

**SECTION 12.0**  
**CLARIFICATIONS AND REVISIONS TO THE**  
**DRAFT ENVIRONMENTAL IMPACT REPORT**

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**12.1 NOTE TO READER**

Section 12.0 consists of clarifications and revisions to the Draft Environmental Impact Report (EIR) that have resulted from responses to comments received from agencies and the public. All clarifications and revisions to the Draft EIR were made to increase the understanding of the EIR. The Draft EIR was released for a 45-day public review period between June 2, 2010, and July 16, 2010. The County of Los Angeles received 11 letters of comment on the Draft EIR and a petition including over 1,800 signatures urging the County to ban plastic carryout bags.

**12.2 CLARIFICATIONS AND REVISIONS**

**VOLUME I DRAFT ENVIRONMENTAL IMPACT REPORT**

**TABLE OF CONTENTS**

**Page i**

The title of Section 2.2.4 has been revised to read

Carryout Bag Bans and Fees

An additional subsection has been added

2.2.6 Assembly Bill 1998

**Page iii**

The following sections have been added:

- 4.2.6 Alternative 5: Ban Plastic Carryout Bags and Impose a Fee on Paper Carryout Bags for All Supermarkets and Other Grocery Stores, Convenience Stores, Pharmacies, and Drug Stores in Los Angeles County
  - 4.2.6.1 Alternative Components
  - 4.2.6.2 Objectives and Feasibility
  - 4.2.6.3 Comparative Impacts

Section 4.3 of the EIR has been renumbered as follows:

- 4.4 Environmentally Superior Alternative

## SECTION ES EXECUTIVE SUMMARY

### ES.3 AREAS OF KNOWN CONTROVERSY

#### Page ES-2

The second sentence in the paragraph under compostable bags has been revised as follows:

However, the proposed ordinances include a ban on the issuance of compostable and biodegradable bags due to the lack of commercial composting facilities in the County that would be needed to process compostable plastic carryout bags,<sup>1</sup> and also due to the availability of evidence supporting the conclusion that oxo-biodegradable plastic bags do not result in benefits to the environment compared with standard plastic bags.<sup>2,3,4,5</sup>

The fifth sentence of the paragraph under public health impacts has been revised to include two additional footnotes:

Commentators do note that the health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps, such as washing and disinfecting the bags, using them only for groceries and using separate bags for raw meat products, being careful with where they are stored, and allowing bags to dry before folding and storing.<sup>6,7,8</sup>

#### Page ES-5

The last sentence in the paragraph under Table ES.5-1 has been revised as follows:

Six alternatives to the proposed ordinances required under CEQA have been carried forward for detailed analysis in this EIR:

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<sup>1</sup> County of Los Angeles, Department of Public Works, Environmental Programs Division. August 2007. *An Overview of Carryout Bags in Los Angeles County: A Staff Report to the Los Angeles County Board of Supervisors*. Alhambra, CA. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport\\_08-2007.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport_08-2007.pdf)

<sup>2</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs.

<sup>3</sup> European Plastic Recyclers. 10 June 2009. *Press Release: Oxo Degradable Additives are Incompatible with Mechanical Recycling*. Brussels, Belgium. Available at: <http://www.plasticsrecyclers.eu/docs/press%20release/EuPR%20Press%20Release%20-%20OXO%20Degradables%20Incompatibility%20with%20Plastics%20Recycling.pdf>

<sup>4</sup> Pearce, Fred. 18 June 2009. "Biodegradable plastic bags carry more ecological harm than good." Available at: <http://www.guardian.co.uk/environment/cif-green/2009/jun/18/greenwash-biodegradeable-plastic-bags>

<sup>5</sup> California Integrated Waste Management Board. June 2007. *Performance Evaluation of Environmentally Degradable Plastic Packaging and Disposable Food Service Ware - Final Report* Available at: <http://www.calrecycle.ca.gov/Publications/Plastics/43208001.pdf>

<sup>6</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>7</sup> Health Canada. 10 August 2010 (Last modified). "Food Safety Tips for Reusable Grocery Bags and Bins." Web site. Available at: <http://www.hc-sc.gc.ca/fn-an/securit/kitchen-cuisine/reusable-bags-sacs-reutilisables-eng.php>

<sup>8</sup> Gerba, C. et al. 9 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

One additional bullet point has been added under the first paragraph under Table ES.5-1:

- Alternative 5, Ban Plastic Carryout Bags and Impose a Fee on Paper Carryout Bags for All Supermarkets and Other Grocery Stores, Convenience Stores, Pharmacies, and Drug Stores in Los Angeles County

The third, fourth, fifth, and sixth sentences of the last paragraph on this page have been deleted and replaced with the following:

Alternatives 1, 2, 3, 4, and 5 would meet all of the basic objectives established by the County for the proposed ordinances. Alternatives 3, 4, and 5 would result in additional benefits to biological resources due to reduced consumption of plastic carryout bags. As with the proposed ordinances, and considering that the County is attempting to evaluate the impacts resulting from paper carryout bags from a conservative worst-case scenario, Alternative 3 may have the potential to result in cumulatively considerable impacts to GHG emissions because it would not place any limitation on the issuance of paper carryout bags. Alternatives 2 and 5 would be expected to reduce consumption of paper carryout bags through implementation of a fee. Unlike the proposed ordinances, Alternatives 1 and 4 would not result be expected to result in any increase in the consumption of paper carryout bags.

## SECTION 1.0 INTRODUCTION

### Page 1-2

The last sentence of the paragraph beneath the bullet points has been revised to read:

A total of seven comment letters were received in response to the NOP and Initial Study (Appendix D).

## SECTION 2.0 PROJECT DESCRIPTION

### Page 2-1

Footnote 4 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

### 2.2.1 Contribution of Plastic Carryout Bags to Litter Stream

#### Page 2-2

The following sentences have been added to the end of the first paragraph in this section:

For 2008–2009, the most recent year available, the County of Los Angeles Flood Control District spent over \$24 million on these activities (\$1.9 million on maintenance of structural and treatment control BMPs, \$9.3 million on municipal street cleaning, \$1.9 million on catch basin cleaning, \$9.6 million on trash collection and recycling, and \$1.3 million on capital costs).<sup>9</sup> The County of Los Angeles has obtained survey data from employees at solid waste facilities within the County that conclusively indicate that plastic carryout bags pose serious operational problems for landfills.<sup>10</sup> All six survey respondents stated that plastic bags cause serious litter issues due to their lightweight nature and propensity to become airborne.<sup>11</sup> Each survey respondent indicated that it was costly and time consuming to provide clean-up crews to address the plastic bag litter problem in neighborhoods in County unincorporated and incorporated areas adjacent to the landfills.<sup>12</sup>

### 2.2.2.3 Key Findings of the LACDPW Report

#### Page 2-4

The second item in the list in this section has been revised as follows:

Compostable carryout bags are not a practical solution to this issue in Los Angeles County because there are no local commercial composting facilities able to process compostable carryout bags at this time.

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<sup>9</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>10</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

<sup>11</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

<sup>12</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

### 2.2.3 Definitions

#### Page 2-4

Under the first bullet point in this section, the definition of a reusable bag has been revised to read:

- *Reusable bag(s)*: a bag with handles that is specifically designed and manufactured for multiple reuse and meets all of the following requirements: (1) has a minimum lifetime of 125 uses, which for purposes of this subsection, means the capability of carrying a minimum of 22 pounds 125 times over a distance of at least 175 feet; (2) has a minimum volume of 15 liters; (3) is machine washable; (4) does not contain lead, cadmium, or any other heavy metal in toxic amounts; (5) has printed on the bag, or on a tag that is permanently affixed to the bag, the name of the manufacturer, the location (country) where the bag was manufactured, a statement that the bag does not contain lead, cadmium, or any other heavy metal in toxic amounts, and the percentage of postconsumer recycled material used, if any; and (6) if made of plastic, is a minimum of at least 2.25 mils thick.

Under the second bullet point in this section, the definition of a paper carryout bag has been revised to read:

- *Paper carryout bag(s)*: a carryout bag made of paper that is provided by a store to a customer at the point of sale and can contain some percentage of post-consumer recycled content. Can be interchangeably referred to as a recyclable paper carryout bag.

Under the third bullet point in this section, the definition of a plastic carryout bag has been revised to read:

- *Plastic carryout bag(s)*: any bag made predominantly of plastic derived from either petroleum or a biologically-based source, such as corn or other plant sources, which is provided to a customer at the point of sale. "Plastic carryout bag" includes compostable and biodegradable bags but does not include reusable bags, produce bags, or product bags.

The fourth bullet point in this section has been deleted, as all types of compostable plastic carryout bags are included in the revised definition of a plastic carryout bag.

#### Page 2-5

Under the first bullet point at the top of this page, the definition of a recyclable paper bag has been revised to read as follows:

- *Recyclable paper carryout bag(s)*: a paper bag that meets all of the following requirements: (1) contains no old growth fiber, (2) is one hundred percent (100%) recyclable overall and contains a minimum of forty percent (40%) post-consumer recycled material; (3) is capable of composting, consistent with the timeline and specifications of the American Society of Testing and Materials (ASTM) Standard D6400; (4) is accepted for recycling in curbside programs in the County; (5) has

printed on the bag the name of the manufacturer, the location (country) where the bag was manufactured, and the percentage of postconsumer recycled material used; and (6) displays the word "Recyclable" in a highly visible manner on the outside of the bag.

#### **2.2.4 Single Use Bag Bans and Fees**

##### **Page 2-5**

The title of Section 2.2.4 has been revised to read:

Carryout Bag Bans and Fees

The first paragraph of Section 2.2.4 has been revised to read as follows:

The State of California considered placing a ban on the issuance of plastic carryout bags under Assembly Bill (AB) 1998. There are currently four city and county governments in California that have imposed bans on plastic carryout bags: City and County of San Francisco, City of Malibu, City of Palo Alto, and Town of Fairfax. Fremont, California is also reconsidering banning single use plastic bags two years after rejecting a similar measure. In addition, there is a plastic carryout bag fee ordinance in effect in the District of Columbia, and Marshall County, Iowa has banned the use of plastic carryout bags. Telluride, Colorado has also voted to ban plastic carryout bags.

An additional subsection has been added under the first paragraph in this section to discuss Assembly Bill 1998:

##### ***Assembly Bill 1998***

AB 1998 was introduced in February 2010 to prohibit convenience food stores, food marts, and certain specified stores in California from providing plastic carryout bags to customers. Initially, the bill would have required a store, beginning on July 1, 2011, to provide only reusable bags, as defined, or to make recycled paper bags available for sale at a cost not less than \$0.25. AB 1998 would have preempted local regulations on the use and sales of reusable bags, plastic carryout bags, and recycled paper bags. AB 1998 underwent revisions throughout the legislative process that changed certain provisions in the bill, including changing the \$0.25 fee to the actual average cost of the recycled paper bag provided to the consumer, rounded to the nearest penny.<sup>13</sup> Supporters of the bill included Californians Against Waste, Heal the Bay, California Grocers Association, California League of Conservation Voters, over 20+ cities in California, Communities for a Better Environment, the County of Los Angeles and five other California counties, Environment California, certain paper and plastic bag manufacturers, and a number of other environmental, business, and commerce groups.<sup>14</sup> Opposers of AB 1998 included the American Chemistry Council (ACC), and two plastic bag manufacturers—Crown Poly, Inc. and Command Packaging—who sued the County of Los Angeles over its voluntary Single

<sup>13</sup> Assembly Bill No. 1998. Amended in Senate August 27, 2010. Available at: [http://www.leginfo.ca.gov/pub/09-10/bill/asm/ab\\_1951-2000/ab\\_1998\\_bill\\_20100827\\_amended\\_sen\\_v94.pdf](http://www.leginfo.ca.gov/pub/09-10/bill/asm/ab_1951-2000/ab_1998_bill_20100827_amended_sen_v94.pdf)

<sup>14</sup> Californians Against Waste. Accessed October 19, 2010. AB 1998 (Brownley) – Plastic Bag Ban. Available at: [http://www.cawrecycles.org/issues/current\\_legislation/ab1998\\_10](http://www.cawrecycles.org/issues/current_legislation/ab1998_10)

Use Bag Reduction and Recycling Program as part of the Save the Plastic Bag Coalition. In August 2010, the ACC, Exxon, and a South Carolina-based bag manufacturer, Hilex Poly Co., made a series of campaign donations to certain California lawmakers.<sup>15</sup> Hilex Poly Co. also gave \$10,000 to the Democratic State Central Committee of California on August 5, 2010. The next day, Exxon gave the Republican Party \$10,000, among other donations it made. However, AB 1998 failed to achieve the number of votes required to pass the State Senate on August 31, 2010, and is currently no longer under consideration in California. Possibly worried that the bill may be resurrected in the future, plastic bag makers contributed campaign donations to California legislators into late October 2010.<sup>16</sup>

### ***City and County of San Francisco***

#### **Page 2-6**

An additional sentence has been added to the end of the first paragraph on this page:

San Francisco has not noted any adverse environmental impacts due to paper carryout bag manufacturing because there are no paper carryout bag manufacturing facilities located in San Francisco.

The following subsections have been added after the last paragraph on this page:

#### **Town of Fairfax**

The Town of Fairfax, pursuant to Ordinance No. 722, requires that all stores, shops, eating places and retail food vendors, as defined, shall provide only recyclable paper bags, reusable bags, or compostable plastic bags, as checkout bags to customers at the point of sale.<sup>17</sup> With respect to compostable plastic bags, "Because of the ongoing threat that compostable plastic bags pose to marine life, the permitted continued use of compostable plastic bags under Section 4 (a) shall be terminated by operation of law, three years from the date of passage of this ordinance."<sup>18</sup>

#### **City of Fremont**

Over two years since rejecting a similar measure, the City Council of Fremont, California, is reconsidering a ban or a fee on the issuance of plastic carryout bags.<sup>19</sup>

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<sup>15</sup> The Sacramento Bee. August 26, 2010. Plastic-bag backers donate to California lawmakers ahead of bill's vote. Available at: <http://www.sacbee.com/2010/08/26/2983643/plastic-bag-backers-donate-to.html>

<sup>16</sup> The Sacramento Bee. October 22, 2010. Plastic-bag maker dumps cash on parties, attacks Blakeslee. Available at: <http://blogs.sacbee.com/capitolalert/latest/2010/10/plastic-bag-fight-big-company.html?commentSort=RecommendationsDescending&pageNum=1>

<sup>17</sup> Town of Fairfax. Ordinance No. 722, Section 18.18.080. August 1, 2007. Available at: [http://www.stopwaste.org/docs/fairfax\\_plastic\\_bag\\_ordinance.pdf](http://www.stopwaste.org/docs/fairfax_plastic_bag_ordinance.pdf)

<sup>18</sup> Town of Fairfax. Ordinance No. 722. August 1, 2007. Available at: [http://www.stopwaste.org/docs/fairfax\\_plastic\\_bag\\_ordinance.pdf](http://www.stopwaste.org/docs/fairfax_plastic_bag_ordinance.pdf)

<sup>19</sup> Oakland Tribune. October 8, 2010. Fremont again will consider banning plastic grocery bags. Available at: [http://www.insidebayarea.com/news/ci\\_16281639](http://www.insidebayarea.com/news/ci_16281639)



## **Page 2-7**

The following subsections have been added after the third paragraph on this page:

### **County of Marshall, Iowa**

The County of Marshall, pursuant to its Plastic Bag Reduction Ordinance, requires all retail or wholesale stores, as defined, to provide only the following types of checkout bags to customers: recyclable paper bags, and/or compostable plastic bags, and/or reusable bags.

### **City of Telluride, Colorado**

In October, 2010, Telluride became the first city in Colorado to ban the issuance of plastic carryout bags by grocers and other retailers.<sup>20</sup> The law will become effective on March 1, 2011, and will not apply to certain types of bags such as bags used for bulk items, prescription drugs, newspapers, and produce bags used for meat and vegetables within a store.

## ***Efforts outside the United States***

### *Ireland*

## **Page 2-7**

The third sentence of this paragraph has been revised to read:

The PlasTax applies to all plastic carryout bags, including biodegradable polymer bags.

### *Australia*

## **Page 2-8**

The first sentence of this paragraph has been revised to read:

Retailers support plastic carryout bag reductions via a voluntary “Retailers Code.”

The following subsection has been added after the paragraph discussing plastic carryout bag reductions in Taiwan:

### **American Samoa**

American Samoa was the first US Territory to ban plastic shopping bags. The law, signed by Governor Togiola Tulafono, takes effect February 23, 2011. According to Jared Blumenfeld, the EPA’s Regional Administrator for the Pacific Southwest, “We welcome American Samoa’s leadership in the Pacific islands to ban plastic shopping bags. This action will decrease the amount of plastic waste in the territory and directly protect marine

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<sup>20</sup> USA Today. October 8, 2010. Another US city bans plastic shopping bags. Available at: <http://content.usatoday.com/communities/greenhouse/post/2010/10/another-us-city-bans-plastic-shopping-bags/1>

and bird life in the Pacific.”<sup>21</sup> The USEPA notes that other countries that have banned free plastic bags include China, Bangladesh, Australia, Italy, South Africa, Ireland, and Taiwan.

### **2.2.5 Litigation History**

#### ***Save the Plastic Bag Coalition vs. Los Angeles County***

##### **Page 2-10**

The penultimate sentence in the first paragraph on this page has been revised to read:

In reaching this conclusion, the Superior Court noted that the January 22, 2008, Board of Supervisors action approved creation of the framework for a voluntary program for plastic carryout bag reduction and recycling that had voluntary goals, and directed that an ordinance banning the issuance of plastic carryout bags be drafted subject to certain contingencies, including completion of any necessary environmental review under CEQA.

#### ***Save the Plastic Bag Coalition vs. City of San Jose***

##### **Page 2-11**

The second sentence in the second paragraph on this page has been revised as follows:

On June 7, 2010, the City of Santa Monica issued its Draft EIR, and the public comment period closed on July 22, 2010.

The third, fourth, and fifth sentences of the paragraph that begins at the bottom of page 2-11 have been deleted and replaced with the following:

On October 22, 2009, the City of San Jose issued a Notice of Preparation of a Draft EIR for the proposed plastic carryout bag ordinance, and in July 2010, the City of San Jose issued a Draft EIR for the proposed plastic carryout bag ordinance.

### **2.3.1 Plastic Carryout Bags**

##### **Page 2-12**

Three additional footnotes have been added at the end of the second sentence in this section:

Since then, plastic carryout bags have been found to contribute substantially to the litter stream and to have adverse effects on marine wildlife.<sup>22,23,24,25,26,27</sup>

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<sup>21</sup> United States Environmental Protection Agency. September 30, 2010. U.S. EPA applauds American Samoa’s decision to ban plastic shopping bags. Available at: <http://yosemite.epa.gov/opa/admpress.nsf/0/921A87D72D9AAFC1852577AE007394F1>

<sup>22</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at : [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>23</sup> California Integrated Waste Management Board. 12 June 2007. Board Meeting Agenda, Resolution: Agenda Item 14. Sacramento, CA.

<sup>24</sup> County of Los Angeles, Department of Public Works, Environmental Programs Division. August 2007. *An Overview of Ordinances to Ban Plastic Carryout Bags in Los Angeles County* *Environmental Impact Report*  
October 28, 2010 *Sapphos Environmental, Inc.*  
W:\PROJECTS\1012\1012-035\Documents\Final EIR\Section 12 Clarifications And Revisions .Doc Page 12-10

The following sentence has been added after the fourth sentence in this paragraph.

County of Los Angeles Flood Control District staff have photographed carryout bags in the catch basins and storm drains.<sup>28</sup>

A reference has been added after the fifth sentence in this paragraph:

...quality of life for County residents and visitors.<sup>29</sup>

### 2.3.2 Paper Bags

#### Page 2-14

The following sentences have been added before the final sentence in this paragraph:

The County currently has an education outreach program for curbside recycling, which includes paper carryout bags.<sup>30</sup> There is nearly universal access to curbside recycling throughout the County, where paper bags can be recycled by homeowners conveniently. The paper used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally biodegradable and compostable material.

The following sentences have been added after the final sentence in this paragraph:

The brown paper bags commonly found at supermarkets are made from Kraft paper.<sup>31</sup> It also appears that the paper carryout bags currently used by stores in the County are made of at least 40 percent post-consumer recycled content.<sup>32</sup>

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*Carryout Bags in Los Angeles County: A Staff Report to the Los Angeles County Board of Supervisors.* Alhambra, CA. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport\\_08-2007.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport_08-2007.pdf)

<sup>25</sup> Bjorndal, K. et. al. 1994. "Ingestion of marine debris by juvenile sea turtles in coastal Florida habitats." *Marine Pollution Bulletin*, 28 (3). Available at: [http://accstr.ufl.edu/publications/BjorndalEtAl\\_1994\\_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf](http://accstr.ufl.edu/publications/BjorndalEtAl_1994_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf)

<sup>26</sup> Okeanos Ocean Research Foundation. 1989. *Marine Mammal and Sea Turtle Encounters with Marine Debris in the New York Bight and the Northeast Atlantic*. Available at: [http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154\\_P562.PDF](http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154_P562.PDF)

<sup>27</sup> Gomerčić, H. et. al. *European Journal of Wildlife Research*. 2006. "Biological aspects of Cuvier's beaked whale (*Ziphius cavirostris*) recorded in the Croation part of the Adriatic Sea." DOI 10.1007/s10344-006-0032-8

<sup>28</sup> County of Los Angeles. 2010. Photographs of Catch Basins in Los Angeles County provided to Sapphos Environmental, Inc. by the County of Los Angeles Flood Control District. Available for viewing at Sapphos Environmental, Inc. Headquarters, Pasadena, CA.

<sup>29</sup> Keep America Beautiful. Accessed October 19, 2010. Litter Prevention. Available at: [http://www.kab.org/site/PageServer?pagename=focus\\_litter\\_prevention](http://www.kab.org/site/PageServer?pagename=focus_litter_prevention)

<sup>30</sup> County of Los Angeles Department of Public Works. Accessed October 12, 2010. Outreach Programs. Web sites available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and <http://dpw.lacounty.gov/epd/recycling/crm.cfm>

<sup>31</sup> American Forest and Paper Association. Accessed October 25, 2010. Web site. Facts about Paper. Available at: <http://www.afandpa.org/FunFacts.aspx>

<sup>32</sup> Perez, David. County of Los Angeles, Department of Public Works. October 30, 2008. Email Correspondence; Paper Bag Distribution – Field Survey Summary - On file at Sapphos Environmental, Inc. Pasadena, CA.

### **2.3.3 Reusable Bags**

#### **Page 2-15**

Footnote 92 has been revised to read as follows:

Reusable bag manufacturers in the United States are expected to enforce industry standards and recommendations to reduce adverse environmental impacts.

### **2.3.4 Voluntary Single Use Bag Reduction and Recycling Program**

#### **Page 2-16**

The following paragraph has been added to the bottom of this page:

Since that time, the County Working Group found that the program was not successful in achieving its goals. Over a two-year period and despite State law, stores in the unincorporated area did not provide data that would enable County staff to determine if the voluntary Program benchmark of 30 percent disposal reduction of plastic bags had been met. Furthermore, although the public education and outreach aspects of the Program, including the successful Brag About Your Bag Campaign<sup>®</sup>, were effective in raising awareness of the environmental impacts of carryout bags and the benefits of reusable bags, this awareness did not translate into a shift in consumer behavior that was significant enough to address the major objectives of the County.<sup>33</sup>

## **2.5 PROPOSED PROJECT**

#### **Page 2-19**

The second sentence of the third paragraph on this page has been deleted.

The third sentence of the third paragraph on this page has been revised to read:

If the County chooses to expand the scope of the proposed ordinance, it may recommend that the 88 incorporated cities of the County consider the same in any proposed ordinances.

## **2.7 ORDINANCE ALTERNATIVES**

The second and third sentences in the first paragraph on this page have been revised as follows:

A total of six project alternatives were evaluated for the proposed ordinances. The No Project Alternative, which is required by the State CEQA Guidelines, was assessed and all six alternatives have been carried forward for detailed analysis in this EIR. The six alternatives to the proposed ordinances are as follows:

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<sup>33</sup> County of Los Angeles Chief Executive Office. August 5, 2010. Single Use Bag Reduction and Recycling Program and Expanded Polystyrene Food Containers – Final Quarterly Progress Report. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls\\_080510\\_bagrpt10.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls_080510_bagrpt10.pdf)

One additional bullet point has been added to the end of the list in this section:

- Alternative 5, Ban Plastic Carryout Bags and Impose a Fee on Paper Carryout Bags for all Supermarkets and Other Grocery Stores, Convenience Stores, and Pharmacies and Drug Stores in Los Angeles County

## SECTION 3.0 EXISTING CONDITIONS, IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

### 3.1 AIR QUALITY

#### 3.1.1 Regulatory Framework

##### Page 3.1-4

The following subsection has been added under the third paragraph on this page:

##### *EPA Title V Permit*

Title V is a federal program designed to standardize air quality permits and the permitting process for major sources of emissions across the country. The name "Title V" comes from Title V of the 1990 federal Clean Air Act Amendments, which require the USEPA to establish a national, operating permit program. Accordingly, EPA adopted regulations [Title 40 of the Code of Federal Regulations, Chapter 1, Part 70 (Part 70)], which require states and local permitting authorities to develop and submit a federally enforceable operating permit programs for EPA approval. Title V only applies to "major sources." EPA defines a major source as a facility that emits, or has the potential to emit any criteria pollutant or hazardous air pollutant at levels equal to or greater than the Major Source Thresholds (MST). The MST for criteria pollutants may vary depending on the attainment status (e.g., marginal, serious, extreme) of the geographic area and the Criteria Pollutant or HAP in which the facility is located (EPA Title V Requirement, accessed March 2010). Carryout bag manufacturing facilities that emit any criteria pollutant or HAP at levels equal to or greater than the MST of the local air quality management district would need to obtain, and maintain compliance with, a Title V permit.

The following subsections have been added after the final paragraph on this page.

##### *On-road Heavy-duty Diesel Vehicles (In-use) Regulation*

On December 12, 2008, the CARB approved a new regulation to significantly reduce emissions from existing on-road diesel vehicles operating in California. The regulation requires affected trucks and buses to meet performance requirements between 2011 and 2023. By January 1, 2023, all vehicles must have a 2010 model year engine or equivalent. The regulation is intended to reduce emissions of diesel PM, oxides of nitrogen, and other criteria pollutants. All diesel trucks making deliveries of carryout bags in California would be required to adhere to this regulation.

##### *Diesel-fueled Commercial Motor Vehicle Idling Limit*

The purpose of this airborne toxic control measure is to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. The regulation applies to diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. The in-use truck requirements require operators of both in-state and out-of-state registered sleeper berth equipped trucks to manually shut down their engine when idling more than five

minutes at any location within California beginning in 2008. All trucks making deliveries in the County of Los Angeles would be required to comply with the no-idling requirements.

### **Page 3.1-5**

The following paragraph has been added after the fourth paragraph on this page:

SCAQMD requires operators that plan to build, install, alter, replace, or operate any equipment that emits or controls the emission of air contaminants to apply for, obtain and maintain equipment permits. Equipment permits ensure that emission controls meet the need for the South Coast Region to make steady progress toward achieving and maintaining federal and state air quality standards. Permits also ensure proper operation of control devices, establish recordkeeping and reporting mechanisms, limit toxic emissions, and control dust or odors. In addition, the SCAQMD routinely inspect operating facilities to verify that equipment has been built and installed as required by the, and to confirm that the equipment operates in compliance with SCAQMD rules and regulations.

The following sentence has been added to the end of the fifth paragraph on this page:

AVAQMD also requires operators that plan to build, install, alter, replace, or operate any equipment that emits or controls the emission of air contaminants to apply for, obtain, and maintain equipment permits.

### **3.1.4 Impact Analysis**

#### *Indirect Emissions Based on Life Cycle Assessments*

### **Page 3.1-14**

The third sentence in the first paragraph on this page has been deleted to remove the reference to the CIT Ekologik study.

The last two sentences of the second paragraph on this page have been deleted and replaced by the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>34</sup> Therefore, air quality impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

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<sup>34</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

### Page 3.1-19

The last two sentences on this page have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>35</sup> Therefore, air quality impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

### Page 3.1-25

The following paragraph has been added under the second paragraph on this page:

Further, recent revisions to CEQA and the CEQA Guidelines discuss the speculative nature of lifecycle analysis, especially for GHGs, and note generally that:

No existing regulatory definition of "lifecycle" exists....Moreover, even if a standard definition of the term "lifecycle" existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered "indirect effects" of a project as that term is defined in section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials.<sup>36</sup> CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be "caused by" the project under consideration.<sup>37</sup>

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<sup>35</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>36</sup> California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

<sup>37</sup> California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)



## 3.2 BIOLOGICAL RESOURCES

### Page 3.2-2

The following sentences have been added to the end of the second paragraph on this page:

Plastic fragments and plastic resin pellets that are used in the manufacturing process of plastic products can serve as vehicles for persistent organic pollutants such as PCB and DDT, which have the potential to cause adverse impacts to biological resources upon ingestion.<sup>38,39,40</sup> Ingestion of plastic fragments can also lead to internal blockages and toxic poisoning.<sup>41</sup>

### 3.2.4 Impact Analysis

#### *Impacts to Rare, Threatened, and Endangered Species*

### Page 3.2-19

An additional footnote has been added to the fifth sentence in this section:

The impacts include fatalities as a result of ingestion, starvation, suffocation, infection, drowning, and entanglement.<sup>42,43,44</sup>

An additional sentence has been added after the fifth sentence in this section:

For example, an article published in the *European Journal of Wildlife Research* attributed the death of a beaked whale to the ingestion of four plastic bags, two of which were plastic shopping bags.<sup>45</sup>

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<sup>38</sup> Rios, L. et. al. 2007. "Persistent organic pollutants carried by synthetic polymers in the ocean environment." *Marine Pollution Bulletin*, 54: 1230–1237).

<sup>39</sup> Takada, H. et. al. *Pellet Watch: Global Monitoring of Persistent Organic Pollutants (POPs) using Beached Plastic Resin Pellets*. Available at: <http://www.tuat.ac.jp/~gaia/ipw/documents/takadaproceeding.pdf>

<sup>40</sup> Teuten, E. L. et. al. 2009. "Transport and release of chemicals from plastic to the environment and to wildlife." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2027-2045.

<sup>41</sup> Todd, Peter, A. et. al. 2010. Impacts of Pollution on marine life in Southeast Asia. In. *Biodiversity and Conservation*. 19: 1063 – 1082.

<sup>42</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>43</sup> Gregory, Murray R. 2009. "Environmental Implications of Plastic debris in Marine Settings –Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2013–2025.

<sup>44</sup> Azzarello, M. and Van Vleet, E. 1987. "Marine Birds and Plastic Pollution." *Marine Ecology Progress Series*, 37: 295–303.

<sup>45</sup> Gomerčić, H. et. al. 2006. "Biological aspects of Cuvier's beaked whale (*Ziphius cavirostris*) recorded in the Croatia part of the Adriatic Sea." *European Journal of Wildlife Research*. DOI 10.1007/s10344-006-0032-8

### 3.3 GREENHOUSE GAS EMISSIONS

#### Page 3.3-4

The first, second, and third sentences in the last paragraph on this page have been deleted and replaced by the following:

While the regulatory framework is discussed in detail below, it is important to note that GHG CEQA Guidelines were adopted in December 2009. However, no federal or State agency (e.g., USEPA, CARB, or SCAQMD) responsible for managing air quality emissions has promulgated a global warming significance threshold that may be used in reviewing newly proposed projects. On a local level, the County has not adopted a climate change significance threshold. Neither the CEQA Statutes nor the CEQA Guidelines establish thresholds of significance for GHG emissions.

#### Page 3.3-8

The following section has been added after the penultimate paragraph on this page:

##### *Landfill Methane Capture Strategy*

On June 21, 2007, CARB approved the Landfill Methane Capture Strategy as an early action measure to reduce GHG emissions in accordance with the goals of AB 32.<sup>46</sup> This measure requires enhanced control of methane emissions from municipal solid waste landfills. The control measure will reduce methane emissions from landfills by requiring gas collection and control systems on landfills where these systems are not currently required and the measure establishes statewide performance standards to maximize methane capture efficiencies.

#### Page 3.3-15

The last sentence and the numbered list at the bottom of this page have been deleted and replaced by the following:

The significance conclusions were based on the application of the significance thresholds provided in Section 3.3.4 above. The threshold "Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases" was applied for conversion from plastic to paper carryout bags and truck trip analyses, and the summary of projections approach was utilized to determine cumulative impact. This is consistent with CEQA Guidelines §15130(b)(1)(B), which provides that cumulative analysis may be based on a "summary of projections in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or *plans for the reduction of greenhouse gas emissions*" (emphasis added). The GHG cumulative analysis was based on consistency with the GHG projections in California's plan to implement AB 32: California Air Resources Board's *Climate Change Scoping Plan* and the County's Energy and Environmental Policy No. 3-045.

