

## **PUBLIC SOLICITATION OF WATER QUALITY INFORMATION**

The San Francisco Regional Water Quality Control Board (RWQCB) has solicited the public on behalf of the State Water Resources Control Board for data and information regarding water quality conditions in the San Francisco Bay Area.

The Waterkeepers of Northern California are submitting the enclosed information as a basis for listing the Guadalupe River, San Leandro Creek, Damon Slough, Lake Merritt and its tributary Glen Echo Creek as being impaired due to excessive amounts of trash and litter after the required technology based requirements have been in place for almost ten years. The Baykeeper acknowledges that Lake Merritt is already listed as impaired due to trash and debris, but requests that the schedule for the development of a TMDL be accelerated in view of the enclosed documentation. In addition the Baykeeper concludes that virtually all streams and water bodies in the San Francisco Bay Area in urbanized areas should be listed as impaired due to trash and debris. There is no reason to believe that urban streams in any community are free of unacceptable amounts of trash and debris and violating water quality objectives.

The Water Quality Control Plan-San Francisco Bay Basin, June 21, 1995 contains the following water quality objectives (WQOs) that are exceeded due to the presence of trash and debris:

***Floating Material** – Waters shall not contain floating material, including solids, liquids, foams,, and scum, in concentration that cause nuisance or adversely affect beneficial uses.*

***Settleable Material** – Waters shall not contain substances in concentrations that result in the deposition of material that cause nuisance or adversely affect beneficial uses.*

***Suspended Material** – Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.*

These WQOs have been incorporated in NPDES stormwater permits issued as early as 1990 to municipalities in Alameda, Contra Costa, Santa Clara and San Mateo Counties and the communities of the City of Fairfield-Suisun City and City of Vallejo. These municipalities have been implementing storm water management programs that included best management practices to control pollutants such as trash and debris yet they have not achieved compliance with the WQOs or obtained compliance with the MEP standard.

The photographs documenting the impairment of the water bodies were all taken at points of readily available public access and the presence of trash and debris in the amounts shown in our opinion constitute a nuisance.

There have been a few studies documenting the adverse impacts on fish, bird life and the environment and these studies have found that plastic particles and bags are ingested by

seabirds and other marine mammals clogging intestines and resulting in death. The enclosed articles and the references cited "Composition and Distribution of Beach Debris in Orange County, California", S.L. Moore, D. Gregorio, M. Carreon, S.B. Weisberg and M.K. Leecaster and "Plastics pollution in north Pacific affects seabirds" Seaweb confirm that trash and debris is much more than a aesthetic issue and adversely affects beneficial uses.