects is already slated for 2019, assuming the measure passes in November. We recommend changing the timeline to reflect that.	Incorporated, in part
Katherine Pease	Heal the Bay	<a href="mailto:kpease@healthebay.org">kpease@healthebay.org</a>	Draft Action #50 – Support Comprehensive Sediment Management Plan - Next Step #3 for this Draft Action is too vague. Again, having a focus on nature-based projects would be good, such as de-channelizing the waterways to return to more natural sediment transport throughout the watershed.	Incorporated
Marcela Benavides-Aguilar	Los Angeles County Flood Control District	<a href="mailto:MBENAVID@dpw.lacounty.gov">MBENAVID@dpw.lacounty.gov</a>	Draft Action # 10 – Restore Urban Streams - The LACFCD is supportive of urban stream restoration provided that it does not impact the LACFCD's ability to manage flood risk. The LACFCD's role for this action would be that of a Collaborative Partner rather than a Lead Entity.	Incorporated

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Marcela Benavides-Aguilar	Los Angeles County Flood Control District	<a href="mailto:MBENAVID@dpw.lacounty.gov">MBENAVID@dpw.lacounty.gov</a>	Draft Action # 50 – Support Comprehensive Sediment Management Plan - The LACFCD is supportive of alternate ways to manage sediment in the region provided that it does not impact the LACFCD’s ability to meet its primary mission of managing flood risk and conserve water. The LACFCD manages a system of reservoirs, debris basins, and other drainage infrastructure that reduces the risk of floods and debris flows for downstream communities. In 2013, the LACFCD completed its Sediment Management Strategic Plan for 2012-32. The Strategic Plan was developed with the aid of a Stakeholder Task Force made of representatives from agencies, companies, the public, and environmental groups that play a role in sediment management or are directly affected by the sediment management process. The Strategic Plan identifies ways to manage sediment in a cost-effective manner while benefitting people and the environment to the highest extent possible. Among the alternatives considered during the development of the Strategic Plan was “Sediment Flushing”. Sediment flushing is a method that allows water flows to transport silts and other light sediment accumulated in a facility through the facility. As indicated in Section 6.3.3.1 of the Strategic Plan, “in order for flows to be able to carry sediment past the existing debris basins, the debris basins would need to be modified. Modification of a debris basin would affect the ability of the debris basin to manage flood risk. Allowing sediment to pass through a debris basin could result in clogged connections between the debris basin and the receiving channel. The sediment-laden flows could exceed the flood-carrying capacity of the channel, clog the channel, or lead to sediment depositing in the channel, which in turn would result in a loss in channel capacity. Sediment deposited in the channels could also make their way into groundwater recharge facilities, which in turn could result in loss of capacity and reduced water infiltration rates at groundwater recharge facilities. Further, due to the abrasive quality of the sediment, such flows could impact the concrete channels downstream of the debris basins by scouring of the channels’ banks and invert over time. All these impacts would lead to additional maintenance at the debris basins and in the channels downstream of the debris basins. Modification of the channels downstream could possibly also be required. For all these reasons, sediment flushing is considered an unsuitable alternative for debris basins.” Beach nourishment was also considered, as detailed in Section 6.5.1 and summarized on page ES-5 of the Strategic Plan. You may want to consider mentioning the LACFCD’s 2012 Sediment Management Strategic Plan in the Action History and Summary Section of Action # 50. You may want to also consider reviewing and mentioning other past relevant studies/plans such as the California Coastal Sediment Management Workgroup’s 2012 Coastal Regional Sediment Management Plan for Los Angeles County for additional background information associated with Action # 50. The LACFCD’s role for this action would be that of a Collaborative Partner rather than a Lead Entity.	Incorporated, and LACFCD changed to collaborating partner
Marcela Benavides-Aguilar	Los Angeles County Flood Control District	<a href="mailto:MBENAVID@dpw.lacounty.gov">MBENAVID@dpw.lacounty.gov</a>	Action # 16: Given that the EWMP and WMP projects will infiltrate and capture stormwater, consider listing MS4 Permit Holders as Lead Entities rather than or in addition to listing Municipalities as Lead Entities.	Incorporated
Marcela Benavides-Aguilar	Los Angeles County Flood Control District	<a href="mailto:MBENAVID@dpw.lacounty.gov">MBENAVID@dpw.lacounty.gov</a>	Replace LAC-DWP with LACDPW.	Incorporated
Marcela Benavides-Aguilar	Los Angeles County Flood Control District	<a href="mailto:MBENAVID@dpw.lacounty.gov">MBENAVID@dpw.lacounty.gov</a>	Replace LAC-FCD with LACFCD.	Incorporated, also corrected "LAC-DBH" to "LACDBH"
Marcela Benavides-Aguilar	Los Angeles County Flood Control District	<a href="mailto:MBENAVID@dpw.lacounty.gov">MBENAVID@dpw.lacounty.gov</a>	Draft Action Item #48 - <b>Change action title</b> to "Support and Implement the Safe Clean Water Program (if approved by voters in November 2018)" <b>Action</b> - Change to Support the Safe Clean Water Program. If approved, implement projects funded by the program to support stormwater pollution control projects. <b>Action History and Summary</b> - Lack of stable funding resources has been a substantial obstacle for carrying out storm water pollution control programs in the region. While a few municipalities in the watershed have been successful in securing funding from voter-approved property assessment fees to meet the need for storm water pollution control, the County and most municipalities in the region have not made or succeeded in similar efforts. A concerted effort by the LACFCD, with input from various stakeholders including environmental organizations, municipalities, the business community, and other community groups obtained the County Board of Supervisor’s approval to place the a measure on the November 2018 ballot to raise money for the Safe Clean Water Program. The measure would allow the LACFCD to levy a tax of 2.5 cents per square foot of impermeable surface on private property within the boundaries of the LACFCD. Revenue from the tax, estimated to amount to \$300 million annually, would fund projects that capture, clean, and conserve storm water, increasing local water supplies, improving water quality, and creating opportunities for new recreational green space and habitat. It would also enable the County of Los Angeles and cities within the boundaries of the LACFCD to comply with federal clean water regulations as well as increase the local water supply. <b>Lead Entity</b> - LACFCD <b>Collaborating Partners(s):</b> LACDPW, cities within the boundaries of the LACFCD, SMBRC, Heal the Bay, LA Waterkeeper <b>Next Step(s)</b> Column 1 Row 2 Change to "Support passage of Measure W, the Safe Clean Water parcel tax"	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Will you include a brief explanation of the table in e.g. an executive summary or overall intro?	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Template and Structure of an Action: a) Expand ‘action’ description to include ‘purpose for action’ or something along these lines. b) Consider revising the SMBNEP role description as follows: “This section categorically describes the role of the Santa Monica Bay National Estuary Program entity, i.e., SMBRC and/or TBF, which is involved in achieving progress towards the completion of an action or steps within the action. The role categories are similar to previous SMBNEP CCMP’s but streamlined to ease in interpretation.” c) Consider using ‘SMBNEP’ for work performed by SMBRC and/or TBF on behalf of the NEP.	Incorporated, in part

