



**SANTA MONICA BAY
RESTORATION COMMISSION**
MANAGEMENT CONFERENCE OF THE NATIONAL ESTUARY PROGRAM

320 West 4th Street
Suite 200
Los Angeles, CA 90013
213-576-6615
www.smbrc.ca.gov

March 11, 2021

Agenda Item: 2.d.ii

To: Executive Committee, Santa Monica Bay Restoration Commission
From: Guangyu Wang, Chief Administrative Director
Re: **Consideration of Approval of the Santa Monica Bay NEP Fiscal Year 2022 Annual Work Plan (FY22 Work Plan)**

Action Requested of the Executive Committee

Staff recommend that the Executive Committee schedule for the April 15, 2021 Governing Board meeting the consideration of approval of the Santa Monica Bay National Estuary Program (NEP) Fiscal Year 2022 Annual Work Plan (FY22 Work Plan).

Background

Each year, the Commission collaborates with The Bay Foundation to develop the Santa Monica Bay NEP Annual Work Plan, which identifies the planned tasks and activities to further implementation of the Comprehensive Conservation and Management Plan (CCMP) for the federal fiscal year. Upon the Governing Board's approval of the Annual Work Plan, The Bay Foundation submits the Annual Work Plan to US EPA to apply for the annual federal Clean Water Act Section 320 NEP grant for implementation of certain Annual Work Plan activities. US EPA uses the Annual Work Plan to track grant expenditures and progress toward achieving the NEP's objectives and to compile information on the environmental outcomes of CCMP implementation.

The FY22 Work Plan outlines tasks, objectives, partners, and deliverables for the work to be performed between October 1, 2021 and September 30, 2022 and must be submitted to US EPA before April 30, 2021 to meet deadlines for US EPA's review and approval. The FY22 Work Plan is consistent with NEP funding guidance and the actions, next steps, and long-term environmental results of the [CCMP Action Plan](#) adopted by the Governing Board in October 2018. The FY22 Work Plan also builds on the current [FY21 Work Plan](#). As such, many of the FY22 Work Plan's priorities and tasks remain similar due to the fact that they are continuations of multi-year efforts.

A preliminary draft of the FY22 Work Plan planned activities was posted for public review on February 10, 2021 and distributed to Governing Board members on February 11, 2021. An overview of the draft FY22 Work Plan was provided at the February 18, 2021 Governing Board meeting, followed by a Santa Monica Bay



The Santa Monica Bay Restoration Commission's mission is to restore and enhance Santa Monica Bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, mitigate the impacts of climate change and sea level rise, and protect Santa Monica Bay's benefits and values.

Stakeholders Workshop on April 24, 2021 to inform stakeholders and receive input on the draft FY22 Work Plan. The workshop was conducted in a facilitated workshop format in collaboration with The Bay Foundation, with a focus on soliciting input on addressing climate change and four areas of special interest identified in US EPA NEP funding guidance: nutrient pollution reduction, water reuse and conservation, marine litter reduction, and green infrastructure and resiliency. In addition to the workshop, stakeholders, including members of the public, had an opportunity to provide input during a written comment period, which opened February 18, 2021 and closed March 5, 2021.

Thirty-five (35) Governing Board members and stakeholders, including members of the public, participated in the workshop and 11 individuals provided written comments on the draft FY22 Work Plan. Attachment 1 includes written comments and summaries of input received at the February 24, 2021 Santa Monica Bay Stakeholders workshop.

Commission staff, in collaboration with The Bay Foundation staff, continue to review input, respond to comments, and incorporate suggestions, as appropriate. The draft FY22 Work Plan will be finalized after considering the input received and completion of the sections on completed projects, budget, and responsibilities of Commission staff and The Bay Foundation staff. The final draft FY22 Work Plan, a redline version compared to the preliminary draft, and a Responses to Comments document will be posted on the Commission's website and distributed to the Governing Board in advance of the Governing Board's consideration of approval.

Attachments

Attachment 1 Comments Received on the Draft FY22 Work Plan

Attachment 1

**Comments Received on the Draft Santa Monica Bay NEP Fiscal Year 2022 Annual Work Plan
(FY22 Work Plan)**

Comment Deadline: March 5, 2021

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WRITTEN COMMENTS

CCMP Action No. (if applicable)	Comment No.	Commenter	Affiliation	Comment
2	1.01	Bob Godfrey	Marina Del Rey Anglers	<p>Add acronyms'</p> <p>CCA - Coastal Conservation Assn. of California HSWRI - Hubbs Sea World Research Institute KHOEP - King Harbor Ocean Enhancement Program</p> <p>Due to the striking similarity of the halibut restoration to the abalone restoration we suggest the following be added to Item #2. HSWRI and DFW are spawning rearing and releasing halibut in Mission Bay. MDRA has provided brood stock and collaborated in spawning halibut at the Carlsbad Fish Hatchery. MDRA has been active with the Ocean Research Enhancement Hatchery Program for many years. We plan on transitioning our existing fish pens over to rearing halibut as soon as possible. MDRA has the funds and volunteers to make this happen. The following is formatted to be consistent with and complementary to the existing text.</p> <p>CCMP Action: Recover halibut population in Santa Monica Bay CCMP Next Step: Maintain aquaculture facility for halibut Lead: MDRA, KHOEP Partners: LACDBH, HSWRI, CDFW Objectives: To perfect captive spawning and rearing of halibut Description: Conduct habitat suitability survey for fish release Outputs: Raise and release halibut into Santa Monica Bay Long-term: Restore viable halibut population</p>

