



FIBERSHED

Local Fiber, Local Dye, Local Labor

January 23, 2023

Wade Crowfoot, Secretary for Natural Resources
California Ocean Protection Council
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Secretary Crowfoot and Members of the Council:

**COMMENTS REGARDING IMPLEMENTATION OF THE STATEWIDE
MICROPLASTICS STRATEGY INCLUDING RESEARCH PRIORITIES**

The following comments are submitted on behalf of Fibershed, a California nonprofit organization dedicated to establishing regionally based fiber and textile systems that build soil and biosphere health.

Research to inform effective solutions and policy to reduce microplastic pollution must continue to focus on true source reduction.

We applaud OPC's prioritization of source reduction in the Statewide Microplastics Strategy. As the OPC works with California Sea Grant to rank proposed projects and award funding for a Microplastics Research Program, we hope you will continue to prioritize solutions that can achieve true source reduction. Pathway interventions such as mechanical and biological filtration, including Low Impact Development stormwater BMPs, while essential interim steps to contain existing flows of microplastic pollution, are not true source reduction, especially given the unique qualities of microplastics as a pollutant. Unlike some other pollutants, synthetic microplastics do not naturally biodegrade and are persistent over long time horizons. Even when temporarily prevented from entering aquatic environments, microplastics can continue to be transferred between terrestrial and aquatic systems¹².

We implore you to emphasize research that will inform development of true source reduction, including the promotion of natural, nontoxic, and biodegradable textile materials, alongside reductions in the excess production and overconsumption of textile products overall.

True source reduction must encourage shifts to nontoxic and biodegradable materials. This is especially relevant in the textile sector.

¹ M. Bigalke, M. Fieber, A. Foetisch, et al., Microplastics in agricultural drainage water: A link between terrestrial and aquatic microplastic po..., Science of the Total Environment, <https://doi.org/10.1016/j.scitotenv.2021.150709>

² Gavigan J, Kefela T, Macadam-Somer I, Suh S, Geyer R (2020) Synthetic microfiber emissions to land rival those to waterbodies and are growing. PLoS ONE 15(9): e0237839. <https://doi.org/10.1371/journal.pone.0237839>

Textiles, abrasable materials composed of fibers, inherently shed microfibers during manufacturing, daily use, laundering, and after their useful life. The materials they are made from will eventually end up in our aquatic and terrestrial environments and in the bodies of the organisms that live there. A source reduction goal for synthetic microfiber microplastics must facilitate shifts in the textile industry toward use of nontoxic and biodegradable materials, so that these materials can cycle within our ecosystems without causing harm.

In the textile industry, we see alarming levels of annual growth in use of synthetic textile materials³. Some synthetic textile materials are increasingly marketed as ‘sustainable,’ leading to growth in their production and heightened market demand. Differentiating between microplastic microfibers and microfibers that have the capacity for harmless natural biodegradation will be important for developing effective policy and market solutions. Natural fiber products derived from California farms and ranches implementing Climate Smart agriculture can be an important part of the solutions we need to uplift.

Monitoring, risk thresholds and health impact studies should consider airborne transport of microplastics, including exposure for workers in textile manufacturing

As noted in the Statewide Microplastics Strategy, aerial transport and deposition of microplastics are likely to have great impact on the flow of microplastics between terrestrial and aquatic systems. Airborne exposure could also be an important source of exposure for physiological impacts on humans and other organisms.

Airborne microfiber release is predominant during garment construction⁴, with potential health impacts on vulnerable workers in manufacturing and sewing phases of textile production⁵. In assessing impacts to vulnerable communities, we ask that you consider including airborne exposure by workers impacted within textile production systems, including garment workers, who may be exposed to elevated levels of airborne microplastics due to emissions during textile manufacturing and processing.

We are extremely grateful for the work OPC and partners have taken on to establish and manage microplastic monitoring and risk threshold development to guide effective solutions and policymaking. Thank you for the opportunity to submit these comments and for your ongoing work to address this critical issue.

Sincerely,



Heather Podoll, Partnership and Advocacy Coordinator, Fibershed

³ Textile Exchange. 2022. Preferred Fiber and Materials Market Report. https://textileexchange.org/app/uploads/2022/10/Textile-Exchange_PFMR_2022.pdf

⁴ Prata JC. Airborne microplastics: Consequences to human health? *Environ Pollut.* 2018;234:115–126.

