



CITY OF PETALUMA

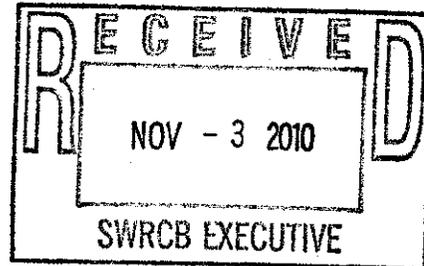
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November 2, 2010

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



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

Dear Ms. Townsend:

Thank you for the opportunity to review and comment on the Water Quality Control Policy for Controlling Trash in Waters of the State. After careful review, the City of Petaluma recommends the adoption of:

- Element #1, Items 3 and 4 with edits
- Element #2, Item 3
- Element #3, Item 5 with edits

Edits and comments are as follows:

Element 1, Item 3:

A policy to ~~eliminate or~~ reduce the sources of trash. Preventing pollution is the most effective method of controlling pollution. Dischargers with MS4 NPDES permits would be required to work with the public within their jurisdictions to ~~eliminate~~ reduce potential sources of trash to storm water. ~~Where eliminating potential sources of trash is not feasible, dischargers would be required to minimize the sources of trash.~~ For nonpoint sources of trash, dischargers would be required to ensure a ~~progressive~~ reduction in trash entering ~~or threatening to enter~~ waters of the state or municipal storm water collection systems.

Element 1, Item 4:

A definition of “trash” that would likely combines the definitions of “litter” in the California Government Code, and “waste”² in the California Water Code. The resulting definition of “trash” would incorporate the essential elements of both definitions to include litter, waste, and other debris of concern such as plastic, expanded styrene, cigarette butts, *wood*, cardboard, metal, and green waste.

Wood is too broad a term. Natural “wood” is needed. Construction debris is not.

Water Resources &
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