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CCMP Action No. (if applicable)	Comment No.	Commenter	Affiliation	Comment
2	1.02	Steve Santen	Marina Del Rey Anglers	<p>CCMP Action: Recover Halibut Populations in SM Bay New CCMP Next Step: Support Aquaculture Facility for Halibut Lead: MDRA, KHOEP Partners: LACDBH , HSWRI, CDFW Objectives: Perfect captive spawning and rearing of Halibut. Description: Conduct Habitat sustainability survey for released fish Outputs: Release Halibut into SM Bay Long-term Outcomes: Sustainable fishery as measured by monitoring</p>
2	1.03	Steve Santen	Marina Del Rey Anglers	<p>Add acronyms' CCA - Coastal Conservation Assn. of California HSWRI - Hubbs Sea World Research Institute KHOEP - King Harbor Ocean Enhancement Program</p>
2	1.04	Tomas Parker	Los Angeles County Sanitation Districts	<p>Action 2 – Recommend including OPC and/or UCI as partners and project descriptions for collaborations at hand (OPCs interim kelp action plan, etc.)</p>
13	2.01	Kathy Knight	Ballona Ecosystem Education Project	<p>3. We need to build consensus on the proposed Restoration of the Ballona Wetlands.</p>
13	2.02	Kathy Knight	Ballona Ecosystem Education Project	<p>4. The EIR for the Ballona Wetlands Ecological Reserve was done by the Bay Foundation. The Bay Foundation has a private interest in having restored kelp beds in Santa Monica Bay. It should not have private interests or connection to the project if it is going to do an EIR for a public reserve.</p>

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13	2.03	Kathy Knight	Ballona Ecosystem Education Project	<p>5. A lot of issues regarding the BWER were raised at the meeting that have not been addressed. When are they going to be addressed?</p> <p>Such as:</p> <p>a. No alternative studied in the EIR to restore the Ballona Wetlands to the mostly fresh water wetland that it has been for at least 400 years. Only changing it into a mostly salt water bay was studied.</p> <p>b. No hydrology report was done on the site. No restoration plans should be approved until a hydrology study is done.</p> <p>c. Impact of sea level rise on Ballona, and salt water intrusion from the proposed restoration plan that could invade 3 fresh water aquifers that need very much to be protected, due to the Los Angeles area already not having enough fresh drinking water for its population.</p> <p>d. Access to the reserve has been denied to the groups and citizens that fought for so many years to get this land saved. They fought for over 30 years to educate the public about the importance of the wetlands and the need to save it. Due to their efforts a large extension of the Playa Vista project was stopped west of Lincoln. Playa Vista sold it to the state government of California. Despite all this work these citizens are not being allowed on the land to do stewardship and give educational tours for the public. They deserve the opportunity to do this. When can they have it?</p>

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13	2.04	Patricia McPherson	Grassroots Coalition	<p>BALLONA WETLANDS AS PART OF THE WORK PLAN OF THE NEP (National Estuary Program)</p> <p>Grassroots Coalition was in attendance at the WorkPlan meeting and provided numerous comments of need of review inclusions. Issues that continue to need address that pertain to the Ballona Wetlands include but are not limited to:</p> <ul style="list-style-type: none"> a. Sea level rise negative impacts upon the freshwater aquifers underlying Ballona Wetlands. b. Subsidence potential damage to the coast from SoCalGas/ Playa del Rey operations inclusive of saltwater intrusion. c. Corrosion aspects of sea level rise including the effects of the certified CDFW Ballona restoration plan upon SoCalGas/ PDR Underground Gas Storage Operations infrastructure. d. Assess the benefit of addition of and inclusion of a least damaging alternative to Ballona Wetlands that includes protection of Ballona as a freshwater dependent wetland/grassland/ salt panne/ upland complex ecosystem. And, address the ongoing diversion of groundwater and surface water away from Ballona Wetlands. Include assessment to assure freshwater protection and groundwater sustainability and biodiversity protection as included in Gov. Newsom’s orders. e. Assess the damage to the current Ballona ecosystems from the CDFW Plan to convert Ballona into a saltwater bay and the plan to bury current wetland delineated habitat into FILL (ED) habitat, including burying of upland/grassland habitat into FILL(ed) habitat. f. Assess the amount of new levees per the CDFW Plan that will be Vector Controlled, mowed habitat per USACE REGULATIONS for new levees.

