

Los Angeles Regional Water Quality Board  
320 W. 4th St., Suite 200  
Los Angeles, CA 90013-2343

MS4StormwaterRB4@waterboards.ca.gov

December 7, 2020

Re: MS4 Permit - Public Comment

Regional Water Quality Board Members and Staff:

San Fernando Valley Audubon, Santa Monica Bay Audubon, Palos Verdes/South Bay Audubon, El Dorado Audubon and Ventura Audubon, with their thousands of members and families respectfully bring to your attention and for your consideration the following ten (10) points regarding the proposed Los Angeles Regional Water Quality Board MS4 Permits:

1. Hundreds of thousands of Los Angeles County bird and wildlife lovers are concerned with ocean plastic pollution and its worldwide effects on seabirds and other marine life
2. Internationally, millions of concerned people are represented by over 1,200 NGOs in 75 counties
3. Ocean plastic kills or injures marine animals by both ingestion and entanglement – from microscopic zooplankton up the food web to seabirds and even whales
4. Specifically, Albatross and Petrels, wide-ranging, surface-feeding, pelagic seabirds, ingest plastic pieces as they smell like food
5. It is estimated that over 80% of ocean plastic pollution comes from watersheds within 30 miles of the coast
6. It is also estimated that 12% of total annual worldwide plastic production (a huge volume) is deposited into the aquatic environment (oceans, rivers, and lakes)
7. Our Los Angeles watershed continues to be a significant contributor to North Pacific Ocean plastic pollution as shown in multiple studies, despite Trash TMDLs in prior MS4 permits
8. Plastic cannot be removed from the open ocean for both practical and economic reasons, it must be reduced and constrained at its source - the watersheds - by MS4 permits which include the Trash TMDLs
9. The Clean Water Act and its Regional Water Quality Boards have the legal obligation and facilities to minimize trash/plastic ocean pollution emanating from the watersheds

10. The proposed LARWQB MS4 Permit which, if they include the approved Trash TDMLs (including Full Capture and Institutional Controls), appear satisfactory but must be fully implemented quickly, actively monitored, transparently reported, and rigorously enforced through fines for non-compliance, by way of an effective MFAC Program.

These ten points have been developed through careful examination of the available proposed MS4 permitting documentation, exploration of the extensive scientific literature regarding the causes and consequences of ocean plastic pollution and in collaboration with other non-profit organizations steeped in these issues as well as in the lexicon, history, and intricacies of the RWQB MS4 Permit process. Citations are available on request.

The below signatories are officers of the five National Audubon Society chapters which represent the entire coastal area of Los Angeles and Ventura Counties, as well as the headwaters of the Los Angeles River.

Thank you for your consideration.

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