February 16, 2021

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

SUBJECT: Agenda Item #4 – Recommended Actions to Address Plastic Pollution in California’s Coastal & Marine Ecosystems

Dear Chair Crowfoot,

On behalf of the California Association of Sanitation Agencies (CASA), thank you for the opportunity to provide comments on the recommended actions to address plastic pollution in California’s coastal and marine ecosystems, which is before the Ocean Protection Council (OPC) for discussion and possible endorsement. CASA represents more than 125 public agencies and municipalities that engage in wastewater collection, treatment, recycling, and resource recovery, and our vision is to advance public policy and programs that promote the clean water community’s efforts in achieving environmental sustainability and the protection of public health.

With very limited time to review these recommendations, we commend the OPC for such bold, holistic, and comprehensive initiatives from a source control paradigm for preventing plastic from entering the environment. The San Francisco Estuary Institute (SFEI) released its seminal microplastics study in 2019, and observed, “It is likely far more cost-effective to prevent pollution in the first place (e.g., bans on sources of microplastic pollution, such as microbeads) or to control it directly at the point of entry (e.g., providing filters for washing machines),” (p. 115/402), and indeed, the OPC’s recommendations will advance critical efforts that will reduce the presence of plastic in the environment.

Insofar as recommendation #8 pertains to developing a statewide monitoring program for microplastics, this has the potential to directly impact CASA’s coastal members, and we encourage its pursuit in conjunction with the OPC’s endeavors under Senate Bill 1263 (Portantino, 2018), which CASA sponsored, and entails the “development of standardized methods,” “investigation of sources and relative importance of significant pathways,” and the “development of a risk-assessment framework.”

As is, critical questions will remain for recommendation #8 without the resolution of these milestones, such as the purpose of a statewide monitoring program, the questions it would seek to answer, and the ultimate needs of the statewide strategy, and it otherwise leaves unknown (1) the types of microplastics to monitor based on their impacts (e.g. size ranges, shapes), (2) where they are coming from and where they are going (i.e. sources, pathways, sinks), and (3) the appropriate collection methods and measurement techniques. Moreover, it will be difficult to enact a successful monitoring program before there is access to the measurement methods and tools that will be provided by SB 1263. Thus we encourage the OPC to not rush this process or get ahead of the science, but rather for this recommendation to be pursued sequentially with the attainment of SB 1263 objectives, so that monitoring goals are clear on the intended use of data and based on a conceptual model grounded in scientific principle.

Finally, we advise that the monitoring of pathways of plastics to the environment be proportional to their contribution to the overall loading, so that efforts to address plastic pollution in the coastal and marine environment remain focused on root causes. For example, given that SFEI found that “a plastic polymer that is 1% of the stormwater microplastic load would be three to five times greater than the entire wastewater microplastic load” (p. 72/402), targeted monitoring (e.g., in collaboration with regional surveys) may be more appropriate than routine, frequent monitoring by POTWs.

To close, we observe these materials were released on a holiday and with no business days before their scheduled hearing when Action by the Council may possibly be taken, and we respectfully request for a timelier process in the future for such significant policy recommendations. Nevertheless, we are grateful for the extension of the comment period to 9 AM on the day of the hearing. We appreciate your consideration of these remarks, and if there any questions about these comments, please do not hesitate to reach me directly at (916) 694-9269 or jvoskuhl@casaweb.org.

Thank you,

Jared Voskuhl
Manager of Regulatory Affairs

Cc: Mark Gold, OPC Executive Director