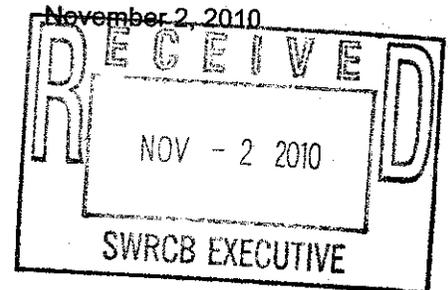


Los Peñasquitos Lagoon Foundation
P.O. Box 940 Cardiff by the Sea, CA 92007

Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street 24th Floor
Sacramento CA 95814



Subject: Comment Letter – Policy for Controlling Trash in Waters of the State

Dear Ms. Townsend

On behalf of the Los Peñasquitos Lagoon Foundation, I would like to submit the following comments regarding the proposed policy for controlling trash in the waters of the State.

1. Element 1: Water Quality Policy Statement. The element should include #2, #3, #4 and #5
 - a. Specific comments, #2: The definition of "Maximum Extent Practical" should include language that prevents dischargers from avoiding actions simply by stating they are not practical, when indeed they are when considering the cost of inaction (e.g. impacting beneficial uses of water bodies, passing clean up costs to other entities such as land owners or management entities of affected water bodies). Include stricter language or requirements for Caltrans since source control (e.g. litter signs) seems to be ineffective as evidenced by presence of litter at MS4 outfalls at Los Peñasquitos Lagoon from I-5 and other water bodies located near freeways and/or major roadways.

2. Element 2: Water Quality Objectives. The element should include a revised #2, #3 and #4
 - a. Specific comments, #2: Change text to "Create a statewide numeric water quality goal of "zero trash" and design/implement water quality objectives to be met over time. Numerical targets for water quality objectives could be moderate at first, followed by aggressive targets by year 10, then tapered over time to reduce impacts to municipalities and issues related to nuisance sources that may take time to control. For example: Zero trash on 50 years = goal. 2-year objective =

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20% reduction; 5-year objective = 60% reduction; 10-year = 85% reduction; 15-year = 90% reduction; 20-year = 95%...."

3. Element 3: Implementation. The element should include #2, #4, #5, and #6.
 - a. Specific comments, #2: I believe this sub-element should include retro-fitting storm drains with trash screens or catchment devices that intercept trash before it can enter water bodies or discharged from MS4 outfalls. Success has been shown along the Los Angeles River in reducing trash from MS4 systems: <http://www.globalgarbage.org/blog/index.php/2010/09/01/12k-la-river-storm-drains-to-be-retrofitted/>
 - b. Specific comments, #4: Institutional controls should be implemented along with structural controls as mentioned in this sub-element.
 - c. Specific comments, #6: Include reasonable alternatives from catchment of plastic pellets smaller than 5mm along with prohibitive language of "zero discharge" to provide industry with alternatives that can be implemented at some point in the future if these alternatives do not already exist.

If you have any questions, please contact me at (760) 271-0574.

Sincerely,



Mike Hastings, Executive Director
Los Peñasquitos Lagoon Foundation