

FY20 Work Plan Draft Comments and Responses

Commenter	Representing	Work Plan Action or Task # (if applicable)	Comments	Staff Responses
GB Members / Alternates				
Clark Stevens	Santa Monica Mountains Resource Conservation District	Action #1	In action item 1 please add RCDSMM to list of partners. We work with private landowners to design and sometimes hold conservation easements	Incorporated
Bob Godfrey	Marina del Rey Anglers	Action #39	<p>Action Item 3: Recreational fishing is the largest participant sport in the USA. The socio-economic impact of recreational fishing is enormous. Certainly we should restore abalone but the restoration of fin fish will deliver more tangible benefits for more people. Seems to me there are parallel efforts underway that should be recognized in the PLAN.</p> <p>The hand out summarizing WAC comments says "FY20 to advance this concept and receive more information". Here is more information about the largest salt water fish hatchery in California. In addition to the on going white seabass program Hubbs Research Institute is actively working with halibut brood stock. As I mentioned there was a halibut die off last year and all the SM Bay brood stock died. Our Club made a financial grant to the hatchery so they could install a new filtration system and continue the halibut program. MDR Anglers is working with DFW and HSWRI to finalize the existing Fishery Mgt plan (FMP) . Our goal is to transition our grow out pens from white seabass to halibut production. https://www.wildlife.ca.gov/Conservation/Marine/ABMP/OREHP</p>	Halibut FMP notes incorporated into Action # 39. Additional comments noted.
Cung Nguyen	Los Angeles County Department of Public Works.	Action #43	<p>Please see below for my comments for the Draft SMBNEP Work Plan for FY 2020.</p> <p>The Work Plan has the following statements:</p> <ul style="list-style-type: none"> • Page 4: "The structure of the Work Plan is intended to mimic the structure of the CCMP Action Plan to facilitate ease of translation of progress towards implementing the 44 identified actions in the 2018 Plan " • Page 10: "Note that next steps or project activities that are on a grey row are part of the 2018 CCMP Action Plan, but are not currently identified as part of this current Work Plan." It's my understanding that the FY 2020 Work Plan mirrors the language and actions included in the October 2018 Action Plan and the Work Plan is saying the 1st step that was listed in the October 2018 Action Plan has been completed and that the SMBRC will not be taking action during FY 2020 on the next steps (the steps/items shown in grey). <p>With regards to Item #43, for the first row:</p> <ul style="list-style-type: none"> • Partner(s): Please list all partners in the appendix or as a footnote • Outputs / Deliverables: Use "Measure approved by voters on 11/06/2018" instead of "Approved measure" <p>With regards to Item #43, for the second row, please see below (attached separately) for the recommended Objectives, Description/Milestone Summary, Partner(s), Outputs/Deliverables. FYI, I'm aware that the next steps or project activities listed in grey are not currently identified as part of this current Work Plan.</p>	Incorporated
Claire Waggoner	State Water Resources Control Board	Action #17	Stormwater actions are underrepresented in this document and should be more prevalent.	Incorporated

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Claire Waggoner	State Water Resources Control Board	Action #19	<ul style="list-style-type: none"> Minor point, but the State does not have a desalination policy. The state amended the CA Ocean Plan to include desalination requirements (Chapter III.M) in 2015. The Ocean Plan is currently undergoing the Triennial Review and there is discussion to amend the desalination requirements. The Long-Term Environmental Result(s)/Outcome(s) does not quite align with the State Water Board's Ocean Plan's desal requirements, which requires minimizing operation- and construction-related mortality for sea water desal. But does allow for impacts and mitigation. Not sure how to remedy. Also, brine disposal should also be a concern. So consider adding something regarding reducing or eliminating impacts from brine disposal. OTC Policy covers power generating facilities, Ocean Plan covers desalination facility requirements. Add OTC policy elsewhere if that was intended 	Incorporated
Claire Waggoner	State Water Resources Control Board	Action #21	In the Long-Term Environmental Result(s)/Outcome(s) box, add "Work towards meeting the State's goals for recycled water in the Recycled Water Policy."	Incorporated
Claire Waggoner	State Water Resources Control Board	Action #34	The State Water board is re-convening the Science Advisory Panel to make recommendations for monitoring CECs in aquatic ecosystems. We anticipate the Panel will begin work in Summer 2019. The CCMP Action Plan could include engaging in this process.	Incorporated
Claire Waggoner	State Water Resources Control Board	General	Not sure if we can add, but suggest to develop social media pages and accounts to share information, conduct public outreach and increase public participation. Establishing a social media presence is a great way to garner public interest and conduct public outreach. This a relatively small effort but could be significantly beneficial to the program.	Noted and partially incorporated re: additional outreach and engagement efforts. TBF has multiple social media accounts that are frequently used (see links in Baywire). SMBRC will also explore the development and use of social media in sharing information and outreach.
Erica Yelensky	US EPA Region 9	General	hyperlink to CCMP action plan	Incorporated
Erica Yelensky	US EPA Region 9	Program Accomplishments	How is this different from appendix a? Can they be combined with a hyperlink to the accomplishments report you just sent out with the latest version of Baywire?	Appendix A includes <i>completed projects</i> for FY19. This section summarizes all major accomplishments from the previous calendar year (2018). Reference just via hyperlink was not incorporated because NEP staff felt that it was important to repeat in a stand-alone document and highlight NEP accomplishments, per the EPA funding guidance
Erica Yelensky	US EPA Region 9	General	Include a statement in the work plan to the effect of "There will be updates on all CCMP actions in each semi-annual report". Define table asterisk earlier - fix asterisk references.	Incorporated
Erica Yelensky	US EPA Region 9	Action #43	Update Measure W language and next steps	Incorporated

