

State Water Resources Control Board

April 7, 2017

Secretary John Laird
California Ocean Protection Council
Transmitted via e-mail

Dear Secretary Laird and Members of the Ocean Protection Council,

The State of California has led the country by being the first state to adopt proactive trash control requirements. This began with the Los Angeles Regional Water Quality Control Board (LARWQCB) implementation of trash Total Maximum Daily Loads (TMDLs) throughout the region in the early 2000's. In addition the State Water Resources Control Board (SWRCB) adopted the amendments to California water quality control plans for trash, also known as the "Trash Amendments," which prohibit storm water discharge permittees from discharging trash (>5mm) into receiving waters. The objective of these Trash Amendments is to provide statewide consistency for the Water Boards' regulatory approach to protect aquatic life and public health beneficial uses, and reduce environmental issues associated with trash in state waters, while focusing limited resources on high trash generating areas. As part of the Trash Amendments, a framework for monitoring and reporting is a requirement. And monitoring methods to estimate these trash reductions in loads is a necessary part of evaluating the effectiveness of the requirements.

Currently, there are no standardized methods available for monitoring trash in receiving waters. Robust monitoring protocols to accurately assess whether permittees are in compliance with the Trash Plan Amendments are needed. While many regional entities and local jurisdictions have been working to develop their own monitoring protocols to address this issue, a statewide approach to developing monitoring protocols will create consistency for permittees and will ensure high-quality monitoring for the Water Boards.

We encourage you to support the proposed project, as methods developed from it will benefit both the Water Boards and its permittees as we move forward with the current trash policies. These standardized methodologies can be used by many who are required to control and monitor trash in the environment and they are crucial for determining the effectiveness and success of structures put in place to reduce trash in the environment.

If you would like to discuss this further or have any questions about the Water Boards program addressing trash please do not hesitate to contact me or my colleagues at the Water Boards.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Gearheart', written over the printed name.

Greg Gearheart, PE
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CA State Water Resources Control Board
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April 14, 2017

John Laird, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: Research and Development of Standardized Trash Monitoring Methods

Dear Secretary Laird and Members of the Ocean Protection Council,

California Coastkeeper Alliance unites locally-based Waterkeeper organizations to fight for swimmable, fishable, drinkable waters for California communities and ecosystems. The Ocean Protection Council's (OPC) Five-Year Strategic Plan directs OPC to "support the [State Water Board] and other agencies in adopting and implementing a statewide trash policy and other relevant trash regulations." On behalf of California Coastkeeper Alliance, Heal the Bay, NRDC, WILDCOAST, and Surfrider Foundation, we strongly support the OPC recommendation to support research and development of scientific and standardized trash monitoring methods to effectively implement the Trash Amendments.

We applaud OPC for the action it has taken to reduce trash impacts to the marine environment. Trash has reportedly harmed through ingestion and entanglement over 663 marine species, some of which are threatened or endangered under California or federal law. Trash transports other pollutants (bacteria, toxins, invasive species) into sensitive marine ecosystems and can become a source of disease. Plastic bags especially hurt sea turtles because bags floating in water look like jellyfish, a primary food for turtles, and researchers have commonly found plastic bags in the digestive tracts of dead turtles. Trash degrades the chemical, physical, and biological integrity of California's marine environment; it is, thus, critical that OPC continue to reduce marine debris pollution.

Developing trash monitoring protocols to determine compliance with the Trash Amendments is absolutely vital to California's ability to control trash from being discharged into our waterways from stormwater systems. As a Member of the State Water Board Trash Policy Advisory Group, California Coastkeeper Alliance strongly encouraged OPC to support the State Water Board's efforts to adopt the Trash Amendments — and to specifically help with developing trash monitoring compliance methodologies. In turn, OPC thoughtfully passed a Resolution on August 27, 2014 that supported the then-draft Trash Amendments and directed OPC to write a letter of support that focused on encouraging better monitoring and reporting. The letter captures OPC's interest in the use of scientific measures to track and verify program effectiveness.

Without a standardized method for determining compliance with the Trash Amendments, California will be unable to meet the goal it has set for itself of no trash present in California waterways by no later than 2031. Approving the recommendation to support development of standardized trash monitoring methods would enable The Southern California Coastal Water Research Project (SCCWRP) to provide the research needed to develop scientific measures to monitor trash. As such, we strongly support OPC's support to SCCWRP and the State Water Board to develop a standardized method for monitoring trash.

Sincerely,



A handwritten signature in black ink, likely belonging to Sean Bothwell.

Sean Bothwell
Policy Director
California Coastkeeper Alliance

A handwritten signature in black ink, likely belonging to Elizabeth Murdock.

Elizabeth Murdock
Director, Pacific Ocean Initiative
Natural Resources Defense Council

A handwritten signature in black ink, likely belonging to Jennifer Savage.

Jennifer Savage
California Policy Manager
Surfrider Foundation

A handwritten signature in black ink, likely belonging to Dana Murray.

Dana Murray
Senior Coastal Policy Manager
Heal the Bay

A handwritten signature in black ink, likely belonging to Zachary Plopper.

Zachary Plopper
Conservation Director
WILDCOAST