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<sup>46</sup> California Air Resources Board. June 17, 2010. Methane Emissions from Municipal Solid Waste Landfills. Available at: <http://www.arb.ca.gov/regact/2009/landfills09/landfillfinalfro.pdf>

The threshold "Generate greenhouse gas emissions, either directly or indirectly that may have a significant effect on the environment" was applied to the life cycle emissions, including the end of life emissions.

The per capita analysis was utilized to evaluate consistency of the project with the goals of AB 32 and its implementation document, CARB's Climate Change Scoping Plan.<sup>47</sup>

### Page 3.3-17

The following paragraph has been added below the first paragraph on this page:

It is also important to note that recent amendments to the CEQA Guidelines addressing Appendix F and greenhouse gas analysis, expressly declined to adopt the term "lifecycle", noting as follows: "Lifecycle: The amendments to Appendix F remove the term "lifecycle." No existing regulatory definition of "lifecycle" exists. In fact, comments received during OPR's public workshop process indicate a wide variety of interpretations of that term.<sup>48</sup> Thus, retention of the term "lifecycle" in Appendix F could create confusion among lead agencies regarding what Appendix F requires. Moreover, even if a standard definition of the term "lifecycle" existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered "indirect effects" of a project as that term is defined in Section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials.<sup>49</sup> CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be "caused by" the project under consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the manufacturing process."<sup>50</sup>

### Page 3.3-19

The last two sentences of the second paragraph on this page have been deleted and replaced by the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle

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<sup>47</sup> California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*. Available at: <http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>

<sup>48</sup> California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

<sup>49</sup> California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

<sup>50</sup> California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

impacts of several different types of bags and concludes that polypropylene and calico reusable bags that are used 104 times result in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>51</sup> Therefore, GHG emission impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the GHG emission impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in a reduction in GHG emissions.

**Page 3.3-22**

The last two sentences on this page have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that polypropylene and calico reusable bags that are used 104 times result in global warming impacts that are significantly lower than the impacts from and plastic carryout bags (Table R3.3.5-5, *Relative Environmental Impacts of Various Types of Bags*).<sup>52</sup> Therefore, GHG emission impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the GHG emission impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in a reduction in GHG emissions.

**Page 3.3-23**

The following table has been added after Table 3.3.5-4:

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<sup>51</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>52</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

**TABLE R3.3.5-5A  
RELATIVE ENVIRONMENTAL IMPACTS OF VARIOUS TYPES OF BAGS**

Bag Type	Number of Trips	Relative Impacts on a Scale from 1 to 5					
		Material Consumption	Global Warming	Energy Consumption	Water Use	Litter Marine Biodiversity	Litter Aesthetics
Reusable non-woven plastic (polypropylene) "Green Bag"	104	♣	♣	♣	♣	♣	♣
Reusable calico (cotton) bag	104	♣	♣	♣	♣♣♣♣♣	♣	♣
100-percent recycled content paper carryout bag	2	♣♣♣♣♣	♣♣♣	♣♣	♣	♣	♣
Oxo-biodegradable carryout bag	1	♣♣♣	♣♣	♣♣♣	♣	♣♣♣	♣♣
100-percent recycled content plastic (HDPE) carryout bag	1	♣♣♣	♣	♣	♣♣	♣♣♣♣♣	♣♣♣♣♣
Paper carryout bag	2	♣♣♣♣♣	♣♣♣♣	♣♣♣	♣	♣	♣
Compostable (starch-polyester) carryout bag	1	♣♣♣♣	♣	♣	♣♣♣♣♣	♣	♣♣
Plastic (HDPE) carryout bag	1	♣♣♣	♣♣	♣♣♣♣	♣	♣♣♣♣♣	♣♣♣♣♣
100-percent recycled content paper carryout bag	1	♣♣♣♣♣	♣♣♣♣♣	♣♣♣♣	♣	♣	♣♣
Paper carryout bag	1	♣♣♣♣♣	♣♣♣♣♣	♣♣♣♣♣	♣♣	♣	♣♣
Plastic (LDPE) "boutique" carryout bag	1	♣♣♣♣♣	♣♣♣♣♣	♣♣♣♣♣	♣	♣♣♣♣♣	♣♣♣♣♣

**SOURCE:** Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives.* Prepared for: Sustainability Victoria, Victoria, Australia.

**NOTES:**

1. A rating of ♣ to ♣♣♣♣♣ is used to show the diversity of impacts for each criterion, with ♣ being the lowest impact. In some cases at the high impact end, the impact value of the bag falls outside of the rating scale. Impacts cannot be added together to produce an overall impact rating.

HDPE = High density polyethylene

LDPE = Low density polyethylene

**Page 3.3-27**

The last sentence of the first paragraph on this page has been deleted.

**Page 3.3-38**

The following paragraph has been added below the first paragraph on this page:

Any emissions resulting from the end of life of paper carryout bags, including from truck trips transporting paper carryout bag waste to landfills in the County, are currently controlled by regional and state regulations. For example, CARB's Solid Waste Collection Vehicle Rule also requires owners of refuse collection vehicles to use best available control technology that has been verified by CARB to reduce vehicle emissions. In addition, SCAQMD Rule 1193, Clean On-road Residential and Commercial Refuse Collection Vehicles, requires all public and private solid-waste collection fleets within the jurisdiction

of the SCAQMD to acquire alternative-fuel refuse collection vehicles when procuring or leasing these vehicles. SCAQMD Rule 1193 applies to governmental agencies and private entities that operate solid-waste collection fleets with 15 or more solid-waste collection vehicles. Finally, the County is also controlling for emissions by requiring in its new refuse agreements that alternative-fuel refuse vehicles be used.<sup>53,54,55,56</sup>

The following has been added after the second paragraph on this page:

However, the County has identified the following mitigation measure that would minimize the potential increase in use of paper carryout bags and indirectly offset GHG emissions. Although the measures specified in this mitigation measure will help offset cumulative GHG emissions resulting from the proposed ordinances, they may not mitigate them to below the level of significance.

**Mitigation Measure GHG-1:**

Implement and/or expand public outreach and educational programs to increase the percentage of paper carryout bags that are recycled curbside.

If the adopted ordinance includes a fee or charge on the issuance of paper carryout bags of at least \$0.05, consider increases to the fee or charge to further reduce consumption of paper carryout bags.

Distribute reusable grocery bags, free of charge within the project area to encourage further transitions to reusable bags. Consider public/private partnerships to offset costs of distribution.

Implement an outreach program for affected stores to encourage consumer transition to reusable bags, to reduce double bagging, and to encourage reuse and in-store recycling of paper carryout bags.

Encourage grocery stores to implement energy efficiency technology particularly in relation to storage of cold and frozen foods (assuming a reduction of 0.65 metric ton carbon dioxide equivalent for each megawatt hour saved<sup>57</sup>).

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<sup>53</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award of Contract for Walnut Park Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54560.pdf>

<sup>54</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award of Contract for Athens/Woodcrest/Olivita Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54567.pdf>

<sup>55</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award the Contract for Firestone Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54559.pdf>

<sup>56</sup> County of Los Angeles, Department of Public Works. 19 January 2010. *Award of Contract for an Exclusive Franchise Agreement to Valley Vista Services, Inc. for the Unincorporated Area of Hacienda Heights*. Available at: <http://file.lacounty.gov/bos/supdocs/52931.pdf>

<sup>57</sup> Emission factors taken from <http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results>

Consider converting public vehicles to low-emitting fuels (assuming a reduction of 0.45 metric ton carbon dioxide equivalent for each 1,000 vehicle miles traveled<sup>58</sup>). Consider funding conversion of vehicles through participation in South Coast Air Quality Management District's Carl Moyer Program.

### **3.3.7 Level of Significance after Mitigation**

#### **Page 3.3-38**

The two sentences in this section have been deleted and replaced with the following:

While the incorporation of Mitigation Measure GHG-1 would monitor and reduce the consumption of paper carryout bags caused by the proposed ordinances and indirectly offset GHG emissions resulting from end of life to the maximum extent feasible, the County has decided that no emission reduction credit will be taken for the measure, and for the purposes of the decision-making process, the County will proceed with the conclusion that indirect impacts to GHG emissions resulting from end of life would remain cumulatively considerable.

### **3.4 HYDROLOGY AND WATER QUALITY**

#### **Page 3.4-9**

Footnote 29 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

#### **Page 3.4-12**

Footnote 40 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

#### **Page 3.4-13**

Footnote 45 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

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<sup>58</sup> Emission factors taken from <http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results>

## Page 3.4-15

The last two sentences on this page have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>59</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

## Page 3.4-16

The beginning of the second sentence in the paragraph under Table 3.4.4-2, *Eutrophication Due to Reusable Bags Based on Ecobilan Data*, has been revised to read:

Compostable bags have been noted to have impacts upon eutrophication worse than the impacts of standard plastic carryout bags...

## Page 3.4-18

Footnote 68 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

## 3.5 UTILITIES AND SERVICE SYSTEMS

### Page 3.5-1

Footnote 5 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

### 3.5.1 Regulatory Framework

#### State

*Assembly Bill 2449*

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<sup>59</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.



### **Page 3.5-2**

The first sentence of the second paragraph on page 3.5-2 has been revised to read:

AB 2449 also restricts the ability of cities (including charter cities) and counties to regulate plastic grocery bags through imposition of a fee on an entity that is otherwise in compliance with the provisions of AB 2449.

### **Page 3.5-5**

Footnote 15 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

### **Page 3.5-10**

The third to last and second to last sentences on this page have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>60</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

### **Page 3.5-11**

Footnote 38 on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Pages 1-5. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

### **Page 3.5-15**

The last sentence on this page has been deleted and replaced by the following.

The Hyder Study does note that water consumption required for the life cycle of a calico (cotton) reusable bag would be greater than the water consumption required for the life

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<sup>60</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

cycle of a non-woven polypropylene reusable bag.<sup>61</sup> However, all other life cycle impacts of the calico reusable bag were determined to be just as low as the impacts of the polypropylene reusable bag.<sup>62</sup> It is important to note that calico reusable bags, like all other types of reusable bags, according to the Hyder Study have the lowest impacts on litter marine biodiversity, litter aesthetics, energy consumption, material consumption, and global warming. Polypropylene reusable bags are more widely used in the County than calico reusable bags due to the fact that they are cheaper to produce and are sold at a lower price.<sup>63,64,65</sup> Therefore, it is anticipated that the proposed ordinances would only have the potential for a limited increase in the use of calico reusable bags in the County. Therefore, the additional water supply that may be required by reusable bag manufacturing facilities as an indirect result of the proposed ordinances will not necessitate new or expanded entitlements for water and would not constitute a significant impact under CEQA.

### Page 3.5-21

The second, third, and fourth sentences of the first paragraph on this page have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>66</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would reasonably be expected to result in an environmental benefit.

The following paragraph has been added under Table 3.5.4-8 on this page:

In addition, the proposed ordinances would be expected to result in benefits to landfills due to a reduction in the amount of plastic carryout bags sent to landfills. The County of Los Angeles has obtained survey data from employees at solid waste facilities within the County that indicate that plastic carryout bags pose serious operational problems for landfills.<sup>67</sup> All six survey respondents stated that plastic bags cause serious litter issues due

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<sup>61</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>62</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>63</sup> Uline. Accessed October 26, 2010, Reusable Shopping Bags. Available at: [http://www.uline.com/BL\\_5528/Reusable-Shopping-Bags](http://www.uline.com/BL_5528/Reusable-Shopping-Bags)

<sup>64</sup> County of Los Angeles, Department of Public Works, Environmental Programs Division. August 2007. *An Overview of Carryout Bags in Los Angeles County: A Staff Report to the Los Angeles County Board of Supervisors*. Alhambra, CA. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport\\_08-2007.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport_08-2007.pdf)

<sup>65</sup> Green Cities California. March 2010. *Master Environmental Assessment on Single-Use and Reusable Bags*. Prepared by ICF International, San Francisco, CA.

<sup>66</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>67</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

to their lightweight nature and propensity to become airborne.<sup>68</sup> Each survey respondent indicated that it was costly and time consuming to provide clean-up crews to address the plastic bag litter problem in neighborhoods in County unincorporated and incorporated areas adjacent to the landfills.<sup>69</sup>

**Page 3.5-24**

The fourth sentence of the second paragraph under Table 3.5.4-10 has been deleted.

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<sup>68</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

<sup>69</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

## SECTION 4.0 ALTERNATIVES TO THE PROPOSED ORDINANCES

### Page 4-1

The final sentence of the third paragraph has been revised to read:

As a result of the Initial Study, comments received during the scoping period, and the environmental analysis undertaken in the Draft EIR, six alternatives including the No Project Alternative were determined to represent a reasonable range.

One additional bullet point has been added under the third paragraph:

6. Alternative 5, Ban Plastic Carryout Bags and Impose a Fee on Paper Carryout Bags for All Supermarkets and Other Grocery Stores, Convenience Stores, Pharmacies, and Drug Stores in Los Angeles County

### Page 4-2

Table 4-1 has been revised to include Alternative 5, which would meet all of the County objectives.

The second sentence in the paragraph under Table 4-1 has been revised to read:

However, the County has eliminated this alternative from further consideration due to the lack of commercial composting facilities in the County that would be needed to process compostable plastic carryout bags,<sup>70</sup> and also due to the availability of substantial evidence that supports the conclusion that oxo-biodegradable plastic bags do not result in benefits to the environment compared with standard plastic bags.<sup>71,72,73,74</sup>

### Page 4-5

The final sentence of the paragraph discussing biological resources will be revised to read:

In comparison with the proposed ordinances, the No Project Alternative would exacerbate rather than avoid or reduce potential impacts to biological resources.

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<sup>70</sup> County of Los Angeles, Department of Public Works, Environmental Programs Division. August 2007. *An Overview of Carryout Bags in Los Angeles County: A Staff Report to the Los Angeles County Board of Supervisors*. Alhambra, CA. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport\\_08-2007.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/PlasticBagReport_08-2007.pdf)

<sup>71</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)  
Prepared for the Department for Environment, Food, and Rural Affairs.

<sup>72</sup> European Plastic Recyclers. 10 June 2009. *Press Release: Oxo Degradable Additives are Incompatible with Mechanical Recycling*. Brussels, Belgium. Available at:  
<http://www.plasticsrecyclers.eu/docs/press%20release/EuPR%20Press%20Release%20-%20OXO%20Degradables%20Incompatibility%20with%20Plastics%20Recycling.pdf>

<sup>73</sup> Pearce, Fred. 18 June 2009. "Biodegradable plastic bags carry more ecological harm than good." Available at:  
<http://www.guardian.co.uk/environment/cif-green/2009/jun/18/greenwash-biodegradeable-plastic-bags>

<sup>74</sup> California Integrated Waste Management Board. June 2007. *Performance Evaluation of Environmentally Degradable Plastic Packaging and Disposable Food Service Ware - Final Report* Available at:  
<http://www.calrecycle.ca.gov/Publications/Plastics/43208001.pdf>

**Page 4-6**

The final sentence of the paragraph discussing greenhouse gas emissions will be revised to read:

However, compared with the proposed ordinances, the No Project Alternative may also have the potential to result in a cumulatively considerable significant impact due to indirect GHG emissions resulting from the production, distribution, transport, and disposal of plastic carryout bags.

**Page 4-8**

The third sentence of the second paragraph under air quality has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from a paper or plastic carryout bag.<sup>75</sup> Therefore, air quality impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would reasonably be expected to result in an environmental benefit.

**Page 4-10**

The last sentence of the second paragraph on this page has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that calico and polypropylene reusable bags that are used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>76</sup> Therefore, GHG emission impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the GHG emission impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in a reduction in GHG emissions.

**Page 4-11**

The last sentence of the first paragraph under hydrology and water quality has been deleted and replaced by the following:

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<sup>75</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>76</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from a paper or plastic carryout bag.<sup>77</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### **Page 4-12**

The final sentence of the first paragraph discussing utilities and service systems has been revised to read:

Furthermore, Alternative 1 would be anticipated to result in indirect reductions in solid waste generation, water consumption, and wastewater generation due to a reduction in the manufacture and disposal of paper carryout bags compared to current conditions.

The last sentence of the second paragraph on this page has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in significantly lower environmental impacts than a paper or plastic carryout bag.<sup>78</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would reasonably be expected to result in an environmental benefit.

#### **Page 4-13**

The following sentence has been added after the third sentence in the section regarding comparative impacts:

Although a paper carryout bag fee of \$0.05 resulted in a significant initial reduction in paper carryout bag use, a higher fee (such as \$0.10 or higher) would reasonably be expected to be more effective at encouraging consumers to transition to using reusable bags, as seen in Ireland and Australia.<sup>79,80</sup>

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<sup>77</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>78</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>79</sup> Nolan-ITU Pty Ltd., et al. December 2002. *Environment Australia: Department of the Environment and Heritage: Plastic Shopping Bags –Analysis of Levies and Environmental Impacts: Final Report*. Sydney, Australia

<sup>80</sup> Convery, F., S. McDonnell and S. Ferreira. 2007. "The Most Popular Tax in Europe? Lessons from the Irish Plastic Bags Levy." In *Environmental and Resource Economics*, 38: 1–11.

#### Page 4-14

The last sentence on this page has been replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from a paper or plastic carryout bag.<sup>81</sup> Therefore, air quality impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### Page 4-16

The second to last sentence of the first paragraph on this page has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that calico and polypropylene reusable bags that are used 104 times results in global warming impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>82</sup> Therefore, GHG emission impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the GHG emission impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in a reduction in GHG emissions.

#### Page 4-17

The last sentence of the first paragraph under hydrology and water quality has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in significantly environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>83</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when

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<sup>81</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>82</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>83</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### **Page 4-18**

The last sentence of the second paragraph under utilities and service systems has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>84</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### **Page 4-19**

The seventh sentence of the first paragraph in Section 4.2.4.1 has been revised to read:

It is important to note that these numbers are likely very high, as 10,000 plastic carryout bags per day is more than twice the average reported by the California Department of Resources Recycling and Recovery in 2008 for AB 2449 affected stores.

#### **Page 4-24**

The last two sentences of the first paragraph under Table 4.2.4.3-3 have been replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>85</sup> Therefore, air quality impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

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<sup>84</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>85</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.



## Page 4-25

Footnotes 59 and 60 have been revised to read:

<sup>59</sup>  $(1,024 \text{ stores} \times 5,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) + (67 \text{ stores} \times 10,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times 13 \approx 33 \text{ daily truck trips}$

<sup>60</sup>  $(4,622 \text{ stores} \times 5,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) + (462 \text{ stores} \times 10,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times 13 \approx 156.5 \text{ daily truck trips}$

## Page 4-31

The title of Table 4.2.4.3-8 has been revised to read:

### **ESTIMATED GHG EMISSIONS INCREASES DUE TO END OF LIFE BASED ON BOUSTEAD DATA**

## Page 4-32

The last two sentences of the first paragraph on this page have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that calico and polypropylene reusable bags that are used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>86</sup> Therefore, GHG emission impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the GHG emission impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in a reduction in GHG emissions.

Footnotes 74 and 75 have been revised to read:

<sup>74</sup>  $(1,024 \text{ stores} \times 5,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times (67 \text{ stores} \times 10,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times 13 \approx 33 \text{ daily truck trips}$

<sup>75</sup>  $(4,622 \text{ stores} \times 5,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times (462 \text{ stores} \times 10,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times 13 \approx 156.5 \text{ daily truck trips}$

## Page 4-35

The last sentence of the first paragraph on this page has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag

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<sup>86</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>87</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### **Page 4-39**

The callout to Table 4.3.4.2-14, after the first paragraph under solid waste on this page has been revised to read:

*Solid Waste Generation Due to Plastic and Paper Carryout Bags Based on Ecobilan Data and Adjusted for 2007 Recycling Rates*

#### **Page 4-40**

The title of Table 4.2.4.3-14 has been revised to read:

#### **SOLID WASTE GENERATION DUE TO PLASTIC AND PAPER CARRYOUT BAGS BASED ON ECOBILAN DATA AND ADJUSTED FOR 2007 RECYCLING RATES**

The header in the fourth column of Table 4.2.4.3-14 has been deleted and replaced with the following:

#### **Increase Due to 85-percent Conversion from Plastic to Paper Carryout Bag Use<sup>1</sup>**

The header in the fifth column of Table 4.2.4.3-14 has been deleted and replaced with the following:

#### **Increase Due to 100-percent Conversion from Plastic to Paper Carryout Bag Use<sup>1</sup>**

The following source has been added below Table 4.2.4.3-14:

2. U.S. Environmental Protection Agency. November 2008. *Municipal Solid Waste in the United States: 2007 Facts and Figures*. Washington, DC. Available at: <http://www.epa.gov/waste/nonhaz/municipal/pubs/msw07-rpt.pdf>

#### **Page 4-42**

The last sentence of the first paragraph on this page has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag

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<sup>87</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>88</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### **Page 4-43**

The header in the third column of Table 4.2.4.3-16 has been deleted and replaced with the following:

#### **Increase Due to 85-percent Conversion from Plastic to Paper Carryout Bag Use**

The header in the fourth column of Table 4.2.4.3-16 has been deleted and replaced with the following:

#### **Increase Due to 100-percent Conversion from Plastic to Paper Carryout Bag Use**

#### **Page 4-45**

The last sentence of the first paragraph on this page has been deleted.

#### **Page 4-46**

The fourth sentence at the top of this page has been revised to read:

It is important to note that these numbers are likely very high, as 10,000 plastic carryout bags per day is more than twice the average reported by the California Department of Resources Recycling and Recovery in 2008 for AB 2449 affected stores.

#### **Page 4-47**

The last two sentences of the second paragraph under air quality have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from a paper or plastic carryout bag.<sup>89</sup> Therefore, air quality impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

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<sup>88</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>89</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

#### Page 4-49

The last two sentences of the first paragraph under greenhouse gas emissions have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that calico and polypropylene reusable bags that are used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>90</sup> Therefore, GHG emission impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the GHG emission impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in a reduction in GHG emissions.

#### Page 4-51

The last sentence of the first paragraph above Table 4.2.5.3-3 has been deleted and replaced by the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from a paper or plastic carryout bag.<sup>91</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### Page 4-52

The last sentence of the paragraph under wastewater generation has been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from a paper or plastic carryout bag.<sup>92</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use

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<sup>90</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>91</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>92</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### **Page 4-53**

The last sentence of the paragraph under water supply has been deleted.

#### **Page 4-54**

The last two sentences of the paragraph under solid waste have been deleted and replaced with the following:

Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifetime of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>93</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

#### **Page 4-55**

The last sentence of the paragraph under energy conservation has been deleted.

#### **Page 4-56**

The following section has been added:

### **4.2.6 Alternative 5: Ban Plastic Carryout Bags and Impose a Fee on Paper Carryout Bags for All Supermarkets and Other Grocery Stores, Convenience Stores, Pharmacies, and Drug Stores in Los Angeles County**

#### **4.2.6.1 Alternative Components**

In response to comments on the Draft EIR, the County developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee of at least \$0.05 on paper carryout bags. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County. Specifically, Alternative 5 would apply to stores within the County that (1) meet the definition of a “supermarket” as written in the California Public Resources Code, Section 14526.5, and (2) are buildings that have retail space that generates sales or use tax pursuant to the Bradley-Burns Uniform Local Sales and Use Tax Law and have a pharmacy licensed pursuant to Chapter 9 of Division 2 of the Business and Professions Code. In addition, Alternative 5 would apply to other grocery stores, convenience stores, and drug stores within the County. Alternative 5, like

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<sup>93</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

Alternative 3 and 4, which include the same broader range of stores, would include a phased approach in that it would apply to large grocery stores and pharmacies prior to smaller grocery stores, convenience stores, and drug stores.

The number of stores that could be affected by Alternative 5 in the unincorporated areas of the County is approximately 1,091.<sup>94</sup> The number of stores that could be affected by Alternative 5 in the incorporated cities of the County is approximately 5,084.<sup>95</sup> This is the same number of stores as analyzed in Alternatives 3 and 4. It was assumed that each store larger than 10,000 square feet currently uses approximately 10,000 plastic carryout bags per day,<sup>96</sup> and each store smaller than 10,000 square feet currently uses approximately 5,000 plastic carryout bags per day.<sup>97</sup> It is important to note that these numbers are very high, as 10,000 plastic carryout bags per day is more than twice the bag average reported by the California Department of Resources Recycling and Recovery (CalRecycle) in 2008 for AB 2449 affected stores. In 2008, 4,700 stores statewide affected by AB 2449 reported an average of 4,695 bags used per store per day.<sup>98</sup> While 10,000 plastic carryout bags per store per day may not accurately reflect the actual number of bags consumed per day on average for stores greater than 10,000 square feet in the County, for the purposes of this EIR this number was used to conservatively evaluate impacts resulting from such a worst-case scenario. The same may also be true of the 5,000 plastic carryout bags per store per day estimate for stores smaller than 10,000 square feet. While the 5,000 plastic carryout bags per store per day is likely very high, for the purposes of this EIR, this number was used to conservatively evaluate impacts resulting from such a worst-case scenario as well.

As with the proposed ordinances, Alternative 5 would not be expected to result in significant adverse impacts to air quality, biological resources, or hydrology and water quality, and would achieve additional benefits. Alternative 5 would lead to a greater reduction in the consumption of plastic carryout bags as a result of including a greater number of stores than the proposed ordinances include; therefore, life cycle impacts of plastic carryout bags to air quality, biological resources, GHG emissions, hydrology and water quality, and utilities and service systems would be eliminated, reduced, or avoided in comparison with the proposed ordinances. A minimal transition, as discussed below, from plastic to paper carryout bags would be expected to occur if a fee or charge were placed on the issuance of paper carryout bags. Alternative 5 would also have

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<sup>94</sup> Number of stores in the unincorporated territories of the County was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110, 445120, and 446110 with no filters for gross annual sales volume or square footage. Accessed on: 29 April 2010.

<sup>95</sup> Number of stores in the 88 incorporated cities of the County was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110, 445120, and 446110 with no filters for gross annual sales volume or square footage. Accessed on: 29 April 2010.

<sup>96</sup> Based on coordination between the County Department of Public Works and several large supermarket chains in the County, it was determined that approximately 10,000 plastic carryout bags are used per store per day. Due to confidential and proprietary concerns, and at the request of the large supermarket chains providing this data, the names of these large supermarket chains will remain confidential. Reported data from only 12 stores reflected a total plastic carryout bag usage of 122,984 bags per day. A daily average per store was then calculated at 10,249 plastic carryout bags and rounded to approximately 10,000 bags per day.

<sup>97</sup> Data from the infoUSA indicates that approximately 40 percent of the stores greater than 10,000 square feet in the unincorporated territories of the County are larger than 40,000 square feet. Therefore, the average size of the stores to be affected by the proposed County ordinance would be greater than 20,000 square feet. Accordingly, it would be reasonable to estimate that the stores smaller than 10,000 square feet that would be affected by Alternative 5 would be at less than half the size of the stores to be affected by the proposed ordinances and would use less than half the number of bags.

<sup>98</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

fewer impacts than Alternative 3, which proposed banning the issuance of plastic carryout bags at the expanded number of stores without imposing a fee or ban on the issuance of paper carryout bags.

#### **4.2.6.2 Objectives and Feasibility**

As shown in Table 4-1, Alternative 5 would accomplish all of the basic objectives of the proposed ordinances established by the County. Alternative 5 would encourage the 88 incorporated cities within the County to adopt similar ordinances to ban the issuance of plastic carryout bags. By expanding the number of stores subject to a ban, Alternative 5 would be more effective than the proposed ordinances in reducing Countywide consumption of plastic carryout bags; plastic carryout bag litter that blights public spaces; and the County's, cities', and Flood Control District's costs for prevention, cleanup, and enforcement efforts to reduce litter in the County. Alternative 5 would increase public awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, by reaching at least 50,000 residents (5 percent of the population) with an environmental awareness message. In addition, Alternative 5 would be more effective than the proposed ordinances in reducing Countywide disposal of plastic carryout bags in landfills. Alternative 5 would also reduce Countywide consumption of paper carryout bags and the Countywide disposal of paper carryout bags in landfills.

#### **4.2.6.3 Comparative Impacts**

Alternative 5 would be expected to cause a greater reduction in plastic carryout bag usage throughout the County because it would affect a greater number of stores than the proposed ordinances. Alternative 5 would also impose a fee or charge on the issuance of paper carryout bags, thus it would not be expected to result in the same degree of increase in paper carryout bag usage as would be expected from Alternative 3.

Carryout-bag fees that have been implemented in other countries and states have been shown to be highly effective in reducing the number of carryout bags used. For example, Ireland's fee on plastic carryout bags resulted in a greater than 90-percent reduction in retailer purchases of plastic carryout bags.<sup>99</sup> The recent \$0.05 fee imposed on plastic and paper carryout bags in Washington, DC, resulted in an 86-percent decrease in the number of carryout bags used in the first month after implementation of the fee.<sup>100</sup> Although the \$0.05 paper carryout bag fee initially resulted in a significant reduction in the use of paper carryout bags, a higher fee (such as \$0.10 or higher) would be expected to be more effective at encouraging consumers to transition to reusable bags.<sup>101,102</sup> Based on the Washington and Ireland scenarios, a County fee on the issuance of paper carryout bags would similarly be expected to reduce the number of paper carryout bags used and disposed of in the County. However, unlike a ban, a fee on the issuance of paper carryout bags would not be expected to completely eliminate retailer purchases of paper carryout bags by affected stores, as consumers would still have the option to purchase paper carryout bags. Therefore, the expected

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<sup>99</sup> McDonnell, S., and C. Convery. Paper presented 26 June 2008. "The Irish Plastic Bag Levy – A Review of its Performance 5 Years On."

<sup>100</sup> ABC News. 30 March 2010. "Nickel Power: Plastic Bag Use Plummets in Nation's Capital." Available at: <http://abcnews.go.com/Politics/plastic-bag-plummets-nations-capital/story?id=10239503>

<sup>101</sup> Nolan-ITU Pty Ltd., et al. December 2002. *Environment Australia: Department of the Environment and Heritage: Plastic Shopping Bags – Analysis of Levies and Environmental Impacts: Final Report*. Sydney, Australia

<sup>102</sup> Convery, F., S. McDonnell and S. Ferreira. 2007. "The Most Popular Tax in Europe? Lessons from the Irish Plastic Bags Levy." In *Environmental and Resource Economics*, 38: 1–11.

reduction in paper carryout bag use resulting from Alternative 5 would not be as substantial as the reduction expected from implementation of Alternative 4, which would ban the issuance of plastic and paper carryout bags. However, as indicated by the results of the Ireland and Washington, DC, bag fees, the reduction in use would still be quite significant.

While it is not possible to determine the actual percentage increase in conversion to paper carryout bags that would result from Alternative 5, the results from bags fees implemented in Ireland and Washington, DC, indicate that the percentage increase would likely be minimal. However, the County cannot predict the exact number of plastic and paper carryout bags that will be eliminated upon implementation of Alternative 5. To evaluate impacts in a conservative worst-case scenario, the County assumed for the purposes of this analysis that 50 percent of customers would switch from using plastic carryout bags to paper carryout bags upon implementation of Alternative 5, and 50 percent of customers would switch from using plastic carryout bags to reusable bags. This assumption is consistent with the analysis undertaken in the City of Santa Monica Nexus Study,<sup>103</sup> and is very conservative in light of the carryout bag reductions in Washington, DC, and Ireland.

During the scoping period for the Initial Study for the proposed ordinances, several members of the public indicated that a fee on paper carryout bags could also cause stores to incur higher administrative costs, which would not be expected to result if a ban were imposed. Therefore, Alternative 5 would be expected to have both adverse and beneficial socioeconomic impacts. Adverse economic impacts upon stores may be offset if the stores are allowed to retain a portion of the paper carryout bag fee for compliance costs.

### *Air Quality*

#### Significance Thresholds

Would the proposed ordinances have the potential for one or more of the following five potential effects?

