**DRAFT PE Comments (April 19, 2019)**

1. Has the NEP fully address challenges identified in the 2014 letter?

**Financial management:** SMBNEP has addressed the comments from the 2014 program evaluation recommending that it "continue to explore new funding mechanisms and opportunities."

- They have embarked on new efforts to diversify funding including local businesses holding fundraising events and the TBF annual fundraiser.
- In November 2017, the Bay Foundation bolstered its partnership with Loyola Marymount University by forming the Coastal Research Institute. This relationship can leverage research power, additional grant opportunities, and hopefully additional funding through the University in the future.
- They are currently working on a finance plan as part of the CCMP revision.
- Per page 6 of the work plan narrative report – Attaining water quality goals remains to be a big challenge. The recent passage of the countywide Parcel Tax, Measure W, will provide hundreds of millions of funding annually for storm water quality improvement and reuse projects throughout Los Angeles County, including the Santa Monica Bay watershed.
- The NEP has done an excellent job of applying for and receiving nonfederal funds, and we encourage the NEP to continue to secure long-term sustainable funding.

**Outreach and Public Involvement:** EPA recommended "SMBNEP to continue to clarify its roles and responsibilities on key environmental projects and urge all partners to publicly clarify their respective roles as well."

- The NEP Director previously held two roles – Executive Director of the Santa Monica Bay Restoration Commission and Executive Director of The Bay Foundation. Now the NEP Director only holds the former role.
- While not specifically noted here, NEP staff have done presentations over the past year as part of the CCMP revision process to further explain the roles and responsibilities of each of the Management Conference committees.
- NEP staff provided scientific and technical information to the US Army Corps of Engineers and California Department of Fish and Wildlife for the draft NEPA/CEQA documents.

EPA recommended "that the SMBNEP continue to use the Watershed Advisory Council meetings as a vehicle for public participation in CCMP and work plan implementation oversight," and encouraged "the SMBNEP to continue communicating on a regular basis with all its stakeholders as well as to encourage public involvement in the implementation of the CCMP"

- SMBNEP responded that the WAC meets at least annually to provide input on work plan priorities. There is opportunity for public input at all commission meetings and input is incorporated into the work plan and CCMP when appropriate. Staff have begun to document public input in response tables and shared the tables at Management Conference meetings
- There have also been comments through a recent survey on SMBNEP governance and structure recommending that the WAC structure be evaluated.

**Perceived challenge***:* While important comments from the public are provided through the WAC, we understand that WAC meetings are not serving their intended function. Meetings are often contentious and unfriendly, making it a difficult environment to have an effective meeting about issues of importance to the watershed. We recommend that 1) the NEP adopts a behavior

code for all meetings (e.g. city of Santa Monica's Rules of Conduct and Safety (see rules 15 and 16)) and 2) a neutral facilitator be hired to help make the WAC meetings less contentious and more productive.

**Perceived Strengths**

- SMBNEP staff engage stakeholders in various restoration projects and all public events are posted online as well as shared through e.g. lyris.
- The strength and diversity of Governing Board- when GB members share information with their constituents, it builds awareness of the NEP's work.

2. Has the NEP provided appropriate/enough supporting information/documents that corroborate their performance measures responses?
    a. Yes, SMBNEP has provided more than sufficient documentation supporting their performance measure responses.
    *b.* Does their workplan summary narrative adequately describe those elements identified on page 6 of the PE Guidance? *"Use the logic model to describe Key NEP work plan goals and activities, stages of progress toward achieving the NEP's environmental milestones and targets, and role of key stakeholders supporting the activities. The following elements describe generally what is in an NEP work plan to achieve CCMP goals" (p6 of the PE guidance)*

    For each of the 6 items listed below I've included supporting language directly from the materials SMBNEP provided to EPA.

    1) **Habitat:** The materials state: "Habitat restorations included subtidal rocky reefs (kelp forests), wetlands, dunes, beaches, riparian corridors, fish barrier removals, and non-native invasive weed maintenance. During this period, SMBNEP acquired 1,722 acres into the public domain for the purposes of restoration or protection and restored an additional 149 acres."

    2) **Water Quality**: the NEP accomplished several water quality improvements by implementing green stormwater infrastructure that treats trash, metals, and bacteria etc. State bonds were the primary source of funding for these projects.

    3) **Living Resources**: the NEP describes him several projects that improved habitat for native endemic species, especially those which are rare, threatened, or endangered. Species include abalone, California red legged frog, Western snowy plover, and Southern California steelhead trout.

    4) **Healthy Communities**: Examples provided include: "TBF had several outreach projects that aim to engage the community to achieve behavior change during this review period, including the Boater Education Program, Clean Bay Certification Program, Table to Farm composting project, water and energy conservation education projects, volunteer restoration event projects, and others. Additionally, SMBNEP shares innovations and lessons learned at regional and national meetings, conferences, and via other accessible sources both online and print."

    5) **Trainings**: "SMBNEP staff are frequently engaged in trainings aimed at benefiting professional development for agency staff, volunteers, students, faculty, teachers, and members of the

public. Some of the training highlights for this review period included Dockwalker trainings led by the Boater Education Program, Clean Bay Certification trainings led by the outreach team, and teacher trainings for subjects such as water and energy conservation and climate change. Additionally, trainings led by The Bay Foundation (TBF) through their partnership with Loyola Marymount University's Coastal Research Institute occur for students and faculty in everything from conducting restoration activities, improving coastal resiliency, adaptive management, sustainability, field ecology, and many more types of scientific research and monitoring techniques. Trainings for students and young professionals occurs across all habitat types from sandy shores to wetlands to rocky subtidal habitats.

6) **Direct Assistance**: "SMBNEP staff provided direct assistance to local municipalities addressing many issues related to specific environmental problems (e.g., climate stressors, habitat restorations, water quality improvements) throughout the reporting period. This assistance was in the form of collaborations, supporting products or outreach materials, participating on regional or state networks or stakeholder groups, producing and making tools available for the public, and others. Many specific examples include collaborating with local cities and Los Angeles County to implement innovative, multi-benefit coastal restoration projects that increase coastal resiliency (e.g., Santa Monica Beach Restoration Pilot Project, Malibu Living Shoreline Project, others in development)."