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13	2.05	Walter Lamb	Ballona Wetlands Land Trust	<p>Ballona Wetlands</p> <p>While there is a task in the draft work plan for NEP staff to support the lead agencies to secure project funding and to help obtain permits for the Ballona Wetlands Restoration Project, the NEP's Policy, Management and Technical Committees have never made any effort to assess whether the recently certified project plans actually further the objectives of the Commission or the state. It is beyond absurd to suggest that the NEP can task itself with helping to secure funds and permits for a major restoration plan, but cannot assess the effectiveness of that plan to achieve the NEP's restoration objectives. A plain reading of the certified project plan shows that implementation of the project would work against the NEP's and state's environmental sustainability objectives with regard to resiliency against sea level rise, reducing greenhouse gas emissions, protecting biodiversity, and ensuring equitable access to natural resources.</p> <p>Requested work plan action: Assess the extent to which the certified Ballona Wetlands Restoration Project plans further the objectives of Bay restoration, to include the extent to which the plans provide sustainable protection for critical wetland habitats and dependent wildlife species against the impacts of sea level rise, the extent to which the plans would affect the amount of greenhouse gases in the atmosphere, the impact of the plans on near and long term public access to the ecological reserve, and other potentially relevant issues.</p>

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13	2.06	Walter Lamb	Ballona Wetlands Land Trust	<p>Specifically with regard to public access, it is clear that groups with an interest in restricting interim access have successfully put off any opportunity consensus building on this issue. It is frankly obscene that groups touting the environmental justice aspects of a future project are simultaneously fabricating reasons to deny access now and in the near future, while far less compatible land uses continue unabated. In addition to the requested work plan action item below, the Executive Committee, at its March meeting, should direct staff to prepare a resolution for consideration and potential adoption by the Governing Board at its April meeting that reaffirms the NEP's support for ecologically sensitive public access to areas (most notably Area A) of the ecological reserve.</p> <p>Requested work plan action: Assess the benefit of enhancing the level of existing public access to currently neglected and unused areas of the ecological reserve (such as Areas A and C of the reserve) in a manner that protects wildlife and their habitats, that respects cultural resources, and that allows outdoor nature education and stewardship activities, and adopt an appropriate, non-regulatory NEP policy in accordance with that assessment.</p>
13	2.07	Randy Rodriguez	California Department of Fish & Wildlife	[Comment received 3/10/21; Long-Term Environmental Result(s) / Outcome(s)] This statement on creating public access is assumed to be part of the overall restoration identified in the primary clause and is not separate from it.
13	2.08	Randy Rodriguez	California Department of Fish & Wildlife	[Comment received 3/10/21; Next Step 1, Partners] Delete CDFW. Yes, CDFW identified as lead.

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13	2.09	Randy Rodriguez	California Department of Fish & Wildlife	[Comment received 3/10/21; Next Step 3, Partners] Add SCC. Delete CDFW. Yes, CDFW identified as lead.
14	3.01	Randy Rodriguez	California Department of Fish & Wildlife	[Comment received 3/10/21; Next Step 3] Is this for identifying crossings within the NEP plan area?
15	4.01	Randy Rodriguez	California Department of Fish & Wildlife	[Comment received 3/10/21; Next Step 2] USFWS should also be identified for CRLF.
16	5.01	Martha Tremblay	Los Angeles County Sanitation Districts	For Action 16 on page 25 of the draft FY 22 Workplan there is mention of State Bond funding but also Safe Clean Water funding. Under the Milestone/Description summary “continue to oversee implementation” is listed. Is that the correct wording for the SMBRC role or should it be “continue to support implementation”? I wasn’t sure if the State Bond money mentioned is Prop funding that is being managed partly by SMBRC? If so the wording would be correct but if you are referring to Safe Clean Water funds, for that SMBRC should continue to support.
16	5.02	Megan Cooper	State Coastal Conservancy	I do not think SCC is a lead agency on this action. Please remove us.
24	6.01	Randy Rodriguez	California Department of Fish & Wildlife	[Comment received 3/10/21; Next Step 1, Partners] Seems like the RWQCB and ACOE would be potential partners here as well.

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25	7.01	Erica Yelensky	US Environmental Protection Agency	[Next step 1] Is there a specific project you can identify for FY 22?
25	7.02	Randy Rodriguez	California Department of Fish & Wildlife	[Comment received 3/10/21; Next Step 2, Partners] It seems like some of the other cities and transit agencies would be identified here as well.
29	8.01	Tomas Parker	Los Angeles County Sanitation Districts	Action 29 – Clarify SMBRC’s role in Safe to Swim and Safe to Eat workgroups. The Safe to Swim interactive maps mentioned have not been updated from Port Hueneme to Seal Beach in a few years, so clarity into SMBRC’s role in “assistance in maintaining and updating” those maps would be useful.
31	9.01	Erica Yelensky	US Environmental Protection Agency	[Next step 1] Is the goal of this activity to reach a new sector of businesses for the Clean Bay Certified program? What does the*signify?
33	10.01	Tomas Parker	Los Angeles County Sanitation Districts	Action 33 – Will the Bay studies for microplastics methods be using standardized methods (e.g. ASTM)? Clarify The Bay Foundation’s role in the SCCWRP microplastics fate and transport study. Is TBF collecting the data, or supporting the project in some other way?

