

CEQA Scoping Mtgs (10/7 & 14/10)  
Policy for Controlling Trash  
Deadline: 11/3/10 by 12 noon



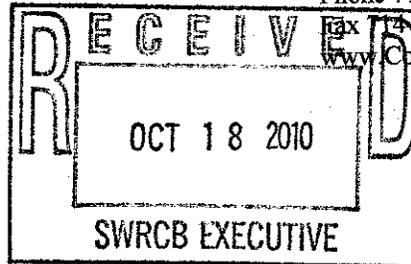
ORANGE COUNTY  
**COASTKEEPER**  
EDUCATION / ADVOCACY / RESTORATION / ENFORCEMENT

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October 14, 2010

Chair Charles R. Hoppin and Members  
California Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



**VIA HAND DELIVERY**

**RE: Proposed Statewide Policy for Controlling Trash in the Waters of the State**

Dear Mr Hoppin et al.,

Orange County Coastkeeper ("Coastkeeper") is an environmental organization with the mission to preserve, protect and restore the watersheds and coastal environment of Orange County. Many of these watersheds and much of the coast are polluted with trash. Coastkeeper supports the implementation and enforcement of a strong statewide trash pollution policy to eliminate trash pollution from the waters of the state.

Coastkeeper urges the board to develop a policy that allows agencies responsible for water quality a reasonable period of time to voluntarily implement trash monitoring and reduction measures. This period is necessary so that agencies may apply for grant funding for trash reduction. Mandatory actions often preclude grant opportunities. Incentives should be offered to agencies that voluntarily monitor and reduce trash pollution in their jurisdiction during this period. However, Coastkeeper believes that there must be specific dates set when monitoring programs, best management practices, and trash reduction levels are mandatory and enforced.

The trash policy should also focus on increased trash data development. Coastkeeper believes that not all water ways in the state that are impaired by trash are currently identified. The type, variety, amount, and location of trash pollution should be identified in every water body. Coastkeeper supports the increased use of the California Rapid Trash Assessment Program by agencies responsible for water quality to better identify where trash pollution is greatest. More trash data is necessary in order to best focus limited resources and maximize the reduction of trash pollution. Coastkeeper believes that by increasing trash data development specific trash polluters may be identified. Coastkeeper supports the proposed prohibition on the discharge of preproduction plastic pellets and the use of NPDES permits to control the manufacture, transport, and use of plastic pellets. The quality of our state's waters is of critical importance to Coastkeeper and we look forward to continued cooperation during the improvement of this program.

Sincerely,

Garry Brown  
Executive Director  
Orange County Coastkeeper