



August 5, 2024

Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Submitted via email: strategicplan@baaqmd.gov

SUBJECT: COMMENTS ON DRAFT 2024-2029 STRATEGIC PLAN

The Bay Area Clean Water Agencies Air Issues and Regulations Committee (BACWA AIR) appreciates the opportunity to comment on BAAQMD's draft [2024-2029 Strategic Plan](#). BACWA is a joint powers agency whose members own and operate publicly owned wastewater treatment works (POTWs) that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. The AIR Committee is a coalition of San Francisco Bay Area POTWs working cooperatively to address air quality and climate change issues, under the guidance of BACWA.

BACWA supports the BAAQMD's efforts to reduce air pollution, protect people's health, and mitigate climate change. The wastewater sector recognizes the importance of climate change mitigation and adaptation to ensure our continued ability to consistently deliver on our mission to protect public health and the environment.

Our comments on the proposed Strategic Plan relate primarily to "Goal 4: Be Effective, Accountable, and Customer-Oriented" and are listed below. BACWA supports implementation of the Strategic Plan without delay, and respectfully requests that BAAQMD commit to this implementation by providing sufficient staff to support these key strategy areas:

- ***Strategy 4.1: Timely Permits***

The primary function of POTWs is to protect the environment and public health. Unlike many industries, POTWS must function effectively at all times. Untimely permit processing can negatively impact POTW projects, which can impact the ability of the facility to satisfy permit requirements imposed by other regulatory agencies. BACWA supports measures to improve tracking, address bottlenecks in the permitting process, and improve coordination to ensure permits are processed in a timely manner. BACWA looks forward to engaging with BAAQMD staff as part of updates to regulations and other policies related to permitting.

- ***Strategy 4.2 Transparent Permit Process***

As noted in this strategy description, permit process complexity, delays, and uncertainty all contribute to frustration with the process. As BACWA has shared in previous correspondence (2017 and 2024), POTWs need at least six years to plan, design, and construct most capital improvement projects. Project planning, scheduling, financial planning, environmental review, funding, pre-design, design, construction permitting, bid and award, and ultimately construction is a lengthy and involved process for public agencies. BACWA supports a more transparent and predictable process resulting in a more

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efficient and effective permitting process.

- ***Strategy 4.3 Consistent Permits***

Clearly written, predictable permit conditions are particularly important to publicly owned facilities. In addition to providing design insight necessary to satisfy BAAQMD permit conditions, clear understanding of anticipated permit conditions supports the financial stewardship that POTWs owe their ratepayers. When permit conditions are not predictable or are inconsistent, or regulations are not consistently applied within the sector, project changes can be required, resulting in additional unnecessary expenditures of public funds. BACWA looks forward to continuing to work with BAAQMD staff to develop standard permit conditions applicable to the wastewater sector.

- ***Goal 3 Become One Air District***

As described by Dr. Fine at the July 30 public workshop, BACWA supports all efforts to reduce siloing at BAAQMD. Good coordination and communication across the different BAAQMD divisions will further implementation of the other strategies presented in the draft Strategic Plan. Through the BAAQMD-BACWA Implementation Workgroup, we have already seen improved engagement between divisions and support more coordination which will assist BAAQMD internally, as well as the regulated community.

Thank you again for the opportunity to provide feedback on the draft Strategic Plan. BACWA is BAAQMD's partner in protecting the Bay Area's public health and environment, and we look forward to working with BAAQMD staff as the Strategic Plan is implemented over the next several years.

We would be happy to discuss any questions regarding these comments. Please contact me at LFono@bacwa.org.

Sincerely,



Lorien Fono
BACWA Executive Director

Cc: BACWA Executive Board
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