It should be noted that additional minor comments and grammatical corrections on the FY20 Work Plan were submitted by several GB Members via changes directly on documents. Those are all reflected in the redline version of the Work Plan.

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WAC / Public Members				
Walter Lamb	Ballona Wetlands Land Trust	Action #13	Please provide more detail regarding the role of the SMBRC in coordinating and advising both near and long-term restoration and management policies, especially as that role involves the Governing Board and Technical Advisory Committee. SMBRC is listed as a corroborating partner in the CCMP action plan, but there is no specific detail as to what that means with regard to this project. As the Land Trust has previously argued, SMBRC has non-regulatory authority to coordinate and advise any state program affecting the Bay or its watershed, but SMBRC has been effectively sidelined from this role in the last four to five years.	The role of SMBNEP in the Ballona Wetland Restoration Project as described in this work plan is consistent with the CCMP Action Plan and directions given to staff by the Management Committee in the past. NEP staff continue to provide technical support and other functions for this action as described in the Work Plan and other NEP documents. SMBRC's Governing Board can continue to take actions as it deems appropriate and which best support the goals of the CCMP Action Plan.
Walter Lamb	Ballona Wetlands Land Trust	Action #13	Page 18 indicates that the objective for the community restoration project is "[t]o restore four acres of degraded wetland and transition habitat." Presumably, this refers to the three acres under TBF's existing permit (referenced on page 9), plus one acre from the existing Friends of Ballona Wetlands project area, but that should be made clear in the work plan to avoid confusion.	Additional information was incorporated into Action #13 in response to Mr. Lamb's comment. Further details can be found in supplemental documents such as permits and implementation plans. The scope of text in next steps for Action #13 is consistent with other actions/projects in the Work Plan and is not intended to be exhaustive in detail given the breadth of projects and activities included in the FY20 Work Plan.
Walter Lamb	Ballona Wetlands Land Trust	General	The new work plan format only includes long-term outcomes, not short-term outcomes. Perhaps I overlooked it, but I did not see any explanation for that change in the plan itself or in the staff report. Please explain in the work plan why short-term objectives (previously defined as 1 to 5 years) are no longer included. Additionally, please retain the short-term objectives that were previously recorded for the Ballona Wetlands, such as interim access, stewardship and educational opportunities.	Short-term outcomes are not a required element of the FY20 Work Plan as defined by the NEP funding guidance. "Objective(s)" can be found in the fourth column. Note that the "objective" column is intended to be a short-term guideline and is framed based on the EPA funding guidance examples, including quantification when possible. Objectives and deliverables will be tracked for progress in SMBNEP's semi-annual report documents (publicly available on TBF's website). As stated in the Work Plan itself, "the structural differences between the FY19 Work Plan and the FY20 Work Plan are considerable due to the cross-walking between this document and the new structure of the 2018 CCMP Action Plan. This new structure and format of the Work Plan document reflects the goals of SMBNEP to increase clarity, increase reporting efficiency, increase the readability and succinctness of the Work Plan, increase consistency between the CCMP Action Plan and Annual Work Plans, and increase consistency with EPA funding guidance." These formatting changes are reflective of guidance provided to staff by SMNBEP's Management Committee.

