



August 4, 2014

Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**RE: Draft Amendments to Statewide Water Quality Control Plans to Control Trash**

Dear Chair Marcus and Board Members,

We appreciate the opportunity to comment on the Draft Amendments to Statewide Water Quality Control Plans to Control Trash, which represent important progress to address a pollutant of concern after many years of ineffective approaches. To ensure significant reductions in trash as soon as possible, the Statewide Plan should explicitly endorse and encourage the progress made in the Bay Area on strategies to reduce trash in receiving waters, and the aggressive existing permit timelines for achieving zero trash loading by 2022.

**We urge the Board to determine that the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (MRP) currently meets or exceeds State Board requirements with respect to delineation of high trash generation areas, annual reporting requirements, and the trash load reduction timeline. We ask that you include language in the amendments formalizing this determination and clarifying Regional Board authority to implement stronger restrictions and timelines.**

Since 2010, permittees, the San Francisco Bay Regional Board, and stakeholders have worked closely to develop a strategy for addressing each Bay Area municipality's unique trash problems in accordance with the MRP. In addition to focusing on high trash land use areas, permittees have gone a step further to delineate more discreet Trash Management Areas (TMA) throughout their jurisdictions. Each TMA will have its own strategy for reducing trash that addresses the sources and pathways specific to these areas. This strategy goes above and beyond the land use focused approach outlined in the draft amendments and allows stakeholders like ourselves to fully participate in the process and monitor progress toward zero trash.

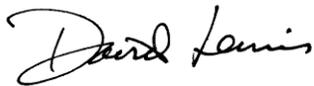
After several iterations of annual reporting, the Regional Board and permittees have agreed upon an outcome-based framework. For the FY 13-14 annual report, permittees are required to detail the level of implementation of "new" (post-MRP) strategies and provide results from on-land visual assessments. Initial visual assessments are being conducted at hundreds of locations regionally and will be continue quarterly (at least) moving forward. Save The Bay supports the demonstration of trends in trash reduction

over time rather than relying on single annual data points. This approach is consistent with the recommended monitoring and compliance structure discussed in Section 4.10 in the proposed amendments.

Finally, we urge the State Board to confirm the Regional Board's authority for implementing the load reduction timeline detailed in the MRP. Permittees have submitted their Long-Term Trash Load Reduction Plans, which detail strategies for achieving zero trash loading by 2022. Regional stakeholders are committed to helping permittees reach this goal and create cleaner, healthier waterways for Bay Area residents and wildlife.

Thank you for giving full consideration to these recommendations for improving the amendments, and please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "David Lewis". The signature is written in a cursive, flowing style.

David Lewis  
Executive Director