



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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

Dear Mr. Laird:

Comments on the Ocean Protection Council Draft Five-Year Strategic Action Plan

Thank you for the opportunity to submit comments regarding the Ocean Protection Council (OPC) draft Five-year Strategic Action Plan (“draft Plan”). The draft Plan outlines specific goals, objectives, and actions that the OPC will implement to manage and protect California’s ocean and coastal resources. The Sanitation Districts congratulate the OPC on the development of the draft Plan and appreciate the opportunity to offer suggestions to clarify the intent of the Plan regarding water quality in Marine Protected Areas (MPAs).

The Sanitation Districts are a confederation of 23 independent special districts located throughout Los Angeles County servicing the wastewater and solid waste management needs for about 5.4 million people. For over 87 years, the Sanitation Districts have operated one of the largest regional wastewater collection and treatment systems in the nation, with a service area that covers approximately 820 square miles and encompasses 78 cities and the unincorporated territories of Los Angeles County. Within the greater Los Angeles metropolitan area, the Sanitation Districts operate an interconnected system of sewers and wastewater treatment plants called the Joint Outfall System (JOS), which serves 17 districts, 73 cities and a population of nearly 5 million people. The terminal treatment plant in the JOS is the Joint Water Pollution Control Plant (JWPCP), which discharges to an ocean outfall system offshore of White Point on the southern side of the Palos Verdes Peninsula. To ensure our operations are protective of public and environmental health, we have conducted over 40 years of comprehensive coastal environmental monitoring along Palos Verdes including the areas associated with two recently designated MPAs that are part of the South Coast region network of MPAs.

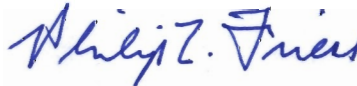
The Sanitation Districts concur with the OPC's objective to coordinate Marine Life Protection Act (MLPA) implementation with other ocean management policies and agencies. In particular, the OPC proposes to coordinate with the State Water Resources Control Board (SWRCB) in amending the California Ocean Plan (Ocean Plan) to address water quality within MPAs. The Sanitation Districts agree that this is the most appropriate and effective approach for water quality protection within MPAs. However, the stated metric of success related to reduction of pollution (Action 5.2.2) should be worded to align with the State Water Board's planned amendment of the Ocean Plan regarding water quality protection in MPAs.

In their November 2010 Resolution (Resolution No. 2010-0057), the SWRCB directed staff to develop an amendment to the Ocean Plan that defines water quality protection standards in MPAs by May of 2012. These requirements will ensure that water quality conditions within an MPA are consistent with and supportive of the goals of the MLPA, and are tailored based on the type of MPA (e.g. state marine reserve, state marine conservation area, etc.). We suggest that the second measure of success in Action 5.2.2 of the OPC strategic plan be modified to read,

“Ensure water quality within MPAs meet all applicable standards as defined by the California Ocean Plan”

This change would ensure that success regarding water quality in MPAs would be measured by standards defined by the SWRCB in the Ocean Plan. Thank you for consideration of our comments.

Very truly yours,
Stephen R. Maguin



Philip L. Friess
Department Head
Technical Services

PLF:JRG:SMW