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34	11.01	Tomas Parker	Los Angeles County Sanitation Districts	Action 34 – Clarify SMBRC’s / TBF’s supportive role in CEC monitoring and methodology project.
36	12.01	Erica Yelensky	US Environmental Protection Agency	[Next step 4] Should TBF be listed as a partner here?
36	12.02	Tomas Parker	Los Angeles County Sanitation Districts	Action 36 – Consider including Del Mar Oceanographic (DMO) as a partner for the Wirewalker project stated in the action.
37	13.01	Tomas Parker	Los Angeles County Sanitation Districts	Action 37 – The Wirewalker project is listed under Action 36; how is the project stated with LACSD as a partner different in this action?
39	14.01	Bob Godfrey	Marina Del Rey Anglers	CCMP Action: Monitor and inform effective management of Marine Protected Areas, Fishery Management Plans, and local fisheries for recreational uses Long-term Outcomes: Healthy sustainable fishery

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CCMP Action No. (if applicable)	Comment No.	Commenter	Affiliation	Comment
39	14.02	Bob Godfrey	Marina Del Rey Anglers	<p>CCMP Next Step 1: Support MDRA in their operation of the Youth and Veteran Fishing Program</p> <p>Lead: MDRA</p> <p>Partners: LACDBH</p> <p>Objectives: Provide disadvantaged youth and veterans the opportunity to experience nature, boating, and fishing and healthy lifestyles</p> <p>Description: Support MDRA plan for 25 fishing trips</p> <p>Outputs: Update in annual report</p> <p>Long-term Outcomes: Healthy sustainable fishery</p>
39	14.03	Bob Godfrey	Marina Del Rey Anglers	<p>CCMP Next Step 2: Support CDFW in the completion of a halibut Stock Assessment FMP</p> <p>Lead: CDFW</p> <p>Partners: OREHP, HSWRI, MDRA, CCA</p> <p>Objectives: Restore a healthy sustainable halibut fishery</p> <p>Description: Release HSWRI reared halibut into Santa Monica Bay</p>
39	14.04	Bob Godfrey	Marina Del Rey Anglers	<p>New CCMP Next Step: Support white seabass Restocking Program (OREHP)</p> <p>Lead: MDRA, KHOEP</p> <p>Partners: LACDBH, OREHP, HSWRI, CCA</p> <p>Objectives: Restore the white seabass population</p> <p>Description: Release HSWRI reared white seabass into Santa Monica Bay</p> <p>Outputs: Update in annual report</p>

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39	14.05	Steve Santen	Marina Del Rey Anglers	<p>CA Halibut. HSWRI and DFW are spawning, rearing, and releasing halibut in Mission Bay. Some in the DFW still suspect a genetic anomaly in the Ca. Halibut stocks of SM Bay. Little scientific research has been done. Little data from SM Bay was used in the generation of the multiple Halibut stock Assessments produced by the DFW. We need to know if our Bay is unique in its Halibut population. Support of this fishery is both Commercially and Recreationally important. The Stock assessment first done in 2011 was restarted peer review resulted in mixed results. "Facilitated by Ocean Science Trust (OST), an independent scientific peer review of the updated halibut stock assessment was completed by a panel of experts. The Panel does not consider the northern area model base model for halibut to be adequate for use in management based primarily on four issues with the northern base model. Additionally, the Panel identified some technical issues in the southern area base model and recommends the Department further investigate these issues prior to using the model to inform management". Please See https://marinespecies.wildlife.ca.gov/california-halibut/false/. Although it has been Ten years in the making we still do not have a CA Halibut Stock Assessment, nor a FMP Fisheries Management Plan. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=185061&inline. I believe that the issues require the SANTA MONICA BAY RESTORATION COMMISSION play a more active role in this valuable fishery.</p>

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39	14.06	Steve Santen	Marina Del Rey Anglers	<p>The Halibut stock assessment Peer review was chaired by the Ocean Science Trust. In its summary it states, “Results were shared for the southern stock assessment model and indicated that the resource was relatively depleted throughout the modeling timeframe”</p> <p>Ocean Science Trust-Halibut-Stock-Assessment-Peer-Review (https://www.oceansciencetrust.org/wp-content/uploads/2020/12/California-Halibut-Stock-Assessment-Peer-Review-Public-Webinar-Key-Themes-Summary.pdf)</p>
39	14.07	Steve Santen	Marina Del Rey Anglers	<p>CCMP Next Step 2: Support CDFW in Peer review of the Stock assessment and the completion of a Halibut FMP</p> <p>Lead: CDFW</p> <p>Partners: OREHP , HSWRI, MDRA, CCA</p> <p>Objectives: To provide technical and outreach support to CDFW in participating and tracking the development of a Halibut FMP by CDFW and promotion of a healthy Fishery</p> <p>Description: 1. Resolve the suspicion that a Genetically isolated Halibut Population exists in SM Bay. 2. Produce a Halibut FMP 3. Develop an Enhancement Plan that yields HSWRI Halibut fry into SM Bay.</p> <p>Long-term Outcomes: Healthy & Sustainable Halibut fishery that supports both the Commercial and Recreational Industries.</p>