- Conflict with or obstruct implementation of the applicable air quality plan
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including release in emissions that exceed quantitative thresholds for O<sub>3</sub> precursors)
- Expose sensitive receptors to substantial pollutant concentrations
- Create objectionable odors affecting a substantial number of people

As with the proposed ordinances, impacts to air quality caused by Alternative 5 would be expected to be below the level of significance. Due to the implementation of a fee on the issuance of paper carryout bags, Alternative 5 would be expected to result in a lesser increase in the consumer use of paper carryout bags than the increase expected from implementation of the proposed ordinances. Therefore, Alternative 5 would be expected to result in a lesser increase in NO<sub>x</sub> emissions due to a lesser indirect increase in the manufacture, distribution, and disposal of paper carryout bags. Alternative 5 would be expected to result in significant reductions in the use of plastic carryout

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<sup>103</sup> City of Santa Monica. January 2010. City of Santa Monica Nexus Study. Prepared by R3 Consulting Group, Inc.



bags in the County, thus it would be expected to indirectly benefit air quality by reducing emissions of CO, PM, and VOCs caused by the manufacture of plastic carryout bags (Table 3.1.4-2). Based on a conservative scenario of 50-percent conversion from the use of plastic carryout bags to the use of paper carryout bags, and using life cycle data from the Ecobilan study, Alternative 5 would be expected to result in an overall decrease in emissions of CO, PM, SO<sub>x</sub>, and VOCs, but would be expected to result in an increase in NO<sub>x</sub> (Table R4.2.6.3-1, *Estimated Daily Emission Changes Due to 50-percent Conversion from Plastic to Paper Carryout Bags Based on Ecobilan Data*, and Appendix C). Accordingly, this result is largely a tradeoff and is inconclusive because the conversion from plastic carryout bags to paper carryout bags would be expected to result in both beneficial and adverse impacts to air quality, depending on which criteria pollutants are analyzed. These impacts are less than the impacts anticipated as a result of Alternative 3, which would not place any limitation on the issuance of paper carryout bags.

These results cannot reasonably be evaluated in relation to the operational thresholds of significance set by SCAQMD because the operational thresholds are intended for specific projects located in the SCAB for the SCAB, whereas LCA data cover all stages of production, distribution, and end-of-life procedures related to a particular product. The production of plastic carryout bags and paper carryout bags is not limited to the SCAB or the MDAB, with manufacturing facilities located in other air basins in the United States and in other countries that may have different emission thresholds and regulations.

**TABLE R4.2.6.3-1  
ESTIMATED DAILY EMISSION CHANGES DUE TO 50-PERCENT CONVERSION FROM  
PLASTIC TO PAPER CARRYOUT BAGS BASED ON ECOBILAN DATA**

Emission Sources	Air Pollutants (Pounds/Day) <sup>2</sup>				
	VOCs <sup>1</sup>	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM
Emission changes caused by a 50-percent conversion from plastic to paper carryout bags in the 1,091 stores in the unincorporated territory of the County	-471	183	-864	-206	-334
Emission changes caused by an 50-percent conversion from plastic to paper carryout bags in the 5,084 stores in the incorporated cities of the County	-2,258	875	-4,140	-984	-1,601
<b>Total Emissions</b>	<b>-2,729</b>	<b>1,058</b>	<b>-5,004</b>	<b>-1,190</b>	<b>-1,936</b>

**SOURCE:** Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

**NOTES:**

1. Total VOCs include all compounds defined as contributors to the formation of photochemical oxidants in the Ecobilan Study, apart from methane, ethane, and acetone, which are not included in the SCAQMD definition of VOCs under Rule 102.
2. A negative number for emissions indicates the extent of the reduction in air pollutants generated by paper carryout bags in comparison to the air pollutants generated by plastic carryout bags by subtracting the data for plastic carryout bags from the data for paper carryout bags.

Other LCAs reviewed during preparation of this EIR state that overall air pollutant emissions due to the life cycle of paper carryout bags would be higher than those emitted during the life cycle of

plastic carryout bags.<sup>104,105</sup> However, as with the Ecobilan data, the majority of these criteria pollutant emissions are likely to originate from processes that occur early in the life cycle of paper and plastic carryout bags, such as raw materials extraction and product manufacturing. Since the majority of paper carryout bags supplied to the greater Los Angeles metropolitan area are produced in and delivered from states outside of California,<sup>106</sup> or from countries outside of the United States such as Canada,<sup>107</sup> it is not necessary to extrapolate LCA data to determine emission levels for the SCAQMD portion of the SCAB and the AVAQMD portion of the MDAB.

Although the facilities that manufacture paper carryout bags supplied to the affected stores in the County are not located within the SCAB or the MDAB, the majority of the landfills that accept plastic and paper carryout bag waste are located within these air basins. The Ecobilan data indicate that approximately 21 percent of the NO<sub>x</sub> emissions generated during the life cycle of paper carryout bags can be attributed to end of life. The end-of-life data include emissions due to transport of waste from households to landfills; however, the data assumes that a large percentage of solid waste is incinerated, which is not accurate for the County. Using the Ecobilan data for the end of life of plastic and paper carryout bags, and adjusting for a scenario where all bags go to landfills at the end of life and are not incinerated, and further adjusting for USEPA recycling rates for 2007, a 50-percent conversion from the use of plastic to paper carryout bags throughout the unincorporated areas of the County would yield an increase in NO<sub>x</sub> emissions of approximately 19 pounds per day from the transport of paper carryout bags to landfills (Table R4.2.6.3-2, *Estimated NO<sub>x</sub> Emission Increases Due to End of Life Based on Ecobilan Data*). If Alternative 5 were applied to every incorporated city in the County, a 50-percent conversion from plastic to paper carryout bags would yield an increase in NO<sub>x</sub> emissions of approximately 91 pounds per day. These impacts are less than the impacts anticipated as a result of Alternative 3, which would not place any limitation on the issuance of paper carryout bags.

The aforementioned calculations are based on an unlikely worst-case scenario that assumes that every store larger than 10,000 square feet in size currently uses 10,000 plastic carryout bags per day. This assumption is an intentional overestimate, as statewide data indicates that this number is likely to be closer to 5,000 plastic carryout bags per day.<sup>108</sup> The same may also be true of the estimate of 5,000 plastic carryout bags per store per day for stores smaller than 10,000 square feet. While the 5,000 plastic-carryout-bags-per-store-per-day estimate may likely be very high, for the purposes of this EIR, this number was used to conservatively evaluate impacts resulting from a worst-case scenario as well. These results also cannot reasonably be evaluated in relation to the operational thresholds of significance set by SCAQMD for the SCAB or by AVAQMD for the MDAB because the operational thresholds are intended for project-specific level proposed projects located in the SCAB and MDAB, and do not apply to LCA data, which cover all stages of end-of-life procedures related to a particular product. Further, the conservative analysis based on Ecobilan data shows that the emissions due to implementation of Alternative 5 in just the unincorporated

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<sup>104</sup> Franklin Associates, Ltd. 1990. *Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks*. Prairie Village, KS.

<sup>105</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

<sup>106</sup> Watt, Stephanie, Sapphos Environmental, Inc., Santa Monica, CA. 15 July 2009. Telephone communication with Ms. Carol Trout, Customer Service Department, Duro Bag Manufacturing Company, Florence, KY.

<sup>107</sup> National Council for Air and Stream Improvement. 5 February 2010. *Life Cycle Assessment of Unbleached Paper Grocery Bags*. Prepared for: American Forest and Paper Association and Forest Product Association of Canada.

<sup>108</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

areas of the County would be a maximum of only 19 pounds per day (Table R4.2.6.3-2). Operational thresholds apply to individual development projects only; they do not apply to cumulative development (note that the proposed ordinances do not even include any development). In addition, due to the fact that there are 11 landfills within the County,<sup>109</sup> and approximately 20 percent of County waste is distributed to other out-of-County landfills,<sup>110</sup> emissions resulting from the end of life of paper carryout bags would be distributed among the facilities within and outside of the County. Any emissions resulting from the end of life of paper carryout bags, including from truck trips transporting paper carryout bag waste to landfills in the County, are currently controlled by regional and state regulations. For example, CARB's Solid Waste Collection Vehicle Rule also requires owners of refuse collection vehicles to use best available control technology that has been verified by CARB to reduce vehicle emissions. In addition, SCAQMD Rule 1193, Clean On-road Residential and Commercial Refuse Collection Vehicles, requires all public and private solid-waste collection fleets within the jurisdiction of the SCAQMD to acquire alternative-fuel refuse collection vehicles when procuring or leasing these vehicles. SCAQMD Rule 1193 applies to governmental agencies and private entities that operate solid-waste collection fleets with 15 or more solid-waste collection vehicles. Finally, the County is also controlling for emissions by requiring in its new refuse agreements that alternative-fuel refuse vehicles be used.<sup>111,112,113,114</sup> Any increases in air pollutant emissions as an indirect impact from Alternative 5 would be controlled by SCAQMD Rule 1193 and the CARB Solid Waste Collection Vehicle Rule; therefore, the impacts from Alternative 5 to air quality due to vehicle trips transporting paper carryout bag waste to landfills would be expected to be below the level of significance. These impacts are less than the impacts anticipated as a result of Alternative 3, which would not place any limitation on the issuance of paper carryout bags.

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<sup>109</sup> County of Los Angeles, Department of Public Works. Report 13. 30 March 2010. Monthly Solid Waste Disposal Quantity Summary by Aggregated Jurisdiction Data.

<sup>110</sup> County of Los Angeles, Department of Public Works. Report 34. 30 March 2010. Waste Disposal Summary Reports by Quarter by Aggregated Jurisdiction Data.

<sup>111</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award of Contract for Walnut Park Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54560.pdf>

<sup>112</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award of Contract for Athens/Woodcrest/Olivita Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54567.pdf>

<sup>113</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award the Contract for Firestone Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54559.pdf>

<sup>114</sup> County of Los Angeles, Department of Public Works. 19 January 2010. *Award of Contract for an Exclusive Franchise Agreement to Valley Vista Services, Inc. for the Unincorporated Area of Hacienda Heights*. Available at: <http://file.lacounty.gov/bos/supdocs/52931.pdf>

**TABLE R4.2.6.3-2  
ESTIMATED NO<sub>x</sub> EMISSION INCREASES DUE TO END OF LIFE BASED ON  
ECOBILAN DATA**

Emission Source	Air Pollutants (Pounds/Day)
	50-percent Conversion from Plastic to Paper Carryout Bags <sup>1</sup>
	NO <sub>x</sub>
Conversion from plastic to paper carryout bags in the 1,091 stores in the unincorporated territory of the County	19
Conversion from plastic to paper carryout bags in the 5,084 stores in the incorporated cities of the County	91
<b>Total Emissions</b>	<b>110</b>

**SOURCES:**

1. Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.
2. U.S. Environmental Protection Agency. November 2008. *Municipal Solid Waste in the United States: 2007 Facts and Figures*. Washington, DC. Available at: <http://www.epa.gov/waste/nonhaz/municipal/pubs/msw07-rpt.pdf>

**NOTES:**

1. Assuming 36.8 percent of paper carryout bags are diverted from landfills and 11.9 percent of plastic carryout bags are diverted from landfills, based on the 2007 USEPA recycling rates for bags and sacks.

Alternative 5 would also be expected to result in increased use of reusable bags. The Ecobilan Study also presented an LCA analysis of a reusable bag and concluded that the particular reusable bag studied has a lesser impact on air pollutant emissions than the impact of a plastic carryout bag, as long as the reusable bag is used a minimum of four times (Table 3.1.4-6).<sup>115</sup> The impacts of the reusable bag are reduced further when the bag is used additional times. Although the Ecobilan data are particular to a specific type of reusable bag, they illustrate the concept that the air quality impacts of reusable bag manufacturing are reduced the more times a bag is used. Air quality impacts are anticipated to be reduced with the banning of the issuance of plastic carryout bags because it would be expected to increase the use of reusable bags and reduce the use of plastic carryout bags. By the definition established by the proposed ordinances, reusable bags must be designed to have a minimum lifespan of at least 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags.<sup>116</sup> Therefore, air quality impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the air quality impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

As with the proposed ordinances, Alternative 5 would not conflict with or obstruct the implementation of any applicable air quality plan; would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; would not result in a cumulatively considerable net increase of any criteria pollutant for which the County is in non-attainment under an applicable federal or state ambient air quality standard; would not expose sensitive receptors to substantial pollutant concentrations; and would not create objectionable

<sup>115</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>116</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

odors affecting a substantial number of people. As with the proposed ordinances, Alternative 5 would be expected to cause a potential increase in delivery truck trips required to transport paper carryout bags and reusable bags to affected stores. For paper carryout bags, assuming that there are 67 affected stores in the unincorporated territory of the County each using 10,000 plastic carryout bags per day and 1,024 affected stores each using 5,000 plastic carryout bags per day, a 50-percent conversion to paper carryout bags would be expected to require fewer than 17 additional truck trips per day.<sup>117</sup> Assuming that Alternative 5 would affect 462 stores each using 10,000 plastic carryout bags per day, and 4,622 stores each using 5,000 plastic carryout bags per day in the 88 incorporated cities of the County, a 50-percent conversion to paper carryout bags would be expected to require fewer than 79 additional truck trips per day.<sup>118</sup>

The criteria pollutant emissions that would be anticipated to result from 17 additional truck trips per day to and from the 1,091 stores in the unincorporated territory of the County, and up to 79 additional truck trips per day to and from the 5,084 stores in the 88 incorporated cities of the County were calculated using URBEMIS 2007 (Table R4.2.6.3-3, *Estimated Daily Operational Emissions from Increased Truck Trips*) (Appendix D). The unmitigated emissions from delivery truck trips would be expected to be well below the SCAQMD and AVAQMD thresholds of significance (Table R4.2.6.3-3). These impacts are also less than the impacts anticipated as a result of Alternative 3, which would not place any limitation on the issuance of paper carryout bags.

**TABLE R4.2.6.3-3  
ESTIMATED DAILY OPERATIONAL EMISSIONS FROM INCREASED TRUCK TRIPS**

Emission Source	Air Pollutants (Pounds/Day)					
	VOCs	NOx	CO	SOx	PM2.5	PM10
17 delivery truck trips in the unincorporated territory of the County	0.15	0.34	2.13	0.00	0.08	0.40
79 delivery truck trips in the incorporated cities of the County	0.65	1.56	9.89	0.01	0.38	1.84
<b>Total Emissions</b>	0.80	1.90	12.02	0.01	0.46	2.24
<b>SCAQMD Threshold</b>	55	55	550	150	55	150
<b>AVAQMD Threshold</b>	137	137	548	137	-	82
<b>Exceedance of Significance?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

An increase in demand for reusable bags would also be expected to result in additional transport of reusable bags to affected stores. However, fewer reusable bags than carryout bags would be expected to be required because reusable bags, as proposed by the County, will be designed to have a minimum lifespan of 125 uses. Therefore, it can be reasonably expected that a conversion from plastic carryout bags to reusable bags would result in fewer required delivery trips than would be required by a conversion from plastic carryout bags to paper carryout bags. Assuming, under a worst-case scenario, that the emissions resulting from the transportation of additional reusable bags to stores would be equivalent to the emissions resulting from the transportation of additional paper carryout bags to stores (Table R4.2.6.3-3), total emissions due to mobile sources as a result of

<sup>117</sup>  $(1,024 \text{ stores} \times 5,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) + (67 \text{ stores} \times 10,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times 6.5 \approx 16.3 \text{ daily truck trips}$

<sup>118</sup>  $(4,622 \text{ stores} \times 5,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) + (462 \text{ stores} \times 10,000 \text{ plastic carryout bags per day} / 2,304,000 \text{ plastic carryout bags per truck}) \times 6.5 \approx 78.2 \text{ daily truck trips}$

Alternative 5 would still be far below the thresholds of significance set by SCAQMD and AVAQMD.

In comparison with the proposed ordinances, Alternative 5 would be expected to reduce total impacts to air quality related to criteria pollutant emissions from potential increases in delivery trucks or from indirect emissions due to the life cycle of paper carryout bags. As with the proposed ordinances, impacts to air quality would still be expected to be below the level of significance, and like the proposed ordinances, would not result in a cumulatively considerable contribution to a significant cumulative impact.

### *Biological Resources*

#### Significance Thresholds

The proposed ordinances would have a significant impact to biological resources when the potential for any one of the following six thresholds is reached:

- Have a substantial adverse effect, through either direct or indirect modification of more than 10 percent of potentially suitable or occupied habitat, or direct take, to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS
- Have an adverse effect on 10 percent of existing riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS
- Have a substantial adverse effect on more than 0.3 acre of federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means
- Interfere with the movement of any native resident or migratory fish or wildlife species such that migratory patterns are eliminated from within the proposed project area or reduce the use of native wildlife nursery sites by 10 percent or more
- Conflict with the policies established by the County of Los Angeles General Plan to provide protection for threatened and endangered species
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan

As with the proposed ordinances, Alternative 5 would result in a significant reduction in the use and disposal of plastic carryout bags within the County. Consequently, Alternative 5 would achieve additional reductions in litter composed of plastic carryout bag waste found in freshwater and coastal environments, which has been shown to have significant adverse impacts upon biological resources. Alternative 5 would also be expected to increase consumer use of reusable bags. Reusable bags have not been widely noted to have adverse impacts upon biological resources. Although reusable bags do eventually get discarded and become part of the waste stream, the fact that they can be reused multiple times means that the number of reusable bags in the waste stream as a result of Alternative 5 would be much lower than the number of paper and plastic carryout bags that would end up in the waste stream as a result of the proposed ordinances. Fewer reusable bags in the waste stream means that reusable bags are less likely than plastic or paper carryout bags to be littered and to end up in the ocean or other wildlife habitats. Further,

reusable bags are heavier than plastic carryout bags, which means that they are less likely to be blown by the wind and end up as runaway litter.

Alternative 5 may indirectly increase the number of paper carryout bags used in the County. However, a study performed in Washington, DC, demonstrated that paper bags were not found in streams except in localized areas, and were not present downstream.<sup>119</sup> Unlike plastic, paper is compostable; the paper used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally compostable material.<sup>120,121</sup> Due to the biodegradable properties of paper, paper bags do not persist in the marine environment for as long as plastic bags persist.<sup>122</sup> As with the proposed ordinances, Alternative 5 would have the potential to improve wildlife habitats and aquatic life, and would result in potentially beneficial impacts to sensitive habitats; federally protected wetlands; rare, threatened, and endangered species; and species of special concern. As with the proposed ordinances, Alternative 5 would not have a substantial adverse effect on any species identified as candidate, sensitive, or special status; would not have a substantial adverse effect on riparian habitats or other sensitive natural communities, including federally protected wetlands as defined by Section 404 of the CWA; would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; and would not conflict with County General Plan policies requiring the protection of biological resources. As with the proposed ordinances, Alternative 5 would not be expected to result in any significant adverse impacts to biological resources and would be expected to achieve additional benefits due to a reduction in the use of plastic carryout bags. Similarly, like the proposed ordinances, Alternative 5 would not result in a cumulatively considerable contribution to a significant cumulative impact.

### *Greenhouse Gas Emissions*

#### Significance Thresholds

The proposed ordinances would have a significant impact to biological resources when the potential for any one of the following two thresholds is reached:

- Generate greenhouse gas emissions, either directly or indirectly that may have a significant effect on the environment
- Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases”

The second threshold is further explained by two additional significance criteria:

- “Inconsistency with laws and regulations in managing GHG emissions

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<sup>119</sup> Anacostia Watershed Society. December 2008. *Anacostia Watershed Trash Reduction Plan*. Prepared for: District of Columbia Department of the Environment. Bladensburg, MD.

<sup>120</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

<sup>121</sup> University of California, Agriculture and Natural Resources. *Compost in a Hurry*. Available at: <http://ucanr.org/freepubs/docs/8037.pdf>

<sup>122</sup> Andrady, Anthony L. and Mike A. Neal. 2009. “Applications and Societal Benefits of Plastics.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

- Inconsistency with the goal to reduce GHG emissions to 1990 levels (approximately 427 metric tons or 9.6 metric tons of CO<sub>2e</sub> per capita) as required by AB 32”

As with the proposed ordinances, based on the above thresholds, the direct impacts to GHG emissions resulting from Alternative 5 would be expected to be below the level of significance. Compared with the proposed ordinances, Alternative 5 would be expected to result in a lesser increase in the consumer use of paper carryout bags because it would implement a fee or charge on the issuance of paper carryout bags. Therefore, Alternative 5 would result in a lesser increase in GHG emissions due to a smaller indirect increase in the manufacture, distribution, and disposal of paper carryout bags. Due to the fact that Alternative 5 would be expected to result in significant reductions in the use of plastic carryout bags in the County, this alternative would be beneficial in that it would be expected to greatly reduce GHG emissions caused by the manufacture of plastic carryout bags (Table 3.3.5-2). Based on a conservative scenario of 50-percent conversion from the use of plastic carryout bags to the use of paper carryout bags, and using life cycle data from Ecobilan, Alternative 5 would be expected to contribute indirectly to an overall decrease in GHG emissions (Table R4.2.6.3-4, *GHG Emissions Based on Ecobilan Data Using 50-percent Conversion from Plastic to Paper Carryout Bags*). Therefore, Alternative 5 would not be expected to conflict with the County’s 2020 target GHG emissions (108 million metric tons per year). However, the emission reductions would not be limited to the County, as manufacturing facilities for paper carryout bags appear to be located in other areas of the United States, or in other countries such as Canada. Unlike the proposed ordinances, indirect GHG emissions due to the life cycle of paper carryout bags would not have the potential to be cumulatively considerable under Alternative 5. These impacts are less than the impacts anticipated as a result of the proposed ordinances and Alternative 3, which would not place any limitation on the issuance of paper carryout bags.

**TABLE R4.2.6.3-4  
GHG EMISSIONS BASED ON ECOBILAN DATA USING 50-PERCENT CONVERSION  
FROM PLASTIC TO PAPER CARRYOUT BAGS**

Emissions Areas	CO <sub>2e</sub> Emission Sources				2020 CO <sub>2e</sub> Target Emissions
	Plastic Carryout Bags	Increase Resulting from 50-percent Conversion from Plastic Carryout Bags to Paper Carryout Bags			Metric Tons Per Year Per Capita <sup>1</sup>
	Metric Tons Per Day	Metric Tons Per Day	Metric Tons Per Year <sup>2</sup>	Metric Tons Per Year Per Capita <sup>1</sup>	
Emissions in the 1,091 stores in the unincorporated territory of the County	98.13	-5.69	-2,075	0.000	9.6
Emissions in the 5,084 stores in the incorporated cities of the County	469.96	-27.23	-9,940	-0.001	
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>-32.92</b>	<b>-12,015</b>	<b>-0.001</b>	

**SOURCE:**

Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

**NOTES:**

1. Per capita emissions are calculated using the estimated 2010 population in the County (10,615,700).
2. A negative number for emissions indicates the extent of the reduction in air pollutants generated by paper carryout bags in comparison to the air pollutants generated by plastic carryout bags by subtracting the data for plastic carryout bags from the data for paper carryout bags.



Other LCAs reviewed during preparation of this EIR state that more GHGs are emitted due to the life cycle of paper carryout bags than are emitted during the life cycle of plastic carryout bags.<sup>123,124,125</sup> However, as with the Ecobilan data, a significant portion of these GHG emissions are likely to originate from processes that occur early in the life cycle of paper and plastic carryout bags, such as raw material extraction and product manufacturing.

Although the facilities that manufacture paper carryout bags that are supplied to affected stores in the County appear to be located outside of the boundaries of the SCAB or the MDAB, the majority of the landfills that accept plastic and paper carryout bag waste are located within these air basins. The Ecobilan data indicate that approximately 18 percent of the GHG emissions generated during the life cycle of paper carryout bags can be attributed to the end of life. The end-of-life data include emissions from the transport of waste from households to landfills. However, the LCA data assume that a large percentage of solid waste is incinerated, which is not accurate for the County. Using the Ecobilan data for the end of life of plastic and paper carryout bags, and adjusting for a) the alternative scenario where all bags go to landfills at the end of life and are not incinerated, and b) for USEPA 2007 recycling rates, landfills would yield approximately 70,250 metric tons of GHG emissions per year, which is equivalent to approximately 0.007 metric tons per capita, based on a 50-percent conversion from the use of plastic carryout bags to paper carryout bags Countywide (Table R4.2.6.3-5, *Estimated GHG Emissions Increases Due to End of Life Based on Ecobilan Data*). These results are likely to be overestimates for the County, as emissions from active landfills in the County are strictly controlled by SCAQMD Rule 1150.1 and AVAQMD Rule 1150.1, Control of Gaseous Emissions from Active Landfills, as well as the new state requirements that regulate methane emissions from landfills in accordance with the goals of Assembly Bill 32<sup>126</sup> as implemented in the California Air Resources Board Climate Change Scoping Plan.<sup>127</sup>

Applying the threshold of “Inconsistency with the goal to reduce GHG emissions to 1990 levels (approximately 427 metric tons or 9.6 metric tons of CO<sub>2e</sub> per capita) as required by AB 32,” even under the worst-case scenario as presented here, the increases resulting from a 50-percent conversion scenario would be expected to be below the level of significance when considered in context with California's 2020 GHG emissions target of 427 million metric tons per year (Table 3.3.2-1) and the County's 2020 GHG emissions target of 108 million metric tons per year (Table 3.3.3-1). The LCA results presented would be equivalent to 0.016 percent of the target 2020 emissions for California and 0.07 percent of the County's 2020 target emissions. The LCA results presented for the entire County, including the 88 incorporated cities, would be equivalent to 0.0066 metric ton per year per capita, which would not conflict with the goals of AB 32 to reduce emissions by the year 2020 to approximately 9.6 metric tons per capita. These impacts are also less than the impacts anticipated as a result of Alternative 3, which would not place any limitation on the issuance of paper carryout bags. These calculations are based on an unlikely worst-case scenario that assumes that every store larger than 10,000 square feet currently uses 10,000 plastic carryout bags per day. This assumption is an intentional overestimate, as statewide data indicate

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<sup>123</sup> Franklin Associates, Ltd. 1990. *Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks*. Prairie Village, KS.

<sup>124</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

<sup>125</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>126</sup> California Environmental Protection Agency Air Resources Board. June 17, 2010. Methane Emissions from Municipal Solid Waste Landfills. Available at: <http://www.arb.ca.gov/regact/2009/landfills09/landfillfinalfro.pdf>

<sup>127</sup> California Air Resources Board, Climate Change Scoping Plan, December 2008

that this number is likely to be closer to 5,000 plastic carryout bags per day.<sup>128</sup> The same may also be true of the assumption that 5,000 plastic carryout bags are used per day for stores smaller than 10,000 square feet. While the estimate of 5,000 plastic carryout bags per store per day is likely very high, this number was used for the purposes of this EIR to conservatively evaluate impacts resulting from a worst-case scenario as well. However, even assuming a worst-case scenario where Alternative 5 causes an indirect increase in disposal of paper carryout bags, any potential increases in GHG emissions in landfills in the SCAQMD portion of the SCAB would be controlled by SCAQMD Rule 1150.1, and any potential increases in GHG emissions in landfills in the AVAQMD portion of the MDAB would be controlled by AVAQMD Rule 1150.1.

**TABLE R4.2.6.3-5  
ESTIMATED GHG EMISSIONS INCREASES DUE TO END OF LIFE BASED ON  
ECOBILAN DATA**

Emission Sources	GHG Emissions	
	Metric Tons CO <sub>2e</sub> Per Year	Metric Tons CO <sub>2e</sub> Per Year Per Capita
	Increase Resulting from 50-percent Conversion from Plastic to Paper Carryout Bags <sup>1</sup>	Increase Resulting from 50-percent Conversion from Plastic to Paper Carryout Bags <sup>1</sup>
Conversion from plastic to paper carryout bags in the 1,091 stores in the unincorporated territory of the County	12,134	0.0011
Conversion from plastic to paper carryout bags in the 5,084 stores in the incorporated cities of the County	58,115	0.0055
<b>Total Emissions</b>	<b>70,250</b>	<b>0.0066</b>

**SOURCES:** Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.  
U.S. Environmental Protection Agency. November 2008. *Municipal Solid Waste in the United States: 2007 Facts and Figures*. Washington, DC. Available at: <http://www.epa.gov/waste/nonhaz/municipal/pubs/msw07-rpt.pdf>

**NOTES:**

1. Assuming 36.8 percent of paper carryout bags are diverted from landfills and 11.9 percent of plastic carryout bags are diverted from landfills, based on the 2007 USEPA recycling rates.

The Boustead Study indicates that the majority of GHG emissions (approximately 60 percent) associated with the life cycle of paper carryout bags occur during decomposition in landfills. In fact, the Boustead Study states that from all operations just prior to disposal, the resulting CO<sub>2e</sub> emissions are more than 20 percent greater for the plastic carryout bag than for the paper carryout bag, if it is assumed that a paper carryout bag holds 1.5 times the amount of groceries that plastic carryout bags hold.<sup>129</sup> Based on the Boustead data, it can be reasonably assumed that under a scenario where 50 percent of customers would switch to using paper carryout bags as a result of Alternative 5, the disposal of paper carryout bags in landfills could potentially result in the emission of 184,621 metric tons of CO<sub>2e</sub> per year for the entire County (Table R4.2.6.3-6, *Estimated GHG Emissions Increases Due to End of Life Based on Data from Boustead*). These results are approximately 0.17 percent of the 2020 target emissions for the County (108 million

<sup>128</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>129</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*, Table 26B. Prepared for: Progressive Bag Affiliates.

metric tons), and approximately 0.04 percent of the 2020 target emissions for California (427 million metric tons).

These results are higher than those calculated using Ecobilan data, emphasizing the uncertainty in using LCA data to estimate GHG emissions. In addition, the Boustead Study calculates GHG emissions for end of life using 20-year CO<sub>2</sub> equivalents, which means that CH<sub>4</sub> is considered to have 62 times the global warming potential of CO<sub>2</sub>.<sup>130</sup> It is standard practice to use 100-year CO<sub>2</sub> equivalents when calculating CO<sub>2e</sub>, which means that CH<sub>4</sub> emissions are considered to have 23 times the global warming potential compared to CO<sub>2</sub>.<sup>131</sup> The non-standard method of calculating CO<sub>2e</sub> for end of life in the Boustead Study inflates the result and renders them incomparable directly to CO<sub>2e</sub> for end of life calculated in other LCAs. In addition, the Boustead Study assumes that only 40 percent of CH<sub>4</sub> in landfills is captured, which is a significant underestimate considering that the USEPA's Landfill Methane Outreach Program states that methane collection efficiency typically ranges from 60 to 90 percent.<sup>132</sup> However, even assuming a worst-case scenario where Alternative 5 causes an indirect increase in disposal of paper carryout bags, any potential increases in GHG emissions in landfills in the SCAQMD portion of the SCAB would be controlled by SCAQMD Rule 1150.1, and any potential increases in GHG emissions in landfills in the AVAQMD portion of the MDAB would be controlled by AVAQMD Rule 1150.1, as well as the new state requirements that regulate methane emissions from landfills in accordance with the goals of Assembly Bill 32.<sup>133</sup>

However, like the proposed ordinances, based on the County's conservative worst-case analysis, the indirect impacts to GHG emissions from the end-of-life of paper carryout bags may have the potential to be cumulatively considerable, depending on the actual percentage conversion to paper carryout bags. Applying the threshold "Generate greenhouse gas emissions, either directly or indirectly that may have a significant effect on the environment", the conclusion that GHG emissions due to the end of life of paper carryout bags in landfills would be potentially cumulatively considerable, is based on the County's assumption of a conservative scenario of 50-percent conversion to paper carryout bags as set forth in Table R4.2.6.3-5. However, if the paper bag fee in Alternative 5 has a similar effect of decreasing conversion to paper carryout bags by 80 to 90 percent, like the Ireland and Washington, D.C., bag fees, indirect impacts to GHG emissions could be minimal and less than significant on a cumulative impact level. The County currently has an education outreach program for curbside recycling, which includes paper carryout bags.<sup>134</sup> Further, the Final EIR identifies mitigation for "end of life" GHG emission impacts under which the County would undertake additional public outreach through an education program that would aim to increase the percentage of paper carryout bags that are recycled within the County. There is nearly universal access to curbside recycling throughout the County, where paper bags can be recycled by homeowners conveniently. Additional public education and outreach would increase

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<sup>130</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates. Table 26B.

<sup>131</sup> California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol, Version 3.1*. Los Angeles, CA.

<sup>132</sup> United States Environmental Protection Agency. Accessed October 7, 2010. Landfill Methane Outreach Program. Available at: <http://www.epa.gov/lmop/basic-info/index.html#a03>

<sup>133</sup> California Environmental Protection Agency Air Resources Board. June 17, 2010. Methane Emissions from Municipal Solid Waste Landfills. Available at: <http://www.arb.ca.gov/regact/2009/landfills09/landfillfinalfro.pdf>

<sup>134</sup> County of Los Angeles Department of Public Works. Accessed October 12, 2010. Outreach Programs. Web sites available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and <http://dpw.lacounty.gov/epd/recycling/crm.cfm>

the number of bags recycled and further reduce indirect impacts of Alternative 5 to GHG emissions. It's also important to note that GHG emissions from landfills located in the County are already controlled in accordance with applicable regional, State, and federal regulations pertaining to GHG emissions. Potential increases in GHG emissions due to decomposition of paper carryout bags in landfills in the County will be controlled by AVAQMD Rule 1150.1 or SCAQMD Rule 1150.1. However, because the County cannot determine with certainty the percentage transition from plastic to paper carryout bags, and the percentage that will end up in the landfills, the County is proceeding forward with the conclusion that indirect impacts resulting from the decomposition of paper carryout bags in landfills would have the potential to be cumulatively significant under the County's conservative worst-case analysis.

