

SCAP

SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS



February 24, 2020

Sent via electronic-mail to: COPCpublic@resources.ca.gov

Wade Crowfoot, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

SUBJECT: Comments on February 2020 Draft Strategic Plan

Dear Chair Crowfoot and Members of the Council,

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates the opportunity to provide comments on the recently revised draft Strategic Plan to Protect California's Coast and Ocean 2020-2025 (Strategic Plan).

SCAP represents over 80 public water/wastewater agencies in southern California. SCAP members provide essential water supply and wastewater treatment for approximately 20 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastewater into resources for beneficial uses such as recycled water and renewable energy.

SCAP fully supports OPC's mission of ocean protection and appreciate the dialogue OPC has provided to the clean water community to date. We have a few specific comments on language in the Strategic Plan:

Comment 1: Consistent with OPC's mission statement, the Strategic Plan should highlight that the best available science will be used as a foundation for decision-making. OPC should be aware that nutrient removal at wastewater treatment plants is a major undertaking that will result in major capital investments funded by the public, significant additional energy use and

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management of waste residuals such as brine. These potential impacts need to be assessed holistically to provide the greatest benefit to the environment.

Proposed revision – Target 1.2.1: Based on the ~~latest scientific research~~ **best available science**, advance adoption of regulations, as needed, establishing water quality objectives for ocean acidification and hypoxia that include, but are not limited to, publicly owned treatment works, stormwater, and non-point source pollution, by 2025, with scientific analysis of the relationship between nutrient inputs and acidification hot spots completed by 2022.

Comment 2: Many factors determine the viability and practical extent of wastewater recycling projects and percentages. There are barriers to achieving 80-90% recycling rates, particularly if seasonal wet weather flows, lack of recycled water demand in wet seasons, non-reclaimable wastewater, brine and environmentally beneficial stormwater diversions are not excluded. With regards to the term “viability”, based on a review of previous State Water Board recycled water policy adoption meeting recordings, the term “viability” has been agreed to by Coast Keeper Alliance. The term “viability” provides a level of comfort to the wastewater community that goals listed in the Strategic Plan are attainable.

Proposed revision – Target 1.2.3: By 2022, based on the ~~latest scientific research~~ **best available science**, establish interim goals as needed for significantly reducing nutrient loading and/or phasing out coastal ~~sewage~~ discharge **of treated wastewater** into the ocean. Work with partners to achieve a goal of ~~80-90%~~ **maximizing the amount of** coastal wastewater recycling that can **viably** be put to beneficial use by 2040.

SCAP would like to thank you for the opportunity to comment on the Strategic Plan. SCAP is always interested in opportunities for further discussion or clarification. If there are any questions, please do not hesitate to call or email at 760.479.4112 or sjepsen@scap1.org.

Sincerely,

Steve Jepsen

Executive Director, SCAP