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39	14.08	Steve Santen	Marina Del Rey Anglers	<p>HSWRI and DFW are spawning, rearing, and releasing halibut in Mission Bay. Some in the DFW still suspect a genetic anomaly in the Ca. Halibut stocks of SM Bay. Little scientific research has been done. Little data from SM Bay was used in the generation of the multiple Halibut stock Assessments produced by the DFW. We need to know if our Bay is unique in its Halibut population. Support of this fishery is both Commercially and Recreationally important. The Stock assessment first done in 2011 was restarted peer review resulted in mixed results. “Facilitated by Ocean Science Trust (OST), an independent scientific peer review of the updated halibut stock assessment was completed by a panel of experts. The Panel does not consider the northern area model base model for halibut to be adequate for use in management based primarily on four issues with the northern base model. Additionally, the Panel identified some technical issues in the southern area base model and recommends the Department further investigate these issues prior to using the model to inform management”. Please See https://marinespecies.wildlife.ca.gov/california-halibut/false/</p>
42	15.01	Cung Nguyen	Los Angeles County Department of Public Works	<p>Page 64 of the plan (page 68 of the PDF document), Action Item No. 42: for the Partner(s) column, change the font size accordingly to keep “Municipalities” on the same line</p>

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43	16.01	Cung Nguyen	Los Angeles County Department of Public Works	Page 64 of the plan (page 68 of the PDF document), Action Item No. 43: For CCMP Action column: Revise the action From: “Implement the County-wide Safe Clean Water Program to support stormwater pollution control projects (if approved by voters in 2018)” To: Implement the County-wide Safe Clean Water Program to protect water quality within our communities and provide new sources of water for current and future generations (approved by voters in 2018) For the Partner(s) column: Change the font size accordingly to keep “municipalities” on the same line
General Comment	17.01	Erica Yelensky	US Environmental Protection Agency	Please include revising the Quality Assurance Program Plan in your workplan. At a minimum, can we plan to have the milestone be an updated draft in FY 22? Let's discuss.
General Comment	17.02	Erica Yelensky	US Environmental Protection Agency	I saw staff support for the technical advisory committee, but not for the executive committee and governing board meetings in the work plan. Please consider adding this.
General Comment	17.03	Erica Yelensky	US Environmental Protection Agency	Per the funding guidance, the work plan is due to EPA by June 1, not April 30.
General Comment	17.04	Erica Yelensky	US Environmental Protection Agency	Please consider including language addressing how some activities may be restricted or done differently due to COVID.

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General Comment	17.05	Erica Yelensky	US Environmental Protection Agency	We recognize that you are working in a complex environment and partners may shift due to a variety of reasons. Please consider including language addressing this.
General Comment	17.06	Kathy Knight	Ballona Ecosystem Education Project	1. We agree with the comments of the Ballona Wetlands Land Trust, and of Grassroots Coalition.
General Comment	17.07	Kathy Knight	Ballona Ecosystem Education Project	2. At the Stakeholder meeting there were about 6 people from the Bay Foundation. But the majority of participants were groups and citizens concerned about the proposed restoration of the Ballona Wetlands Ecological Reserve (BWER). However there was not much support from the Bay Foundation to follow up with plans to include working on the concerns raised. It seemed like it was just a required meeting that the Bay Foundation had to get done, but with no follow up. We are disappointed at that.
General Comment	17.08	Kathy Knight	Ballona Ecosystem Education Project	There are many more important issues that were brought up at this once a year meeting. How can we view a recording of the meeting to document them, and can there be a transcript made to review?

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General Comment	17.09	Kathy Knight	Ballona Ecosystem Education Project	<p>We have many other concerns, as do other participants. How can we get them resolved? Who do we talk to and how do we work with them to resolve these issues?</p> <p>We look forward to someone contacting us to answer our questions as soon as possible.</p>
General Comment	17.10	Patricia McPherson	Grassroots Coalition	<p>Background</p> <p>Grassroots Coalition(GC) has been participating with the Santa Monica Bay Restoration Project, now known as the Santa Monica Bay Restoration Commission for the past 15 years. During this timeframe we have attempted to bring the Commission into alignment with its legislated mandates of operation as we focused upon the rare habitat and ecosystems of Ballona Wetlands within the Santa Monica watershed.</p> <p>While certain positive changes were made, that included the separation of the private business -The Bay Foundation's board members from having a controlling leadership of the Commission, it was short-lived.</p> <p>A lawsuit in which the Ballona Wetlands Landtrust prevailed, gave rise to a momentary pause in the private business's control over the Commission but this separation has been eaten away with the support of USEPA to the Bay Foundation. The Bay Foundation, was founded by highly conflicted consultants beholdng to developer and fossil fuel interests and remains a highly conflicted group that preys upon public bond funding.</p>

