

Mr. Barry Breen
Acting Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
1301 Constitution Ave, N.W.
Washington, D.C. 20460

Re: EPA's Draft National Strategy to Prevent Plastic
Pollution: Request for Public Comment; Docket Number EPA-HQ-OLEM-2023-0228

Dear Acting Assistant Administrator Breen:

Thank you for the opportunity to comment on the United States Environmental Protection Agency (EPA) "Draft National Strategy to Prevent Plastic Pollution" (Strategy). The League to Save Lake Tahoe (League) is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we advocate for the implementation of policies that prevent fine sediments, nutrients, and trash from entering Lake Tahoe.

Overall, the League supports the Strategy as a first means to reduce source materials for plastic pollution. A recent study published in the journal *Nature*¹ found that Lake Tahoe, known for its renowned clarity and water quality, had the third highest concentration of plastic particles in its waters among 38 lakes tested around the world, and a higher concentration of plastics than the surface water of ocean trash gyres where plastic pollution often collects. The League, working with researchers from the Desert Research Institute and University of California, Davis Tahoe Environmental Research Center, first discovered microplastics in Lake Tahoe in 2019.

Microplastics are an emerging threat to Lake Tahoe, and their source, plastic pollution, must be appropriately mitigated to avoid environmental harm. The League has been collecting data on plastics in Lake Tahoe for 11 years and have utilized this data to:

- support and enact a plastic bag ban in the City of South Lake Tahoe;
- support and enact a polystyrene ban in the City of South Lake Tahoe;
- support and enact a single-use plastic commercial water bottle ban in the City of South Lake Tahoe, which will be enacted in 2024;
- acquire funding for BEBOT, a beach-cleaning robot that collects small plastics from the top four inches of beach sand before they photodegrade into microplastics; and
- acquire funding to launch additional education and programming around sustainable recreation, which will be piloted as "Tahoe Blue Beaches" in 2023.

The League's experience dealing with plastic debris from source to waterbody has informed our more specific comments below.

¹ <https://www.nature.com/articles/s41586-023-06168-4>

Objective A

- “Frequently littered plastic” is a term used throughout the document, specifically in Section A1. However, there is no definition of frequently littered plastic. On which geographic scale will frequently littered plastic be determined? Is this at the national level? By EPA region? Consistent language and data collection is vital for this strategy to be successful.
- Climate change considerations should be an aspect of the life cycle analysis conducted. CO2 emissions or other greenhouse gas emissions should also be considered for sustainability standards, ecolabels, certifications, and design guidelines in production.
- Reuse center infrastructure should consider rural populations such as Lake Tahoe and communities with limited or no access to such infrastructure.

Objective B

- The benefit of compostable plastic products is unclear, as they can still leak into the environment, can still break down, and can still contain chemicals. What is the benefit of including compostable plastics in the nationwide Strategy when considering these drawbacks? How will these technologies be vetted?
- More work needs to be done to understand the life cycle of compostable products and the products that form during composting. Our preliminary research has shown that many compostable products don't break down as advertised. Considerations for chemical additives, micro- or nanoplastics, and greenhouse gas emissions during the product life cycle must also be addressed.
- Standardizing and increasing data collection is incredibly important.
- Regarding Sections B1 and B5, it would be prudent to evaluate the purpose and effectiveness of the "chasing arrows" symbols used to identify types of plastics and what to do with them at the end of their life. As currently implemented in the national retail marketplace, the symbols are confusing at best, but more accurately, they are misleading for the consumer who mistakes any chasing arrow symbols as a guarantee of recyclability.

Objective C

- An analysis on the cost, effectiveness, and equity of policies addressing the problems of litter is an important aspect and should also be considered for Sections B4.2 and B4.4. This section should also consider barriers to access to waste management systems in rural areas.
- Using the Clean Water Act authorities to reduce trash loadings into waterways is potentially an effective approach. However, funding is necessary to meet these requirements.

- The ability to monitor trash and micro- and nanoplastic capture systems for efficacy also needs to be developed and funded, in addition to funding the reduction of plastic production.

Thank you for your consideration of these comments on behalf of the League to Save Lake Tahoe. We look forward to continuing to see progress on this initiative and science on the impacts of plastics on our environment.

Sincerely,

A handwritten signature in black ink that reads "Laura J Patten". The signature is written in a cursive style with a large, stylized initial "L".

Laura Patten
Senior Science Policy Analyst
League to Save Lake Tahoe (Keep Tahoe Blue)