Based on this conservative analysis, the indirect impacts to GHG emissions from the end of life of paper carryout bags may have the potential to be cumulatively considerable, depending on the actual percentage increase in conversion to paper carryout bags, the number of stores affected, the actual bag usage per day, the size of the fee or charge, and other relevant factors that are specific to each of the 88 incorporated cities within the County. In the development of this EIR, the County has recognized and acknowledged that each city has the authority to render an independent decision regarding implementation of its own ordinance. For the purposes of this EIR, the County has extended the worst-case scenario for the County ordinance and alternatives to a scenario where all 88 cities adopt comparable ordinances. However, an individual determination, including for cumulative impacts, for each city would be contingent on the exact parameters of the city's proposed ordinance, consideration of the above-identified factors, the city's adopted thresholds of significance, and its projected AB 32 GHG emissions target.

**TABLE R4.2.6.3-6  
ESTIMATED GHG EMISSIONS INCREASES DUE TO END OF LIFE BASED ON DATA  
FROM BOUSTEAD**

Emission Sources	GHG Emissions	
	Metric Tons CO <sub>2e</sub> Per Year	Metric Tons CO <sub>2e</sub> Per Year Per Capita
	Increase Resulting from 50-percent Conversion from Plastic to Paper Carryout Bags <sup>1</sup>	Increase Resulting from 50-percent Conversion from Plastic to Paper Carryout Bags <sup>1</sup>
Conversion from plastic to paper carryout bags in the 1,091 stores in the unincorporated territory of the County	31,890	0.00300
Conversion from plastic to paper carryout bags in the 5,084 stores in the incorporated cities of the County	152,731	0.01439
<b>Total Emissions</b>	<b>184,621</b>	<b>0.01739</b>

**SOURCE:** Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

**NOTE:** 1. Assuming 21 percent of paper carryout bags are diverted from landfills and 5.2 percent of plastic carryout bags are diverted from landfills.

The Ecobilan Study also presented an LCA analysis of a reusable bag and concluded that that particular reusable bag has a smaller impact on GHG emissions than the impact of a plastic

carryout bag, as long as the reusable bag is used a minimum of three times (Table 3.3.5-4).<sup>135</sup> The impacts of the reusable bag are reduced further when the bag is used additional times. Although the Ecobilan data are particular to a specific type of reusable bag, they illustrate the general concept of how GHG emission impacts of the life cycle of reusable bags are reduced with additional uses. The ExcelPlas report supports Ecobilan data with its finding that, of the different types of bags studied, reusable bags had the lowest GHG emission impacts over the total life cycle.<sup>136</sup> Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifespan of 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that calico and polypropylene reusable bags that are used 104 times results in environmental impacts that are significantly less than the impacts resulting from paper and plastic carryout bags (Table R4.2.6.3-7, *Relative Environmental Impacts of Various Types of Bags*).<sup>137</sup> Therefore, GHG emission impacts due to the life cycle of a reusable bag would be expected to be significantly less than the GHG emission impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in a reduction in GHG emissions.

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<sup>135</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>136</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>137</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

**TABLE R4.2.6.3-7  
RELATIVE ENVIRONMENTAL IMPACTS OF VARIOUS TYPES OF BAGS**

Bag Type	Number of Trips	Relative Impacts on a Scale from 1 to 5					
		Material Consumption	Global Warming	Energy Consumption	Water Use	Litter Marine Biodiversity	Litter Aesthetics
Reusable non-woven plastic (polypropylene) "Green Bag"	104	♣	♣	♣	♣	♣	♣
Reusable calico (cotton) bag	104	♣	♣	♣	♣♣♣♣♣	♣	♣
100-percent recycled content paper carryout bag	2	♣♣♣♣♣	♣♣♣	♣♣	♣	♣	♣
Oxo-biodegradable carryout bag	1	♣♣♣	♣♣	♣♣♣	♣	♣♣♣	♣♣
100-percent recycled content plastic (HDPE) carryout bag	1	♣♣♣	♣	♣	♣♣	♣♣♣♣♣	♣♣♣♣♣
Paper carryout bag	2	♣♣♣♣♣	♣♣♣♣	♣♣♣	♣	♣	♣
Compostable (starch-polyester) carryout bag	1	♣♣♣♣	♣	♣	♣♣♣♣♣	♣	♣♣
Plastic (HDPE) carryout bag	1	♣♣♣	♣♣	♣♣♣♣	♣	♣♣♣♣♣	♣♣♣♣♣
100-percent recycled content paper carryout bag	1	♣♣♣♣♣	♣♣♣♣♣	♣♣♣♣	♣	♣	♣♣
Paper carryout bag	1	♣♣♣♣♣	♣♣♣♣♣	♣♣♣♣♣	♣♣	♣	♣♣
Plastic (LDPE) "boutique" carryout bag	1	♣♣♣♣♣	♣♣♣♣♣	♣♣♣♣♣	♣	♣♣♣♣♣	♣♣♣♣♣

**SOURCE:** Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives.* Prepared for: Sustainability Victoria, Victoria, Australia.

**NOTES:**

1. A rating of ♣ to ♣♣♣♣♣ is used to show the diversity of impacts for each criteria, with ♣ being the lowest impact. In some cases at the high impact end, the impact value of the bag falls outside of the rating scale. Impacts cannot be added together to produce an overall impact rating.

HDPE = High density polyethylene

LDPE = Low density polyethylene

Similar to the proposed ordinances, Alternative 5 would not directly generate GHG emissions that may have a significant impact on the environment, and applying the second threshold, would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHGs emissions. As with the proposed ordinances, which would cause a less than significant increase in emissions due to delivery truck trips to transport paper carryout bags to affected stores, Alternative 5 would be expected to cause a potential increase in delivery truck trips required to transport paper carryout bags to affected stores. Assuming that in the unincorporated territory of the County, Alternative 5 would affect 67 stores each using 10,000 plastic carryout bags per day, and 1,024 stores each using 5,000 plastic carryout bags per day, a 50-percent conversion to paper carryout bags would be expected to require fewer than 17 additional truck trips per day.<sup>138</sup> Assuming that in the 88 incorporated cities of the County, Alternative 5 would affect 462 stores each using 10,000 plastic carryout bags per day, and 4,622 stores each using 5,000 plastic carryout bags per day, a 50-percent conversion to paper carryout bags would be expected to require fewer than 79 additional truck trips per day.<sup>139</sup>

<sup>138</sup> (1,024 stores x 5,000 plastic carryout bags per day / 2,304,000 plastic carryout bags per truck) x (67 stores x 10,000 plastic carryout bags per day / 2,304,000 plastic carryout bags per truck) x 13 ≈ 33 daily truck trips

<sup>139</sup> (4,622 stores x 5,000 plastic carryout bags per day / 2,304,000 plastic carryout bags per truck) x (462 stores x 10,000 plastic carryout bags per day / 2,304,000 plastic carryout bags per truck) x 13 ≈ 156.5 daily truck trips

URBEMIS 2007 was used to calculate the GHG emissions that would be anticipated to result from 17 additional truck trips per day to and from the 1,091 stores in the unincorporated territory of the County, and up to 79 additional truck trips per day to and from the 5,084 stores in the incorporated cities of the County (Table R4.2.6.3-8, *Estimated Daily Operational Emissions Due to Increased Vehicle Trips from 50-percent Conversion from Plastic to Paper Carryout Bags*) (Appendix D). The unmitigated emissions due to delivery truck trips would be approximately 46 metric tons per year of CO<sub>2</sub> for the 1,091 stores that would be affected by Alternative 5 in the unincorporated territory of the County, and up to an additional 214 metric tons per year if similar ordinances were adopted in the 88 incorporated cities of the County (Table 4.2.6.3-8). The total indirect GHG emissions due to mobile sources as a result of a 50-percent conversion scenario throughout the County represents an increase of approximately 0.00006 percent of California's GHG emissions target for 2020 of 427 million metric tons per year, and approximately 0.0002 percent of the County's target emissions for 2020 (108 million metric tons), or 0.00005 metric ton per capita per year, which would not conflict with the emission reduction goals established to reduce emissions of GHGs in California down to 1990 levels by 2020 as required by AB 32 (approximately 427 million metric tons in total or 9.6 metric tons per capita by 2020).<sup>140</sup> Therefore, the indirect GHG emissions due to mobile sources for Alternative 5 would be expected to be below the level of significance. These impacts are also less than the impacts anticipated as a result of Alternative 3, which would not place any limitation on the issuance of paper carryout bags.

**TABLE R4.2.6.3-8  
ESTIMATED DAILY OPERATIONAL EMISSIONS DUE TO INCREASED VEHICLE TRIPS  
FROM 50-PERCENT CONVERSION FROM PLASTIC TO PAPER CARRYOUT BAGS**

<b>Emission Sources</b>	<b>CO<sub>2</sub> Emissions (Pounds/Day)</b>	<b>CO<sub>2</sub> Emissions (Metric Tons/Year)</b>	<b>CO<sub>2</sub> Emissions per Capita (metric tons/Year)</b>	<b>Target GHG Emissions per Capita in the County (metric tons of CO<sub>2e</sub>)</b>
17 delivery truck trips in the unincorporated territory of the County	278.44	46.10	0.000004	<b>9.6</b>
79 delivery truck trips in the incorporated cities of the County	1293.91	214.22	0.000020	
<b>Total Emissions</b>	<b>1,572.35</b>	<b>260.32</b>	<b>0.000025</b>	

An increase in demand for reusable bags would also result in additional transport of reusable bags to stores. However, due to the fact that reusable bags must be designed to have a minimum lifetime of at least 125 uses, the number of reusable bags required would be expected to be far less than the number of carryout bags currently used. Therefore, it can be reasonably expected that fewer delivery truck trips would be required if more customers switched from plastic carryout bags to reusable bags than if they switched from plastic carryout bags to paper carryout bags. Therefore, as will the proposed ordinances, GHG emission impacts of Alternative 5 due to mobile source emissions would be expected to be below the level of significance.

<sup>140</sup> California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*. Available at: <http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>

## Mitigation Measures

Wherever the EIR identifies a potential significant impact from “end of life” GHG emissions, the Final EIR recommends the adoption of all of the following mitigation measures. Although these measures will help offset GHG emissions, they may not mitigate them to below the level of significance.

### **Mitigation Measure MM-GHG-1**

Implement and/or expand public outreach and educational programs to increase the percentage of paper carryout bags that are recycled curbside.

If the adopted ordinance includes a fee or charge of at least \$0.05 on the issuance of paper carryout bags, consider increases to the fee or charge to further reduce consumption of paper carryout bags.

Distribute reusable grocery bags, free of charge within the ordinance-affected area to encourage further transitions to reusable bags. Consider public/private partnerships to offset costs of distribution.

Implement an outreach program for affected stores to encourage consumer transition to reusable bags, to reduce double bagging, and to encourage reuse and in-store recycling of paper carryout bags.

Encourage grocery stores to implement energy efficiency technology particularly in relation to storage of cold and frozen foods (assuming a reduction of 0.65 metric ton carbon dioxide equivalent for each megawatt hour saved).<sup>141</sup>

Consider converting public vehicles to low-emitting fuels (assuming a reduction of 0.45 metric ton carbon dioxide equivalent for each 1,000 vehicle miles traveled).<sup>142</sup> Consider funding conversion of vehicles through participation in the Carl Moyer Program of the South Coast Air Quality Management District.

## *Hydrology and Water Quality*

### Significance Thresholds

The potential for the proposed ordinances to result in impacts to public services was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The proposed ordinances would be considered to have a significant impact to hydrology and water quality if they fulfill the following thresholds:

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<sup>141</sup> Emission factors taken from <http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results>

<sup>142</sup> Emission factors taken from <http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results>



- Violate any water quality standards or waste discharge requirements
- Substantially deplete groundwater supplies or interfere with groundwater recharge leading to a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)
- Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation either on site or off site
- Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or substantial increase in the rate or amount of surface runoff in a manner that would result in flooding either on-site or off-site
- Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff
- Otherwise substantially degrade water quality
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map
- Place structures within a 100-year flood hazard area that would impede or redirect flood flows
- Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam
- Result in inundation by seiche, tsunami, or mudflow

As with the proposed ordinances, the impacts to hydrology and water quality caused by Alternative 5 would be expected to be below the level of significance. Alternative 5 would be expected to further reduce the disposal of plastic carryout bags in the County and to create additional benefits for hydrology and water quality. Due to the fee on the issuance of paper carryout bags, Alternative 5 would result in a smaller percentage increase in the consumer use of paper carryout bags than the increase from the proposed ordinances. Therefore, Alternative 5 would be expected to cause less eutrophication due to a smaller indirect increase in the manufacture of paper carryout bags. Several LCAs have analyzed the impacts of bag manufacturing upon eutrophication and concluded that paper carryout bag manufacturing releases more pollutants, such as nitrates and phosphates, into water than does plastic carryout bag manufacturing.<sup>143,144</sup> Using the Ecobilan results, it was determined that a 50-percent conversion from the use of plastic carryout bags to the use of paper carryout bags would be expected to increase eutrophication by approximately 9 kilograms of phosphate equivalent per day for the 1,901 affected stores in the unincorporated territory of the County, and by up to 42 additional kilograms of phosphate per day if similar ordinances were adopted by the 88 incorporated cities of the County (Table R4.2.6.3-9, *Eutrophication Due to Plastic and Paper Carryout Bags Based on Ecobilan Data*, and Appendix C).

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<sup>143</sup> Franklin Associates, Ltd. 1990. *Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks*. Prairie Village, KS.

<sup>144</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

**TABLE R4.2.6.3-9  
EUTROPHICATION DUE TO PLASTIC AND PAPER CARRYOUT BAGS BASED ON  
ECOBILAN DATA**

Eutrophication Sources	Eutrophication (kilograms phosphate equivalent)	
	Eutrophication from Plastic Carryout Bags	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use
Eutrophication due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	1.79	8.79
Eutrophication due to carryout bag use in the 5,084 stores in the incorporated cities of the County	8.59	42.08
<b>Total eutrophication due to carryout bag use</b>	<b>10.39</b>	<b>50.87</b>

**SOURCE:** Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

Increased demand for reusable bags could also indirectly increase eutrophication impacts from facilities that manufacture reusable bags. However, impacts of reusable bag manufacturing upon eutrophication are likely to be less significant than the impacts due to plastic and paper carryout bag manufacturing, when considered on a per-use basis. For example, the Ecobilan Study evaluated the eutrophication impacts of a reusable bag that measures 70 micrometers thick (approximately 2.8 mils), weighs 44 grams, and holds 37 liters of groceries, and concluded that this particular reusable bag has a lesser impact on eutrophication than the impact from a plastic carryout bag, as long as the reusable bag is used at least three times (Table 3.4.4-2).<sup>145</sup> The impacts of the reusable bag are reduced further when the bag is used additional times (Table 3.4.4-2). Although the Ecobilan data are particular to a specific type of reusable bag, they illustrate the general concept of how the eutrophication impacts of reusable bag manufacturing are reduced with each time a bag is used. Reusable bags, by the definition established by the proposed ordinances, must be designed to have a minimum lifespan of 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly less than the impacts resulting from paper and plastic carryout bags (Table R4.2.6.3-7).<sup>146</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly less than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to be environmentally beneficial.

While a quantitative analysis for eutrophication has been undertaken as discussed above, determining the level of significance of eutrophication impacts from bag manufacturing would be speculative due to the lack of an established baseline or significance threshold, and is further inapplicable and speculative given that the manufacturing facilities for paper carryout bags appear not be located within the County. Since the majority of paper carryout bags supplied to the greater Los Angeles metropolitan area are produced in and delivered from states outside of California,<sup>147</sup> or

<sup>145</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>146</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>147</sup> Watt, Stephanie, Sapphos Environmental, Inc., Santa Monica, CA. 15 July 2009. Telephone communication with Ms. Carol Trout, Customer Service Department, Duro Bag Manufacturing Company, Florence, KY.

from countries outside of the United States, such as Canada,<sup>148</sup> there would be no expected impacts from eutrophication to surface water quality in the watersheds in the County as a result of Alternative 5. Since there appears to be no manufacturing and production of paper carryout bags in the County unincorporated and incorporated areas, there would be no expected impacts to water quality resulting from eutrophication during the manufacturing process. Therefore, indirect impacts to water quality from eutrophication due to a potential increase in the demand for paper carryout bag manufacturing would be expected to be less than significant.

Further, any indirect increase in pollutant discharge from manufacturing plants due to increased demand for paper carryout bags would be regulated and controlled by the local, regional, and federal laws applicable to each manufacturing plant. It is incorrect to assume that eutrophication resulting from the production and manufacture of paper carryout bags would be left unchecked and unregulated. Within the United States, pollutant discharges from bag manufacturing facilities have to comply with National Pollutant Discharge Elimination System requirements and permits. Therefore, impacts of Alternative 5 upon surface water quality outside of the Southern California region due to eutrophication would also be expected to be less than significant. In addition, any adverse indirect impact upon water quality due to eutrophication would likely be offset by the positive impacts Alternative 5 would be expected to have upon water quality due to a decrease of litter attributed to plastic carryout bags in water bodies.

As with the proposed ordinances, Alternative 5 would not violate any water quality standards or waste discharge requirements; would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; would not substantially alter the existing drainage pattern of the area in a manner that would result in substantial erosion or siltation; would not substantially alter the existing drainage pattern of the area or substantially increase the rate or amount of surface runoff in a manner that would result in flooding; would not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; would not otherwise substantially degrade water quality; would not place housing within a 100-year flood hazard area; would not place within a 100-year flood hazard area structures that would impede or redirect flood flows; would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam; and would not cause inundation by seiche, tsunami, or mudflow. As with the proposed ordinances, Alternative 5 would be expected to benefit surface water drainage, storm drain systems, and surface water quality in the County. Alternative 5 would further assist the County in attaining TMDLs because it would result in even less litter attributable to plastic carryout bags. As with the proposed ordinances, Alternative 5 would not be expected to result in any significant adverse impacts to hydrology and water quality, and would achieve additional benefits due to a greater reduction in the use of plastic carryout bags.

### *Utilities and Service Systems*

As with the proposed ordinances, the impacts to utilities and service systems as a result of Alternative 5 would be expected to be below the level of significance. Due to the fact that Alternative 5 would result in additional reductions in the disposal of plastic carryout bags in the County, Alternative 5 would also create additional potential benefits to utilities and service systems

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<sup>148</sup> National Council for Air and Stream Improvement. February 5, 2010. *Life Cycle Assessment of Unbleached Paper Grocery Bags*. Prepared for: American Forest and Paper Association and Forest Product Association of Canada

in terms of reducing indirect impacts associated with the production and disposal of plastic carryout bags. Due to the implementation of a fee on the issuance of paper carryout bags, Alternative 5 would result in a smaller degree of increase in the consumer use of paper carryout bags compared with the proposed ordinances. Therefore, Alternative 5 would result in a lesser increase in water use, wastewater generation, energy consumption, and solid waste generation due to a smaller indirect increase in the manufacture of paper carryout bags. Similarly, like the proposed ordinances, Alternative 5 would not result in a cumulatively considerable contribution to a significant cumulative impact.

### Wastewater Generation

It is important to note that manufacturing facilities for paper carryout bags appear not to be located within the County. Therefore, any increase in wastewater generation due to paper carryout bag manufacturing would not impact wastewater treatment providers in the County. However, using the Ecobilan results and assuming that 50 percent of consumers switch from plastic carryout bags to paper carryout bags, there would be an expected increase in wastewater of approximately 0.04 MGD for the 1,091 affected stores in the unincorporated territory of the County, and up to an additional 0.17 MGD if similar ordinances were to be adopted by the 88 incorporated cities of the County (Table R4.2.6.3-10, *Wastewater Generation Due to Plastic and Paper Carryout Bags Based on Ecobilan Data*, and Appendix C). The Sanitation Districts of Los Angeles County treat approximately 510 MGD.<sup>149</sup> Therefore, an additional 0.21 MGD due to paper carryout bag use throughout the County, or approximately 0.04 percent of the current amount of wastewater treated per day, would not be considered a significant increase in wastewater and would not be anticipated to necessitate construction of new wastewater treatment facilities or expansion of existing facilities.

**TABLE R4.2.6.3-10  
WASTEWATER GENERATION DUE TO PLASTIC AND PAPER CARRYOUT BAGS  
BASED ON ECOBILAN DATA**

Wastewater Sources	Wastewater Generation (MGD)	
	Wastewater Generation Due to Plastic Carryout Bags	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use
Wastewater generation due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	0.12	0.04
Wastewater generation due to carryout bag use in the 5,084 stores in the incorporated cities of the County	0.57	0.17
<b>Total Wastewater Generation</b>	<b>0.69</b>	<b>0.21</b>

**SOURCE:** Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>149</sup> Sanitation Districts of Los Angeles County. Accessed on: 8 March 2010. "Wastewater Facilities." Web site. Available at: [http://www.lacsd.org/contact/facility\\_locations/wastewater\\_facilities.asp](http://www.lacsd.org/contact/facility_locations/wastewater_facilities.asp)

## Water Supply

The Ecobilan results also show that the potential increase in required water supply due to a 50-percent conversion from plastic carryout bags to paper carryout bags would be approximately 0.08 MGD for the 1,091 affected stores in the unincorporated territory of the County, and up to an additional 0.39 MGD if similar ordinances were adopted within the 88 incorporated cities of the County (Table R4.2.6.3-11, *Water Consumption Due to Plastic and Paper Carryout Bags Based on Ecobilan Data*). The water districts within the County supplied approximately 1,563 MGD in fiscal year 2007/2008; therefore, the estimated water demands from Alternative 5 would represent approximately 0.03 percent of this total, which would not be considered to be significant.<sup>150</sup> It is also important to note that manufacturing facilities for paper carryout bags appear not to be located within the County. Therefore, any increase in water supply necessary for paper carryout bag manufacturing would not impact water suppliers in the County.

**TABLE R4.2.6.3-11  
WATER CONSUMPTION DUE TO PLASTIC AND PAPER CARRYOUT BAGS  
BASED ON ECOBILAN DATA**

Water Consumption Sources	Water Consumption (MGD)	
	Water Consumption Due to Plastic Carryout Bags	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use
Water consumption due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	0.13	0.08
Water consumption due to carryout bag use in the 5,084 stores in the incorporated cities of the County	0.60	0.39
<b>Total Water Consumption</b>	<b>0.72</b>	<b>0.47</b>

**SOURCE:** Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

Other studies, including the Boustead Study, have also noted that paper carryout bag manufacturing requires more water consumption than plastic manufacturing requires.<sup>151</sup> The Boustead results support the conclusion that the potential increase in required water supply due to an 50-percent conversion scenario would be approximately 1.76 MGD for the 1,091 affected stores in the unincorporated territory of the County, and up to an additional 8.44 MGD if similar ordinances were adopted within the 88 incorporated cities of the County (Table R4.2.6.3-12, *Water Consumption Due to Plastic and Paper Carryout Bags Based on Boustead Data*, and Appendix C). The water districts within the County supplied approximately 1,563 MGD in fiscal year 2007/2008; therefore, the estimated water demands from Alternative 5 would represent approximately 0.65 percent of this total.<sup>152</sup> Again, it is also important to note that the paper carryout bag manufacturing facilities that produce paper carryout bags for stores in the County

<sup>150</sup> The Metropolitan Water District of Southern California. 2008. Annual Report for the Fiscal Year July 1, 2007 to June 30, 2008. Los Angeles, California. Available at: <http://www.mwdh2o.com/mwdh2o/pages/about/AR/AR08.html>

<sup>151</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

<sup>152</sup> The Metropolitan Water District of Southern California. 2008. Annual Report for the Fiscal Year July 1, 2007, to June 30, 2008. Los Angeles, California. Available at: <http://www.mwdh2o.com/mwdh2o/pages/about/AR/AR08.html>

appear not to be located within the County. Therefore, the water supply required for paper carryout bag manufacturing may be supplied by water districts outside of the County or outside of California, so impacts may not directly affect the water districts within the County. Therefore, the additional water supply expected to be required by paper carryout bag manufacturing facilities as an indirect result of Alternative 5 would not be anticipated to necessitate new or expanded entitlements for water.

**TABLE R4.2.6.3-12  
WATER CONSUMPTION DUE TO PLASTIC AND PAPER CARRYOUT BAGS  
BASED ON BOUSTEAD DATA**

Water Consumption Sources	Water Consumption (MGD)	
	Water Consumption Due to Plastic Carryout Bags	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use
Water consumption due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	0.22	1.76
Water consumption due to carryout bag use in the 5,084 stores in the incorporated cities of the County	1.07	8.44
<b>Total Water Consumption</b>	<b>1.30</b>	<b>10.21</b>

**SOURCE:** Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

Alternative 5 would be expected to significantly increase consumers’ use of reusable bags, the production of which would consume less water than the production of both paper carryout bags and plastic carryout bags when considered on a per-use basis, because reusable bags are designed to be used multiple times. For example, the Ecobilan Study concluded that the life cycle of a particular type of reusable bag requires less water than a plastic carryout bag, as long as the reusable bag is used a minimum of three times.<sup>153</sup> The water demands of the reusable bag are reduced further when the bag is used additional times.<sup>154</sup> Although the Ecobilan data is particular to a specific type of reusable bag, it illustrates the general concept of how water supply impacts of reusable bag manufacture are reduced the more times a bag is used. A study by Hyder Consulting supports this finding and concludes that a reusable non-woven polypropylene bag that is used 104 times would result in water savings equivalent to approximately 7 liters per household per year (which is equivalent to just under 2 gallons per household per year).<sup>155</sup> As the banning of plastic carryout bags is expected to increase the use of reusable bags, life cycle water supply impacts are anticipated to be reduced. The Hyder Study does note that water consumption required for the life cycle of a calico (cotton) reusable bag would be greater than the water consumption required for

<sup>153</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>154</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>155</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

the life cycle of a non-woven polypropylene reusable bag (Table R4.2.6.3-7).<sup>156</sup> However, all other life cycle impacts of the calico reusable bag were determined to be just as low as the impacts of the polypropylene reusable bag (Table R4.2.6.3-7).<sup>157</sup> Polypropylene reusable bags are more widely available in the County than are calico reusable bags due because they less expensive to produce. Therefore, it is anticipated that Alternative 5 would only have the potential for a limited increase in the use of calico reusable bags in the County. In addition, the manufacturing facilities that produce calico reusable bags for stores in the County appear to not be located within the County. Therefore, the water supply required for reusable bag manufacturing may be supplied by water districts outside of the County or outside of California, so impacts may not directly affect the water districts within the County. Therefore, the additional water supply that may be required by reusable bag manufacturing facilities as an indirect result of Alternative 5 would not necessitate new or expanded entitlements for water and would not constitute a significant impact under CEQA.

### Solid Waste

Using the Ecobilan data and adjusting for a scenario in which all bags go to landfills at the end of life, and further adjusting the data for current recycling rates and the number of bags used by stores that would be affected by the Alternative 5 throughout the County, it can be concluded that a 50-percent conversion scenario would result in less solid waste deposited at landfills each day (Table R4.2.6.3-13, *Solid Waste Generation Due to Plastic and Paper Carryout Bags Based on Ecobilan Data*, and Appendix C).<sup>158</sup> Alternative 5 would also be expected to increase the use and eventual disposal of reusable bags, which, by the definition established by the proposed ordinances, must be designed to have a minimum lifespan of 125 uses. The Hyder Study analyzes life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly less than the impacts resulting from paper and plastic carryout bags (Table R4.2.6.3-7).<sup>159</sup> Therefore, environmental impacts due to the life cycle of a reusable bag would be expected to be significantly less than the environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit. The permitted daily maximum capacity of the County landfills in total is 43,749 tons per day (Table 3.5.2-1). Based on first quarter 2009 daily average in-County disposal averages, the County landfills are not accepting anywhere near the daily maximum capacity, averaging only 21,051 tons per day; the estimated remaining permitted capacity of County landfills is 154.386 million tons (Table 3.5.2-1). In addition, approximately 20 percent of County waste is distributed to out-of-County landfills.<sup>160</sup> Therefore, the existing landfills in the County would be expected to accommodate any indirect solid waste impacts of Alternative 5, and expected impacts of Alternative 5 to utilities and service systems related to solid waste generation would be expected to be below the level of significance. Finally, although the impacts to utilities and service systems would be expected to be below the level of significance, the County is considering undertaking

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<sup>156</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>157</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>158</sup> U.S. Environmental Protection Agency. November 2008. *Municipal Solid Waste in the United States: 2007 Facts and Figures*. Washington, DC. Available at: <http://www.epa.gov/waste/nonhaz/municipal/pubs/msw07-rpt.pdf>

<sup>159</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>160</sup> County of Los Angeles, Department of Public Works. Report 34. 30 March 2010. Waste Disposal Summary Reports by Quarter by Aggregated Jurisdiction Data.

additional public outreach through an education program that would aim to increase the percentage of paper carryout bags that are recycled within the County. There is nearly universal access to curbside recycling throughout the County, where paper bags can be recycled by homeowners conveniently. Additional public education and outreach would increase the number of bags recycled and further reduce indirect impacts of Alternative 5 to utilities and service systems with regard to solid waste.

**TABLE R4.2.6.3-13  
SOLID WASTE GENERATION DUE TO PLASTIC AND PAPER CARRYOUT BAGS  
BASED ON ECOBILAN DATA**

Solid Waste Sources	Solid Waste Generation (Tons per day)	
	Plastic Carryout Bag LCA	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use, Assuming 2007 EPA Recycling Rates <sup>1,2</sup>
Waste due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	41.63	-3.55
Waste due to carryout bag use in the 5,084 stores in the incorporated cities of the County	199.40	-16.99
<b>Total waste</b>	<b>241.03</b>	<b>-20.54</b>

**SOURCE:** Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

**NOTES:**

1. Negative numbers indicate the extent of the decrease in solid waste generation that would be expected from a conversion from the current use of plastic carryout bags, to a 50 percent use of paper carryout bags.
2. A negative number for emissions indicates the extent of the reduction in air pollutants generated by paper carryout bags in comparison to the air pollutants generated by plastic carryout bags by subtracting the data for plastic carryout bags from the data for paper carryout bags

Other studies, including the Boustead Study, have noted that paper carryout bag disposal generates more solid waste than the disposal of plastic carryout bags.<sup>161</sup> The Boustead results support the conclusion a 50-percent conversion from use of plastic carryout bags to use of paper carryout bags would result in approximately 44.02 additional tons of solid waste per day from the 1,091 stores in the unincorporated territory of the County, and up to an additional 210.82 tons of solid waste per day if similar ordinances were adopted within the 88 incorporated cities of the County (Table R4.2.6.3-14, *Solid Waste Generation Due to Plastic and Paper Carryout Bags Based on Boustead Data*, and Appendix C). The permitted daily maximum capacity of the County landfills in total is 43,749 tons per day (Table 3.5.2-1). Under the 50-percent conversion scenario, the amount of solid waste generated throughout the County based on Boustead data is approximately 0.58 percent of the total daily capacity of the landfills in the County. Therefore, the existing landfills in the County would be expected to be able to accommodate any indirect solid waste impacts from Alternative 5; impacts from Alternative 5 to utilities and service systems related to solid waste generation would be expected to be below the level of significance. The amount of solid waste generated for the life cycle of paper carryout bags according to the Boustead Study is considerably higher than the amount of solid waste generated for the life cycle of paper carryout bags based on Ecobilan data. These apparently conflicting results emphasize the particularity of each study and

<sup>161</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.



the importance of understanding study boundaries, inputs, and methodologies.<sup>162</sup> However, the existing landfills in the County would be expected to be able to accommodate any indirect solid waste impacts from Alternative 5; impacts from Alternative 5 to utilities and service systems related to solid waste generation would be expected to be below the level of significance. This is especially true given that the County landfills accept an average of only 21,051 tons per day, which is far from the daily maximum capacity; the estimated remaining permitted capacity of the County landfills is 154.386 million tons (Table 3.5.2-1). Finally, if the County undertakes additional public outreach through a paper bag recycling public education program that would aim to increase the percentage of paper carryout bags that are recycled within the County, it could further reduce indirect impacts from Alternative 5 to utilities and service systems with regard to solid waste.

**TABLE R4.2.6.3-14  
SOLID WASTE GENERATION DUE TO PLASTIC AND PAPER CARRYOUT BAGS  
BASED ON BOUSTEAD DATA**

Solid Waste Sources	Solid Waste Generation (Tons per day)	
	Waste Generation due to Plastic Carryout Bags	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use
Waste due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	29.93	44.02
Waste due to carryout bag use in the 5,084 stores in the incorporated cities of the County	143.36	210.82
<b>Total Solid Waste</b>	<b>173.29</b>	<b>254.84</b>

**SOURCE:** Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates

### Energy Conservation

The results of the Ecobilan LCA were used to analyze the potential energy consumption in a conservative worst-case scenario of 50-percent conversion of plastic carryout bags to paper carryout bags (Table R4.2.6.3-15, *Non-renewable Energy Consumption Due to Plastic and Paper Carryout Bags Based on Ecobilan Data*, and Appendix C). The Ecobilan results support the conclusion that there would be a potential decrease in non-renewable energy consumption 50 percent of consumers switched from use of plastic carryout bags to use of paper carryout bags in the County (Table R4.2.6.3-15 and Appendix C).