Written Comments on Draft CCMP and Responses

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Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Thank you for directly referencing the definition of leveraging roles with the SMBNEP roles.	Comment noted
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Suggestion: edit the action titles to make them all action oriented where possible. For example, "Assess and Restore Seagrass," "Restore Beaches or Beach Habitat?" "Restore Malibu Creek Ecosystem," "Reduce Marine Debris," "Install and Monitor Pumpout Stations"	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Please include the desired long term environmental result/benefit in Action History and Summary where possible. For example, the long-term outcome for kelp forests in the FY 19 workplan is: "Restore 150 acres of kelp forest to improve habitat functions, local fisheries, and coastal resilience."	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Performance Metrics: this would be good to cover during our September 25 call. a) Are "next steps" and "performance metrics" equivalent to outcomes and outputs/deliverables as described in the Funding/PE Guidance?	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Please write out acronyms for each lead entity and collaborating partner(s), unless they are already defined in the Action History and Summary. a) Add CRAM to acronym list	For space-saving purposes they are identified and written out in the acronym list
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Santa Monica Bay vs SM Bay vs SMB vs the Bay: look for consistency in terminology across the actions.	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	References: please consider adding references where applicable.	Incorporated, in part
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Consider grouping actions thematically so they appear near each other in the document e.g. restoration oriented actions, water conservation and reuse oriented actions, stormwater related actions, boater related actions, and people oriented actions (22, 29, 30) etc....	Incorporated where possible, but TAC categorizations / organization structure remains
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Who is responsible for "next steps" regardless of who is the lead/collaborating partner? Or are "next steps" only applicable to the NEP's portion of the work?	Responsible entities to implement next steps are identified as lead entities for that action: either an NEP entity or partner(s)
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Consider adding an action that supports the outreach work you do e.g. "Champion the Estuary."	Communications and outreach were incorporated more strategically throughout and will be crosswalked to the EPA funding guidance
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #1, Next Step 3: is there already GIS analysis for identifying key sites for acquisition?	No
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #2: "The development and implementation of a plan for the beneficial use of this natural sediment <b>values</b> should be further pursued." Consider removing "values" or consider explaining what you mean by "values."	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #22: the action title is a little unclear. What about "Improve Public Access to Beaches and Trails?"	Not incorporated because that would change the meaning
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #32: how about: "Engage Businesses in Improving Water Quality?"	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action #44 and #21: should these be combined?	Comment noted; different categorizations
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action #44: There has been a lot of research done on this already by the state of California and EPA. Is there something novel to the research described here? "Research landfill diversions reduction in greenhouse gas emissions and carbon sequestration due to compost application."	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action #44: revise the second next step to read "... Santa Monica Bay and its watersheds."	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action #16 and 43 have a lot of overlap. a) Is #16 more about implementing projects and #43 more research oriented? b) Lead entities: Draft action #43 lists "companies and others," and draft action #16 says "businesses, others" This is quite broad in respect to your definition of a lead entity. c) #43: there's an extra space after "dry- weather"	Incorporated, in part
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #15 and 28 have a lot of overlap. Does it make sense to combine or at least co-locate the document?	Incorporated, in part
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action #14 a) Consider changing title to "Support Activities to Achieve Stormwater TMDLs" b) Consider adding the language in bold to the action description: "... (EWMPs) and activities identified in TMDL implementation schedule, to help achieve TMDL goals..." c) Next step 1: change "support implement" to "support implementation"	Incorporated except for title change. Not just stormwater TMDLs - also dry weather targets