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General Comment	17.11	Patricia McPherson	Grassroots Coalition	<p>None of the early tenets of the SMBRProject have been allowed to occur and most have now been totally stripped away and the SMBRCommission only provides lip service to so-called public & stakeholder participation.</p> <p>Most recently the SMBRP’s tenet of providing for public/stakeholder participation in groups working throughout the year with SMBR staff to discuss individual projects and provide for true transparency and accountability has been totally stripped away for good, after years of attempts by the public & stakeholders to have it enforced.</p>
General Comment	17.12	Patricia McPherson	Grassroots Coalition	<p>The bond funds spent on Ballona Wetlands that have been manipulated through the SMBRCommission and the SMBRFOUNDATION, aka The Bay Foundation and its leadership that also controlled the SMBR Authority bond funds, have been determined to have been abused and misappropriated by both the Dept. of Finance (2010 Audit) and by the Los Angeles County Board of Supervisors in an audit. There is no dispute that funds have been misappropriated and misspent with lack of approvals by both the County Board of Supervisors and the Commission itself. (Audits) While the Bay Foundation/SMBR/SMBR AUTHORITY(Bay Foundation) were given a verbal cuff for the wrongdoing, it is apparent that ‘verbal cuffs’ provide only for a heightened green light for wrongdoing.</p>

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General Comment	17.13	Patricia McPherson	Grassroots Coalition	<p>Lastly, Grassroots Coalition supports the written 3/5/21 comments made by the Ballona Wetlands Landtrust in full. And, requests viewing of the SMBRC Meeting attached as GC supports the comments made 10/22/20 and requests response to all. McPherson, Knight, Dr. Griswold, Harden, Lamb—YouTube</p> <p>https://www.youtube.com/watch?v=M9tB0YHzHy0</p>
General Comment	17.14	Tomas Parker	Los Angeles County Sanitation Districts	Update our agency name to Los Angeles County Sanitation Districts to reflect our current name

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CCMP Action No. (if applicable)	Comment No.	Commenter	Affiliation	Comment
General Comment	17.15	Walter Lamb	Ballona Wetlands Land Trust	<p>General Comment</p> <p>For eight or so years I have been taking the time to research, document, and provide feedback on issues of importance to the Ballona Wetlands, a critical ecosystem in the Santa Monica Bay Watershed. It has not been time well spent because there is never any effort to gauge stakeholder consensus and the process for determining which suggestions are incorporated into the work plan and which are dismissed is beyond the public's view. The Commission has instead abdicated this governmental decision-making process over to The Bay Foundation, which routinely dismisses any suggestion for increased project accountability as being outside the scope of the work plan. Sadly, this National Estuary Program is not science-based or fact-based, but instead operates as a political networking club focused on the flow of bond funds. This NEP seems incapable of acknowledging its mistakes, whether related to work on special interest projects at Ballona, abdicating its public duties, pushing for poorly thought out legislation, or failing to disclose public records, and instead uses public resources to double down on those mistakes without any regard for the impact to the public interest. The resulting leadership vacuum is a direct cause of the ongoing neglect, delays, and cost overruns at the Ballona Wetlands.</p> <p>I am submitting these comments to maintain a record of our repeated but unsuccessful attempts to work within the system.</p>

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CCMP Action No. (if applicable)	Comment No.	Commenter	Affiliation	Comment
General Comment	17.16	Walter Lamb	Ballona Wetlands Land Trust	<p>Transparency</p> <p>There is no associated action item related to this issue, just a common sense observation that when a state agency hosts a series of public meetings and invites the public to participate in the development of a public work plan, the primary if not sole purpose of which is to be submitted as part of a broader application to US EPA for federal assistance, that application and the corresponding grant agreement should be (and is legally required to be) accessible to the state agency and to the public.</p>

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**SUMMARY OF INPUT FROM
FEBRUARY 24, 2021 SANTA MONICA BAY STAKEHOLDERS WORKSHOP
BREAKOUT SESSION**

Comment Category	Comment No.	Breakout Group No.	Input Summary
Nutrient Pollution Reduction	18.01	Breakout Group #1	<ul style="list-style-type: none"> • Ballona creek TMDL restoration project example
Nutrient Pollution Reduction	18.02	Breakout Group #3	<ul style="list-style-type: none"> • Protect aquifers from saltwater intrusion and study risk potential
Nutrient Pollution Reduction	18.04	Breakout Group #5	<ul style="list-style-type: none"> • Consider the impacts of removal of earth that could cause seawater intrusion from Ballona restoration • Regarding Action #40 [Research and inform best management and pollution reduction practices to address non- point source pollution and facilitate reduction]: Consider including a policy transition from lawns and use of chemical fertilizers towards native, drought-tolerant, and water capture
Water Reuse and Conservation	19.01	Breakout Group #1	<ul style="list-style-type: none"> • Rain barrels (usually for private citizens, but potential usage for municipalities) • More permeable parking lots • Dry weather diversions • Prioritize water quality in every project • Review Culver City rain gardens project, LAX related initiatives, and Hermosa Beach project as examples of diverting stormwater