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162 Green Cities California. March 2010. *Master Environmental Assessment on Single-Use and Reusable Bags*. Prepared by ICF International. San Francisco, CA.

**TABLE R4.2.6.3-15  
NON-RENEWABLE ENERGY CONSUMPTION DUE TO PLASTIC  
AND PAPER CARRYOUT BAGS BASED ON ECOBILAN DATA**

Energy Consumption Sources	Energy Consumption (million kWh)	
	Energy Consumption Due to Plastic Carryout Bags	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use <sup>1</sup>
Energy consumption due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	0.72	-0.35
Energy consumption due to carryout bag use in the 5,084 stores in the incorporated cities of the County	3.43	-1.66
<b>Total Energy Consumption</b>	<b>4.14</b>	<b>-2.01</b>

**SOURCE:** Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

**NOTE:**

1. A negative number for emissions indicates the extent of the reduction in air pollutants generated by paper carryout bags in comparison to the air pollutants generated by plastic carryout bags by subtracting the data for plastic carryout bags from the data for paper carryout bags.

Other studies, including the Boustead Study, have noted that paper carryout bag manufacturing consumes more energy than plastic carryout bag manufacturing consumes.<sup>163</sup> The Boustead results support the conclusion that the potential increase in energy demand due to a 50-percent conversion from use of plastic carryout bags to use of paper carryout bags would be approximately 0.62 million kilowatt hours (kWh) for the 1,091 affected stores in the unincorporated territory of the County, and up to an additional 2.99 million kWh if similar ordinances were adopted within the 88 incorporated cities of the County (Table R4.2.6.3-16, *Total Energy Consumption Due to Plastic and Paper Carryout Bags Based on Boustead Data*, and Appendix C). The estimated total electricity consumption in the County in 2007 was 68,120 million kWh, with 47,484 million kWh in the non-residential sector; therefore, the estimated electricity demands from Alternative 5 (not including the energy reductions associated with conversion to reusable bags discussed below) would represent less than 0.01 percent of the total energy use in the non-residential sector of the County.<sup>164</sup> The amount of energy required for the life cycle of paper carryout bags according to the Boustead Study is considerably higher than the amount of energy required for the life cycle of paper carryout bags based on Ecobilan data. These apparently conflicting results emphasize the particularity of each study and the importance of understanding study boundaries, inputs, and methodologies.<sup>165</sup> In addition, the Ecobilan data presented above was specifically for non-renewable energy, rather than total energy. The majority of the energy use analyzed here occurs early in the life cycle of plastic and paper carryout bags, during processes such as fuel extraction and bag manufacturing. Again, it is also important to note that the paper carryout bag manufacturing facilities that produce paper carryout bags for stores in the County appear not to be located within the County. Therefore, the energy supply required for paper carryout bag manufacturing may be supplied by districts outside of the County or outside of

<sup>163</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

<sup>164</sup> California Energy Commission. Accessed on: 4 May 2010. "Electricity Consumption by County." *California Energy Consumption Data Management System*. Available at: <http://ecdms.energy.ca.gov/elecbycounty.aspx>

<sup>165</sup> Green Cities California. March 2010. *Master Environmental Assessment on Single-Use and Reusable Bags*. Prepared by ICF International. San Francisco, CA.

California, so impacts may not directly affect the County. However, even in the conservative worst-case scenario as presented here, an increase in energy demand of approximately 3.61 million kWh from a 50-percent conversion scenario, which paper carryout bag manufacturing facilities would be expected to require as an indirect result of Alternative 5, would be expected to be below the level of significance.

**TABLE R4.2.6.3-16  
TOTAL ENERGY CONSUMPTION DUE TO PLASTIC  
AND PAPER CARRYOUT BAGS BASED ON BOUSTEAD DATA**

Energy Consumption Sources	Energy Consumption (Million kWh)	
	Energy Consumption Due to Plastic Carryout Bags	Increase Due to 50-percent Conversion from Plastic to Paper Carryout Bag Use
Energy consumption due to carryout bag use in the 1,091 stores in the unincorporated territory of the County	0.82	0.62
Energy consumption due to carryout bag use in the 5,084 stores in the incorporated cities of the County	3.92	2.99
<b>Total Energy Consumption</b>	<b>4.74</b>	<b>3.61</b>

**SOURCE:** Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

It is also important to note that Alternative 5 would be expected to increase consumers' use of reusable bags, the production of which would consume less energy than the production of both paper carryout bags and plastic carryout bags when considered on a per-use basis, because reusable bags are designed to be used numerous times. For example, the Ecobilan Study concluded that the life cycle of a particular type of reusable bag requires less energy than a plastic carryout bag, as long as the reusable bag is used a minimum of three times (Table 3.5.4-11 and Appendix C).<sup>166</sup> The energy demands of the reusable bag are reduced further when the bag is used additional times (Table 3.5.4-11 and Appendix C). Although the Ecobilan data is particular to a specific type of reusable bag, it illustrates the general concept that energy impacts from reusable bag manufacturing are reduced with every additional use of a bag. A study by Hyder Consulting supports this finding and concludes that a reusable non-woven polypropylene bag that is used 104 times would result in energy savings of 190 mega joules per household, which is equivalent to powering a television for six months.<sup>167</sup> Consumers would be expected to use more reusable bags if the issuance of plastic carryout bags were banned, which would in turn reduce impacts to energy conservation. Therefore, a conversion from plastic carryout bags to reusable bags would be anticipated to have reduced impacts upon energy conservation.

As with the proposed ordinances, Alternative 5 would not be expected to exceed the wastewater treatment requirements of the applicable regional water quality control board; would not require or result in the construction of new water or wastewater treatment facilities; would not require or

<sup>166</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>167</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

result in the construction of new storm water drainage facilities or expansion of existing facilities; would not require new or expanded entitlements for water supply; would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the proposed ordinances' projected demand in addition to the provider's existing commitments; would not be served by a landfill with insufficient permitted capacity to accommodate the proposed ordinances' solid waste disposal needs; and would comply with federal, state, and local statutes and regulations related to solid waste. As with the proposed ordinances, Alternative 5 would lead to reduced operational impacts and costs associated with storm drain system maintenance. Unlike the proposed ordinances, Alternative 5 would be expected to significantly impact utilities and service systems with regard to generation of solid waste, but would achieve additional benefits to the storm drain system due to a greater reduction in the use of plastic carryout bags. As with the proposed ordinances, Alternative 5 would not result in a cumulatively considerable contribution to a significant cumulative impact.

#### **4.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

The third, fourth, fifth, and sixth sentences under Section 4.4 (please note, Section 4.3 of the EIR has been renumbered to Section 4.4, and is noted above under the revisions and clarifications to the Table of Contents) have been deleted and replaced with the following:

Alternatives 1, 2, 3, 4, and 5 would meet all of the basic objectives of the proposed ordinances established by the County. Alternatives 3, 4, and 5 would result in additional benefits to biological resources as a result of reduced consumption of plastic carryout bags. As with the proposed ordinances, and considering that the County is attempting to evaluate the impacts resulting from paper carryout bags from a conservative worst-case scenario, Alternative 3 may have the potential to result in cumulatively considerable impacts to GHG emissions because it would not place any limitation on the issuance of paper carryout bags. Alternatives 2 and 5 would be expected to reduce consumption of paper carryout bags through implementation of a fee. Unlike the proposed ordinances, Alternatives 1 and 4 would not result in any increase in the consumption of paper carryout bags.

## **SECTION 5.0 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED ORDINANCES ARE IMPLEMENTED**

The first sentence in the third paragraph in this section has been deleted and replaced with the following:

Although there are no feasible mitigation measures that could be implemented to reduce life cycle GHG emissions of paper carryout bags, the County has identified mitigation measure GHG-1 that would minimize the potential increase in use of paper carryout bags and indirectly offset GHG emissions. Although the measures specified in mitigation measure GHG-1 will help offset cumulative GHG emissions resulting from the proposed ordinances, they may not mitigate them to below the level of significance.

The beginning of the first sentence of the fourth paragraph has been revised as follows:

Pursuant to CEQA, this EIR identifies five alternatives...

One additional bullet point has been added after the fourth paragraph on this page:

- Alternative 5, Ban Plastic Carryout Bags and Impose a Fee on Paper Carryout Bags for All Supermarkets and Other Grocery Stores, Convenience Stores, Pharmacies, and Drug Stores in Los Angeles County

The beginning of the final sentence on this page has been revised as follows:

Each of these five alternatives...

## SECTION 10.0 REFERENCES

### Page 10-1

The following references have been added:

American Forest and Paper Association. Accessed October 25, 2010. Web site. Facts about Paper. Available at: <http://www.afandpa.org/FunFacts.aspx>

Assembly Bill No. 1998. Amended in Senate August 27, 2010. Available at: [http://www.leginfo.ca.gov/pub/09-10/bill/asm/ab\\_1951\\_2000/ab\\_1998\\_bill\\_20100827\\_amended\\_sen\\_v94.pdf](http://www.leginfo.ca.gov/pub/09-10/bill/asm/ab_1951_2000/ab_1998_bill_20100827_amended_sen_v94.pdf)

Azzarello, M. and Van Vleet, E. 1987. "Marine Birds and Plastic Pollution." *Marine Ecology Progress Series*, 37: 295–303.

Bjorndal, K. et. al. 1994. "Ingestion of marine debris by juvenile sea turtles in coastal Florida habitats." *Marine Pollution Bulletin*, 28 (3). Available at: [http://accstr.ufl.edu/publications/BjorndalEtAl\\_1994\\_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf](http://accstr.ufl.edu/publications/BjorndalEtAl_1994_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf)

### Page 10-2

The following reference has been added:

California Air Resources Board. June 17, 2010. Methane Emissions from Municipal Solid Waste Landfills. Available at: <http://www.arb.ca.gov/regact/2009/landfills09/landfillfinalfro.pdf>

### Page 10-4

The following references have been added:

Californians Against Waste. Accessed October 19, 2010. AB 1998 (Brownley) – Plastic Bag Ban. Available at: [http://www.cawrecycles.org/issues/current\\_legislation/ab1998\\_10](http://www.cawrecycles.org/issues/current_legislation/ab1998_10)

California Integrated Waste Management Board. June 2007. *Performance Evaluation of Environmentally Degradable Plastic Packaging and Disposable Food Service Ware - Final Report*. Available at: <http://www.calrecycle.ca.gov/Publications/Plastics/43208001.pdf>

California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

## Page 10-5

The following reference has been deleted:

CIT Ekologik, Chalmers Industriteknik. 2000. *Distribution in Paper Sacks*. Goteborg, Sweden.

## Page 10-6

The following references have been added:

City of Santa Monica. June 2010. Santa Monica Single-use Carryout Bag Ordinance EIR. SCH #2010041004.

City of Santa Monica. January 2010. City of Santa Monica Nexus Study. Prepared by R3 Consulting Group, Inc.

City of San Jose. July 2010. Single-use Carryout Bag Ordinance. Draft Environmental Impact Report. SCH #2009102095.

County of Los Angeles. 2010. Photographs of Catch Basins in Los Angeles County provided to Sapphos Environmental, Inc. by the County of Los Angeles Flood Control District. Available for viewing at Sapphos Environmental, Inc. Headquarters, Pasadena, CA.

The second reference on this page has been revised as follows:

City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

## Page 10-7

The following reference has been added:

County of Los Angeles Department of Public Works. Accessed October 12, 2010. Outreach Programs. Web sites available at:  
<http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and  
<http://dpw.lacounty.gov/epd/recycling/crm.cfm>

County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

## Page 10-8

The following references have been added:

European Plastic Recyclers. 10 June 2009. *Press Release: Oxo Degradable Additives are Incompatible with Mechanical Recycling*. Brussels, Belgium. Available at:  
<http://www.plasticsrecyclers.eu/docs/press%20release/EuPR%20Press%20Release%20-%20OXO%20Degradables%20Incompatibility%20with%20Plastics%20Recycling.pdf>

Gerba, C. et. al. 9 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

Gomerčić, H. et. al. 2006. "Biological aspects of Cuvier's beaked whale (*Ziphius cavirostris*) recorded in the Croatia part of the Adriatic Sea." *European Journal of Wildlife Research*. DOI 10.1007/s10344-006-0032-8

#### **Page 10-9**

The following references have been added:

Health Canada. 10 August 2010 (Last modified). "Food Safety Tips for Reusable Grocery Bags and Bins." Web site. Available at: <http://www.hc-sc.gc.ca/fn-an/securit/kitchen-cuisine/reusable-bags-sacs-reutilisable-eng.php>

Keep America Beautiful. Accessed October 19, 2010. Litter Prevention. Available at: [http://www.kab.org/site/PageServer?pagename=focus\\_litter\\_prevention](http://www.kab.org/site/PageServer?pagename=focus_litter_prevention)

#### **Page 10-13**

The following references have been added:

Oakland Tribune. October 8, 2010. Fremont again will consider banning plastic grocery bags. Available at: [http://www.insidebayarea.com/news/ci\\_16281639](http://www.insidebayarea.com/news/ci_16281639)

Okeanos Ocean Research Foundation. 1989. *Marine Mammal and Sea Turtle Encounters with Marine Debris in the New York Bight and the Northeast Atlantic*. Available at: [http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154\\_P562.PDF](http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154_P562.PDF)

Pearce, Fred. 18 June 2009. "Biodegradable plastic bags carry more ecological harm than good." Available at: <http://www.guardian.co.uk/environment/cif-green/2009/jun/18/greenwash-biodegradeable-plastic-bags>

Perez, David. County of Los Angeles, Department of Public Works. October 30, 2008. Email Correspondence; Paper Bag Distribution – Field Survey Summary. On file at Sapphos Environmental, Inc. Pasadena, CA.

Rios, L. et. al. 2007. "Persistent organic pollutants carried by synthetic polymers in the ocean environment." *Marine Pollution Bulletin*, 54: 1230–1237.

#### **Page 10-15**

The following references have been added:

Takada, H. et. al. Undated. *Pellet Watch: Global Monitoring of Persistent Organic Pollutants (POPs) using Beached Plastic Resin Pellets*. Available at: <http://www.tuat.ac.jp/~gaia/ipw/documents/takadaproceeding.pdf>



Teuten, E. L. et. al. 2009. "Transport and release of chemicals from plastic to the environment and to wildlife." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2027-2045.

The Sacramento Bee. October 22, 2010. Plastic-bag maker dumps cash on parties, attacks Blakeslee. Available at: <http://blogs.sacbee.com/capitolalert/latest/2010/10/plastic-bag-fight-big-company.html?commentSort=RecommendationsDescending&pageNum=1>

The Sacramento Bee. 26 August 2010. "Plastic-bag backers donate to California lawmakers ahead of bill's vote." Available at: <http://www.sacbee.com/2010/08/26/2983643/plastic-bag-backers-donate-to.html>

Todd, Peter, A. et. al. 2010. "Impacts of Pollution on marine life in Southeast Asia." In. *Biodiversity and Conservation* 19: 1063–1082.

Town of Fairfax. Ordinance No. 722. 1 August 2007. Available at: [http://www.stopwaste.org/docs/fairfax\\_plastic\\_bag\\_ordinance.pdf](http://www.stopwaste.org/docs/fairfax_plastic_bag_ordinance.pdf)

Town of Fairfax. Ordinance No. 722, Section 18.18.080. 1 August 2007. Available at: [http://www.stopwaste.org/docs/fairfax\\_plastic\\_bag\\_ordinance.pdf](http://www.stopwaste.org/docs/fairfax_plastic_bag_ordinance.pdf)

Uline. Accessed October 26, 2010, Reusable Shopping Bags. Available at: [http://www.uline.com/BL\\_5528/Reusable-Shopping-Bags](http://www.uline.com/BL_5528/Reusable-Shopping-Bags)

USA Today. 8 October 2010. "Another US city bans plastic shopping bags." Available at: <http://content.usatoday.com/communities/greenhouse/post/2010/10/another-us-city-bans-plastic-shopping-bags/1>

**VOLUME II TECHNICAL APPENDICES**

**APPENDIX C: CALCULATION DATA**

Calculation data for Alternative 5 has been added to Appendix C.

Stores in unincorp territory	67		
Stores in cities	462	Reusable Bag Size	37
Plastic bag size (liters)	14	Ratio of Reusable	
Paper bag size (liters)	20.48	to Plastic Bags	2.6
Number of plastic bags per store per day	10000		
Number of paper bags per store per day	6836		

\*based on 100% conversion from plastic to paper

Ecobilan Data - Eutrophication	CML*	Reusable Bag (1 Use)	
		g output	g phosphate
(w) Ammonia	0.42	3.35E-01	1.41E-01
(w) COD (Chemical Oxygen Demand)	0.022	1.43E+01	3.15E-01
(w) Nitrate	0.095	5.80E-02	5.51E-03
(w) Nitrite	0.13	-5.06E-07	-6.58E-08
(w) Nitrogenous Matter (Kjeldahl, as N)	0.42	9.56E-04	4.02E-04
(w) Nitrogenous Matter (unspecified)	0.42	4.45E-02	1.87E-02
(w) Phosphates	3.06	2.25E-02	6.89E-02
(w) Phosphorous Matter	3.06	0.00E+00	0.00E+00
(w) Phosphorous	3.06	3.86E-05	1.18E-04
(w) Phosphorous Pentoxide	1.336	-8.42E-06	-1.12E-05
<b>Total</b>			<b>0.55</b>

\* CML is the equivalence coefficient used to convert grams of each individual output to grams of phosphate equivalent

Ecobilan Data - Eutrophication	CML*	Plastic Bags		Paper Bags	
		g output	g phosphate	g output	g phosphate
(w) Ammonia	0.42	1.28E-01	5.38E-02	6.11E-01	2.57E-01
(w) COD (Chemical Oxygen Demand)	0.022	5.09E+00	1.12E-01	2.74E+01	6.03E-01
(w) Nitrate	0.095	1.25E-01	1.19E-02	1.25E+00	1.19E-01
(w) Nitrite	0.13	4.39E-07	5.71E-08	1.90E-05	2.47E-06
(w) Nitrogenous Matter (Kjeldahl, as N)	0.42	3.00E-05	1.26E-05	-3.63E-04	-1.52E-04
(w) Nitrogenous Matter (unspecified)	0.42	7.36E-03	3.09E-03	2.51E+00	1.05E+00
(w) Phosphates	3.06	6.01E-03	1.84E-02	1.03E-01	3.15E-01
(w) Phosphorous Matter	3.06	3.02E-07	9.24E-07	1.52E-04	4.65E-04
(w) Phosphorous	3.06	3.67E-05	1.12E-04	5.25E-04	1.61E-03
(w) Phosphorous Pentoxide	1.336	2.66E-06	3.55E-06	1.29E-05	1.72E-05
<b>Total</b>			<b>0.20</b>		<b>2.35</b>

\* CML is the equivalence coefficient used to convert grams of each individual output to grams of phosphate equivalent

Eutrophication - Ecobilan Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
grams phosphate per 9000 liters groceries	0.20	2.35	2.15	1.17	0.98	
grams phosphate per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
grams phosphate per bag	0.00	0.01	0.01	0.00	0.00	
grams phosphate per day per store	3.10	36.55	33.45	18.27	15.17	
kg phosphate per day per store	0.00	0.04	0.03	0.02	0.02	
kg phosphate per day in unincorp territory	0.21	2.45	2.24	1.22	1.02	
kg phosphate per day in cities	1.43	16.88	15.45	8.44	7.01	
<b>Total kg phosphate for whole county</b>	<b>1.64</b>	<b>19.33</b>	<b>17.69</b>	<b>9.67</b>	<b>8.03</b>	
*based on 100% conversion from plastic to paper						
**based on 50% conversion from plastic to paper						

Eutrophication - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
grams phosphate per 9000 liters groceries	0.20	0.18	-0.02	0.03	-0.17	
grams phosphate per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
grams phosphate per bag	0.00	0.00	0.00	0.00	0.00	
grams phosphate per day per store	3.10	2.85	-0.25	0.43	-2.67	
kg phosphate per day per store	0.00	0.00	0.00	0.00	0.00	
kg phosphate per day in unincorp territory	0.21	0.19	-0.02	0.03	-0.18	
kg phosphate per day in cities	1.43	1.31	-0.12	0.20	-1.23	
<b>Total kg phosphate for whole county</b>	<b>1.64</b>	<b>1.51</b>	<b>-0.13</b>	<b>0.23</b>	<b>-1.41</b>	
*based on 3 uses						
**based on 20 uses						

Ecobilan Data - Utilities	Plastic Bags	Paper Bags	Reusable Bags
<b>Water Used (total) (liters)</b>	<b>52.6</b>	<b>173</b>	<b>137</b>
Water Generated (unspecified) (liters)	4.1	1.3	-0.186
Water Generated (chemically polluted) (liters)	34.3	107	105
Water Generated (thermally polluted) (liters)	11.6	22.4	31.8
<b>Total Wastewater Generated (liters)</b>	<b>50</b>	<b>130.7</b>	<b>136.614</b>
<b>Waste Generated (total) (kg)</b>	<b>2.59</b>	<b>4.73</b>	<b>6.99</b>
<b>Non-renewable energy consumption (MJ)</b>	<b>286</b>	<b>295</b>	<b>805</b>
<b>Total solid waste due to disposal (kg)</b>	<b>4.76</b>	<b>12.14</b>	<b>13.11</b>

\*Assuming all bags are sent to landfill

Water Consumption - Ecobilan Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
Liters H2O per 9000 liters groceries	52.60	173.00	120.40	86.50	33.90	
Liters H2O per 1 liter groceries	0.01	0.02	0.01	0.01	0.00	
Liters H2O per bag	0.08	0.39	0.31	0.20	0.12	
Liters H2O per day per store	818.22	2691.11	1872.89	1345.56	527.33	
Gallons H2O per day per store	216.15	710.92	494.76	355.46	139.31	
MGD per day per store	0.00	0.00	0.00	0.00	0.00	
MGD per day in unincorp territory	0.01	0.05	0.03	0.02	0.01	
MGD per day in cities	0.10	0.33	0.23	0.16	0.06	
<b>Total MGD for whole county</b>	<b>0.11</b>	<b>0.38</b>	<b>0.26</b>	<b>0.19</b>	<b>0.07</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Water Consumption - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
Liters H2O per 9000 liters groceries	52.60	45.67	-6.93	6.85	-45.75	
Liters H2O per 1 liter groceries	0.01	0.01	0.00	0.00	-0.01	
Liters H2O per bag	0.08	0.10	0.02	0.02	-0.07	
Liters H2O per day per store	818.22	710.37	-107.85	106.56	-711.67	
Gallons H2O per day per store	216.15	187.66	-28.49	28.15	-188.00	
MGD per day per store	0.00	0.00	0.00	0.00	0.00	
MGD per day in unincorp territory	0.01	0.01	0.00	0.00	-0.01	
MGD per day in cities	0.10	0.09	-0.01	0.01	-0.09	
<b>Total MGD for whole county</b>	<b>0.11</b>	<b>0.10</b>	<b>-0.02</b>	<b>0.01</b>	<b>-0.10</b>	

\*based on 3 uses

\*\*based on 20 uses

<b>Water Consumption - Boustead Data</b>					
	<b>Plastic LCA</b>	<b>Paper LCA</b>	<b>Difference</b>	<b>Paper LCA</b>	<b>Difference</b>
Gallons H2O 1000 paper bags (1500 plastic)	58.00	1004.00	946.00	502.00	444.00
Gallons H2O per bag	0.04	1.00	0.97	0.50	0.46
Gallons H2O per day per store	386.67	6863.28	6476.61	3431.64	3044.97
MGD per day per store	0.00	0.01	0.01	0.00	0.00
MGD per day in unincorp territory	0.03	0.46	0.43	0.23	0.20
MGD per day in cities	0.18	3.17	2.99	1.59	1.41
<b>Total MGD for whole county</b>	<b>0.20</b>	<b>3.63</b>	<b>3.43</b>	<b>1.82</b>	<b>1.61</b>
*based on 100% conversion from plastic to paper					
**based on 50% conversion from plastic to paper					

<b>Wastewater Generation - Ecobilan Data</b>					
	<b>Plastic LCA</b>	<b>Reusable LCA</b>	<b>Difference</b>	<b>Reusable LCA</b>	<b>Difference</b>
Liters H2O per 9000 liters groceries	50.00	45.54	-4.46	6.83	-43.17
Liters H2O per 1 liter groceries	0.01	0.01	0.00	0.00	0.00
Liters H2O per bag	0.08	0.10	0.03	0.02	-0.06
Liters H2O per day per store	777.78	708.37	-69.41	106.26	-671.52
Gallons H2O per day per store	205.47	187.13	-18.34	28.07	-177.40
MGD per day per store	0.00	0.00	0.00	0.00	0.00
MGD per day in unincorp territory	0.01	0.01	0.00	0.00	-0.01
MGD per day in cities	0.09	0.09	-0.01	0.01	-0.08
<b>Total MGD for whole county</b>	<b>0.11</b>	<b>0.10</b>	<b>-0.01</b>	<b>0.01</b>	<b>-0.09</b>
*based on 3 uses					
**based on 20 uses					

<b>Wastewater Generation - Ecobilan Data</b>						
	<b>Plastic LCA</b>	<b>Paper LCA</b>	<b>Difference</b>	<b>Paper LCA</b>	<b>Difference</b>	
Liters H2O per 9000 liters groceries	50.00	130.70	80.70	65.35	15.35	
Liters H2O per 1 liter groceries	0.01	0.01	0.01	0.01	0.00	
Liters H2O per bag	0.08	0.30	0.22	0.15	0.07	
Liters H2O per day per store	777.78	2033.11	1255.33	1016.56	238.78	
Gallons H2O per day per store	205.47	537.09	331.62	268.55	63.08	
MGD per day per store	0.00	0.00	0.00	0.00	0.00	
MGD per day in unincorp territory	0.01	0.04	0.02	0.02	0.00	
MGD per day in cities	0.09	0.25	0.15	0.12	0.03	
<b>Total MGD for whole county</b>	<b>0.11</b>	<b>0.28</b>	<b>0.18</b>	<b>0.14</b>	<b>0.03</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

<b>Solid Waste - Boustead Data</b>						
	<b>Plastic LCA</b>	<b>Paper LCA</b>	<b>Difference</b>	<b>Paper LCA</b>	<b>Difference</b>	
kg waste per 1000 paper bags (1500 plastic)	7.04	33.90	26.87	16.95	9.92	
kg waste per bag	0.00	0.03	0.03	0.02	0.01	
kg waste per day per store	46.90	231.74	184.84	115.87	68.97	
tons waste per day per store	0.05	0.26	0.20	0.13	0.08	
tons waste per day in unincorp territory	3.46	17.11	13.65	8.56	5.09	
tons waste per day in cities	23.88	118.02	94.13	59.01	35.12	
<b>Total tons waste for whole county</b>	<b>27.35</b>	<b>135.13</b>	<b>107.78</b>	<b>67.57</b>	<b>40.22</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Solid Waste - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
kg waste per 9000 liters groceries	4.76	4.37	-0.39	0.66	-4.10	
kg waste per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
kg waste per bag	0.01	0.01	0.00	0.00	-0.01	
kg waste per day per store	74.04	67.98	-6.07	10.20	-63.85	
tons waste per day per store	0.08	0.07	-0.01	0.01	-0.07	
tons waste per day in unincorp territory	5.47	5.02	-0.45	0.75	-4.72	
tons waste per day in cities	37.71	34.62	-3.09	5.19	-32.52	
<b>Total tons waste for whole county</b>	<b>43.18</b>	<b>39.64</b>	<b>-3.54</b>	<b>5.95</b>	<b>-37.23</b>	

\*based on 3 uses

\*\*based on 20 uses

Solid Waste - Ecobilan Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
kg waste per 9000 liters groceries	4.76	12.14	7.38	6.07	1.31	
kg waste per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
kg waste per bag	0.01	0.03	0.02	0.01	0.01	
kg waste per day per store	74.04	188.84	114.80	94.42	20.38	
tons waste per day per store	0.08	0.21	0.13	0.10	0.02	
tons waste per day in unincorp territory	5.47	13.95	8.48	6.97	1.50	
tons waste per day in cities	37.71	96.17	58.46	48.09	10.38	
<b>Total tons waste for whole county</b>	<b>43.18</b>	<b>110.12</b>	<b>66.94</b>	<b>55.06</b>	<b>11.88</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

<b>2007 recycle rate - plastic bags and sacks</b>	11.9%
<b>2007 recycle rate - paper bags and sacks</b>	36.8%



Solid Waste - Ecobilan Data	Adjusted for 2007 EPA Recycle Rates			Adjusted for 2007 EPA Recycle Rates		
	Plastic LCA	Paper LCA	Difference	Plastic LCA	Paper LCA	Difference
kg waste per 9000 liters groceries	4.19	7.67	3.48	4.19	3.84	-0.36
kg waste per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	0.00
kg waste per bag	0.01	0.02	0.01	0.01	0.01	0.00
kg waste per day per store	65.23	119.35	54.12	65.23	59.67	-5.56
tons waste per day per store	0.07	0.13	0.06	0.07	0.07	-0.01
tons waste per day in unincorp territory	4.82	8.81	4.00	4.82	4.41	-0.41
tons waste per day in cities	33.22	60.78	27.56	33.22	30.39	-2.83
<b>Total tons waste for whole county</b>	<b>38.04</b>	<b>69.60</b>	<b>31.56</b>	<b>38.04</b>	<b>34.80</b>	<b>-3.24</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Energy Consumption - Ecobilan Data	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
	MJ per 9000 liters groceries	286.00	295.00	9.00	147.50
MJ per 1 liter groceries	0.03	0.03	0.00	0.02	-0.02
MJ per bag	0.44	0.67	0.23	0.34	-0.11
MJ per day per store	4448.89	4588.89	140.00	2294.44	-2154.44
kWh per day per store	1235.80	1274.69	38.89	637.35	-598.46
Million kWh per day per store	0.00	0.00	0.00	0.00	0.00
Million kWh per day in unincorp territory	0.08	0.09	0.00	0.04	-0.04
Million kWh per day in cities	0.57	0.59	0.02	0.29	-0.28
<b>Total million kWh for whole county</b>	<b>0.65</b>	<b>0.67</b>	<b>0.02</b>	<b>0.34</b>	<b>-0.32</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Energy Consumption - Ecobilan Data					
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference
MJ per 9000 liters groceries	286.00	268.33	-17.67	40.25	-245.75
MJ per 1 liter groceries	0.03	0.03	0.00	0.00	-0.03
MJ per bag	0.44	0.61	0.17	0.09	-0.35
MJ per day per store	4448.89	4174.07	-274.81	626.11	-3822.78
kWh per day per store	1235.80	1159.47	-76.34	173.92	-1061.88
Million kWh per day per store	0.00	0.00	0.00	0.00	0.00
Million kWh per day in unincorp territory	0.08	0.08	-0.01	0.01	-0.07
Million kWh per day in cities	0.57	0.54	-0.04	0.08	-0.49
<b>Total million kWh for whole county</b>	<b>0.65</b>	<b>0.61</b>	<b>-0.04</b>	<b>0.09</b>	<b>-0.56</b>

\*based on 3 uses

\*\*based on 20 uses

Energy Consumption - Boustead Data					
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
MJ per 1000 bags	763.00	2622.00	1859.00	1311.00	548.00
MJ per bag	0.51	2.62	2.11	1.31	0.80
MJ per day per store	5086.67	17923.83	12837.16	8961.91	3875.25
Million kWh per day per store	0.00	0.00	0.00	0.00	0.00
Million kWh per day in unincorp territory	0.09	0.33	0.24	0.17	0.07
Million kWh per day in cities	0.65	2.30	1.65	1.15	0.50
<b>Total Million kWh for whole county</b>	<b>0.75</b>	<b>2.63</b>	<b>1.89</b>	<b>1.32</b>	<b>0.57</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Conversion Factors	
liters to gallons	0.26417205
kg to short tons	0.00110231
MJ to kWh	0.27777778

Stores in unincorp territory	1024
Stores in cities	4622
Plastic bag size (liters)	14
Paper bag size (liters)	20.48
Number of plastic bags per store per day	5000
Number of paper bags per store per day	3418