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Walter Lamb	Ballona Wetlands Land Trust	Action #13	Staff's previous response to the Land Trust's WAC meeting comments on the issue of access ignored the important distinction between interim access, which can benefit the ecological reserve and the public right now, and post-restoration access, which could be up to fifteen years or more away.	Access to the Ballona Reserve is a determination made by CDFW. NEP staff recognize and appreciate the multitude of opinions and feelings surrounding the complex issues facing the Ballona Wetlands Ecological Reserve.
Walter Lamb	Ballona Wetlands Land Trust	General	Please also provide the time-range that is intended to be conveyed for long-term objectives (i.e. 5 to 20 years or something else?).	Long-term Environmental Result(s) / Outcome(s) are provided in the second column from right and are intended to reflect the long-term results of the activity/project. There is not a "date" associated with each outcome, but they are intended to generally reflect a 5-20 year time frame, in some cases longer.
Walter Lamb	Ballona Wetlands Land Trust	General	Additionally, the Land Trust has been requesting for many years for a work group or committee to be established that is dedicated to the complex issues facing the Ballona Wetlands. This would allow a more thoughtful discussion of these issues in coordination with the Technical Advisory Committee, and would facilitate the submission of consensus policy recommendations to the SMBRC Governing Board. Potential issues for work group discussion include interim access, native re-vegetation policies, commercial parking in the ecological reserve, protection of important species, etc. The Land Trust is fully aware that any work group or committee would have only an advisory function to the Governing Board, and that the Governing Board itself has only an advisory role with regard to the Ballona Wetlands, other than as it pertains to the activity of NEP staff in that project. Advisory functions are an important element of sound policy-making. Please add discussion of the purpose for including a description of work groups in the MOU, and what role work groups can have in benefiting various work plan objectives.	New working groups or committees as part of the NEP structure are being considered as part of the structure and governance evaluation process within the CCMP revision.
Walter Lamb	Ballona Wetlands Land Trust	Staffing	The work plan should increase SMBRC staffing levels to in response to multiple Governing Board member comments to the effect that SMBRC staffing is constraining the work of the agency.	All NEP staff positions are contingent on funding availability. New positions cannot be created without available long-term and consistent funding. It is recognized that implementation of the CCMP Action Plan requires diverse resources and partnerships, and NEP staff are extremely grateful for the support of the Management Conference in assistance towards meeting these significant goals and actions within the CCMP Action Plan. Staffing associated with the FY20 Work Plan is commensurate with resources currently available.

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Walter Lamb	Ballona Wetlands Land Trust	Budget	<p>The budget section of the work plan should provide more detail than the FY 2019 work plan did with regard to how money is actually being spent. For instance, if additional Section 320 grant funds are to be allocated to the Ballona Wetlands community restoration project - the purpose of those funds should be explained in detail (i.e. staff, materials, native plants or seed collection). The standard for detail should be set by what is most informative to the Governing Board and to the public, not merely the minimal requirements as TBF interprets them. The work plan should also clarify that SMBRC has full control over expenditure of the section 320 funds as the agency authorized to develop and approve the work plan, the document that allows funds to be disbursed and which determines how funds are spent.</p>	<p>The level of detail in the Budget Section is consistent with federal EPA Section 320 grant guidelines. See additional narrative within the Budget Section describing the tentative nature of the estimated funding allocations.</p>
Walter Lamb	Ballona Wetlands Land Trust	General	<p>Although relatively few Governing Board members have provided feedback regarding SMBRC's structure and governance, there has been a strong consensus among those who have that new and existing board members would benefit from a formal orientation process that explains SMBRC's role in the NEP and its relationship to other entities. Establishing an effective orientation process will require staff time, and should be discussed in the work plan. Currently, the only reference to a orientation in the draft work plan is a link to the existing orientation page. Governing Board members and the public should have access to the same orientation materials, which should include not just the text of state laws, federal regulations and other governing documents, but also interpretation and guidance relating to those documents, as well as answers to questions posed by Governing Board members and the public.</p>	<p>SMBNEP's recent survey on the evaluation of the structure and governance of the NEP received 43 responses, for which the Governing Board should be commended both on their participation and requests for input from partners. An orientation to SMBNEP and specifically the Management Committee was mentioned by multiple individuals. NEP staff agree that an orientation would be beneficial. Responsibility for conducting orientation with new members and keeping those materials up to date should be defined in the new MOU.</p>