Doug George

From: MCL [mcl@marinconservationleague.org]

Sent: Monday, March 23, 2009 4:11 PM

To: COPCpublic@resources.ca.gov; dgeorge@scc.ca.gov

Cc: patty.garbarino@marinsanitary.com; tgaffney@bartlewells.com; mfrost@co.marin.ca.us **Subject:** Support for the Completion of an MEA on single-use (plastic and paper) and reusable bags

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March 23, 2009

Delivered via electronic mail to: COPCpublic@resources.ca.gov dgeorge@scc.ca.gov
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:

Marin Conservation League, San Rafael, California, commends the California Ocean Protection Council for its leadership in addressing the critical issue of marine debris facing California's coast and ocean. We support 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) that are being required for new ordinances that place restrictions on usage of single-use bags.

Marin Conservation League (MCL) was founded in 1934 – we are celebrating our 75th Anniversary this year – to protect and preserve the natural assets of Marin County. However, our scope of concern has gone far beyond our own county boundaries, and now covers impacts of our citizenry on the world outside our borders. Hence, we are deeply concerned over the health of our oceans and our responsibility for preventing further damage. We are well aware of the insidious and extensive threat that discarded plastic and other debris pose to ocean health. 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. MCL supports this strategy.

Many California cities are also concerned and are developing ordinances intended to minimize or eliminate single-use bags, such as through 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 a municipality to complete an EIR before it can implement its ban.

Marin Conservation League is a strong supporter of CEQA. However, in this case we feel that it could be tailored to examine the nature of the problem at a programmatic level. The Master Environmental Assessment (MEA) is an appropriate tool to do this. Completion of an MEA on single-use bags will greatly simplify the EIR process for any city considering

passing a similar ordinance, allowing them to incorporate the MEA into their individual EIRs. This will save time and money and facilitate the implementation of single-use bag regulations throughout the state. Thank you for considering our input.

Sincerely,

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LEAGUE

Celebrating **75** Years

President