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Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #16: why are the next steps specific to rain gardens as opposed to other types of LID? In the action history and summary the term "constructed biofilters" is used as a catchall. Is that more appropriate here or do you really want to focus on rain gardens? a) What will happen with the data from the rain garden metal fate study? Will it feed into maintenance and design specs?	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action #20: a) Next Step 1 performance metric: can you clarify what the performance metric is? 230,000 acre-feet per year of water recycled? Or reduce demand for freshwater by 230,000 acre-feet per year? b) Next step 3 performance metric: do you have a baseline for the improved percent use of recycled water? c) References would be helpful here.	Incorporated, in part
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #35 Next Step 1: Will you complete/implement the kelp forest hydrodynamic study? What is the action?	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action #42: We recommend a slight edit "Action: improve understanding... reduce loading of e.g. fire retardants, especially in the context of climate change" a) for next steps, we recommend you include "description of lab methods that can be used to analyze CECs" with the second performance metric. b) Should the NEP role be Participate?	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft action 48: will this action be edited or removed based on the outcome of the November 2018 ballot results?	Incorporated
Erica Yelensky	USEPA Region 9	<a href="mailto:Yelensky.Erica@epa.gov">Yelensky.Erica@epa.gov</a>	Draft Action #50 Support Comprehensive Sediment Management Plan: the action history and summary states "To advance this concept, an analysis involving the hydrodynamic of the Los Angeles basin would need to be undertaken, identifying opportunities and limitations to enhance sediment transport." Should the hydrodynamic analysis be included as a next step? a) "With recognition that sea level rise will continue [ADD A COMMA] the beaches and flood plains of coastal wetlands will need sediment to keep pace with the ocean's rise."	Incorporated
Richard Burg	California Department of Fish and Wildlife	<a href="mailto:richard.burg@wildlife.ca.gov">richard.burg@wildlife.ca.gov</a>	Include DEIS/R release date: 9/25/2017 (correct from "2016"); change timeline for completed FEIS/R to 2022	Incorporated
Dana Murray	City of Manhattan Beach	N/A	Incorporate where possible the next couple of years of planning goals/projects for City of Manhattan Beach as identified in the Environmental Accomplishments Report (2019 and beyond); incorporate where possible City of Manhattan Beach into actions where City initiatives overlap (see City Work Plan, page 3, initiatives from 2018-2020); focus on climate resiliency and incorporating SLR planning	Incorporated
Juliette Finzi-Hart	USGS	N/A	Incorporate soft-scape climate resiliency measures where possible into planning and implementation; incorporate SLR into LCP updates and other planning efforts, etc. Implement more beach and dune restoration projects. Incorporate local effects into SLR models and scale-down for our region and specific areas to aid in planning efforts, e.g. incorporating groundwater changes and sediment movement, etc. Engage communities with SLR in more ways - be innovative - e.g. VR modeling, etc. Encourage understanding of need for adaptation measures.	Incorporated
Walter Lamb	Ballona Wetlands Land Trust	<a href="mailto:landtrust@ballona.org">landtrust@ballona.org</a>	Prior BRP updates indicated the "Role of the SMBRC" for every milestone. The draft action plan includes actions, and specifies the "SMBNEP Role" for each action. An explanation on page 3 indicates that "[t]his section categorically describes the role of the Santa Monica Bay National Estuary Program entity, i.e., SMBRC and/or TBF, which is involved in progress towards the completion of an action or steps within the action." This implies that the SMBNEP role for a particular project may apply only to SMBRC, only to TBF, or to both SMBRC and TBF. This new format creates confusion in three ways: <b>First</b> , unlike recent annual work plans, the draft action plan does not specify which entities are being referred to for a particular action. For projects in which SMBRC, TBF or both are listed as lead or collaborating entities, it could be inferred that the SMBNEP role applies to whichever entity or entities are listed. However, for actions such as Draft Action #1, where neither entity is listed, it is unclear which entity is being referred to. This could be remedied by adding an SMBNEP entity section for each action. <b>Second</b> , for actions in which SMBRC is not included as a lead or collaborating entity, such as the Ballona Wetlands Restoration Project, there is no indication what role, if any, SMBRC has in furthering the action. This could be addressed by specifying up front any general role that SMBRC can be inferred to have for any action identified in its Bay Restoration Plan. <b>Finally</b> , the roles focus only on staff, not on any of the governance or advisory bodies. Given that the SMBRC Governing Board is the Management Committee of the local NEP, a section called "Management Committee Role" or "SMBRC Governing Board Role" could be included for each action or defined generally up front.	Incorporated in part. SMBRC and/or TBF are involved in progress towards the completion of an action or specific "next step(s)" within the action. SMBNEP entities are supported in implementing this Action Plan by their collaborating partners, the NEP's management conference, and additional stakeholders.