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Comment Category	Comment No.	Breakout Group No.	Input Summary
Water Reuse and Conservation	19.02	Breakout Group #2	<ul style="list-style-type: none"> Integrate efforts related to preventing saltwater intrusion (e.g. South Bay and Dominguez Gap technologies) Increase water capture onsite, including via property owners
Water Reuse and Conservation	19.03	Breakout Group #3	<ul style="list-style-type: none"> Promote Ocean Friendly Gardens to collect water, reuse, and percolate rather than divert runoff to storm drains; Playa Vista’s water output should be cleaned and restored to wetland, rather than its current output pumping both polluted and possibly reusable water
Water Reuse and Conservation	19.04	Breakout Group #5	<ul style="list-style-type: none"> Consider whether a desalination plan would be good or bad for the bay, and assess whether consistent with the objectives of the NEP
Marine Litter Reduction	20.01	Breakout Group #1	<ul style="list-style-type: none"> Reduction of metallic balloons Certification program to help businesses that are conserving water “Rethink disposable”— #31 [Achieve water quality benefits by businesses through community engagement and implementation of best management practices] and Actions #32 [Reduce marine debris by supporting bans on single- use items, conducting outreach, and participating in trash reduction programs]
Marine Litter Reduction	20.02	Breakout Group #2	<ul style="list-style-type: none"> Concern that a large amount of water from the Ballona wetland project could turn into a sewage bathtub Find ways to enhance TDML implementation so compliance is achieved more quickly Improve description of manuscript in item #33 [Monitor microplastics (including microfibers) and other marine debris in the Bay and coastal environments to inform management actions]

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Comment Category	Comment No.	Breakout Group No.	Input Summary
Marine Litter Reduction	20.03	Breakout Group #3	<ul style="list-style-type: none"> • Keep in mind neighboring parks, rec areas, etc. near the watershed • Non-point source litter reduction in the watershed
Marine Litter Reduction	20.04	Breakout Group #5	<ul style="list-style-type: none"> • Regarding Action #32 [Reduce marine debris by supporting bans on single-use items, conducting outreach, and participating in trash reduction programs]: Has outreach to cities about source reduction projects occurred? There could be value in convening cities and restaurants on this topic. For example, there may be value in rethinking the Clean Bay Restaurant Certification Program
Green Infrastructure and Resiliency	21.01	Breakout Group #1	<ul style="list-style-type: none"> • Cross-boundary thinking is key • Target having more resources for safe clean water
Green Infrastructure and Resiliency	21.02	Breakout Group #2	<ul style="list-style-type: none"> • Include partnership with OPC in project #2 [Restore kelp forests in the Bay to improve the extent and condition of the habitat] • Kelp restoration; use daylighting streams for stormwater management
Green Infrastructure and Resiliency	21.03	Breakout Group #3	<ul style="list-style-type: none"> • Berms are a major concern • Alternative structures including wetlands • Reef structures • Plant trees and restore kelp forests

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Comment Category	Comment No.	Breakout Group No.	Input Summary
Green Infrastructure and Resiliency	21.04	Breakout Group #5	<p><i>Considerations Related to Ballona Wetlands</i></p> <ul style="list-style-type: none"> • Beach Characterization Study –Folks would be interested in learning about the results of this study. <i>Is now the right time to convene a meeting to share results of the study?</i> • Include an action item in the work plan to assess how / if the proposed restoration plan strengthens resiliency • Organize a policy committee discussion about impacts of project on greenhouse gas emissions • The NEP Action Plan should reference other sites in CA or nationwide that would allow for removal of earth with associated impacts (saltwater intrusion, implications on freshwater aquifers and groundwater protections.) • Conduct a hydrology study regarding the potential implications of diverting fresh water from the wetlands and impacts on aquifers and the surface • Address historical studies done on Ballona Wetlands with bond monies • Equitable access to coastal resources is an important topic to consider

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Comment Category	Comment No.	Breakout Group No.	Input Summary
Climate Change	22.01	Breakout Group #1	<ul style="list-style-type: none"> • Think beyond engineering • Emphasis on reduction of CO2 and other greenhouse gases • Use all the resources in the basin, including other areas of public works, alternative fuels, and water reuse • Emphasize environmentally safe designs / approaches • Address climate change and resiliency in a holistic way • Dune restoration project are great for wave run-up (co-benefit: improves wildlife habitat) • Potential to include handling of organic materials as another focus area to integrate across silos • When looking at watersheds, climate change is a bullet point coming forward for all projects
Climate Change	22.02	Breakout Group #2	<ul style="list-style-type: none"> • The included projects for climate change mitigation and resiliency are well-thought out

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Comment Category	Comment No.	Breakout Group No.	Input Summary
Climate Change	22.03	Breakout Group #3	<p><i>Concerns</i></p> <ul style="list-style-type: none"> • Sea level rise will bring saline water into freshwater environments • Bulldozing activities related to berm construction will negatively impact air quality <p><i>Strategies</i></p> <ul style="list-style-type: none"> • Slow, careful restoration for Ballona because wetlands absorb storm impacts • Protect wildlife (while allowing public access in appropriate conditions)
Climate Change	22.05	Breakout Group #5	<ul style="list-style-type: none"> • Consider the Playa del Rey gas facility implications for climate change • Consider SoCal Gas saltwater corrosion from infrastructure
General Comment	23.01	Breakout Group #1	<p>Cross-cutting projects:</p> <ul style="list-style-type: none"> • Ballona wetlands have several existing / proposed projects that address all four of these key areas <p>Other ideas or suggestions for the FY22 Work Plan:</p> <ul style="list-style-type: none"> • Need to remember the importance of cross-boundary thinking and partnerships in any and all projects—this is important for coordination and effectiveness, and avoiding situations where folks are operating in silos • Multi-benefit / co-benefit projects are important