\*based on 100% conversion from plastic to paper

Eutrophication - Ecobilan Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
grams phosphate per 9000 liters groceries	0.20	2.35	2.15	1.17	0.98	
grams phosphate per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
grams phosphate per bag	0.00	0.01	0.01	0.00	0.00	
grams phosphate per day per store	1.55	18.27	16.72	9.14	7.59	
kg phosphate per day per store	0.00	0.02	0.02	0.01	0.01	
kg phosphate per day in unincorp territory	1.59	18.71	17.13	9.36	7.77	
kg phosphate per day in cities	7.16	84.46	77.30	42.23	35.07	
<b>Total kg phosphate for whole county</b>	<b>8.75</b>	<b>103.17</b>	<b>94.43</b>	<b>51.59</b>	<b>42.84</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Eutrophication - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
grams phosphate per 9000 liters groceries	0.20	0.18	-0.02	0.03	-0.17	
grams phosphate per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
grams phosphate per bag	0.00	0.00	0.00	0.00	0.00	
grams phosphate per day per store	1.55	1.42	-0.13	0.21	-1.34	
kg phosphate per day per store	0.00	0.00	0.00	0.00	0.00	
kg phosphate per day in unincorp territory	1.59	1.46	-0.13	0.22	-1.37	
kg phosphate per day in cities	7.16	6.58	-0.59	0.99	-6.18	
<b>Total kg phosphate for whole county</b>	<b>8.75</b>	<b>8.03</b>	<b>-0.71</b>	<b>1.21</b>	<b>-7.54</b>	

\*based on 3 uses

\*\*based on 20 uses

<b>Ecobilan Data - Utilities</b>	<b>Plastic Bags</b>	<b>Paper Bags</b>	<b>Reusable Bags</b>
<b>Water Used (total) (liters)</b>	<b>52.6</b>	<b>173</b>	<b>137</b>
Water Generated (unspecified) (liters)	4.1	1.3	-0.186
Water Generated (chemically polluted) (liters)	34.3	107	105
Water Generated (thermally polluted) (liters)	11.6	22.4	31.8
<b>Total Wastewater Generated (liters)</b>	<b>50</b>	<b>130.7</b>	<b>136.614</b>
<b>Waste Generated (total) (kg)</b>	<b>2.59</b>	<b>4.73</b>	<b>6.99</b>
<b>Non-renewable energy consumption (MJ)</b>	<b>286</b>	<b>295</b>	<b>805</b>
<b>Total solid waste due to disposal (kg)</b>	<b>4.76</b>	<b>12.14</b>	<b>13.11</b>

\*Assuming all bags are sent to landfill

<b>Water Consumption - Ecobilan Data</b>					
	<b>Plastic LCA</b>	<b>Paper LCA</b>	<b>Difference</b>	<b>Paper LCA</b>	<b>Difference</b>
Liters H2O per 9000 liters groceries	52.60	173.00	120.40	86.50	33.90
Liters H2O per 1 liter groceries	0.01	0.02	0.01	0.01	0.00
Liters H2O per bag	0.08	0.39	0.31	0.20	0.12
Liters H2O per day per store	409.11	1345.56	936.44	672.78	263.67
Gallons H2O per day per store	108.08	355.46	247.38	177.73	69.65
MGD per day per store	0.00	0.00	0.00	0.00	0.00
MGD per day in unincorp territory	0.11	0.36	0.25	0.18	0.07
MGD per day in cities	0.50	1.64	1.14	0.82	0.32
<b>Total MGD for whole county</b>	<b>0.61</b>	<b>2.01</b>	<b>1.40</b>	<b>1.00</b>	<b>0.39</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

<b>Water Consumption - Ecobilan Data</b>					
	<b>Plastic LCA</b>	<b>Reusable LCA</b>	<b>Difference</b>	<b>Reusable LCA</b>	<b>Difference</b>
Liters H2O per 9000 liters groceries	52.60	45.67	-6.93	6.85	-45.75
Liters H2O per 1 liter groceries	0.01	0.01	0.00	0.00	-0.01
Liters H2O per bag	0.08	0.10	0.02	0.02	-0.07
Liters H2O per day per store	409.11	355.19	-53.93	53.28	-355.83
Gallons H2O per day per store	108.08	93.83	-14.25	14.07	-94.00
MGD per day per store	0.00	0.00	0.00	0.00	0.00
MGD per day in unincorp territory	0.11	0.10	-0.01	0.01	-0.10
MGD per day in cities	0.50	0.43	-0.07	0.07	-0.43
<b>Total MGD for whole county</b>	<b>0.61</b>	<b>0.53</b>	<b>-0.08</b>	<b>0.08</b>	<b>-0.53</b>

\*based on 3 uses

\*\*based on 20 uses

Water Consumption - Boustead Data					
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
Gallons H2O 1000 paper bags (1500 plastic)	58.00	1004.00	946.00	502.00	444.00
Gallons H2O per bag	0.04	1.00	0.97	0.50	0.46
Gallons H2O per day per store	193.33	3431.64	3238.31	1715.82	1522.49
MGD per day per store	0.00	0.00	0.00	0.00	0.00
MGD per day in unincorp territory	0.20	3.51	3.32	1.76	1.56
MGD per day in cities	0.89	15.86	14.97	7.93	7.04
<b>Total MGD for whole county</b>	<b>1.09</b>	<b>19.38</b>	<b>18.28</b>	<b>9.69</b>	<b>8.60</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Wastewater Generation - Ecobilan Data					
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference
Liters H2O per 9000 liters groceries	50.00	45.54	-4.46	6.83	-43.17
Liters H2O per 1 liter groceries	0.01	0.01	0.00	0.00	0.00
Liters H2O per bag	0.08	0.10	0.03	0.02	-0.06
Liters H2O per day per store	388.89	354.18	-34.70	53.13	-335.76
Gallons H2O per day per store	102.73	93.57	-9.17	14.03	-88.70
MGD per day per store	0.00	0.00	0.00	0.00	0.00
MGD per day in unincorp territory	0.11	0.10	-0.01	0.01	-0.09
MGD per day in cities	0.47	0.43	-0.04	0.06	-0.41
<b>Total MGD for whole county</b>	<b>0.58</b>	<b>0.53</b>	<b>-0.05</b>	<b>0.08</b>	<b>-0.50</b>

\*based on 3 uses

\*\*based on 20 uses

<b>Wastewater Generation - Ecobilan Data</b>						
	<b>Plastic LCA</b>	<b>Paper LCA</b>	<b>Difference</b>	<b>Paper LCA</b>	<b>Difference</b>	
Liters H2O per 9000 liters groceries	50.00	130.70	80.70	65.35	15.35	
Liters H2O per 1 liter groceries	0.01	0.01	0.01	0.01	0.00	
Liters H2O per bag	0.08	0.30	0.22	0.15	0.07	
Liters H2O per day per store	388.89	1016.56	627.67	508.28	119.39	
Gallons H2O per day per store	102.73	268.55	165.81	134.27	31.54	
MGD per day per store	0.00	0.00	0.00	0.00	0.00	
MGD per day in unincorp territory	0.11	0.27	0.17	0.14	0.03	
MGD per day in cities	0.47	1.24	0.77	0.62	0.15	
<b>Total MGD for whole county</b>	<b>0.58</b>	<b>1.52</b>	<b>0.94</b>	<b>0.76</b>	<b>0.18</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

<b>Solid Waste - Boustead Data</b>						
	<b>Plastic LCA</b>	<b>Paper LCA</b>	<b>Difference</b>	<b>Paper LCA</b>	<b>Difference</b>	
kg waste per 1000 paper bags (1500 plastic)	7.04	33.90	26.87	16.95	9.92	
kg waste per bag	0.00	0.03	0.03	0.02	0.01	
kg waste per day per store	23.45	115.87	92.42	57.93	34.48	
tons waste per day per store	0.03	0.13	0.10	0.06	0.04	
tons waste per day in unincorp territory	26.47	130.79	104.32	65.39	38.93	
tons waste per day in cities	119.48	590.34	470.86	295.17	175.69	
<b>Total tons waste for whole county</b>	<b>145.94</b>	<b>721.13</b>	<b>575.18</b>	<b>360.56</b>	<b>214.62</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Solid Waste - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
kg waste per 9000 liters groceries	4.76	4.37	-0.39	0.66	-4.10	
kg waste per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
kg waste per bag	0.01	0.01	0.00	0.00	-0.01	
kg waste per day per store	37.02	33.99	-3.03	5.10	-31.92	
tons waste per day per store	0.04	0.04	0.00	0.01	-0.04	
tons waste per day in unincorp territory	41.79	38.37	-3.42	5.75	-36.03	
tons waste per day in cities	188.62	173.17	-15.45	25.98	-162.65	
<b>Total tons waste for whole county</b>	<b>230.41</b>	<b>211.53</b>	<b>-18.88</b>	<b>31.73</b>	<b>-198.68</b>	

\*based on 3 uses

\*\*based on 20 uses

Solid Waste - Ecobilan Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
kg waste per 9000 liters groceries	4.76	12.14	7.38	6.07	1.31	
kg waste per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	
kg waste per bag	0.01	0.03	0.02	0.01	0.01	
kg waste per day per store	37.02	94.42	57.40	47.21	10.19	
tons waste per day per store	0.04	0.10	0.06	0.05	0.01	
tons waste per day in unincorp territory	41.79	106.58	64.79	53.29	11.50	
tons waste per day in cities	188.62	481.07	292.45	240.54	51.91	
<b>Total tons waste for whole county</b>	<b>230.41</b>	<b>587.65</b>	<b>357.24</b>	<b>293.83</b>	<b>63.41</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

<b>2007 recycle rate - plastic bags and sacks</b>	11.9%
<b>2007 recycle rate - paper bags and sacks</b>	36.8%

Solid Waste - Ecobilan Data	Adjusted for 2007 EPA Recycle Rates			Adjusted for 2007 EPA Recycle Rates		
	Plastic LCA	Paper LCA	Difference	Plastic LCA	Paper LCA	Difference
kg waste per 9000 liters groceries	4.19	7.67	3.48	4.19	3.84	-0.36
kg waste per 1 liter groceries	0.00	0.00	0.00	0.00	0.00	0.00
kg waste per bag	0.01	0.02	0.01	0.01	0.01	0.00
kg waste per day per store	32.62	59.67	27.06	32.62	29.84	-2.78
tons waste per day per store	0.04	0.07	0.03	0.04	0.03	0.00
tons waste per day in unincorp territory	36.82	67.36	30.54	36.82	33.68	-3.14
tons waste per day in cities	166.18	304.04	137.86	166.18	152.02	-14.16
<b>Total tons waste for whole county</b>	<b>202.99</b>	<b>371.40</b>	<b>168.40</b>	<b>202.99</b>	<b>185.70</b>	<b>-17.30</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Energy Consumption - Ecobilan Data	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
	MJ per 9000 liters groceries	286.00	295.00	9.00	147.50
MJ per 1 liter groceries	0.03	0.03	0.00	0.02	-0.02
MJ per bag	0.44	0.67	0.23	0.34	-0.11
MJ per day per store	2224.44	2294.44	70.00	1147.22	-1077.22
kWh per day per store	617.90	637.35	19.44	318.67	-299.23
Million kWh per day per store	0.00	0.00	0.00	0.00	0.00
Million kWh per day in unincorp territory	0.63	0.65	0.02	0.33	-0.31
Million kWh per day in cities	2.86	2.95	0.09	1.47	-1.38
<b>Total million kWh for whole county</b>	<b>3.49</b>	<b>3.60</b>	<b>0.11</b>	<b>1.80</b>	<b>-1.69</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper



Energy Consumption - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
MJ per 9000 liters groceries	286.00	268.33	-17.67	40.25	-245.75	
MJ per 1 liter groceries	0.03	0.03	0.00	0.00	-0.03	
MJ per bag	0.44	0.61	0.17	0.09	-0.35	
MJ per day per store	2224.44	2087.04	-137.41	313.06	-1911.39	
kWh per day per store	617.90	579.73	-38.17	86.96	-530.94	
Million kWh per day per store	0.00	0.00	0.00	0.00	0.00	
Million kWh per day in unincorp territory	0.63	0.59	-0.04	0.09	-0.54	
Million kWh per day in cities	2.86	2.68	-0.18	0.40	-2.45	
<b>Total million kWh for whole county</b>	<b>3.49</b>	<b>3.27</b>	<b>-0.22</b>	<b>0.49</b>	<b>-3.00</b>	
*based on 3 uses						
**based on 20 uses						

Energy Consumption - Boustead Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
MJ per 1000 bags	763.00	2622.00	1859.00	1311.00	548.00	
MJ per bag	0.51	2.62	2.11	1.31	0.80	
MJ per day per store	2543.33	8961.91	6418.58	4480.96	1937.62	
Million kWh per day per store	0.00	0.00	0.00	0.00	0.00	
Million kWh per day in unincorp territory	0.72	2.55	1.83	1.27	0.55	
Million kWh per day in cities	3.27	11.51	8.24	5.75	2.49	
<b>Total Million kWh for whole county</b>	<b>3.99</b>	<b>14.06</b>	<b>10.07</b>	<b>7.03</b>	<b>3.04</b>	
*based on 100% conversion from plastic to paper						
**based on 50% conversion from plastic to paper						

Conversion Factors	
liters to gallons	0.26417205
kg to short tons	0.00110231
MJ to kWh	0.27777778

Stores in unincorp territory 10,000 sq ft	1091
Stores in cities 10,000 sq ft	5084

Eutrophication - Ecobilan Data					
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
kg phosphate per day in unincorp territory	1.79	21.16	19.37	10.58	8.79
kg phosphate per day in cities	8.59	101.35	92.75	50.67	42.08
<b>Total kg phosphate for whole county</b>	<b>10.39</b>	<b>122.51</b>	<b>112.12</b>	<b>61.25</b>	<b>50.87</b>
*based on 100% conversion from plastic to paper					
**based on 50% conversion from plastic to paper					

Eutrophication - Ecobilan Data					
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference
kg phosphate per day in unincorp territory	1.79	1.65	-0.15	0.25	-1.55
kg phosphate per day in cities	8.59	7.89	-0.70	1.18	-7.41
<b>Total kg phosphate for whole county</b>	<b>10.39</b>	<b>9.54</b>	<b>-0.85</b>	<b>1.43</b>	<b>-8.96</b>
*based on 3 uses					
**based on 20 uses					

Water Consumption - Ecobilan Data					
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
MGD per day in unincorp territory	0.13	0.41	0.29	0.21	0.08
MGD per day in cities	0.60	1.97	1.37	0.99	0.39
<b>Total MGD for whole county</b>	<b>0.72</b>	<b>2.38</b>	<b>1.66</b>	<b>1.19</b>	<b>0.47</b>
*based on 100% conversion from plastic to paper					
**based on 50% conversion from plastic to paper					

Water Consumption - Ecobilan Data					
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference
MGD per day in unincorp territory	0.13	0.11	-0.02	0.02	-0.11
MGD per day in cities	0.60	0.52	-0.08	0.08	-0.52
<b>Total MGD for whole county</b>	<b>0.72</b>	<b>0.63</b>	<b>-0.10</b>	<b>0.09</b>	<b>-0.63</b>
*based on 3 uses					
**based on 20 uses					

Water Consumption - Boustead Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
MGD per day in unincorp territory	0.22	3.97	3.75	1.99	1.76	
MGD per day in cities	1.07	19.03	17.96	9.52	8.44	
<b>Total MGD for whole county</b>	<b>1.30</b>	<b>23.01</b>	<b>21.71</b>	<b>11.50</b>	<b>10.21</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Wastewater Generation - Ecobilan Data					
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference
MGD per day in unincorp territory	0.12	0.11	-0.01	0.02	-0.10
MGD per day in cities	0.57	0.52	-0.05	0.08	-0.49
<b>Total MGD for whole county</b>	<b>0.69</b>	<b>0.63</b>	<b>-0.06</b>	<b>0.09</b>	<b>-0.59</b>

\*based on 3 uses

\*\*based on 20 uses

Wastewater Generation - Ecobilan Data					
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
MGD per day in unincorp territory	0.12	0.31	0.19	0.16	0.04
MGD per day in cities	0.57	1.49	0.92	0.74	0.17
<b>Total MGD for whole county</b>	<b>0.69</b>	<b>1.80</b>	<b>1.11</b>	<b>0.90</b>	<b>0.21</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Solid Waste - Boustead Data					
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference
tons waste per day in unincorp territory	29.93	147.90	117.97	73.95	44.02
tons waste per day in cities	143.36	708.36	565.00	354.18	210.82
<b>Total tons waste for whole county</b>	<b>173.29</b>	<b>856.26</b>	<b>682.97</b>	<b>428.13</b>	<b>254.84</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Solid Waste - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
tons waste per day in unincorp territory	47.26	43.39	-3.87	6.51	-40.75	
tons waste per day in cities	226.33	207.79	-18.54	31.17	-195.16	
<b>Total tons waste for whole county</b>	<b>273.59</b>	<b>251.17</b>	<b>-22.42</b>	<b>37.68</b>	<b>-235.91</b>	

\*based on 3 uses

\*\*based on 20 uses

Solid Waste - Ecobilan Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
tons waste per day in unincorp territory	47.26	120.53	73.27	60.26	13.01	
tons waste per day in cities	226.33	577.24	350.91	288.62	62.29	
<b>Total tons waste for whole county</b>	<b>273.59</b>	<b>697.77</b>	<b>424.18</b>	<b>348.89</b>	<b>75.29</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Solid Waste - Ecobilan Data						
	Adjusted for 2007 EPA Recycle Rates			Adjusted for 2007 EPA Recycle Rates		
	Plastic LCA	Paper LCA	Difference	Plastic LCA	Paper LCA	Difference
tons waste per day in unincorp territory	41.63	76.17	34.54	41.63	38.09	-3.55
tons waste per day in cities	199.40	364.82	165.42	199.40	182.41	-16.99
<b>Total tons waste for whole county</b>	<b>241.03</b>	<b>440.99</b>	<b>199.96</b>	<b>241.03</b>	<b>220.50</b>	<b>-20.54</b>

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Energy Consumption - Ecobilan Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
Million kWh per day in unincorp territory	0.72	0.74	0.02	0.37	-0.35	
Million kWh per day in cities	3.43	3.53	0.11	1.77	-1.66	
<b>Total million kWh for whole county</b>	<b>4.14</b>	<b>4.27</b>	<b>0.13</b>	<b>2.14</b>	<b>-2.01</b>	

\*based on 100% conversion from plastic to paper

\*\*based on 50% conversion from plastic to paper

Energy Consumption - Ecobilan Data						
	Plastic LCA	Reusable LCA	Difference	Reusable LCA	Difference	
Million kWh per day in unincorp territory	0.72	0.67	-0.04	0.10	-0.61	
Million kWh per day in cities	3.43	3.22	-0.21	0.48	-2.94	
<b>Total million kWh for whole county</b>	<b>4.14</b>	<b>3.89</b>	<b>-0.26</b>	<b>0.58</b>	<b>-3.56</b>	
*based on 3 uses						
**based on 20 uses						

Energy Consumption - Boustead Data						
	Plastic LCA	Paper LCA	Difference	Paper LCA	Difference	
Million kWh per day in unincorp territory	0.82	2.88	2.06	1.44	0.62	
Million kWh per day in cities	3.92	13.81	9.89	6.90	2.99	
<b>Total Million kWh for whole county</b>	<b>4.74</b>	<b>16.69</b>	<b>11.95</b>	<b>8.34</b>	<b>3.61</b>	
*based on 100% conversion from plastic to paper						
**based on 50% conversion from plastic to paper						

Stores in unincorp territory	67		
Stores in cities	462		
Plastic bag size (liters)	14	Reusable	
Paper bag size (liters)	20.48	Bag Size	37
Number of plastic bags per store per day	10000	Ratio of Reusable	
Ratio of Paper Bags to Plastic Bags	1.5	to Plastic Bags	2.6
Population in the County in 2010	10,615,700		

Ecobilan Data - VOCs	Plastic Bags	Paper Bags	Reusable Bag (1 Use)
	g output	g output	g output
(a) Hydrocarbons (unspecified)	4.01E-01	6.16E+00	1.40E+00
(a) VOC (Volatil Organic Compounds)	5.38E-01	0.00E+00	0.00E+00
(a) VOC (Volatile Organic Compounds)	2.25E+01	2.65E-01	1.58E+01
(a) Acetaldehyde	-2.80E-04	1.08E-01	-1.61E-03
(a) Acetylene	2.30E-03	-1.15E-02	-2.26E-03
(a) Alcohol	7.02E-02	7.21E-01	0.00E+00
(a) Aldehyde	2.06E-03	4.61E-04	5.96E-03
(a) Alkane	1.35E-02	1.19E+00	-3.39E-02
(a) Aromatic Hydrocarbons	3.04E-01	7.55E-01	3.47E-01
(a) Benzaldehyde	5.65E-11	2.51E-09	-6.48E-11
(a) Benzene	5.06E-03	1.50E-02	-4.65E-03
(a) Butane	4.23E-03	2.03E-01	-2.13E-02
(a) Butene	4.23E-03	2.23E-03	1.72E-04
(a) Ethanol	-5.69E-04	3.11E-03	-3.21E-03
(a) Ethyl Benzene	1.70E-04	1.16E-02	1.96E-04
(a) Ethylene	7.89E-02	2.75E+00	-8.47E-02
(a) Formaldehyde	-2.63E-04	7.39E-03	-5.72E-03
(a) Heptane	1.59E-03	2.20E-02	1.72E-03
(a) Hexane	3.17E-03	4.32E-02	3.42E-03
(a) Hydrocarbons (except methane)	1.40E+01	1.58E+01	3.03E+01
(a) Methanol	-9.67E-04	5.28E-03	-5.45E-03
(a) Propane	-1.97E-03	2.29E-01	-7.41E-02
(a) Propionaldehyde	1.55E-10	6.92E-09	-1.78E-10
(a) Propylene	2.69E-03	-6.70E-03	-2.14E-03
(a) Tetrachloroethylene	2.40E-06	1.18E-02	6.61E-06
(a) Toluene	2.42E-03	9.00E-02	-7.63E-04
<b>Total VOCs</b>	<b>37.9294734</b>	<b>28.37487101</b>	<b>47.61867161</b>

<b>Ecobilan Plastic Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs</b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions (grams) per 9,000 liters groceries	<b>37.9294734</b>	<b>27.1</b>	<b>48.2</b>	<b>23.4</b>	<b>19.2</b>
Emissions (grams) per 1 liter groceries	0.004214386	0.003011111	0.005355556	0.0026	0.002133333
Emissions per bag (grams)	0.06	0.04	0.07	0.04	0.03
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	1.30	0.93	1.65	0.80	0.66
Emissions in the unincorp territory (pounds)	<b>87</b>	<b>62</b>	<b>111</b>	<b>54</b>	<b>44</b>
Emissions in the cities (pounds)	<b>601</b>	<b>429</b>	<b>764</b>	<b>371</b>	<b>304</b>

<b>Ecobilan Paper Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs</b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions per 9,000 liters of groceries (in grams)	<b>28.37487101</b>	<b>72.6</b>	<b>9.34</b>	<b>26.1</b>	<b>4.72</b>
Emissions (grams) per 1 liter groceries	0.003152763	0.008066667	0.001037778	0.0029	0.000524444
Emissions per bag (grams)	0.06	0.17	0.02	0.06	0.01
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.97	2.49	0.32	0.90	0.16
Emissions in the unincorp territory (pounds)	<b>65</b>	<b>167</b>	<b>21</b>	<b>60</b>	<b>11</b>
Emissions in the cities (pounds)	<b>450</b>	<b>1,150</b>	<b>148</b>	<b>414</b>	<b>75</b>

<b>Ecobilan Emission differences caused by a 50% conversion from plastic to paper</b>					
Unincorporated territory	<b>-55</b>	<b>21</b>	<b>-100</b>	<b>-24</b>	<b>-39</b>
Cities	<b>-376</b>	<b>146</b>	<b>-690</b>	<b>-164</b>	<b>-267</b>

<b>Ecobilan Emission differences caused by a 100% conversion from plastic to paper</b>					
Unincorporated territory	<b>-22</b>	<b>105</b>	<b>-89</b>	<b>6</b>	<b>-33</b>
Cities	<b>-151</b>	<b>721</b>	<b>-616</b>	<b>43</b>	<b>-229</b>

<b>Ecobilan Plastic Bag LCA - Just end-of-life - All bags disposed</b>		<b>Adjusted for 2007 Recycle Rates</b>	
<b>Emissions Sources</b>	<b>NOx</b>	<b>NOx</b>	
Emissions (grams) per 9,000 liters groceries	<b>0.97</b>		
Emissions (grams) per 1 liter groceries	0.000107778		
Emissions per bag (grams)	0.00		
Emissions per bag (pounds)	0.00		
Emissions per store (pounds)	0.03	0.03	
Emissions in the unincorp territory (pounds)	<b>2</b>	<b>2</b>	
Emissions in the cities (pounds)	<b>15</b>	<b>14</b>	

<b>Ecobilan Paper Bag LCA - Just end-of-life - All bags disposed</b>		<b>Adjusted for 2007 Recycle Rates</b>	
<b>Emissions Sources</b>	<b>NOx</b>	<b>NOx</b>	
Emissions per 9,000 liters of groceries (in grams)	<b>5.74</b>		
Emissions (grams) per 1 liter groceries	0.000637778		
Emissions per bag (grams)	0.01		
Emissions per bag (pounds)	0.00		
Emissions per store (pounds)	0.20	0.12	
Emissions in the unincorp territory (pounds)	<b>13</b>	<b>8</b>	
Emissions in the cities (pounds)	<b>91</b>	<b>57</b>	

<b>Ecobilan Emission differences caused by a 50% conversion from plastic to paper</b>		<b>Adjusted for 2007 Recycle Rates</b>	
Unincorporated territory	<b>4</b>		<b>2</b>
Cities	<b>30</b>		<b>15</b>

<b>Ecobilan Emission differences caused by a 100% conversion from plastic to paper</b>		<b>Adjusted for 2007 Recycle Rates</b>	
Unincorporated territory	<b>11</b>		<b>6</b>
Cities	<b>76</b>		<b>44</b>



<b>Ecobilan Reusable Bag LCA -- 4 Uses</b>					
<b>Emissions Sources</b>	<b>VOCs<sup>1</sup></b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions per 9,000 liters of groceries (in grams)	<b>11.9046679</b>	<b>19.125</b>	<b>7</b>	<b>17.475</b>	<b>13.35</b>
Emissions (grams) per 1 liter groceries	0.001322741	0.002125	0.000777778	0.001941667	0.001483333
Emissions per bag (grams)	0.05	0.08	0.03	0.07	0.05
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.41	0.66	0.24	0.60	0.46
Emissions in the unincorp territory (pounds)	<b>27</b>	<b>44</b>	<b>16</b>	<b>40</b>	<b>31</b>
Emissions in the cities (pounds)	<b>189</b>	<b>303</b>	<b>111</b>	<b>277</b>	<b>212</b>

<b>Boustead Plastic Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs<sup>1</sup></b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions (miligrams) per 1,000 bags	<b>994</b>	<b>45,400</b>	<b>67,400</b>	<b>50,500</b>	<b>14,300</b>
Emissions (grams) per 1,000 bags	0.994	45.4	67.4	50.5	14.3
Emissions per bag (grams)	0.00	0.05	0.07	0.05	0.01
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.02	1.00	1.49	1.11	0.32
Emissions in the unincorp territory (pounds)	<b>1</b>	<b>67</b>	<b>100</b>	<b>75</b>	<b>21</b>
Emissions in the cities (pounds)	<b>10</b>	<b>462</b>	<b>686</b>	<b>514</b>	<b>146</b>

<b>Boustead Paper Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs<sup>1</sup></b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions per 9,000 liters of groceries (in grams)	<b>2</b>	<b>264,000</b>	<b>121,000</b>	<b>579,000</b>	<b>128,000</b>
Emissions (grams) per 1,000 bags	0.002	264	121	579	128
Emissions per bag (grams)	0.00	0.26	0.12	0.58	0.13
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.00	3.98	1.82	8.73	1.93
Emissions in the unincorp territory (pounds)	<b>0</b>	<b>267</b>	<b>122</b>	<b>585</b>	<b>129</b>
Emissions in the cities (pounds)	<b>0</b>	<b>1,838</b>	<b>842</b>	<b>4,031</b>	<b>891</b>

<b>Boustead Emission differences caused by a 50% conversion from plastic to paper</b>					
Unincorporated territory	<b>-1</b>	<b>66</b>	<b>-38</b>	<b>218</b>	<b>44</b>
Cities	<b>-10</b>	<b>457</b>	<b>-265</b>	<b>1,501</b>	<b>300</b>

Boustead Emission differences caused by a 100% conversion from plastic to paper					
Unincorporated territory	-1	200	23	510	108
Cities	-10	1,376	156	3,517	746

Ecobilan Data - Greenhouse Gas Emissions	Reusable Bag (1 Use)		
	GWP (IPCC)	g output	g CO2e
(a) Carbon Dioxide (CO2, fossil)	1	2.65E+04	2.65E+04
(a) Methane	23	8.76E+01	2.01E+03
(a) Nitrous Oxide	296	7.10E-02	2.10E+01
(a) Carbon Tetrafluoride	5700	-5.21E-08	-2.97E-04
(a) Halon 1301	6900	1.95E-05	1.35E-01
<b>Total</b>			<b>2.85E 04</b>

\* GWP = Global Warming Potential

Ecobilan Data - Greenhouse Gas Emissions	GWP (IPCC)	Plastic Bags		Paper Bags	
		g output	g CO2e	g output	g CO2e
(a) Carbon Dioxide (CO2, fossil)	1	1.01E+04	1.01E+04	1.67E+04	1.67E+04
(a) Methane	23	3.37E+01	7.75E+02	1.58E+02	3.63E+03
(a) Nitrous Oxide	296	6.63E-02	1.96E+01	6.46E-01	1.91E+02
(a) Carbon Tetrafluoride	5700	4.54E-08	2.59E-04	2.02E-06	1.15E-02
(a) Halon 1301	6900	1.83E-05	1.26E-01	2.71E-04	1.87E+00
<b>Total</b>			<b>1.09E 04</b>		<b>2.05E 04</b>

\* GWP = Global Warming Potential

Ecobilan GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper	per year	per year per capita
Emissions (grams) per 9,000 liters groceries	10894.8513	20527.0974	9632.2461	3515769.821	0.331
Emissions (metric tons) per 9,000 liter groceries	0.0109	0.0205	0.0096	3.516	0.000
Emissions (metric tons) per 1 liter groceries	0.0000	0.0000	0.0000	0.000	0.000
Emissions (metric tons) per bag	0.0000	0.0000	0.0000	0.011	0.000
Emissions (metric tons) per store	0.1695	0.3193	0.1498	54.690	0.000
Emissions in the unincorp territory (metric tons)	11.35	21.39	10.04	3,664	0.000
Emissions in the cities (metric tons)	78.30	147.52	69.22	25,267	0.002
<b>Total Emissions in the County</b>	<b>89.65</b>	<b>168.92</b>	<b>79.26</b>	<b>28,931</b>	<b>0.003</b>

Ecobilan GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase Caused by 50 Percent Conversion from Plastic to Paper	per year	per year per capita
Emissions (grams) per 9,000 liters groceries	10894.8513	20527.0974	9632.2461	3515769.820	0.331
Emissions (metric tons) per 9,000 liter groceries	0.0109	0.0205	0.0096	3.516	0.000
Emissions (metric tons) per 1 liter groceries	0.0000	0.0000	0.0000	0.000	0.000
Emissions (metric tons) per bag	0.0000	0.0000	0.0000	0.011	0.000
Emissions (metric tons) per store	0.1695	0.1597	-0.0098	-3.584	0.000
Emissions in the unincorp territory (metric tons)	11.35	10.70	-0.66	-240	0.000
Emissions in the cities (metric tons)	78.30	73.76	-4.54	-1,656	0.000
<b>Total Emissions in the County</b>	<b>89.65</b>	<b>84.46</b>	<b>-5.19</b>	<b>-1,896</b>	<b>0.000</b>

Ecobilan GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Reusable Bags Used Three Times	CO <sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Reusable	per year	per year per capita
Emissions (grams) per 9,000 liters groceries	10894.8513	9511.9834	-1382.8679	-504746.788	-0.048
Emissions (metric tons) per 9,000 liter groceries	0.0109	0.0095	-0.0014	-0.505	0.000
Emissions (metric tons) per 1 liter groceries	0.0000	0.0000	0.0000	0.000	0.000
Emissions (metric tons) per bag	0.0000	0.0000	0.0000	0.008	0.000
Emissions (metric tons) per store	0.1695	0.1480	-0.0215	-7.852	0.000
Emissions in the unincorp territory (metric tons)	11.35	9.91	-1.44	-526	0.000
Emissions in the cities (metric tons)	78.30	68.36	-9.94	-3,627	0.000
<b>Total Emissions in the County</b>	<b>89.65</b>	<b>78.27</b>	<b>-11.38</b>	<b>-4,154</b>	<b>0.000</b>

