

Summary of Comments on the Draft SMBNEP FY 2020 Work Plan (2/14/19 GB Review Version)*

Commenter	Representing	Work Plan Action/Task # (if applicable)	Comments
GB Members/alternates			
Clark Stevens	Santa Monica Mountains Resource Conservation District	Action #1, Acquire open space for preservation of habitat and ecological services	In action item 1 please add RCDSMM to list of partners. We work with private landowners to design and sometimes hold conservation easements
Bob Godfrey	Marina del Rey Anglers	Action #3, Recover abalone populations in the Santa Monica Bay and region to support rare species and socioeconomic benefits to people	<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"</p> <p>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.</p> <p>https://www.wildlife.ca.gov/Conservation/Marine/ABMP/OREHP</p>

Cung Nguyen	Los Angeles County Department of Public Works.	Action #43, Implement the County-wide Safe Clean Water Program to support stormwater pollution control projects (if approved by voters in 2018)	<p>Please see below for my comments for the Draft SMBNEP Work Plan for FY 2020. 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.” <p>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> <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>
Claire Waggoner	State Water Resources Control Board	Action #17, 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	Stormwater actions are underrepresented in this document and should be more prevalent.

Claire Waggoner	State Water Resources Control Board	Action #19, Support minimization of biological impacts of water intake and discharge from coastal power generation and desalination facilities, including public engagement and education	<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 sweeter 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
Claire Waggoner	State Water Resources Control Board	Action #21, Support policies that promote reuse, recycling, and advanced wastewater treatment to reduce reliance on imported water sources	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."
Claire Waggoner	State Water Resources Control Board	Action #34, 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	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.
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.

WAC/Public Members			
Walter Lamb	Ballona Wetlands Land Trust	Action #13, Restore Ballona Wetlands Ecological Reserve to enhance wetland habitats and benefits to people	<p>Ballona Wetlands 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.</p> <p>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.</p> <p>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. 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. 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?).</p> <p>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</p>

			<p>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.</p> <p>SMBRC Staffing</p> <p>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.</p> <p>Budget</p> <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.</p> <p>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>SMBRC Orientation Process</p>
--	--	--	--

			<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>
--	--	--	--

*Include all comments received by 3/08/2019.

Attachment to Mr. Cung Nguyen’s Comments – Recommended Objectives, Description/Milestone Summary, Partner(s), Outputs/Deliverables for Action #43

#	CCMP Action	CCMP Next Step(s) / Project Activity Name	Objective(s)	Description / Milestone Summary	Partner(s)	Outputs / Deliverables	Long-Term Environmental Result(s) / Outcome(s)	CWA Core
43	Implement the County-wide Safe Clean Water Program to support Stormwater pollution control projects	Participate in advisory board and support implementation of projects from the new funding mechanism	Improve stormwater management in urban areas and reduce stormwater pollution	Support the efforts of agencies to fund stormwater improvement and LID projects throughout the watershed	Please list all partners in the appendix or as a footnote	Attainment of water quality objectives, increased stormwater retention, and increased service to disadvantaged communities	Assist in achieving constituent percentage load reduction targets for waterbodies in the Santa Monica Bay according to TMDL compliance timeline	4, 6, 7