



**B A C W A**  
**BAY AREA**  
**CLEAN WATER**  
**AGENCIES**

**SCAP**

SOUTHERN CALIFORNIA ALLIANCE OF  
PUBLICLY OWNED TREATMENT WORKS



April 20, 2018

*Submitted via e-mail to [COPCpublic@resources.ca.gov](mailto:COPCpublic@resources.ca.gov)*

Secretary John Laird, Chair, and Members  
California Ocean Protection Council  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

Re: Comments on the Proposed Final Draft California Ocean Litter Prevention Strategy

Dear Chairman Laird and Members of the California Ocean Protection Council:

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 Proposed Final Draft (April 13, 2018) of the "California Ocean Litter Prevention Strategy: Addressing Marine Debris from Source to Sea" (hereafter, "Final Draft Strategy"), a collaborative effort of the Ocean Protection Council (OPC) and the National Oceanic and Atmospheric Administration Marine Debris Program (NOAA MDP).

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 NOAA MDP 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, January 2018, and February 2018. We support the Final Draft Strategy, which provides three goals to reduce land-based and ocean-based sources of ocean litter. The objectives in Goal 2 (Microplastics and Microfibers) use leveraged national and international resources and knowledge, where feasible, to first develop and validate standardized microplastic monitoring methods by 2021, then develop a

comprehensive research plan for microplastics by 2024 which includes 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 robust science.

Many elements of the diverse strategy, including method development, engineering, ecosystem impacts, and human health risk assessment, will require OPC to collaborate with an array of experts. Coordinating efforts on significant peer-reviewed research currently happening nationally and internationally will contribute greatly to the OPC's ability to achieve the microplastics-related goals of the strategy.

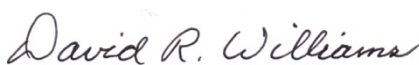
Although it will be a challenge to accomplish these objectives in the specified six-year timeframe recommended during the stakeholder workshop, thorough research is essential to ensure that resulting management actions can effectively address microplastics issues. The United States Environmental Protection Agency (USEPA) staff has noted that development of standardized methods can take up to ten years to complete; fortunately, USEPA has already begun development of microplastics methods in some relevant matrices. Sufficient funding and similar leveraging of ongoing work by experts in the field will help with timely completion of the objectives in the Strategy.

In conclusion, the Wastewater Associations would like to thank the OPC's staff and the team that led the update of the Strategy for their leadership and willingness to work with stakeholders, and for their consideration of our comments throughout the update process. The Wastewater Associations strongly support the adoption of the 2018 Update to the California Litter Prevention Strategy.

Sincerely,



Adam D. Link  
Director of Government Affairs  
CASA



David R. Williams  
Executive Director  
BACWA



Steven C. Jepsen  
Executive Director  
SCAP

cc: Holly Wyer, OPC Program Staff