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Walter Lamb	Ballona Wetlands Land Trust	<a href="mailto:landtrust@ballona.org">landtrust@ballona.org</a>	In line with the above comments, the Land Trust specifically requests clarification on the role of SMBRC with regard to draft Action #12 - Restore Ballona Wetlands Ecological Reserve. In June of 2015, SMBRC claimed that past references to SMBRC sometimes should have been references to the general SMBNEP (i.e. TBF and not SMBRC), but there has been little to no clarity regarding with references to SMBRC's involvement in the restoration planning process SMBRC now claims are inaccurate. For instance, when the SMBRC Governing Board pledged in 2010 to participate in the restoration planning process, it can't credibly be argued that they meant to pledge TBF's involvement instead. As such, the revised BRP should expressly make clear, as it did in the 2008 and 2013 updates, that SMBRC's role in Draft Action #12 is to participate, including the participation of the SMBRC Governing Board. Alternatively, the Governing Board should vote to rescind the resolution to avoid confusion. As noted above, if SMBRC wants to formalize the end of its participation in that process, it should also remove the project from its BRP and work plans and allow TBF to work on the project independently of the National Estuary Project.	Incorporated in part by adding SMBRC as collaborating partner. The participation role of the SMBNEP is consistent with the past Governing Board resolution. Also see response to the comment above.
Walter Lamb	Ballona Wetlands Land Trust	<a href="mailto:landtrust@ballona.org">landtrust@ballona.org</a>	Draft Action #6, LAWA Dunes Restoration, seems to indicate that TBF is the involved SMBNEP entity. Setting aside the concerns listed above about what that actually means, there is a long record of involvement by the Santa Monica Bay Restoration Authority regarding that project, including approval and re-approval of a Memorandum of Understanding for the project with Los Angeles World Airports. The Land Trust objected to the SMBRA's purported involvement because it was clear that TBF was making all of the decisions regarding the project, and it appears that TBF chose to work directly with LAWA on this project. However, there does not seem to be any record of that decision in the SMBRA's meeting minutes. This highlights a structure and governance question that the Land Trust has raised before, which is who decides which projects will involve SMBRA and which projects will not.	Comment noted. The MOU between LAWA and SMBRA for the LAWA Dunes Restoration never took effect and they have not been directly involved.
Walter Lamb	Ballona Wetlands Land Trust	<a href="mailto:landtrust@ballona.org">landtrust@ballona.org</a>	Along the lines of the point above, the only reference to SMBRA seems to be in the glossary. It may help to avoid confusion to include some reference to SMBRA and explain why is not listed as a lead or collaborating entity for any action, such as draft action #11 – Restore Small Coastal Lagoons, which includes Malibu Lagoon.	Comment noted. SMBRA is supported by the staff of the SMBRC and LA County Flood Control District, and administer the grant agreements / contracts for projects currently including the post restoration monitoring in Malibu Lagoon.
Johntommy Rosas	TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION	<a href="mailto:tattnlaw@gmail.com">tattnlaw@gmail.com</a>	TATTN is now formally lodging its OBJECTIONS and OPPOSITION to the draft action item # 12 on the grounds 1. TATTN was not consulted on this matter and draft plan which have various impacts to our tribal cultural resources and rights 2. the BWER EIS/EIR does not have the required FRESHWATER WETLANDS alternative that is legally required- 3. historically that area was mostly freshwater wetlands -the 3 alts in the deis/eir only have salt water intrusion/inundation -alternatives all of which we oppose/object to- 4. they tongva village is located there and is a registered sacred site with the state and also in the federal designated district called the ballona lagoon archaeological district	Comment noted; Staff reached out to and advised commentor to contact the lead agencies for input on the Ballona Wetlands Restoration Project EIR/EIS (Army Corps, CDFW).

