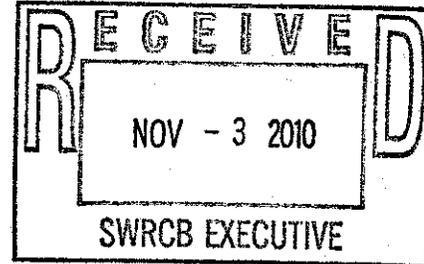




November 3, 2010

Jennifer Townsend, Clerk of the Board  
State Water Resources Control Board  
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**Subject: Comment Letter – Policy for Controlling Trash in Waters of the State**

Dear Ms. Townsend and Board Members:

Members of the Inland Empire Disposal Association are writing to provide comments on the State Water Board scope and content of the environmental review for developing a Statewide Policy for Controlling Trash in Waters of the State (Trash Policy). We concur that the presence of trash in California waters can impair beneficial uses and violate water quality objectives. It is our belief that the goal of all entities in the State should endorse the Trash Policy to ensure that beneficial uses are protected.

Pursuant to the requirements of the California Environmental Quality Act (CEQA) we have observed that the scoping meetings did not include environmental information and mitigation regarding integrated waste management service systems. As noted in Appendix G of the CEQA Guidelines, this project should address potentially significant impacts related to the project being served by landfills with sufficient permitted capacity to accommodate the project's solid waste disposal needs. In addition, an analysis and mitigation of compliance with federal, state, and local statutes and regulations regulating solid waste management and recycling should be included in your CEQA analysis to assure that lead, responsible, and trustee agencies participate in Trash Policy development and implementation.

It is imperative that the Trash Policy and accompanying CEQA analysis include the policies, best management practices, programs, and enforcement by CalRecycle and the Local Enforcement Agencies. There is a need and necessity for the State Water Board staff and the CalRecycle staff to develop cooperative, consistent and comprehensive Trash Policies that address the three elements of the scoping consideration: (1) water quality policy, (2) water quality objectives, and (3) cross agency and cross media implementation.

As part of the scoping considerations of the three elements, the following integrated waste management components should be included:

1. Illegal dumping
2. Trash collection services
3. Recycling and other diversion activities
4. Source reduction and product stewardship
5. Disposal
6. Consistency between the Trash Policy and AB 939 Integrated Waste Management mandates.

We hope that the State Water Board and staff will include these considerations in the CEQA scoping analysis for the Trash Policy. As stakeholders, we hope that there will be further opportunities to discuss and provide input into the development and implementation of the Trash Policy.

Sincerely,



Paul F. Ryan  
Executive Director  
Inland Empire Disposal Association  
951/288-5049

cc: IEDA Membership