⁵ Wright SL, Kelly FJ. Plastic and Human Health: A Micro Issue? *Environ Sci Technol.* 2017 Jun 20; 51(12):6634-6647.



San Francisco Bay Regional Water Quality Control Board

January 19, 2023

Secretary Wade Crowfoot
California Natural Resources Agency
715 P Street
Sacramento, CA 95814

SUBJECT: LETTER OF SUPPORT FOR PROPOSED PROJECT ON DEVELOPMENT OF A STATEWIDE PLASTICS MONITORING PLAN (01-24-23 Agenda Item 7.b.2)

Dear Secretary Crowfoot and Members of the Ocean Protection Council:

The San Francisco Bay Regional Water Quality Control Board (Regional Water Board) strongly supports the proposed project, *Development of a Statewide Plastics Monitoring Plan*, that will be presented at the January 24, 2023 Ocean Protection Council (OPC) meeting by Kaitlyn Kalua, who will request approval for the project that will be led by the OPC and San Francisco Estuary Institute (SFEI).

The project will initiate the development of a statewide macro- and microplastic monitoring program. The program includes evaluating the greatest sources and pathways of plastics entering California waters with a priority on monitoring Severely Disadvantaged Communities and Disadvantaged Communities, track the efficacy of existing source reduction and trash management requirements, and inform future interception and source reduction efforts. The project will support this by developing a pilot and long-term plastics monitoring plan.

The California Water Boards have engaged in water quality management and regulation for more than 50 years. In 2015, the State Water Resources Control Board (State Water Board) added requirements to control trash to the Water Quality Control Plans for Ocean Waters of California and for Inland Surface Waters, Enclosed Bays, and Estuaries. Together these are referred to as the Trash Amendments, and they require municipalities to eliminate discharges of trash, including macro-plastics, from storm drain systems by 2030.

The outcomes and deliverables of the proposed project and other components of the statewide plastics monitoring program will fill existing research and knowledge gaps that will inform the identification of trash-impaired waters, determine the efficacy of trash controls, inform implementation of municipal trash control requirements to comply with the Trash Amendments, and advance additional programmatic priorities related to trash and microplastics source control, interception, and abatement.

SFEI is a leader in the study of marine debris, including trash and microplastics. SFEI's recent investigations and findings provide one of the first measured estimates of microplastic loads from an urban region. SFEI and project partners lead work on trash monitoring methods, responding to the need to establish robust, quantitative methods for municipalities to determine compliance with the Trash Amendments. The California Water Boards have supported these

JAYNE BATTEY, CHAIR | EILEEN WHITE, EXECUTIVE OFFICER

scientific efforts and resulting findings have provided significant information relevant to water quality management. Finally, SFEI has a well-established track record as an independent science authority, providing decision-makers, stakeholders, scientists, and the public with the scientific information needed to inform decision-making.

For these reasons, the Regional Water Board pledges its support for this proposed project and further offers to facilitate internal communication and application of the future projects' findings within our relevant water quality programs. My staff and I have considerable expertise in trash, microplastics, and monitoring to inform management, and look forward to engaging in a statewide monitoring program for macro- and microplastics.

I encourage your full support of this timely and needed project.

Sincerely,

Thomas Mumley
Assistant Executive Officer

From: [CNRA COPC Public](#)
To: [COPC Public Distro List](#)
Subject: FW: OPC Agenda Item 7c - Written Comment
Date: Monday, January 23, 2023 8:32:25 AM

From: Simone K Schmidt
Sent: Monday, January 23, 2023 8:31:40 AM (UTC-08:00) Pacific Time (US & Canada)
To: CNRA COPC Public <COPCPublic@resources.ca.gov>
Subject: OPC Agenda Item 7c - Written Comment

I appreciate the work the Ocean Protection Council does to protect our ocean, biodiversity and equity.

It was nice to see in the [Ten Actions](#) in 2021 that you would give grants to local agencies to implement reusable foodware ordinances. Now, LA County is being awarded with [\\$417,125](#). The County did an awesome job in community outreach when they were drafting the ordinance. The implementation would also be great with the grant. Hopefully, this would encourage other politicians to ban plastics.

But this ordinance is not perfect. It should not exempt street vendors from the Styrofoam ban. Almost no restaurant is closer to storm drains and waterways than street vendors. The County should unexempt them asap before other agencies follow suit.

Thank you!

Simone Schmidt