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Johntommy Rosas	TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION	<a href="mailto:tattnlaw@gmail.com">tattnlaw@gmail.com</a>	TATTN additionally expects this item [12] to be withdrawn or add the freshwater wetlands alternative info I have provided [in upper case and underlined ]to the draft action # 12 DRAFT ACTION #12 – Restore Ballona Wetlands Ecological Reserve Action: Restore Ballona Wetlands Ecological Reserve to enhance wetland habitats and benefits to people Action History and Summary: Over 96% of the vegetated estuarine wetlands INCLUDING FRESHWATER WETLANDS have been lost over the past 150 years in the Los Angeles region. Thus, restoration to bring back higher-level ecosystem functions and services of wetlands is of the utmost importance in our area. The largest coastal FRESHWATER wetland remaining in the Los Angeles region is part of the Ballona Wetlands Ecological Reserve (Reserve), once over 2,100 estuarine acres (near present-day Marina del Rey) rich in biological diversity and abundance. The Reserve has suffered over a century of degradation, including the dumping of millions of cubic yards of fill from the excavation of Ballona Creek in the 1930's - <b>[THIS CLAIM IS INACCURATE AND THERE IS NO EVIDENCE OF THAT AS THE EXCAVATION MATERIALS WERE USED TO BUILD THE MASSIVE LEVEE SYSTEM and Marina del Rey in the 1950's, and the continued encroachment of habitat-altering invasive species. In 1998, the Ballona Wetlands were included on California's 303(d) list of impaired water bodies due to excessive sediment dumping, hydrological impairments, and exotic vegetation. AND THAT IS OCCURRING BECAUSE ITS ACTUALLY THE MDR HARBOR WATERS THAT ARE SEC 303 IMPAIRED AND THEY GO INTO THE BWER FROM THE FIJI DITCH.</b> In 2003 and subsequent years, the Reserve was purchased by the State of California for the purposes of restoration and public access, and the current approximately 577-acre Reserve is now managed by CDFW. In 2012, USEPA completed a Total Maximum Daily Load for the Reserve, including recommendations for restoration. TBF and many partners completed an <b>[ INACCURATE AND FALSIFIED SET OF REPORTS BY SCC TO SUPPORT THEIR AGENDA TO EXCAVATE AND BUILD THE NEW LEVEE SYSTEM TO PROVIDE PLAYA VISTA DEVELOPMENT WITH A FLOOD CONTROL AND TSUNAMI BARRIER THOSE REPORTS INACCURATE REPORTS WERE ALSO UTILIZED BY THE USEPA AND STATE WATER BOARD WHO PAID FOR THEM WITH VARIOUS BOND FUNDS GRANT TO SCC AND TBF WHICH HAVE NUMEROUS CONFLICTS OF INTEREST S VIOLATIONS AND SHOULD BE INVESTIGATED BY THE WATER BOARD ]</b> extensive baseline monitoring program to inform the restoration process including comprehensive biological, chemical, and physical monitoring parameters between the years of 2009-2015. Restoration of the Reserve has been a multi-year process initiated in 2012 with the release of the Notice of Intent / Preparation. In 2016, the lead agencies, Army Corps and CDFW, released a joint Draft Environmental Impact Statement and Report, which went out for public comment for 133 days and received thousands of public comments, highlighting its regional importance. Small-scale community restoration has been conducted by Friends of Ballona Wetlands (FBW) for 40 years, and TBF since 2016.	Comment noted; Staff reached out to and advised commentor to contact the lead agencies for input on the Ballona Wetlands Restoration Project EIR/EIS (Army Corps, CDFW).
Andy Salas		<a href="mailto:andyosalas07@yahoo.com">andyosalas07@yahoo.com</a>	Mr Rosas is correct we are going to all have to consult regarding this . We stress that our concerns are addressed . Already sacred sites have been desecrated near by. We can set up a conference call with your team Mr. Rosas and our council . Please contact us at your earliest convenience. Thank you	Comment noted; Staff reached out to commenter to initiate a dialogue prior to the Governing Board meeting.
<b>BELOW COMMENTS WERE SENT BY PUBLIC AFTER COMMENT PERIOD DEADLINE</b>				
Leslie Purcell	N/A	<a href="mailto:lesliepurcell@gmail.com">lesliepurcell@gmail.com</a>	"The Santa Monica Mountains National Recreation Area, which encompasses more than 150,050 acres of public parkland and lands in other private or other government ownership, is the largest urban park in the United States." (p5) -- SMMNRA is urban-adjacent, but not an urban park. "The kelp forests of Santa Monica Bay are one of the most biodiverse, productive communities in existence." (p6) -- Again, this sounds a bit like hyperbole, especially as the kelp forest is diminished and degraded, in need of restoration, after which it may qualify as "one of the most" etc. etc.	Incorporated
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	Repeat of comments by Johntommy Rosas (see above)	Comment noted; see above response
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	Grassroots Coalition also thanks the SMBNEP and the NEP oversight agencies for this comment period for both: a) a forum to provide our exhaustion of administrative duty and, b) our attempts to attain a true working relationship with the NEP / USEPA and the SMBNEP as part of GC's goals to protect the environment and work to allow the public to have capacity to make informed decisions based upon accurate data and information.	Comment noted
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	Draft Action Plan #12 Restoration of Ballona Wetlands Ecological Reserve (BWER): The SMNEP has provided an inaccurate history and summary of the BWER which serves to promote a false presentation to the public and state and federal agencies that disallows the general public and agencies from making informed commentary pertaining to past, current and future actions by the SMNEP representatives along with their LIMITED & CONFLICTED world of people that populate their cloistered and closed system of support groups. The limited and historically cloistered SMNEP support groups include Heal the Bay, The Bay Foundation leadership (which has also been one and the same for SMBRC) and certain state officials within the Ca. Coastal Conservancy. These groups' leadership and their longtime consultants also populate SWRCCP and SMBRC leadership which has provided a narrowed few with control of all messaging, bond funding and shared communication regarding Ballona. That messaging has likewise provided false and misleading characterizations of Ballona which has led to the current problems associated with all legitimate processes that would otherwise ensure for bond accountability, independent, legitimate baseline studies of Ballona and ensure that the public and agencies would be provided with prudent, legitimate environmental assessment of Ballona and other sites. The conflicted and biased assessment has led to an utterly intentionally falsified, inaccurate and incomplete DEIR/S. The SMNEP and its federal overseers have failed to help correct this ongoing problem of conflicted interests and have instead, placed public comments into a black hole rather than address these issues in a forthright manner and work through these problems as promised via all the NEP rhetoric.	Comment noted; Please contact the lead agencies for input on the Ballona Wetlands Restoration Project (Army Corps, CDFW)

