

Chair Marcus and Board Members
California State Water Resources Control Board



Dear State Water Board Members:

I commend the Water Board's efforts in developing a Trash Policy for California that addresses the millions of pounds of trash entering our waters, including our beloved coast and ocean. Trash severely and negatively impacts marine habitat, visual and recreational uses, and creates a health and safety risk to everyone. I strongly support the proposed Trash Policy. I urge you to strengthen the proposed policy by encouraging source reduction and imposing strict monitoring requirements to ensure enforcement of the policy is feasible and effective.

The proposed Trash Policy allows permittees to choose either Track 1 or Track 2. While this allows for cities to have flexibility to comply with the law, it could leave room for avoidance or delay of implementation of the trash policy. A more comprehensive policy would require full catch systems while simultaneously encouraging source reduction efforts, such as plastic bag bans, and educational outreach to reduce the amount of trash generated all together. Allowing a permittee to choose Track 1 without requiring an actual showing of trash reduction through monitoring reports discourages permittees from implementing more holistic methods of trash reduction. Full catch systems are effective at taking care of trash already in storm water, but not preventing its presence in the first place.

Creating an enforceable policy requires that both Track 1 and Track 2 contain monitoring requirements to ensure that there is actual trash reduction. The State Water Board should hold municipalities accountable by compelling them to calculate the current amount of trash they release into the water, and then develop a method for calculating their trash reductions annually. Numerical goals should be set for each permittee to ensure enforceable compliance and swift success at eliminating trash from our water.

I once again thank the Water Board for its efforts to eliminate trash from our rivers, bays, and oceans and strongly support the Trash Policy. I urge the Board to strengthen this policy by encouraging the reduction of trash altogether, capturing the trash that makes its way to our water, and monitoring its presence to ensure compliance.

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