Boustead GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper	per year	per year per capita
metric tons for 1,000 paper or 1,500 plastic bags	0.0400	0.0800	0.0400	14.600	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.0001	0.019	0.000
Emissions (metric tons) per store	0.2667	0.5469	0.2802	102.276	0.000
Emissions in the unincorp territory (metric tons)	17.87	36.64	18.77	6,852	0.001
Emissions in the cities (metric tons)	123.20	252.66	129.46	47,252	0.004
<b>Total Emissions in the County</b>	<b>141.07</b>	<b>289.30</b>	<b>148.23</b>	<b>54,104</b>	<b>0.005</b>

Boustead GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase with 50 Percent Conversion from Plastic to Paper	per year	per year per capita
metric tons for 1,000 paper or 1,500 plastic bags	0.0400	0.0800	0.04	14.600	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.00	0.019	0.000
Emissions (metric tons) per store	0.2667	0.2734	0.01	2.471	0.000
Emissions in the unincorp territory (metric tons)	17.87	18.32	0.45	166	0.000
Emissions in the cities (metric tons)	123.20	126.33	3.13	1,142	0.000
<b>Total Emissions in the County</b>	<b>141.07</b>	<b>144.65</b>	<b>3.58</b>	<b>1,307</b>	<b>0.000</b>

ExcelPlas GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase with 50 Percent Conversion from Plastic to Paper	per year	per year per capita
kilograms for 520 bags	6.0800	30.5000	24.42	8913.300	0.001
Emissions (metric tons) per bag	0.0000	0.0001	0.0000	0.017	0.000
Emissions (metric tons) per store	0.1169	0.2933	0.1763	64.366	0.000
Emissions in the unincorp territory (metric tons)	7.83	19.65	11.82	4,313	0.000
Emissions in the cities (metric tons)	54.02	135.49	81.47	29,737	0.003
<b>Total Emissions in the County</b>	<b>61.85</b>	<b>155.14</b>	<b>93.29</b>	<b>34,050</b>	<b>0.003</b>

ExcelPlas GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase with 100 Percent Conversion from Plastic to Paper	per year	per year per capita
kilograms for 520 bags	6.0800	30.5000	24.4200	8913.300	0.001
Emissions (metric tons) per bag	0.0000	0.0001	0.0000	0.017	0.000
Emissions (metric tons) per store	0.1169	0.5865	0.4696	171.410	0.000
Emissions in the unincorp territory (metric tons)	7.83	39.30	31.46	11,484	0.001
Emissions in the cities (metric tons)	54.02	270.98	216.96	79,191	0.007
<b>Total Emissions in the County</b>	<b>61.85</b>	<b>310.28</b>	<b>248.43</b>	<b>90,676</b>	<b>0.009</b>

Conversion Factors	
grams to pounds	0.002204623
pounds to metric tons	0.000453592

2007 recycle rate - plastic bags and sacks	11.9%
2007 recycle rate - paper bags and sacks	36.8%

Ecobilan Data - Greenhouse Gas Emissions Just End of Life	GWP (IPCC)	Plastic Bags		Paper Bags	
		g output	g CO <sub>2e</sub>	g output	g CO <sub>2e</sub>
(a) Carbon Dioxide (CO <sub>2</sub> , fossil)	1	8.70E+01	8.70E+01	5.15E+02	5.15E+02
(a) Methane	23	2.60E-01	5.98E+00	4.96E+02	1.14E+04
(a) Nitrous Oxide	296	1.00E-02	2.96E+00	7.00E-02	2.07E+01
(a) Carbon Tetrafluoride	5700	0.00E+00	0.00E+00	0.00E+00	0.00E+00
(a) Halon 1301	6900	0.00E+00	0.00E+00	0.00E+00	0.00E+00
<b>Total</b>			<b>9.59E 01</b>		<b>1.19E 04</b>

\* GWP = Global Warming Potential

Ecobilan Plastic Bag LCA - Just end-of-life		Adjusted for 2007 Recycle Rates		
Emissions Sources	CO2e	CO2e	Annual CO2e	Per Capita
Emissions (grams) per 9,000 liters groceries	9.59E+01			
Emissions (grams) per 1 liter groceries	0.01066			
Emissions per bag (grams)	0.15			
Emissions per bag (metric tons)	0.00			
Emissions per store (metric tons)	0.00	0.00		
Emissions in the unincorp territory (metric tons)	0	0	32	0.0000
Emissions in the cities (metric tons)	1	1	222	0.0000

Ecobilan Paper Bag LCA - Just end-of-life		Adjusted for 2007 Recycle Rates		
Emissions Sources	CO2e	CO2e	Annual CO2e	Per Capita
Emissions per 9,000 liters of groceries (in grams)	1.19E+04			
Emissions (grams) per 1 liter groceries	1.327591111			
Emissions per bag (grams)	27.19			
Emissions per bag (metric tons)	0.00			
Emissions per store (metric tons)	0.19	0.12		
Emissions in the unincorp territory (metric tons)	12	8	2873	0.0003
Emissions in the cities (metric tons)	86	54	19808	0.0019

Ecobilan Emission differences caused by an 50% conversion from plastic to paper		Adjusted for 2007 Recycle Rates		
Unincorporated territory			1,404	0.00013
Cities			9,682	0.00091

Ecobilan Emission differences caused by a 100% conversion from plastic to paper		Adjusted for 2007 Recycle Rates		
Unincorporated territory			2,840	0.00027
Cities			19,586	0.00185

<b>Boustead GHG emissions - Just end of life</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
metric tons for 1,000 paper or 1,500 plastic bags	0.0030	0.0500	0.0470	17.155	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.0000	0.018	0.000
Emissions (metric tons) per store	0.0200	0.3418	0.3218	117.456	0.000
Emissions in the unincorp territory (metric tons)	1.34	22.90	21.56	7,870	0.00074
Emissions in the cities (metric tons)	9.24	157.91	148.67	54,265	0.00511
<b>Total Emissions in the County</b>	<b>10.58</b>	<b>180.81</b>	<b>170.23</b>	<b>62,134</b>	<b>0.00585</b>

<b>Boustead GHG emissions - Just end of life</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase with 50 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
metric tons for 1,000 paper or 1,500 plastic bags	0.0030	0.0500	0.05	17.155	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.00	0.018	0.000
Emissions (metric tons) per store	0.0200	0.1709	0.15	55.078	0.000
Emissions in the unincorp territory (metric tons)	1.34	11.45	10.11	3,690	0.00035
Emissions in the cities (metric tons)	9.24	78.96	69.72	25,446	0.00240
<b>Total Emissions in the County</b>	<b>10.58</b>	<b>90.41</b>	<b>79.83</b>	<b>29,136</b>	<b>0.00274</b>

Stores in unincorp territory	1024	
Stores in cities	4622	
Plastic bag size (liters)	14	
Paper bag size (liters)	20.48	Reusable Bag Siz
Number of plastic bags per store per day	5000	Ratio of Reusable
Ratio of Paper Bags to Plastic Bags	1.5	to Plastic Bags
Population in the County in 2010	10,615,700	

Ecobilan Plastic Bag LCA					
Emissions Sources	VOCs	NOx	CO	SOx	Particulates
Emissions (grams) per 9,000 liters groceries	37.9294734	27.1	48.2	23.4	19.2
Emissions (grams) per 1 liter groceries	0.004214386	0.003011111	0.005355556	0.0026	0.00213333
Emissions per bag (grams)	0.06	0.04	0.07	0.04	0.03
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.65	0.46	0.83	0.40	0.33
Emissions in the unincorp territory (pounds)	666	476	846	411	337
Emissions in the cities (pounds)	3,006	2,148	3,820	1,855	1,522

Ecobilan Paper Bag LCA					
Emissions Sources	VOCs	NOx	CO	SOx	Particulates
Emissions per 9,000 liters of groceries (in grams)	28.37487101	72.6	9.34	26.1	4.72
Emissions (grams) per 1 liter groceries	0.003152763	0.008066667	0.001037778	0.0029	0.00052444
Emissions per bag (grams)	0.06	0.17	0.02	0.06	0.01
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.49	1.24	0.16	0.45	0.08
Emissions in the unincorp territory (pounds)	498	1,275	164	458	83
Emissions in the cities (pounds)	2,249	5,754	740	2,069	374

Ecobilan Emission differences caused by a 50% conversion from plastic to paper					
Unincorporated territory	-417	162	-764	-182	-296
Cities	-1,882	729	-3,450	-820	-1,335

Ecobilan Emission differences caused by a 100% conversion from plastic to paper					
Unincorporated territory	-168	799	-682	47	-254
Cities	-757	3,606	-3,080	214	-1,148



<b>Ecobilan Plastic Bag LCA - Just end-of-life - All bags disposed</b>		<b>Adjusted for 2007 Recycle Rates</b>	
<b>Emissions Sources</b>	<b>NOx</b>	<b>NOx</b>	
Emissions (grams) per 9,000 liters groceries	<b>0.97</b>		
Emissions (grams) per 1 liter groceries	0.000107778		
Emissions per bag (grams)	0.00		
Emissions per bag (pounds)	0.00		
Emissions per store (pounds)	0.02		0.01
Emissions in the unincorp territory (pounds)	<b>17</b>		<b>15</b>
Emissions in the cities (pounds)	<b>77</b>		<b>68</b>

<b>Ecobilan Paper Bag LCA - Just end-of-life - All bags disposed</b>		<b>Adjusted for 2007 Recycle Rates</b>	
<b>Emissions Sources</b>	<b>NOx</b>	<b>NOx</b>	
Emissions per 9,000 liters of groceries (in grams)	<b>5.74</b>		
Emissions (grams) per 1 liter groceries	0.000637778		
Emissions per bag (grams)	0.01		
Emissions per bag (pounds)	0.00		
Emissions per store (pounds)	0.10		0.06
Emissions in the unincorp territory (pounds)	<b>101</b>		<b>64</b>
Emissions in the cities (pounds)	<b>455</b>		<b>288</b>

<b>Ecobilan Emission differences caused by a 50% conversion from plastic to paper</b>		<b>Adjusted for 2007 Recycle Rates</b>	
Unincorporated territory	<b>33</b>		<b>17</b>
Cities	<b>151</b>		<b>76</b>

<b>Ecobilan Emission differences caused by a 100% conversion from plastic to paper</b>		<b>Adjusted for 2007 Recycle Rates</b>	
Unincorporated territory	<b>84</b>		<b>49</b>
Cities	<b>378</b>		<b>220</b>

<b>Ecobilan Reusable Bag LCA -- 4 Uses</b>					
<b>Emissions Sources</b>	<b>VOCs<sup>1</sup></b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions per 9,000 liters of groceries (in grams)	<b>11.9046679</b>	<b>19.125</b>	7	<b>17.475</b>	<b>13.35</b>
Emissions (grams) per 1 liter groceries	0.001322741	0.002125	0.000777778	0.001941667	0.00148333
Emissions per bag (grams)	0.05	0.08	0.03	0.07	0.05
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.20	0.33	0.12	0.30	0.23
Emissions in the unincorp territory (pounds)	<b>209</b>	<b>336</b>	<b>123</b>	<b>307</b>	<b>234</b>
Emissions in the cities (pounds)	<b>943</b>	<b>1,516</b>	<b>555</b>	<b>1,385</b>	<b>1,058</b>

<b>Boustead Plastic Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs<sup>1</sup></b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions (miligrams) per 1,000 bags	<b>994</b>	<b>45,400</b>	<b>67,400</b>	<b>50,500</b>	<b>14,300</b>
Emissions (grams) per 1,000 bags	0.994	45.4	67.4	50.5	14.3
Emissions per bag (grams)	0.00	0.05	0.07	0.05	0.01
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.01	0.50	0.74	0.56	0.16
Emissions in the unincorp territory (pounds)	<b>11</b>	<b>512</b>	<b>761</b>	<b>570</b>	<b>161</b>
Emissions in the cities (pounds)	<b>51</b>	<b>2,313</b>	<b>3,434</b>	<b>2,573</b>	<b>729</b>

<b>Boustead Paper Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs<sup>1</sup></b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions per 9,000 liters of groceries (in grams)	<b>2</b>	<b>264,000</b>	<b>121,000</b>	<b>579,000</b>	<b>128,000</b>
Emissions (grams) per 1,000 bags	0.002	264	121	579	128
Emissions per bag (grams)	0.00	0.26	0.12	0.58	0.13
Emissions per bag (pounds)	0.00	0.00	0.00	0.00	0.00
Emissions per store (pounds)	0.00	1.99	0.91	4.36	0.96
Emissions in the unincorp territory (pounds)	<b>0</b>	<b>2,037</b>	<b>934</b>	<b>4,468</b>	<b>988</b>
Emissions in the cities (pounds)	<b>0</b>	<b>9,195</b>	<b>4,214</b>	<b>20,166</b>	<b>4,458</b>

<b>Boustead Emission differences caused by a 50% conversion from plastic to paper</b>					
Unincorporated territory	<b>-11</b>	<b>506</b>	<b>-294</b>	<b>1,664</b>	<b>332</b>
Cities	<b>-51</b>	<b>2,284</b>	<b>-1,327</b>	<b>7,510</b>	<b>1,500</b>

<b>Boustead Emission differences caused by a 100% conversion from plastic to paper</b>					
Unincorporated territory	<b>-11</b>	<b>1,525</b>	<b>173</b>	<b>3,898</b>	<b>826</b>
Cities	<b>-51</b>	<b>6,882</b>	<b>780</b>	<b>17,593</b>	<b>3,729</b>

Ecobilan Data - Greenhouse Gas Emissions	Reusable Bag (1 Use)		
	GWP (IPCC)	g output	g CO2e
(a) Carbon Dioxide (CO2, fossil)	1	2.65E+04	2.65E+04
(a) Methane	23	8.76E+01	2.01E+03
(a) Nitrous Oxide	296	7.10E-02	2.10E+01
(a) Carbon Tetrafluoride	5700	-5.21E-08	-2.97E-04
(a) Halon 1301	6900	1.95E-05	1.35E-01
<b>Total</b>			<b>2.85E 04</b>

\* GWP = Global Warming Potential

Ecobilan Data - Greenhouse Gas Emissions	GWP (IPCC)	Plastic Bags		Paper Bags	
		g output	g CO2e	g output	g CO2e
(a) Carbon Dioxide (CO2, fossil)	1	1.01E+04	1.01E+04	1.67E+04	1.67E+04
(a) Methane	23	3.37E+01	7.75E+02	1.58E+02	3.63E+03
(a) Nitrous Oxide	296	6.63E-02	1.96E+01	6.46E-01	1.91E+02
(a) Carbon Tetrafluoride	5700	4.54E-08	2.59E-04	2.02E-06	1.15E-02
(a) Halon 1301	6900	1.83E-05	1.26E-01	2.71E-04	1.87E+00
<b>Total</b>			<b>1.09E 04</b>		<b>2.05E 04</b>

\* GWP = Global Warming Potential

Ecobilan GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper	per year	per year per capita
Emissions (grams) per 9,000 liters groceries	10894.8513	20527.0974	9632.2461	3515769.821	0.331
Emissions (metric tons) per 9,000 liter groceries	0.0109	0.0205	0.0096	3.516	0.000
Emissions (metric tons) per 1 liter groceries	0.0000	0.0000	0.0000	0.000	0.000
Emissions (metric tons) per bag	0.0000	0.0000	0.0000	0.011	0.000
Emissions (metric tons) per store	0.0847	0.1597	0.0749	27.345	0.000
Emissions in the unincorp territory (metric tons)	86.77	163.49	76.72	28,001	0.003
Emissions in the cities (metric tons)	391.66	737.93	346.27	126,388	0.012
<b>Total Emissions in the County</b>	<b>478.43</b>	<b>901.41</b>	<b>422.98</b>	<b>154,389</b>	<b>0.015</b>

Ecobilan GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase Caused by 50 Percent Conversion from Plastic to Paper	per year	per year per capita
Emissions (grams) per 9,000 liters groceries	10894.8513	20527.0974	9632.2461	3515769.820	0.331
Emissions (metric tons) per 9,000 liter groceries	0.0109	0.0205	0.0096	3.516	0.000
Emissions (metric tons) per 1 liter groceries	0.0000	0.0000	0.0000	0.000	0.000
Emissions (metric tons) per bag	0.0000	0.0000	0.0000	0.011	0.000
Emissions (metric tons) per store	0.0847	0.0798	-0.0049	-1.792	0.000
Emissions in the unincorp territory (metric tons)	86.77	81.74	-5.03	-1,835	0.000
Emissions in the cities (metric tons)	391.66	368.96	-22.69	-8,284	-0.001
<b>Total Emissions in the County</b>	<b>478.43</b>	<b>450.71</b>	<b>-27.72</b>	<b>-10,119</b>	<b>-0.001</b>

Ecobilan GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Reusable Bags Used Three Times	CO <sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Reusable	per year	per year per capita
Emissions (grams) per 9,000 liters groceries	10894.8513	9511.9834	-1382.8679	-504746.788	-0.048
Emissions (metric tons) per 9,000 liter groceries	0.0109	0.0095	-0.0014	-0.505	0.000
Emissions (metric tons) per 1 liter groceries	0.0000	0.0000	0.0000	0.000	0.000
Emissions (metric tons) per bag	0.0000	0.0000	0.0000	0.008	0.000
Emissions (metric tons) per store	0.0847	0.0740	-0.0108	-3.926	0.000
Emissions in the unincorp territory (metric tons)	86.77	75.76	-11.01	-4,020	0.000
Emissions in the cities (metric tons)	391.66	341.95	-49.71	-18,145	-0.002
<b>Total Emissions in the County</b>	<b>478.43</b>	<b>417.70</b>	<b>-60.73</b>	<b>-22,165</b>	<b>-0.002</b>

Boustead GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper	per year	per year per capita
metric tons for 1,000 paper or 1,500 plastic bags	0.0400	0.0800	0.0400	14.600	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.0001	0.019	0.000
Emissions (metric tons) per store	0.1333	0.2734	0.1401	51.138	0.000
Emissions in the unincorp territory (metric tons)	136.53	280.00	143.47	52,365	0.00493
Emissions in the cities (metric tons)	616.27	1263.83	647.56	236,360	0.02227
<b>Total Emissions in the County</b>	<b>752.80</b>	<b>1543.83</b>	<b>791.03</b>	<b>288,725</b>	<b>0.02720</b>

Boustead GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase with 50 Percent Conversion from Plastic to Paper	per year	per year per capita
metric tons for 1,000 paper or 1,500 plastic bags	0.0400	0.0800	0.04	14.600	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.00	0.019	0.000
Emissions (metric tons) per store	0.1333	0.1367	0.00	1.236	0.000
Emissions in the unincorp territory (metric tons)	136.53	140.00	3.47	1,265	0.00012
Emissions in the cities (metric tons)	616.27	631.91	15.65	5,711	0.00054
<b>Total Emissions in the County</b>	<b>752.80</b>	<b>771.91</b>	<b>19.11</b>	<b>6,977</b>	<b>0.00066</b>

ExcelPlas GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase with 100 Percent Conversion from Plastic to Paper	per year	per year per capita
kilograms for 520 bags	6.0800	30.5000	24.4200	8913.300	0.001
Emissions (metric tons) per bag	0.0000	0.0001	0.0000	0.017	0.000
Emissions (metric tons) per store	0.0585	0.2933	0.2348	85.705	0.000
Emissions in the unincorp territory (metric tons)	59.86	300.31	240.44	87,762	0.00827
Emissions in the cities (metric tons)	270.21	1355.49	1085.28	396,128	0.03732
<b>Total Emissions in the County</b>	<b>330.07</b>	<b>1655.80</b>	<b>1325.72</b>	<b>483,889</b>	<b>0.04558</b>

Conversion Factors	
grams to pounds	0.002204623
pounds to metric tons	0.000453592

2007 recycle rate - plastic bags and sacks	11.9%
2007 recycle rate - paper bags and sacks	36.8%

Ecobilan Data - Greenhouse Gas Emissions	GWP (IPCC)	Plastic Bags		Paper Bags	
		g output	g CO <sub>2e</sub>	g output	g CO <sub>2e</sub>
(a) Carbon Dioxide (CO <sub>2</sub> , fossil)	1	8.70E+01	8.70E+01	5.15E+02	5.15E+02
(a) Methane	23	2.60E-01	5.98E+00	4.96E+02	1.14E+04
(a) Nitrous Oxide	296	1.00E-02	2.96E+00	7.00E-02	2.07E+01
(a) Carbon Tetrafluoride	5700	0.00E+00	0.00E+00	0.00E+00	0.00E+00
(a) Halon 1301	6900	0.00E+00	0.00E+00	0.00E+00	0.00E+00
<b>Total</b>			<b>9.59E 01</b>		<b>1.19E 04</b>

\* GWP = Global Warming Potential

Ecobilan Plastic Bag LCA - Just end-of-life		Adjusted for 2007 Recycle Rates		
Emissions Sources	CO2e	CO2e	Annual CO2e	Per Capita
Emissions (grams) per 9,000 liters groceries	9.59E+01			
Emissions (grams) per 1 liter groceries	0.01066			
Emissions per bag (grams)	0.15			
Emissions per bag (metric tons)	0.00			
Emissions per store (metric tons)	0.00	0.00		
Emissions in the unincorp territory (metric tons)	1	1	246	0.0000
Emissions in the cities (metric tons)	3	3	1109	0.0001

Ecobilan Paper Bag LCA - Just end-of-life		Adjusted for 2007 Recycle Rates		
Emissions Sources	CO2e	CO2e	Annual CO2e	Per Capita
Emissions per 9,000 liters of groceries (in grams)	1.19E+04			
Emissions (grams) per 1 liter groceries	1.327591111			
Emissions per bag (grams)	27.19			
Emissions per bag (metric tons)	0.00			
Emissions per store (metric tons)	0.09	0.06		
Emissions in the unincorp territory (metric tons)	95	60	21952	0.0021
Emissions in the cities (metric tons)	430	271	99084	0.0093

Ecobilan Emission differences caused by a 50% conversion from plastic to paper		Adjusted for 2007 Recycle Rates		
Unincorporated territory			10,730	0.00101
Cities			48,433	0.00456

Ecobilan Emission differences caused by a 100% conversion from plastic to paper		Adjusted for 2007 Recycle Rates		
Unincorporated territory			21,706	0.00204
Cities			97,975	0.00923

<b>Boustead GHG emissions - Just end of life</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
metric tons for 1,000 paper or 1,500 plastic bags	0.0030	0.0500	0.0470	17.155	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.0000	0.018	0.000
Emissions (metric tons) per store	0.0100	0.1709	0.1609	58.728	0.000
Emissions in the unincorp territory (metric tons)	10.24	175.00	164.76	60,137	0.00566
Emissions in the cities (metric tons)	46.22	789.89	743.67	271,440	0.02557
<b>Total Emissions in the County</b>	<b>56.46</b>	<b>964.89</b>	<b>908.43</b>	<b>331,578</b>	<b>0.03123</b>

<b>Boustead GHG emissions - Just end of life</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase with 50 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
metric tons for 1,000 paper or 1,500 plastic bags	0.0030	0.0500	0.05	17.155	0.000
Emissions (metric tons) per bag	0.0000	0.0001	0.00	0.018	0.000
Emissions (metric tons) per store	0.0100	0.0854	0.08	27.539	0.000
Emissions in the unincorp territory (metric tons)	10.24	87.50	77.26	28,200	0.00266
Emissions in the cities (metric tons)	46.22	394.95	348.73	127,285	0.01199
<b>Total Emissions in the County</b>	<b>56.46</b>	<b>482.45</b>	<b>425.99</b>	<b>155,485</b>	<b>0.01465</b>



<b>Stores in unincorp territory 10,000 sq ft</b>	1091
<b>Stores in cities 10,000 sq ft</b>	5084

<b>Ecobilan Plastic Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs</b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions in the unincorp territory (pounds)	753	538	957	465	381
Emissions in the cities (pounds)	3,607	2,577	4,584	2,225	1,826

<b>Ecobilan Paper Bag LCA</b>					
<b>Emissions Sources</b>	<b>VOCs</b>	<b>NOx</b>	<b>CO</b>	<b>SOx</b>	<b>Particulates</b>
Emissions in the unincorp territory (pounds)	563	1,442	185	518	94
Emissions in the cities (pounds)	2,698	6,904	888	2,482	449

<b>Ecobilan Emission differences caused by a 50% conversion from plastic to paper</b>					
Unincorporated territory	-471	183	-864	-206	-334
Cities	-2,258	875	-4,140	-984	-1,601

<b>Ecobilan Emission differences caused by a 100% conversion from plastic to paper</b>					
Unincorporated territory	-190	903	-772	54	-288
Cities	-909	4,327	-3,695	257	-1,377

<b>Ecobilan Plastic Bag LCA - Just end-of-life</b>		<b>Adjusted for 2007 Recycle Rates</b>	
<b>Emissions Sources</b>	<b>NOx</b>	<b>NOx</b>	
Emissions in the unincorp territory (pounds)	19	17	
Emissions in the cities (pounds)	92	81	

<b>Ecobilan Paper Bag LCA - Just end-of-life</b>		<b>Adjusted for 2007 Recycle Rates</b>	
<b>Emissions Sources</b>	<b>NOx</b>	<b>NOx</b>	
Emissions in the unincorp territory (pounds)	114	72	
Emissions in the cities (pounds)	546	345	

<b>Ecobilan Emission differences caused by a 50% conversion from plastic to paper</b>			<b>Adjusted for 2007 Recycle Rates</b>	
Unincorporated territory	38		19	
Cities	181		91	

Ecobilan Emission differences caused by a 100% conversion from plastic to paper			Adjusted for 2007 Recycle Rates	
Unincorporated territory	95		55	
Cities	454		264	

Ecobilan Reusable Bag LCA -- 4 Uses					
Emissions Sources	VOCs <sup>1</sup>	NOx	CO	SOx	Particulates
Emissions in the unincorp territory (pounds)	-517	-158	-818	-118	-116
Emissions in the cities (pounds)	-2,475	-758	-3,918	-563	-556

Boustead Plastic Bag LCA					
Emissions Sources	VOCs <sup>1</sup>	NOx	CO	SOx	Particulates
Emissions in the unincorp territory (pounds)	13	580	860	645	183
Emissions in the cities (pounds)	61	2,775	4,120	3,087	874

Boustead Paper Bag LCA					
Emissions Sources	VOCs <sup>1</sup>	NOx	CO	SOx	Particulates
Emissions in the unincorp territory (pounds)	0	2,304	1,056	5,052	1,117
Emissions in the cities (pounds)	0	11,033	5,057	24,197	5,349

Boustead Emission differences caused by a 50% conversion from plastic to paper					
Unincorporated territory	-13	572	-332	1,882	376
Cities	-61	2,741	-1,592	9,011	1,800

Boustead Emission differences caused by a 100% conversion from plastic to paper					
Unincorporated territory	-13	1,724	195	4,408	934
Cities	-61	8,257	936	21,110	4,475

Ecobilan GHG emissions	CO <sub>2e</sub> Emissions from Plastic Bags	CO <sub>2e</sub> Emissions from Paper Bags	CO <sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper	per year	per year per capita
Emissions in the unincorp territory (metric tons)	98.13	184.88	86.75	31,665	0.003
Emissions in the cities (metric tons)	469.96	885.45	415.49	151,655	0.014
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>1070.33</b>	<b>502.25</b>	<b>183,320</b>	<b>0.017</b>

<b>Ecobilan GHG emissions</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase Caused by 50 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
Emissions in the unincorp territory (metric tons)	98.13	92.44	-5.69	-2,075	0.000
Emissions in the cities (metric tons)	469.96	442.72	-27.23	-9,940	-0.001
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>535.16</b>	<b>-32.92</b>	<b>-12,015</b>	<b>-0.001</b>

<b>Ecobilan GHG emissions</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Reusable Bags Used Three Times</b>	<b>CO<sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Reusable</b>	<b>per year</b>	<b>per year per capita</b>
Emissions in the unincorp territory (metric tons)	98.13	85.67	-12.46	-4,546	0.000
Emissions in the cities (metric tons)	469.96	410.30	-59.65	-21,773	-0.002
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>495.98</b>	<b>-72.11</b>	<b>-26,319</b>	<b>-0.002</b>

<b>Boustead GHG emissions</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase Caused by 100 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
Emissions in the unincorp territory (metric tons)	154.40	316.64	162.24	59,218	0.00558
Emissions in the cities (metric tons)	739.47	1516.48	777.02	283,611	0.02672
<b>Total Emissions in the County</b>	<b>893.87</b>	<b>1833.13</b>	<b>939.26</b>	<b>342,829</b>	<b>0.03229</b>

<b>Boustead GHG emissions</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase with 50 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
Emissions in the unincorp territory (metric tons)	154.40	158.32	3.92	1,431	0.00013
Emissions in the cities (metric tons)	739.47	758.24	18.78	6,853	0.00065
<b>Total Emissions in the County</b>	<b>893.87</b>	<b>916.56</b>	<b>22.70</b>	<b>8,284</b>	<b>0.00078</b>

<b>ExcelPlas GHG emissions</b>	<b>CO<sub>2e</sub> Emissions from Plastic Bags</b>	<b>CO<sub>2e</sub> Emissions from Paper Bags</b>	<b>CO<sub>2e</sub> Emission Increase with 100 Percent Conversion from Plastic to Paper</b>	<b>per year</b>	<b>per year per capita</b>
Emissions in the unincorp territory (metric tons)	67.70	339.61	271.91	99,246	0.00935
Emissions in the cities (metric tons)	324.23	1626.47	1302.24	475,319	0.04478
<b>Total Emissions in the County</b>	<b>391.93</b>	<b>1966.08</b>	<b>1574.15</b>	<b>574,565</b>	<b>0.05412</b>

<b>Greenhouse Gas Emissions due to Mobile Sources</b>			
	<b>CO<sub>2</sub> Emissions (Pounds/Day)*</b>	<b>CO<sub>2</sub> Emissions (Metric Tons/Year)</b>	<b>CO<sub>2</sub> Emissions per Capita (metric tons/Year)</b>
17 Delivery Truck Trips in the Unincorporated Territory of Los Angeles	278.44	46.10	0.000004
79 Delivery Truck Trips in the Incorporated Cities of Los Angeles	1293.91	214.22	0.000020
<b>Total Emissions</b>	<b>1,572.35</b>	<b>260.32</b>	<b>0.000025</b>

\*Numbers from URBEMIS 2007

<b>Ecobilan Plastic Bag LCA - Just end-of-life</b>	<b>Adjusted for 2007 Recycle Rates</b>			
<b>Emissions Sources</b>	<b>CO<sub>2e</sub></b>	<b>CO<sub>2e</sub></b>	<b>Annual CO<sub>2e</sub></b>	<b>Per Capita</b>
Emissions in the unincorp territory (metric tons)	1	1	278	0.0000
Emissions in the cities (metric tons)	4	4	1331	0.0001

Ecobilan Paper Bag LCA - Just end-of-life		Adjusted for 2007 Recycle Rates		
Emissions Sources	CO <sub>2</sub> e	CO <sub>2</sub> e	Annual CO <sub>2</sub> e	Per Capita
Emissions in the unincorp territory (metric tons)	108	68	24825	0.0023
Emissions in the cities (metric tons)	515	326	118892	0.0112

Ecobilan Emission differences caused by a 50% conversion from plastic to paper		Adjusted for 2007 Recycle Rates		
Unincorporated territory			12,134	0.00114
Cities			58,115	0.00547

Ecobilan Emission differences caused by a 100% conversion from plastic to paper		Adjusted for 2007 Recycle Rates		
Unincorporated territory			24,547	0.00231
Cities			117,561	0.01107

Boustead GHG emissions - Just end of life	CO <sub>2</sub> e Emissions from Plastic Bags	CO <sub>2</sub> e Emissions from Paper Bags	CO <sub>2</sub> e Emission Increase Caused by 100 Percent Conversion from Plastic to Paper	per year	per year per capita
Emissions in the unincorp territory (metric tons)	11.58	197.90	186.32	68,007	0.00641
Emissions in the cities (metric tons)	55.46	947.80	892.34	325,705	0.03068
<b>Total Emissions in the County</b>	<b>67.04</b>	<b>1145.70</b>	<b>1078.66</b>	<b>393,712</b>	<b>0.03709</b>

Boustead GHG emissions - Just end of life	CO <sub>2</sub> e Emissions from Plastic Bags	CO <sub>2</sub> e Emissions from Paper Bags	CO <sub>2</sub> e Emission Increase with 50 Percent Conversion from Plastic to Paper	per year	per year per capita
Emissions in the unincorp territory (metric tons)	11.58	98.95	87.37	31,890	0.00300
Emissions in the cities (metric tons)	55.46	473.90	418.44	152,731	0.01439
<b>Total Emissions in the County</b>	<b>67.04</b>	<b>572.85</b>	<b>505.81</b>	<b>184,621</b>	<b>0.01739</b>



## **APPENDIX D: INITIAL STUDY AND COMMENT LETTERS**

A letter of comment received from the American Chemistry Council on the Initial Study has been added in Appendix D.