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Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	<p>1. The Ballona Wetlands Ecological Reserve was provided the highest level of protective status--namely as an Ecological Reserve. However, contrary to multiple laws, including but not limited to laws such as California's Porter-Cologne Act; federal, Clean Water Act; and California's Groundwater Protection Act, there has been NO PROTECTION to the UNIQUE AND RARE FRESHWATER AQUIFER AND SURFACE PONDING upon which Ballona Wetlands is dependent upon. Contrary to protecting the freshwater of Ballona, the SMBNEP has consistently worked to offer a politically agendized outcome-- the creation of a saltwater embayment-- that is a) without historical merit; b) part of an outdated and highly controversial/ conflicted SETTLEMENT AGREEMENT (1990) with the developers of Playa Vista &amp; the Ca. Coastal Commission and others and; c) been an active participant in both concealment by failing to include in ANY STUDIES pertaining to Ballona freshwater hydrology including but not limited to the drainage effects of illegal (Ca. Coastal Act violations) FRESHWATER DRAINAGE of BALLONA WETLANDS since at least 2004 c) which serves NOT THE PUBLIC OR THE ENVIRONMENT but, instead, illegitimately serves to dry out the wetlands on behalf of the private interests of the mega-development-- Playa Vista. Playa Vista interests still control the controversial and incomplete flood control system for Playa Vista, aka the Freshwater Marsh System and its attendant needs included in the portion of CDP 5-91-463 which were never fulfilled--namely, the digging out of Ballona outside of the catch basin to fulfill Playa Vista flood control needs. Currently, the conflicted and biased Playa Vista contractors and consultants are part of the gravy train of improper bond, grant and NEP money usage. The SMNEP has failed to act in transparency and openly work with the public as promised and/or in good faith. The SMNEP has instead, confined itself to a closed set of historically aligned parties to the outdated and factually inaccurate/ disoriented Settlement Agreement (SA), the parties of which have assumed and improperly maintained control over all facets of Ballona conservatoryship. The conflicted and biased interests include The Bay Foundation leadership. The so called 'extensive baseline monitoring' DID NOT INCLUDE FRESHWATER HYDROLOGY STUDIES-of Ballona despite repeated requests from groups that saved Ballona habitat from Playa Vista buildout and the broader public. The DEIR/S and the SMNEP both share inaccurate and false information as to the FILL PLACEMENT ON BALLONA. This falsification of Ballona in the SMNEP SUMMARY continues the deliberacy of fraud upon the public and agencies-- individuals of whom, many are new to the Ballona saga. The SMNEP must provide data support for its claims and it has not and cannot because the creation of Marina del Rey documents speak to the soils being used to create the moles of MDR, beach expansion both to the north and south and elsewhere of Ballona. Considering Howard Hughes estate still controlled the Ballona property at the time of MDR buildout and considering the estate had plans even then for creation of a larger marina into Area A, it would have made no sense to allow permanent fill onto an area the Hughes heirs would have to pay for more soil removal. In short, the SMNEP provides no factual response to soils placement but relies upon rhetoric to those unaware of Ballona's history.</p>	<p>Comment noted; Please contact the lead agencies for input on the Ballona Wetlands Restoration Project (Army Corps, CDFW)</p>
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	<p>Further, the SMNEP leadership relies upon not answering and not addressing the factual history of Ballona in order to maintain a falsified spin of Ballona's past. The DEIR/ S still contains no freshwater hydrology studies despite repeated requests, history of Ballona being a predominantly freshwater, seasonal wetlands, and having a history of abuse by Playa Vista leadership and conflicted, biased control-which includes The Bay Foundation leadership (which is likewise SMBRC leadership). Such conflicted leadership is important because Playa Vista is starving Ballona of its freshwater aquifers by 1) inserting illegal drains to drain away any and all ponding rainwaters or freshwater diverted into the drains area by Playa Vista and 2) sending all the cleansed toxic waters under Playa Vista to either the Ballona Channel or to the LA Sanitation District/Department AND; 3) DEWATERING under the Playa Vista development as part of the methane mitigation systems and sending all the groundwater to Sanitation. In short, while SMNEP keeps claiming Ballona is drying out, in order to falsely claim the way back to Ballona health is for saltwater intrusion, it is the SMNEP and its leadership who are part and parcel--Playa Vista consultants or conflicted via the Bay Foundation/ Friends Ballona union (PV VIPs and consultants) that are IMPLEMENTING THE DRYING OUT OF BALLONA via stemming the flow and use of Ballona's freshwater aquifers from reaching what is left of Ballona Wetlands.</p>	<p>Comment noted; Please contact the lead agencies for input on the Ballona Wetlands Restoration Project (Army Corps, CDFW)</p>
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	<p>Meanwhile the SMNEP Draft is stocked with issues that could be addressed at Playa Vista on behalf of Ballona but due to the conflicted interests, the SMNEP is nonresponsive to what is clearly ongoing.</p> <p>1. The GC lawsuit against CDFW AND PLAYA VISTA was won with Coastal Commission analysis of the illegal drainage harming Ballona.</p> <p>2. The SMNEP cites its work on wildlife corridors yet no one from the Bay Foundation, Heal the Bay or Friends of Ballona or any of its 'partners' address the fact that Playa Vista was ensured of a wildlife corridor under Lincoln Blvd. from the Riparian Corridor to the Catch Basin via the EIR mitigations Playa Vista agreed to perform. THAT WILDLIFE UNDERPASS that expressly is stated in the Playa Vista Vesting Tract Agreements and EIR docs NEVER WAS BUILT. Why does the SMNEP not even attempt to compel the enforcement of this mitigation requirement? Unfortunately, the leadership of the SMNEP are connected as one with the Bay Foundation/ FBW etc. which are Playa Vista leadership. Therefore, the current writeup of commitments are hollow in their intent to fulfill.</p>	<p>Comment noted</p>

