

January 4, 2018

Chair Felicia Marcus and Board Members
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor, Sacramento, CA 95814
Sent via electronic mail to: commentletters@waterboards.ca.gov



RE: Informational Item 8 – Ocean Plan Triennial Review as a 2018 Priority

Dear Chair Marcus and Board Members:

California Coastkeeper Alliance (CCKA) is a network of California Waterkeeper organizations working to protect and enhance clean and abundant waters throughout the state, for the benefit of Californians and California ecosystems. We appreciate the opportunity to comment on the January 9th, 2018 Board Hearing regarding Informational Item 8 – Discussion of Board Member’s priorities and organizational issues.

One item we hope to see the Board prioritize in 2018 is the Ocean Plan Triennial Review, which is now nearly four years overdue. The State Water Resources Control Board (State Water Board) adopted the Ocean Plan in 1972 and revised it in 1978, 1983, 1988, 1990, 1997, 2001, 2005, 2009, and lastly March 15, 2011. The State Water Board is responsible for reviewing Ocean Plan water quality standards every three years, and for modifying and adopting standards in accordance with Section 303(c)(1) of the Federal Clean Water Act and Section 13170.2(b) of the California Water Code. Clean Water Act Section 303(c)(1) states that:

“...State water pollution control agency of such State shall from time to time (but at least once each three year period) hold public hearings for the purpose of reviewing applicable water quality standards and, as appropriate, modifying and adopting standards.”

The State Water Board is required by federal law to review water quality standards in the Ocean Plan at least once each three-year period. It is now been almost seven years since the State Water Board performed its Ocean Plan triennial review. We recognize that several large policies were incorporated into the Ocean Plan since 2011, but that does not diminish the need for a comprehensive review of the Ocean Plan in its entirety.

CCKA has been advocating for a timely and comprehensive review of the Ocean Plan since it was due in 2014, in addition to urging action on more surgical amendments to address emerging issues. From our perspective, the priorities of an Ocean Plan Triennial review would include:

- an overhaul of the deficient Areas of Special Biological Significance (ASBS) program;
- comprehensive evaluation of how to address new information on ocean acidification, harmful algal blooms (HABs) and other ocean changes, including the recommendations and findings of the West Coast OAH Panel related to developing water quality criteria for acidification; and
- an update of bacteria standards for the protection of shellfish as a beneficial use.

We encourage the Board to initiate a scoping process to invite public comment on other ocean priorities.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Aminzadeh".

Sara Aminzadeh, Executive Director