



March 25, 2009

Delivered via electronic mail to:

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Attn: Doug George

Sam Schuchat
Ocean Protection Council Secretary
Coastal Conservancy Executive Officer
Ocean Protection Council
California Coastal Conservancy
1330 Broadway, Suite 1300
Oakland, CA 94612

Re: Support for the Completion of a Master Environmental Assessment (MEA) on single-use (plastic and paper) and reusable bags.

Dear Secretary Schuchat and Members of the California Ocean Protection Council:

San Diego Coastkeeper, an environmental non-profit focused on clean water, commends the California Ocean Protection Council for its leadership in addressing critical issues facing California's coast and ocean including marine debris. Please accept our support for the recommended action to complete a Master Environmental Assessment (MEA) on single-use (plastic and paper) and reusable bags. This MEA will provide the necessary background information for California municipalities to quickly complete Environmental Impact Reports (EIR) necessary for the development of new ordinances placing restrictions on usage of the single-use bags.

As you know, the Ocean Protection Council has clearly identified that single-use plastic bags significantly contribute to the serious litter and marine debris problem facing the state. For that reason, OPC's Ocean Litter Implementation Strategy includes as Priority Action #2 a call for a prohibition on single-use products such as plastic bags.

Many California cities have heeded this call for action and are developing ordinances intended to minimize or eliminate single-use bags through the adoption of bans on plastic bags and, in some cases, fees on paper bags. However, a ruling issued February 20, 2009, in Los Angeles County on a challenge under CEQA to a municipal plastic bag ban now requires that municipality to complete an EIR before it can implement its ban.

In December, the City of San Diego Natural Resources and Culture Committee voted in favor of moving a draft ordinance forward to the full City Council that would ban single-use plastic bags and pose a fee on paper bags. We are now waiting for this ordinance to be heard at City Council but the reality of the costs associated with a full EIR and the possibility of a lawsuit puts the City in a challenging economic position. The Ocean Protection Council Completion of an MEA on single-use bags will greatly simplify the EIR process for these cities, allowing them to incorporate the MEA into their individual EIRs, saving time and money, and facilitating the implementation of single-use bag regulations throughout the state. Thank you for considering our input.

Sincerely,

Danielle Miller
Marine Debris Campaign Manager
San Diego Coastkeeper