Written Comments on Draft CCMP and Responses

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Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	3. DRAFT #S 42, 44 regarding GREENHOUSE GAS/ CLIMATE CHANGE The SMNEP has been many times informed regarding the oilfield gas issues on Ballona that stem, in part from Playa Vista AND share SOCALGAS/SOCAL EDISON interests. The Bay Foundation/Friends of Ballona / Playa Vista shared leadership entities all ignore and do nothing to address the ongoing leakage issues over University City Syndicate- an oilwell last operated and poorly abandoned by Playa Vista leadership and its consultants. The leakage that began shortly after its reabandonment by Playa Vista has continued to steadily increase and there is no one monitoring the situation--contrary to SMNEP promises. Further, the so-called marsh management by and through the Ballona Conservancy, which is a Playa Vista construct, behooves Playa Vista to ignore the outgassing problems that are ever increasing in the marsh area and no monitoring occurs for the Freshwater Marsh Reports to agencies. Similar to the illegal( 17 plus citations to Playa Vista/ Ballona Conservancy from LABuilding & Safety- proving that no permits were ever garnered for the massive construction process that Bay Foundation leader and Ballona Conservancy leader--C. Tyrrell falsely told the public-- when the public became outraged and concerned--the fill being placed was A MERE 'FILLING OF RUTS'. The mega roadway construction sanctioned by the Ballona Conservancy-- Playa Vista leadership including C. Tyrrell (also founder and member of the Bay Foundation, SMBRC & Playa Vista consultant...etc.) the Ballona Conservancy--- is SIMILAR TO THE LACK OF FORTHRIGHT DISCLOSURE AND PROPER ACTION to address the climate changer, greenhouse gas emissions and other BTEX and hydrogen sulfide emissions in any of the SMNEP and/or Ballona Conservancy--MONITORING for agency reports. SMNEP words of issues that are being addressed and/or will be addressed are hollow without implementation as is the case at Ballona Wetlands Ecological Reserve.	Comment noted
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	4. DRAFT # 34 HARMFUL ALGAE BLOOMS TATTN has placed to LARWQCB, a request for investigation into the latest algae bloom in the Ballona Riparian Corridor.	Comment noted
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	The SMNEP and its Playa Vista allies--that are also part of the Playa Vista Ballona Conservancy have not addressed this issue. Freshwater Marsh System.	Comment noted
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	SMNEP SUMMARY OF BALLONA- There is a failure of accuracy/ failure to meaningfully inform regarding 2012 as being the start of the DEIR/S. All of the documents were done as part of the DEIR/S started in 2005 and fraudulently stopped by by claiming the SMBRC no longer wanted for the process to take place. In fact, the SMBRC had no knowledge of the cessation of the 2005 -2012 process. Then SMBRC Director, falsely informed USACE that the SMBRC approved the cessation of the 2005 ongoing process and USACE capitulated. Both federal and state information requests provide the data trail proving that SMBRC never took part and USACE simply never questioned the Director. Hence, control and power manipulated the situation by less than a handful of people intent upon their own process. INTERESTING TO NOTE that the FOB are mentioned as 'restoring' portions of Ballona. This exclusory summary note, highlights the failure to include the groups that saved ballona from the Playa Vista development and includes only the SA- FBW whose past work only provided for the Playa Vista catch basin to become part of Playa Vista's flood control measures. The rest of the land , west of Lincoln and north of the Channel was declared off limits to development by LADBS due to SCG underground gas issues, and the LUP from 1990 HAD ALREADY designated lands west of the freshwater marsh system as wetland protected.	Comment noted; Please contact the lead agencies for input on the Ballona Wetlands Restoration Project (Army Corps, CDFW)
Patricia McPherson	Grassroots Coalition	<a href="mailto:patriciamcpherson1@verizon.net">patriciamcpherson1@verizon.net</a>	OXFORD LAGOON has been left out of this Draft which is of great concern to GC. Mr. Topal's management of Oxford was absent during time of the public coming to SMBRC for help in addressing flora that was destroyed and could have been saved from destruction. Namely, trees used by the Osprey were needlessly removed and placed the use of Oxford by this raptor at risk. Other trees were rescued from destruction via the work of GC with the Coastal Commission on behalf of the Monarch Butterfly's use of this area as a wintering site. Mr. Topal was part and parcel of allowing the destruction to take place due to his failure to utilize the SMBRC'S presence and influence in the preservation of these key trees. Such indifference and failure to perform as cited in the bond documents resulted in his participation of this dramatic loss that letters from Water Resources (one of the bond providers) cited to ---never let this happen again. (Currently, no attempt by SMNEP parties have been made to provide Oxford's Osprey with a platform to help replace its safe roosting area in the large Eucalyptus tree it frequented. USFWS has written that it supports GC's idea of a platform and addressed a need for funding support. Should SMNEP parties help to acquire the funding, this would be a step in the positive direction at Oxford.)	Comment noted. The Oxford Basin enhancement project was implemented by the Los Angeles County Flood Control District with bond funding support recommended by the SMBRC. The project was completed in compliance with all grant and permit requirements.
Jeanette Vosburg + Kathy Knight	Airport Marina Group - Sierra Club	<a href="mailto:saveballona@hotmail.com">saveballona@hotmail.com</a>	The Sierra Club Airport Marina Group supports comments made by Grassroots Coalition regarding Draft Action Plan of the Santa Monica Bay Restoration Plan (SMB National Estuary Program - NEP/SMBNEP). Every issue Grassroots Coalition has raised needs to be fully addressed. The Sierra Club Airport Marina Group also supports comments made by Johntommy Rosas of TATTN. We especially support Johntommy Rosas' position that the Ballona Wetlands Ecological Reserve is a FRESH WATER coastal wetland, and that the restoration of it needs to be for a fresh water wetland.	Comment noted; Please contact the lead agencies for input on the Ballona Wetlands Restoration Project (Army Corps, CDFW)

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Miriam Faugno	Airport Marina Group - Sierra Club	<a href="mailto:mfaugnos@gmail.com">mfaugnos@gmail.com</a>	Yes!!! Agreed. "FRESH WATER coastal wetland, and that the restoration of it needs to be for a fresh water wetland. "	Comment noted; Please contact the lead agencies for input on the Ballona Wetlands Restoration Project (Army Corps, CDFW)

