



B A C W A
BAY AREA
CLEAN WATER
AGENCIES



February 23, 2018

Submitted via e-mail to oceanlitterstrategy@resources.ca.gov

Ocean Litter Prevention Strategy Planning Team

Re: CASA and Coalition Comments on the revised draft California Ocean Litter Prevention Strategy

Ocean Litter Prevention Strategy Planning Team:

The California Association of Sanitation Agencies (CASA), Bay Area Clean Water Agencies (BACWA), and the Southern California Alliance of Publicly Owned Treatment Works (SCAP) (collectively referred to herein as "Wastewater Associations") appreciate the opportunity to comment on the Ocean Protection Council's (OPC) Revised Draft (January 22, 2018) of the "California Ocean Litter Prevention Strategy: Addressing Marine Debris from Source to Sea" (hereafter, "Draft Strategy").

For 60 years, CASA has been the leading voice for public wastewater agencies on regulatory, legislative and legal issues. CASA is an association of local agencies, engaged in advancing the recycling of wastewater into usable water, generation of renewable energy, and other valuable resources. Through these efforts CASA's members help create a clean and sustainable environment for Californians. BACWA is a joint powers agency whose members own and operate publicly owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay (SF Bay) Area. SCAP represents over 80 public agencies providing water and wastewater service for 19 million people in 7 counties of southern California.

The Wastewater Associations support statewide and nationwide efforts to reduce ocean litter and marine debris, and the OPC's efforts to update the State's 2008 Ocean Litter Prevention Strategy.

The Wastewater Associations thank the OPC and the Ocean Litter Prevention Strategy Planning Team for their efforts to engage stakeholders and their support of science-based objectives to increase understanding of microplastics in the marine environment, and we appreciate the incorporation of the comments that we previously submitted in October 2017 and January 2018. We support the revised Draft Strategy, which takes a step-wise approach to achieving objectives by first developing robust monitoring methods, then a comprehensive research plan including characterizing microplastics' sources, pathways, concentrations, and risk assessment, followed by the identification of management actions to control sources as appropriate. This approach ensures that the objectives can be achieved using reliable data and conclusions.

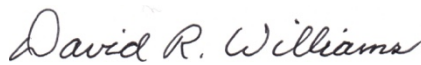
The Wastewater Associations suggest the following adjustments to the Draft Strategy as listed below:

1. Under OPC Goal #2, Microplastics, Objective 2, the comprehensive research plan should engage experts nationally and internationally to the extent feasible, and incorporate research results in order to leverage resources and use the best available science.
 2. Once reliable monitoring methods have been established, convene scientists and experts to leverage national and international resources and knowledge where feasible, and to develop a comprehensive research plan by 2024 to characterize microplastics' sources, pathways, ambient concentrations, risk assessments, and impacts.
2. The Draft Strategy is organized into two sections including OPC priorities and stakeholder efforts. These sections should be integrated within the document where feasible. There is considerable overlap with microplastics in particular, and it is a bit confusing, as it reads as if these will be carried out as separate efforts.
3. We request that the OPC standardize the multiple listings of our participation. Within the Action Items, please replace each occurrence of CASA, BACWA, or SCAP with "CASA/BACWA/SCAP". We will collaborate to identify specific representatives of our organizations to participate in each Action Item, as appropriate.
4. Regarding OPC's three broad categories of priorities, for Microplastics and Microfibers, there is a statement that "Microplastics and microfibers are increasingly found in the marine environment" (p.24). The Wastewater Associations recommend that a supporting citation be provided, or the statement be clarified, as ongoing collaborative research does not seem to support a conclusion that loadings are increasing, but rather that loadings are very different depending on the area sampled. We recommend that the statement be modified as follows:
 - Microplastics and Microfibers: Microplastics and microfibers are of increasingly ~~found~~ concern in the marine environment and are ingested by marine organisms, including seafood species. These plastics are emerging as a concern for ocean health because they can physically block the digestive tracts of marine organisms, and chemicals associated with the plastic may be absorbed by marine organisms through ingestion.

The Wastewater Associations thank you for your consideration of these comments.



Adam D. Link
Director of Government Affairs
CASA



David R. Williams
Executive Director
BACWA



Steven C. Jepsen
Executive Director
SCAP