

Mr. John Muller  
Chair, San Francisco Bay Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Re: Agenda Item No. 7 - Implementation of the Municipal Regional Stormwater  
Permit Trash Load Reduction Requirements

Dear Chairman Muller:

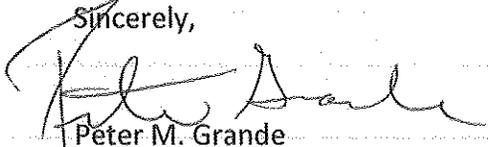
As the CEO of a Los Angeles based manufacturer of plastic bags I strenuously object to the Water Board motion to incentivize cities and counties to ban plastic bags and Styrofoam.

1. The proposed "credits" which would serve as inducements for municipalities to ban plastic bags is at best a political bounty and at worse an illegal coercion for cities to selectively and subjectively destroy particular industries.
2. Any proposal for credits must be based on a reasonable relationship to the impact a product has on the environment. All legitimate waste characterization studies indicate plastic bags account for .4% of the landfill space. The proposed 12% credit for cities that ban plastic bags has no correlation to science or the facts.
3. If the credit system is implemented, a fair and equitable credit system which includes credits for ALL forms of waste must be implemented. To subjectively include on an item like plastic bags that has a far lower impact than products such as paper defies the spirit of a program ostensibly designed to create waste diversion.
4. Cities cannot ban plastic bags without doing proper Environmental Impact Reports. All previous reports definitively prove that paper bags are worse for the environment than plastic bags in every category except marine debris. Encouraging cities to ignore the findings of properly conducted EIR's usurps the intent of CEQA law. Cities should make decisions on facts, not political preferences of special interests or state agencies.

The unfiltered perpetuation of myths and distorted information regarding plastic bags has become one of the great witch hunts of our time. It is a travesty that a state agency would ignore science to destroy an industry, kill thousands of jobs, to accomplish nebulous results.

I urge you to show common sense and restraint and resist acting as a surrogate for political special interests. This is nothing more than an attempt to bypass the legislative and democratic process and institute what amounts to a statewide ban of plastic products by regulatory order.

Sincerely,

  
Peter M. Grande  
CEO