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Comment Category	Comment No.	Breakout Group No.	Input Summary
General Comment	23.02	Breakout Group #2	<p>Other ideas or suggestions for the FY22 Work Plan:</p> <ul style="list-style-type: none"> • Identify multi-benefit projects (e.g. green spaces that serve infiltration and wastewater recycling, kelp restoration that provides habitat and supports coast resiliency, nutrient pollution reduction, etc.) • Interest in increasing angling and hatcheries, especially halibut and white seabass <p>Clarifications and questions:</p> <ul style="list-style-type: none"> • Q: Item #29 [Reduce health risks of swimming in contaminated water and consuming contaminated seafood]– What is participation now? Is it just with the Safe to Swim workgroup? What is CMMP’s focus/ role? • Q: Item #33 [Microplastics] – Description is confusing. What are next steps? Where are you at in the process? • Item #37 – Los Angeles County Sanitation District is listed as partner, but their specific role needs to be clarified. Also, make sure that the organization name is accurate throughout.

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Comment Category	Comment No.	Breakout Group No.	Input Summary
General Comment	23.03	Breakout Group #3	<p>Other ideas or suggestions for the FY22 Work Plan</p> <p><i>Outreach and Engagement</i></p> <ul style="list-style-type: none"> • Create educators and trainers • Support public access (under appropriate conditions) • Rely on groups who have been long-term stewards (e.g., Audubon) • Focus on DEI and getting younger generations involved and leading (Ben Hamilton offered to guest present on kelp substrate) • Goals / desired outcomes should align with the NTRL system; Santa Monica is an exposed coast, rather than an estuary <p><i>Information and Data</i></p> <ul style="list-style-type: none"> • Need to conduct a Ballona wetlands hydrology study • Focus on data transparency, quality monitoring, and sharing • Gather information on marine benthic ecology (kelp forests) <p><i>Other Concerns</i></p> <ul style="list-style-type: none"> • Agencies’ roles and actions seem to conflict with overarching goals • Plant trees and kelp—over 60% of oxygen comes from the sea and is produced by algae and marine plants. LA County is in the process of losing 6 million trees. Plant trees that resist the fungus carried by bark beetle

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<p>General Comment</p>	<p>23.04</p>	<p>Breakout Group #4</p>	<ul style="list-style-type: none"> • Need to make clear what actions in the work plan are already complete, versus those that are in progress or planned <p><i>Marine Projects</i></p> <ul style="list-style-type: none"> • Abalone restoration – this project is similar to the halibut-related project; suggestion that both projects be put under the same heading in the work plan • Kelp initiatives – Kelp anchor establishment should be prioritized for Santa Monica Bay to protect the coastline • Item 9: [Implement Malibu Creek Ecosystem Restoration Project (Rindge Dam and other barrier removals) to support ecosystem restoration] – debris from the dam removal could be used as reef material, or put to other environmentally beneficial use <p><i>Ballona Wetlands</i></p> <ul style="list-style-type: none"> • Taking into account trail-building and access related goals, there are concerns about the White-tailed Kite and other species. • There was a question about how the long-term access goals of the Ballona Restoration project aligns with the current situation with some areas blocked off (e.g., Area A) • Other organizations should be considered for partnering on project implementation in Ballona (e.g., Ballona Wetlands Trust, Grass Roots Neighbors, Ballona Institute) <p><i>Partnership Clarification Needs</i></p> <ul style="list-style-type: none"> • Item 29: [Reduce health risks of swimming in contaminated water and consuming contaminated seafood]– clarify maintenance of maps; make clear that this project will be advanced in collaboration with the relevant work groups (e.g., Safe to Eat, Safe to Swim)
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Comment Category	Comment No.	Breakout Group No.	Input Summary
			<ul style="list-style-type: none"> • Item 39: [Monitor and inform effective management of Marine Protected Areas, Fishery Management Plans, and local fisheries for recreational and commercially important species] – work plan language should make clear that Marina del Rey Anglers are supporting CDFW in completing the halibut stock assessment; review comments from Marina del Rey Anglers representative related to updates to the White Seabass project • Collaboration with Ocean Protection Council – opportunity for collaboration with OPC regarding their work on urchin culling and kelp monitoring • Work Plan should reference the name change of LACSD – now: “Los Angeles County Sanitation Districts”
General Comment	23.05	Breakout Group #5	<ul style="list-style-type: none"> • Consider subsidence and potential uplift related to SoCal Gas activities • It is important to consider tsunami effects outside the Ballona area caused by the creation of berms/levees from Ballona Restoration project