



bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission / 320 west 4th street, ste 200; los angeles, california 90013
213/576-6615 phone / 213/576-6646 fax / www.smbrc.ca.gov

September 12, 2011

John Laird

Secretary, Natural Resources Agency
Chair, California Ocean Protection Council

Via email: opc.comments@scc.ca.gov

Re: Ocean Protection Council Draft Strategic Action Plan

Thank you for providing us the opportunity to comment on the OPC's Strategic Action Plan. The Santa Monica Bay Restoration Foundation (SMBRF) is the non-profit partner of the Santa Monica Bay Restoration Commission (SMBRC), a federal, state, and local partnership established in 2002 under California State Law (Senate Bill 1381). Together, SMBRF and SMBRC work to improve water quality, conserve and rehabilitate natural resources, and protect the Bay's benefits and values. Similar to the OPC, our activities are guided by our state- and federally-sanctioned Bay Restoration Plan, which identifies three priority areas: Water Quality, Natural Resources, and Benefits and Values to Humans.

Overall, OPC staff has done a tremendous job developing an action plan that efficiently addresses priority coastal and ocean issues facing the state of California. There are only a few additions and improvements that we encourage the OPC to consider. Below, please find our specific comments arranged by section.

Lessons Learned

- Add a point about better integrating the OPC Science Advisory Team (OPC-SAT) into the process for identifying priorities and setting goals. As stated in the Accomplishments, the creation of the OPC Science Advisory Team (OPC-SAT) has greatly improved the visibility of science in the OPC's decisions. The OPC-SAT was integrated into the process for identifying priorities and setting goals for the strategic plan; this is a big step forward and should be acknowledged.

Issue 1: Storm Events, Coastal Flooding and Sea Level Rise

- In our experience there is a lack of true adaptation planning for climate change and the impacts to coastal infrastructure and public health that come with it. We support the objectives and actions listed and believe the methodologies and guidance documents are needed. In addition, cities and counties may benefit from

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model ordinances or specific language that could be incorporated into existing policies and laws that regulate coastal planning and development. This could be incorporated into Action 1.2.2.

- The SMBRC is modeling potential changes in runoff in the Ballona watershed under different climate change scenarios that impact intensity and frequency of rainfall. The modeling results will be used to make policy recommendations to local agencies regarding coastal planning and development. We will be glad to share the outcomes of this project with you when it is completed in December 2011.

Issue 3: Sustainable Fisheries

- Action 3.1.2: The Montrose Settlements Restoration Program and US EPA Region 9 are heavily involved with seafood contamination and toxicity issues. The OPC should coordinate with these federal agencies, in addition to the state agencies listed, when developing this program.
- Action 3.1.2: The description of this action should specify seafood contamination along with toxicity. Toxicity implies domoic acid or some other ephemeral toxin, rather than the legacy chemical contamination that builds up in fish and humans over time.

Issue 4: Effective Fisheries Management

- We agree that improving and enhancing the capacity of the DFG and FGC is of utmost importance and are glad that this is included in the Strategic Plan.
- Action 4.1.1: We agree that improving recreational fishing data collection and reporting is much needed. This is in our Bay Restoration Plan (Milestone 4.3b). One issue that falls under this action is improving return rate of spiny lobster report cards. This will require significant outreach effort that could be accomplished through existing networks developed through the MLPA stakeholder process.
- Action 4.2.1: This is a critical action and very timely, as the state proceeds with the Fish and Wildlife Visioning process.

Issue 7: Marine Debris

- Reducing plastics as a way of addressing the Marine Debris issue is a step in the right direction. The OPC can play a very critical role by focusing on the types of marine debris that do not get funded by NOAA, primarily derelict fishing gear.
- Action 7.1.1: This action does a great job covering the need to reconvene the steering committee and expanding membership, supporting policies, outreach, and research. SMBRC's boater program has been working to address marine debris in Marina del Rey and other marinas and would bring a valuable and unique perspective to this committee. If there is an opportunity for us to participate, we would like to be included.

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- We also strongly support Action 7.2.3. In order to have any meaningful reduction in the proximal sources of marine debris, the State Water Board will need to set and enforce the trash TMDL statewide. This will benefit the coast and coastal waters, but will also benefit the rivers, streams, estuaries, sloughs, and everything else that carries water downhill.
- Consider adding an action to improve data collection on trash accumulation and removal. It is nearly impossible to measure success with the current data collected (for example, Los Angeles County weighs trash removed from beaches, but this weight co-mingles trash from beach trash cans and kelp wrack picked up by beach grooming).

Issue 8: Sediment Management

- Action 8.3.1: Re-creating "natural sediment transport" and dam removal are worthy goals. The sediment management workgroup report released this past spring included some good information on the major littoral cells functioning off our coast. However, this report shied away from addressing the role beach armoring plays in coastal erosion. The OPC should consider including this in its thinking about sediment management.
- There is no discussion of large material, such as cobble and boulders. Much more than sand, silt, and clay are kept back behind the dam. The larger rock is an important component of nearshore subtidal habitats as well as being critical for functioning streams. We believe that the loss of non-aggregated rock coming down the Malibu creek watershed is part of the reason why the northern part of Santa Monica Bay no longer has rocky reefs that support kelp. Including this point in the discussion helps further clarify why dam removal is critical to a sustainable healthy coast.
- There is growing interest in the construction or enhancement of offshore reefs to alter the size and function of littoral cells and abate wave energy. The OPC may want to monitor such activities since they have implications for sediment management.

Issue 9: Desalination and OTC

- Water recycling and conservation are issues associated with desalination of seawater. It is appropriate to incorporate them into this issue. Orange County's wastewater recycling operation is showing some success and we hope other counties will realize the benefits of wastewater recycling and reuse. In our 2008 Bay Restoration Plan, the Los Angeles County Sanitation Districts and the City of Los Angeles's Hyperion Treatment Facility agreed to recycle 230,000 and 81,300 ac-ft/yr of wastewater, respectively, by 2020. In the case of Los Angeles County, recycled water would replace the current imported water supply in their service area. The OPC should include a goal of replacing imported water with recycled water for the five largest Publically Owned Treatment Works in the State.

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Science Based Decision Making – Cross Cutting Area

- It is getting harder and harder for researchers to get scientific collection permits to conduct their research: the length of time it takes to get a permit prevents students from applying; the permit application wants detailed information that is not always known by an academic researcher at the start of the project; academic researchers and biotech companies are permitted through the same process even though the needs of each are very different; DFG has no capacity to track permits or permittees; and DFG does not feel they have the right of refusal as the application is currently created. Consider tasking the OPC-SAT to work with the DFG and other stakeholders to develop recommendations for improving the permitting process.

Thank you again for considering our comments on the draft OPC Strategic Action Plan. We look forward to seeing the final version and continuing to work with the OPC on complimentary efforts to protect California's ocean and coastal resources.

Sincerely,

Lia Protopapadakis
Marine Scientist and Project Manager
For the staff of the Santa Monica Bay Restoration Commission

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