## Action Number Crosswalk

<b>Draft Action Number</b>	<b>Final Action Number</b>	<b>CCMP Action Category</b>	<b>CCMP Final Action</b>
1	1	Direct Management Actions	Acquire open space for preservation of habitat and ecological services
2	2	Direct Management Actions	Restore kelp forests in the Bay to improve the extent and condition of the habitat
3	3	Direct Management Actions	Recover abalone populations in the Bay and region to support rare species and socioeconomic benefits to people
4	4	Direct Management Actions	Assess and restore seagrass habitats in the Bay and nearshore environments to benefit marine ecosystems and improve coastal resilience
24	5	Direct Management Actions	Assess and implement offshore artificial reefs to benefit marine ecosystems and provide socioeconomic benefits to people
5	6	Direct Management Actions	Restore coastal strand and foredune habitat to beaches and sandy shores to improve coastal resilience
6	7	Direct Management Actions	Restore and maintain the entire LAX Dunes system to support native plants, wildlife, and rare species
7	8	Direct Management Actions	Restore coastal bluff habitats in the Bay watershed to support ecosystem services
8	9	Direct Management Actions	Implement Malibu Creek Ecosystem Restoration Project (Rindge Dam and other barrier removals) to support ecosystem restoration
9	10	Direct Management Actions	Remove additional barriers to support fish migration and ecosystem services
10	11	Direct Management Actions	Restore urban streams, including daylighting culverted streams, removing cement channels, and restoring riparian habitats
11	12	Direct Management Actions	Restore smaller coastal lagoons and other wetland types to increase wetland habitat area and condition throughout the watershed
12	13	Direct Management Actions	Restore Ballona Wetlands Ecological Reserve to enhance wetland habitats and benefits to people
13	14	Direct Management Actions	Implement wildlife crossings and other innovative projects for benefits to wildlife and people
17	15	Direct Management Actions	Implement projects that improve understanding and/or enhance endangered and threatened species populations (e.g. habitat improvements for Western Snowy Plover, genetic banking)

## Action Number Crosswalk

<b>Draft Action Number</b>	<b>Final Action Number</b>	<b>CCMP Action Category</b>	<b>CCMP Final Action</b>
14	16	Direct Management Actions	Support the implementation of activities and projects such as those in Enhanced Watershed Management Plans (EWMPs) and activities identified in the TMDL implementation schedule to help achieve TMDL goals for 303d listed waterbodies in the Bay and its watersheds
16	17	Direct Management Actions	Infiltrate, capture, and reuse stormwater and dry-weather runoff through green infrastructure, LID, and other multi-benefit projects and improve understanding of ecosystem services provided
15	18	Direct Management Actions	Support installation and monitoring of additional sewage and bilge pumpout facilities in Southern California harbors
18	19	Governance and Policy	Support minimization of biological impacts of water intake and discharge from coastal desalination facilities and other facilities, including public engagement and education
19	20	Governance and Policy	Support elimination of non-point pollution from onsite wastewater treatment systems
20	21	Governance and Policy	Support policies that promote reuse, recycling, and advanced wastewater treatment to reduce reliance on imported water sources
21	22	Governance and Policy	Support policies and implement projects that divert landfill waste and encourage composting to improve water quality and lower greenhouse gas emissions
23	23	Governance and Policy	Facilitate development and adoption of natural stream and riparian protection policies, including restoration
25	24	Governance and Policy	Support the inclusion of coastal resilience through natural means and softscape measures into local coastal plan updates
22	25	Governance and Policy	Support best management practices, increased public access, and improved public facilities for beaches and other public trail systems to support both enhanced natural resources values and benefits to people
26	26	Stakeholder Education and Engagement	Participate in research, education, outreach, and policy on invasive species removal and control
28	27	Stakeholder Education and Engagement	Produce educational resources and materials and conduct outreach to improve best management practices for Southern California boaters (e.g. fuel, sewage, and hazardous waste management)
29	28	Stakeholder Education and Engagement	Support efforts of disadvantaged communities to achieve healthy habitats, implement green infrastructure, and reduce pollution
30	29	Stakeholder Education and Engagement	Reduce health risks of swimming in contaminated waters and consuming contaminated seafoods through more comprehensive source control and, advanced monitoring and public notification

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<b>Draft Action Number</b>	<b>Final Action Number</b>	<b>CCMP Action Category</b>	<b>CCMP Final Action</b>
31	30	Stakeholder Education and Engagement	Conduct community engagement, education, and inform policies related to water conservation and reuse to reduce water demand and reliance on imported sources
32	31	Stakeholder Education and Engagement	Achieve water quality benefits by businesses through community engagement and implementation of best management practices
27	32	Stakeholder Education and Engagement	Reduce marine debris by supporting bans on single-use items, conducting outreach, and participating in trash reduction programs
41	33	Research and Monitoring	Monitor microplastics (including microfibers) and other marine debris in the Bay and coastal environments to inform management actions
42	34	Research and Monitoring	Improve understanding of emerging contaminants through monitoring and research to inform source control and reduce loading (e.g. fire retardants), especially in the context of climate change
34	35	Research and Monitoring	Monitor and inform management actions for Harmful Algal Blooms (HABs)
35	36	Research and Monitoring	Monitor chemical, physical, and biological characteristics in the Bay to inform climate change impacts such as ocean acidification
36	37	Research and Monitoring	Increase understanding of deep water habitats such as submarine canyons, deep reefs, and outfall pipes
37	38	Research and Monitoring	Monitor and improve understanding of rocky intertidal habitats to inform restoration actions
39	39	Research and Monitoring	Monitor and inform effective management of Marine Protected Areas, Fishery Management Plans, and local fisheries for recreational and commercially important species
43	40	Research and Monitoring	Research and inform best management and pollution reduction practices to address non-point source pollution and facilitate reduction
46	41	Research and Monitoring	Facilitate research, monitoring, and assessments that inform more accurate waste load allocations and development of new water, sediment, and biological objectives
44	42	Research and Monitoring	Inform strategies to reduce greenhouse gas emissions and increase carbon sequestration in support of existing state actions and policies
48	43	Funding and/or Partnerships	Implement the County-wide Safe Clean Water Program to support stormwater pollution control projects (if approved by voters in 2018 )
50	44	Funding and/or Partnerships	Support the development and implementation of a comprehensive regional sediment management plan for restoring natural hydrological functions of river systems and mitigating impacts from climate change