A letter of comment received from the County of Los Angeles Fire Department on the Initial Study has been added in Appendix D.



January 4, 2010

Mr. Coby Skye  
County of Los Angeles Department of Public Works  
Environmental Programs Division  
900 South Fremont Avenue, 3<sup>rd</sup> Floor  
Alhambra, California 91803

Via email: [CSkye@dpw.lacounty.gov](mailto:CSkye@dpw.lacounty.gov)

Re: Comments of the Progressive Bag Affiliates of the American Chemistry Council on Initial Study on Ordinances to Ban Plastic Carryout Bags in Los Angeles County

Dear Mr. Skye:

I write on behalf of the American Chemistry Council ("ACC")'s Progressive Bag Affiliates (PBA) to provide the attached comments on the Initial Study on Ordinances to Ban Plastic Carryout Bags in Los Angeles County prepared by Sapphos Environmental and dated December 1, 2009 (referred to as "Initial Study").

We are pleased to have the opportunity to submit comments, as we recognize that the correct and complete definition of all reasonably foreseeable elements of a proposed project is the single most important element of the California Environmental Quality Act (CEQA) compliance process. Our comments focus on the adequacy and accuracy of the information contained in the Initial Study under CEQA. While we recognize that the initial study does not need to include the level of detail included in the Environmental Impact Report (EIR) it should nevertheless be supported by "facts, technical studies or other substantial evidence to document its findings," CEQA Guidelines § 15063, and we have conducted our review and submit these comments accordingly. Given that the Initial Study also defines the scope of the EIR to be conducted, we provide further comments on the scope and content of the EIR.

While we are encouraged to see that the study recommends preparation of an EIR, it grossly over-represents the adverse environmental impact of plastic bags and grossly under-represents those of paper bags. This review is at the very heart of the EIR and must be conducted thoroughly and comprehensively. Importantly, the study makes a number of assumptions about consumer behavior that are not substantiated. Contrary to the conclusions set out in the report, there is no data to suggest that a consumer switch from plastic to paper would be temporary. To the contrary, data suggests that most consumers will continue to select free carryout bags at checkout. Selection of paper bags instead of plastic bags would have the effect of significantly increasing the use of natural resources, fossil fuels, and water; and will have other significant adverse impacts, particularly on the emission of more greenhouse gases and further burdening the County's landfills.

We support the preparation of a complete EIR that addresses the broadest range of potential impacts. This is particularly the case given the controversial nature of the proposed ordinances. We also encourage the lead agency to exercise its authority to request the County to collect and submit additional information needed for environmental evaluation of the proposed ordinances.

Please feel free to contact me if I can assist you further with respect to these comments.

Very truly yours,

A handwritten signature in black ink that reads "Shari M. Jackson".

Shari M. Jackson  
Director, Progressive Bag Affiliates



COMMENTS OF  
THE PROGRESSIVE BAG AFFILIATES OF THE AMERICAN CHEMISTRY COUNCIL  
ON INITIAL STUDY -- ORDINANCES TO BAN PLASTIC CARRYOUT BAGS  
IN LOS ANGELES COUNTY

**Introduction**

Various localities in California have explored the viability of imposing product bans as a mechanism to prevent particular products from being littered. The theory is seemingly elegant, and on first glance, attractive: if there is a perceived litter problem with a product and there appear to be viable alternatives to that product, then just ban it and force consumers to switch to the substitute.

This theory, however, is flawed. Littering behavior has been extensively studied, and much littering is deliberate (intentional). Simply removing one potential source of litter does not solve the underlying behavior; the litterer simply litters with another product.

Litter aside, the forced substitution of one product with another can create significant unintended consequences, and is not necessarily a net advantage for the environment or human health. In the case of plastic bags, data show that widespread adoption of paper – the most likely substitute – would have adverse impacts on the environment, while doing little or nothing to prevent litter.

This is why it is so important that the County accurately and fully characterize the environmental benefits and impacts of plastic bags, and in exploring the environmental consequences of a plastic bag ban, accurately and fully characterize the environmental benefits and impacts of the replacement product, paper bags. It is also important to understand that a policy that results in a slight shift to reusable bags but a significant shift to paper bags will nevertheless have significant adverse environmental consequences.

We continue to believe that a comprehensive approach based on the three pillars of sustainable consumption (reduce, reuse and recycle) is the best method to reduce bag waste and promote litter prevention. And, our experience has been that working cooperatively in partnership with other organizations is an effective way to leverage scarce resources and achieve results more quickly. We have supported a number of programs using this approach and promoting bag recycling including Keep California Beautiful’s new “Got Your Bags” program. This initiative encourages consumers to bring their bags back to the grocery store whether they are reusable bags or recyclable plastic bags. Recycling and reusing plastic bags is one of the simplest things consumers can do to contribute to a better environment. Surveys show that 92 percent of consumers already reuse their plastic shopping bags (*Source: National Plastic Shopping Bag Recycling Signage Testing March 2007, see attached*).

**GENERAL COMMENTS**

**General Comment #1: The Key Findings of the Initial Study Fail to Thoroughly and Properly Evaluate the Potential Environmental Impacts of the Proposed Ordinances.**

The statutory responsibility of the lead agency in preparing the Initial Study includes evaluating the significance of the environmental effect of the ordinances. The CEQA Guidelines 15064 require consideration of both “direct physical changes in the environment which may be caused by the project” and (2) “reasonably foreseeable indirect physical changes in the environment which may be caused by the project.” An indirect physical change in the environment is “a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project.” The stated example in the Guidelines is an increase in air pollution caused by increased population growth resulting from the construction of a new sewage plant.

The key findings are deficient on their face, because while the Initial Study devotes significant effort to examining the purported environmental “benefits” of the ordinances, it devotes virtually no effort to evaluating indirect effects. Without adequately examining the indirect effects of the ordinances, the review severely under-represents the significance of adverse environmental effects from the ordinances (e.g., a consumer switch to paper bags).

There are two areas of local concern that are particularly glaring in their deficiencies. The first is the anticipated additional burden to already overtaxed landfills in the County as consumers shift from plastic bags to paper bags. This shift will result in additional greenhouse gas generation from trucks moving solid waste, and additional greenhouse gas generation as methane is generated in the landfill by paper bags. The shift will also accelerate landfill capacity and closure. The second area is again related to greenhouse gas generation, as additional trucks carrying additional paper bags generates additional greenhouse gases over those needed to transport plastic bags.

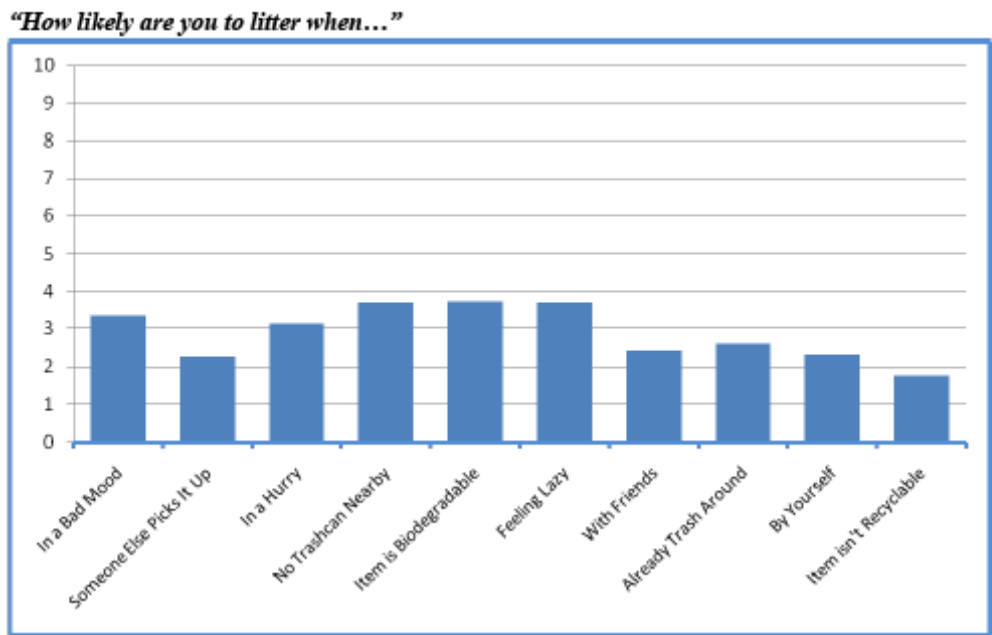
Recommendation: The County should devote at least equivalent time and focus to examining the adverse environmental impacts of switching from plastic bags to one or more substitute products. Evaluation of the environmental benefits/adverse impacts of various products should use reliable Life Cycle Analysis (LCA) (see Appendix A, Life Cycle Assessments of Paper and Plastic Bags). It should explore the various scenarios that motivate consumer behavior so the consumer shift to substitute products can be reasonably projected and the associated environmental impacts calculated. The evaluation should not be based on speculation about what consumer behavior might be, but should be based on empirical data of consumer behavior following plastic bag bans in other jurisdictions such as San Francisco where an overwhelming switch to paper bags has been observed. *A Qualitative Study of Grocery Bag Use in San Francisco*, <http://use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>.

1 cont.

**General Comment #2: The Initial Study Fails To Adequately Address the Additional Litter and Human Health Impacts that May be Introduced by the Use of Biodegradable Bags or Reusable Bags.**

While a key finding of the Initial Study is that biodegradable carryout bags are not a practical solution to “this issue” in Los Angeles County, and while we agree with this conclusion, we believe that the Initial Study fails to adequately address the many evidentiary reasons that support this conclusion. First, as noted above, litter behavioral studies suggest that people may litter more if they believe the products they are using are organic or can biodegrade (*Source: Littering in the I-Generation, Keep Los Angeles Beautiful, 2009, see attached*). For example, a study of littering conducted by Keep Los Angeles Beautiful reported that perception of biodegradability is one of the strongest contributors to littering (figure #3 below).

**Figure 3. Mean Scores for Barriers and Motivators to Proper Disposal**



2

If a prohibition of plastic carryout bags leads to the use of more “biodegradable” bags including paper the potential impact on a net increase in litter must be considered. Additionally, many such bags in fact are not biodegradable within the layman’s understanding at all; rather, the bags degrade very slowly in the natural environment.

To the extent that the proposed ordinances may result in a shift from plastic carryout bags to bags that are used repeatedly without regular washings, the substitute bags may present new health risks that should be evaluated. The Initial Study fails to adequately address this public health risk. The first North American microbiological study on reusable bags, issued earlier this year, found high levels of bacterial, yeast, mold and coliform counts in many reusable bags. Sixty-four (64) percent of the bags tested were contaminated with some level of bacteria.

Dr. Richard Summerbell, research director at Toronto-based Sporometrics and former chief of medical mycology for the Ontario Ministry of Health, reviewed the study and stated that “the main risk is food poisoning ... but other significant risks include skin infections such as bacterial boils, allergic reactions, triggering of asthma attacks, and ear infections.” The study conclusions included the observation that there is a potential for cross-contamination of food if the same reusable bags are used on successive trips; that check-out staff in stores may be transferring these microbes from reusable bag to reusable bag as the contaminants get on their hands; and that in cases of food poisoning, experts will have to test reusable bags in addition to food products as the possible sources of contamination.

2 cont.

[http://www.cpia.ca/files/files/A\\_Microbiological\\_Study\\_of\\_Reusable\\_Grocery\\_Bags\\_May20\\_09.pdf](http://www.cpia.ca/files/files/A_Microbiological_Study_of_Reusable_Grocery_Bags_May20_09.pdf). Health Canada issued guidance as a result of this study. See, Health Canada guidance, at <http://www.hc-sc.gc.ca/fn-an/securit/kitchen-cuisine/reusable-bags-sacs-reutilisable-eng.php>.

Recommendation: The County should study the potential environmental impacts and public health impacts of reusable bags and include these calculations in the EIR.

**General Comment #3: The Initial Study Fails to Adequately Address Potential Adverse Impacts From Reduced Recycling of Plastic Film and Impacts on the Recycling Infrastructure.**

Over 830 million pounds of plastic bags and film are recycled every year in the U.S., predominantly through the nationwide grocery and retail system where they are consolidated with stores’ stretch film (pallet wrap) and recycled through a well established recycling infrastructure.

A prohibition of plastic carryout bags may result in an overall decrease in the recycling of plastics, or damage the recycling infrastructure for polyethylene bags, wraps, and film. Currently, stores that accept plastic bags for recycling, as mandated by California law, also accept other polyethylene wraps and films, including dry cleaning bags, toilet paper wraps, paper towel wraps, and other wraps and bags. But if commercial retailers and grocers may no longer offer plastic bags under the proposed ordinance, it is reasonable to assume that a significant majority of such businesses will also stop offering to accept plastic bags for recycling at their stores, since they will no longer be required to do so. In fact, empirical evidence bearing this out has already emerged in a study conducted by *Use Less Stuff* following the San Francisco plastic bag ban. See, <http://www.use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>. The study, following the City’s plastic bag ban, reported that several stores had already removed, or had moved to obscured areas, plastic bag recycling bins from their stores within a fairly short period following the ban.

3

The clear impact is that the proposed ordinances are likely to significantly reduce recycling of other plastic bags, films, and wraps, and perhaps completely eliminate the ability for County residents to recycle any of these items. If recycling facilities are no longer readily available to accept these products, very few if any of these products will be recycled. Existing behavioral evidence is clear that if readily available recycling centers are not available, people will stop recycling. See, e.g., <http://www.articlesbase.com/home-improvement-articles/why-is-recycling-important-697194.html>. (readily available recycling centers are essential to promote recycling behavior); Sidique et al., *The Effects of Behavior and Attitudes on Drop-off Recycling Activities (2009)*, available at [www.sciencedirect.com](http://www.sciencedirect.com) (recyclers use the drop-off sites more when they feel that recycling is a convenient

activity and when they are more familiar with the sites). This outcome is a potentially serious environmental consequence, and one that could result in a net increase in litter or landfill impacts.

It should also be noted that the reduced availability of plastic grocery bags could have other detrimental effects on recycling programs in the Los Angeles Basin, further reducing recycling and imposing additional burdens on landfills.

3 cont.

Recommendation: The County should determine the current recycling rate and volume for non-plastic bag films and the intake origin for such material (e.g., grocery stores currently offering bag and film recycling). The study should examine existing alternate avenues, if any, for collection of plastic films for recycling. The net adverse environmental impact should be calculated, including landfill burden, as this additional avenue for film, bag, and wrap recycling of polyethylene is lost.

**General Comment #4: The Initial Study Does Not Present Sufficient Evidence to Support its Key Finding that “accelerating the use of reusable bags will diminish plastic bag litter.”**

The study here makes several flawed assumptions. The first is that a ban on plastic bags will drive consumers to use reusable bags. Available data suggest that this is not the case; where paper bags are freely available at checkout, consumers will select paper bags. This has been documented by a recent study conducted by *Use Less Stuff* (ULS), which surveyed the effect of the plastic bag ban in San Francisco on paper bag usage. ULS found that paper bag use increased significantly.

<http://www.use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>.

The second flawed assumption is that removing a source of litter will diminish littering behavior. Substituting one packaging material, or carryout bag for another, does not address littering behavior. The Initial Study assumes that reducing the total number of plastic carryout bags used in the jurisdiction will necessarily reduce the number of plastic bags that are littered. There is, however, no substantiated basis for such an assumption, and significant evidence that without actions that directly address the behavioral issue, litter will continue unabated, or worsen. See generally, A Review of Litter Studies, Attitude Surveys and Other Litter-Related Literature, Keep America Beautiful, July 2007 ([http://www.kab.org/site/DocServer/Litter\\_Literature\\_Review.pdf?docID=481](http://www.kab.org/site/DocServer/Litter_Literature_Review.pdf?docID=481) (referred to as “KAB Report”).

4

The psychological behaviors that lead to littering have been well studied. A number of influences have been noted, such as:

- An already clean environment. One study from California State University, Sacramento, concludes that littering is less likely to occur in an environmental area that is already clean or maintained clean. This principle is sometimes called the “litter begets litter” principle. See, Reiter, S.M., and Samuel, W., Littering as a Function of Prior Litter and the Presence or Absence of Prohibitive Signs, *Journal of Applied Social Psychology*, 1980 (concluding that the littering rate was lowest in an already clean environment); Curnow, R.; Strecker, P.; Williams, E.; *Understanding Littering Behaviour; a Review of the Literature*. Beverage Industry Environmental Council, Pyrmont, Australia, 1997 (p. 31).
- The ready availability, design and convenience of trash receptacles. Curnow, R.; Strecker, P.; Williams, E.; *Understanding Littering Behaviour; a Review of the Literature*. Beverage Industry Environmental Council, Pyrmont, Australia, 1997.
- Effective communication and education. Stern, P.C.; Oskamp, S.; *Managing Scarce Environmental Resources*, In: Stokols, D.; Altman, I. *Handbook of Environmental Psychology, Vol. 2*. Krieger Publishing Company, Malabar, Florida, 1991 (pp. 1055-1057); see also Hansmann, R.; Scholz, R.W. *Environment and Behavior*, 2003, Vol. 35 No. 6, 752-762 (literature review of research concerning the effective design of explicit anti-littering messages noting evidence that prompts phrased as requests are more effective than those phrased as orders; and prompts are more effective if they contain a more specific description of the desired behavior).

One of the more significant findings in the literature reviews is that there are certain littering behaviors that may continue, or worsen, if the litterer believes that the litter will biodegrade. See, e.g., KAB Report at 6-3 (an acceptable reason provided for littering is the belief that the waste is organic). In fact, Keep Los Angeles Beautiful has conducted a study of factors that contribute to littering and concluded that the perception of biodegradability is one of the major contributors. (Source: *Littering in the I-Generation, Keep Los Angeles Beautiful, 2009, see attached*). This is particularly relevant here because the Initial Study fails to take into consideration that a shift from plastic carryout bags to paper or fabric may result in a net increase in litter since certain litterers believe the bags will degrade in the environment.

4 cont.

The third flawed assumption is that if there is reduced access to plastic bags, plastic bag litter will necessarily diminish. This assumption is unfounded. To reach such a conclusion, it would be necessary for the County to conduct a targeted litter audit focused on plastic bags, and then to restrict access to the specific plastic bags that are actually in the litter stream.

Recommendation: To inform the EIR, the County should conduct a detailed litter audit focused on sourcing plastic bag litter. The study should also contain an observational behavioral component that seeks to better understand the impact that demographic factors such as age have on littering behavior.

**General Comment #5: The Initial Study Fails to Identify Significant Irreversible Environmental Effects of the Proposed Ordinances.**

Under CEQA, an EIR must analyze the extent to which a plan's primary and secondary effects would commit resources to uses that future generations will probably be unable to reverse. CEQA Guidelines Section 15126(f). Implementation of the proposed ordinances would result in the irreversible commitment of certain natural resources. The most notable significant irreversible impacts are expenditure of energy resources in the form of natural gas, electricity, and gasoline; increased generation of pollutants; and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources such as lumber and other forest products, landfill capacity, and water resources.

5

A shift from plastic bags to paper bags will result in substantial additional depletion of natural resources. Fossil fuels will be needed to support lumbering operations. During manufacture, fossil fuels and electricity would be consumed. During transportation – bags to store and also bags from the store to consumers' homes - fossil fuels would be consumed.

**General Comment #6: The Initial Study Fails to Identify Cumulative Effects, Including Air Quality, Greenhouse Gas and Global Warming Impacts, of the Proposed Ordinance.**

Implementation of the proposed ordinances would result in cumulative impacts related to air quality and greenhouse gases from increased landfill emissions (methane), truck traffic (CO, VOCs, NOx, PM10, and PM2.5), and air pollution impacts from paper bag manufacture and lumbering. Methane gases from landfills are a serious greenhouse gas and global warming concern.

See, e.g., <http://cdm.unfccc.int/UserManagement/FileStorage/WT2UQTYRGORYSPUBWL923QLJX31KFQ>. At the federal level (under NEPA), greenhouse gas emissions resulting from a proposed project "are either direct or indirect effects, and therefore the resulting global climate change impacts are classic examples of cumulative effects." 40 C.F.R. § 1502.16. Climate change impacts are, by definition, inherently cumulative and significant. See 40 C.F.R. § 1508.27[b] [7], and at the federal level, the U.S. Supreme Court has ruled that such impacts are reasonably foreseeable. *Massachusetts et al. v. Environmental Protection Agency*, 549 U.S. 497 (2007). The EIR must address these issues fully in its review with respect to the impacts of a consumer shift from plastic to paper bags.

6

**General Comment #7: The Initial Study Fails to Identify Significant Environmental Impacts Outside Los Angeles County that Will Occur If the Proposed Ordinances are Implemented.**

7

The California Supreme Court has held that consideration of environmental impacts extends outside the jurisdiction in which the statutory project is located:

[N]o statute (in CEQA or elsewhere) imposes any per se geographical limit on otherwise appropriate CEQA evaluation of a project's environmental impacts. To the contrary, CEQA broadly defines the relevant geographical environment as "the area which will be affected by a proposed project." (Pub. Resources Code, § 21060.5.) Consequently, "the project area does not define the relevant environment for purposes of CEQA when a project's environmental effects will be felt outside the project area." (*County Sanitation Dist. No. 2 of Los Angeles County v. County of Kern* (2005) 127 Cal.App.4<sup>th</sup> 1544, 1582-1583.) Indeed, "the purpose of CEQA would be undermined if the appropriate governmental agencies went forward without an awareness of the effects a project will have on areas outside of the boundaries of the project area." (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001). 7 cont.

*Muzzy Ranch Co. v. Solano County Airport Land Use Com'n*, 41 Cal.4th 372, 384-385, 389, 60 Cal.Rptr.3d 247, 160 P.3d 116 (2007).

Given the nature of the proposed ordinances, many of the environmental impacts that will occur from a shift from paper to plastic bags will occur within the County, but many others will occur outside the County. The County is therefore obliged under CEQA to consider geographically distant environmental impacts of their activities. This includes environmental impacts of lumbering (fossil fuel use; land degradation, habitat impacts); paper bag manufacturing (water use, fossil fuel use, air and water pollution); landfill burden outside the county; transportation of paper bags into and out of the County. The EIR should address all these issues fully.

### Specific Comments

Page 1-3 Study: The study estimates that litter from plastic carryout bags that are designed for single use account for as much as 25 percent of the litter stream. As support for this estimate, the study cites a 2004 study and a more recent 2008 study by the County of Los Angeles Department of Public Works.

Comment: The estimate presented is speculative and does not meet criteria for inclusion in the Initial Study or EIR. The estimate is also inconsistent with hard data drawn from litter audits. Data from the most recent, comprehensive national litter literature study indicates that litter composition from 9 states using IAR methodology for the category "napkins, bags, and tissues" was on average 6.3%. See A Review of Litter Studies, Attitude Surveys and Other Litter Related Literature, R.W. Beck (July, 2007), available at [http://www.kab.org/site/DocServer/Litter\\_Literature\\_Review.pdf?docID=481](http://www.kab.org/site/DocServer/Litter_Literature_Review.pdf?docID=481); Table 3.4, Composition of Litter, IAR-Based Surveys (1993-2006) (p.3-7). Notably, the category does not distinguish among the three constituents (napkins, bags, and tissues) nor does it distinguish between paper and plastics, so the actual composition of plastic bags in the litter stream would be expected to be significantly lower. The average is also inflated by a higher number from older data (1993) from the State of Hawaii; notably, the most recent data collected from Tennessee and Georgia from 2006 for this entire category indicates litter stream concentrations at 1.8% and 4.6%, respectively. Again, the plastic bag component of this category would be a subset, and perhaps significantly smaller. 8

The report's estimate is also inconsistent with the City of San Francisco's recent litter audit data. San Francisco's Department of Environment Litter Survey Report (July 2008) (Table 5, p. 30), shows that non-retail plastic bags composed only 3.4% of the large litter portion of the litter stream from 2008 data. [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf).

Actual litter stream audit data therefore suggests that plastic bags in fact represent a very small percentage of the litter stream, and the “estimates” presented in the Initial Study grossly over-represent plastic bags. 8 cont.

Page 1-3 Study: The study presents data on the number of plastic bags consumed annually in the County as 6 million.

Comment: No evidence is presented to connect the amount of plastic bag litter with the number of bags consumed annually. No evidence is presented on the number of paper bags annually consumed within the County. No evidence is presented with respect to the equivalent number of paper bags that this figure represents, so that the environmental impacts of product substitution can be adequately evaluated. 9

Page 1-3 Study: The study claims that the County of Los Angeles Flood Control District spent more than \$18 million annually for prevention, clean up, and enforcement efforts to reduce litter, of which “plastic bags are a component.”

Comment: The reported figure is for a variety of programs, including litter prevention and education efforts. The study does not report which fraction of monies are spent on which activity, so there is no documentation presented regarding how much money is actually expended annually on cleanup versus outreach and education. In addition, the study does not quantify how much is spent on plastic bag litter, nor the size of the component of the waste stream that plastic bag litter constitutes. 10

Page 1-5 Study: The study claims a key finding that “Plastic carryout bags have been found to significantly contribute to litter and have other negative impacts on marine wildlife and the environment.”

Comment: This “key finding” is actually three “findings”: one with respect to litter, and one with respect to impacts on marine wildlife, and one with respect to impacts on the environment. All three “findings” are anecdotal and speculative in nature, and are not supported by “facts, technical studies or other substantial evidence,” CEQA Guidelines § 15063.

Litter: It is anecdotally true, and documented through litter audits, that plastic bag litter is a part of the litter stream. Mere presence of a material or product as litter, however, does not mean that its contribution to the litter stream is significant. A proper and complete evaluation of the potential environmental benefits, as well as adverse environmental impacts, of the proposed project (ordinance) demand a careful, up to date, and accurate analysis of the contribution of plastic bags to the litter stream. If this discussion is not based on accurate data and it overstates or overestimates the presence of plastic bags in the litter stream, subsequent environmental study will fail to accurately characterize the environmental benefits of the project, and this will undermine the ability of decision makers and the public to compare anticipated environmental benefits with anticipated adverse environmental impacts. See also, supra, specific comments on page 1-3 with respect to the low contribution of plastic bags to measured litter streams in multi-state litter audits. 11

Marine wildlife: The study does not present credible or properly developed evidence that plastic bags “have other negative impacts on marine wildlife.” CEQA considers impacts to be significant if they occur at the population level. This is well understood in the context of wind farms, where it is accepted that some bird mortality may occur without necessarily constituting a significant impact that would trigger EIR preparation. See also CEQA Guidelines § 15065 (mandatory findings of significance include whether the project “has the potential to ...substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten

to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species...”). Speculative evidence has no place in either an Initial Study or an EIR and should be deleted. The presented anecdotal evidence that certain marine mammals have chewed on a plastic bag, however unfortunate, does not provide adequate substantiation of the scope and degree of environmental impact needed to support appropriate analysis under CEQA. It is also important to note that bans have not been demonstrated to reduce litter and thus impacts on animals. In fact, San Francisco’s litter audit does not show a significant impact on bag litter despite the ban.

Environment: Like any other consumer product, plastic bags consume resources and have potential environmental impacts. The relevant exercise for the Initial Study is to identify the significant environmental impacts of the project: “If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall [prepare an EIR].” CEQA Guidelines §15063. That said, we are concerned that the claimed environmental impacts from plastic bags are overstated, and that the finding is not based on adequate “facts, technical studies or other substantial evidence,” CEQA Guidelines § 15063; likewise, we are concerned that the study lacks an adequate exploration of the many adverse environmental impacts of paper bags.

11 cont.

Page 1-5

Study: The study claims a key finding that “Biodegradable carryout bags are not a practical solution to this issue in Los Angeles because there are no local commercial composting facilities able to process the biodegradable carryout bags at this time.”

Comment: While we agree that “biodegradable” carryout bags are not a solution, it is for different reasons than those stated in the study. This finding is completely disconnected with and unsupported by the claimed environmental finding that plastic carryout bags result in litter. Litter is a behavioral problem, and no amount of landfills nor of commercial composting facilities will address a litter behavioral problem.

12

Page 1-5

Study: The study claims a key finding that “Reusable bags contribute toward environmental sustainability over plastic and paper carryout bags.”

Comment: We are puzzled by the use of the term “sustainability” in this context, as it has multiple and potentially complex meanings. However, if the term is meant to mean environmental impacts across all categories that can be measured using appropriate life cycle analysis, this finding is not adequately supported. The report over-represents the alleged environmental detriment of plastic bags, and fails to adequately gauge the adverse environmental impacts of substitute products, including reusable bags and paper bags.

13

Page 1-5

Study: The study claims a key finding that “Accelerating the widespread use of reusable bags will diminish plastic bag litter and redirect environmental preservation efforts and resources towards “greener” practices.”

Comment: This finding is actually several separate compounded findings related to (1) a claim of diminished plastic bag litter, and (2) redirected environmental preservation efforts and resources towards (3) “greener” practices.

14

Litter: We question whether “accelerating the widespread use of reusable bags” will in fact diminish plastic bag litter. This appears to be an entirely unsupported assumption, rather than a documented finding. Both behavioral and litter audit data suggest that such an action will not itself decrease the overall amount of litter, since such an action does



not address littering behavior. Current literature does not suggest that persons toting their weekly groceries from the grocery store – the targets of the proposed ordinances – are those most likely to litter their grocery bags, or even likely to litter at all; rather, those aged 19 and under are more likely to litter. See generally, Littering Behavior in America, Results of a National Study (2009) (p. 5)

[http://www.kab.org/site/DocServer/KAB\\_Report\\_Final\\_2.pdf?docID=4581](http://www.kab.org/site/DocServer/KAB_Report_Final_2.pdf?docID=4581) (principal investigator, Wesley Schultz, Professor of Psychology, California State University).

In addition, we note that the proposed ordinances would not require the use of reusable bags; rather, paper carryout bags would continue to be available at checkout. This key “finding” is actually an assumption that banning plastic bags will, by itself, lead consumers to select and consistently use reusable bags over free paper bags at checkout. No data has been presented nor do we believe exists to support this assumption. Available observations suggest that consumers at checkout will select the most convenient, highest performing, and least expensive checkout bags, and thus if consumers are denied the choice of a free plastic bag at checkout, they will default next to selecting a free paper bag as they appear to have done in San Francisco.

14cont.

“Redirected environmental preservation efforts and resources”: This finding is not sufficiently developed to be articulated in the report. We are unclear as to what this finding is supposed to mean. If it is intended to mean that the County of Los Angeles will be able to redirect litter clean up costs, there is no evidence to suggest such an outcome. Indeed, available behavioral and litter audit data suggest that the proposed ordinances will either have no net effect on the total amount of litter – or will actually increase the total amount of litter. Behavioral data suggests that some of the motivating factors to littering include the belief that the product is biodegradable or not recyclable. See, supra, Littering Behavior in America (2009) at page 4: “Littering was reported more frequently in instances when the person was in a hurry, no trash can was nearby, the item was biodegradable, there was a sense that someone else would pick it up, and when the item was not recyclable.”

Page 1-6

Study: The study states that “Plastic carryout bags have been found to contribute substantially to the litter stream and to have other adverse effects on marine wildlife.”

Comment: Available litter audit data in fact do not suggest that plastic bags contribute substantially to the litter stream; to the contrary, available data shows their contribution to be in the low single digits. The specific contribution of plastic carryout bags from grocery stores, the subject of the proposed ordinance, is likely to be significantly lower still, since it is a smaller subset of plastic carryout bags. Each of the documents used to support this statement fail to provide sufficient factual basis to support the stated finding. The first document, a 2009 UNEP report on marine debris, does not make any findings nor reach any conclusions about plastic bags having adverse effects on marine wildlife; the executive summary actually concludes at page 9 that “Further research and documentation on the impacts of marine litter is needed to assess this issue effectively.” The second cited document is a resolution from a board meeting of the California Integrated Waste Management Board, which is itself not a finding of fact but a political resolution from an agenda. The third document, a staff report to the Los Angeles County Board of Supervisors, cites a number of sources for its claims of harm to marine mammals. Further review of the underlying sources reveals that the sources do not provide evidentiary support for the claimed finding. For example, among the citations is a NOAA report on marine debris. The report is very careful to debunk widespread claims about the severity of environmental impact on marine life from plastic bags:

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Origin of plastic bag statement: We were able to find no information to support this statement [claims that plastic bags are injuring marine animals]. An erroneous statement attributing these figures to plastic bags was published in a 2002 report published by the Australian Government; it was corrected in 2006. See the 2002 report published by Environment Australia entitled, “Plastic Shopping Bags – Analysis of Levies and Environmental Impacts” or [click here](#).

In 2006, Environment Canada recanted the statement “A figure of 100,000 marine animals killed annually has been widely quoted by environmental groups; this was from a study in Newfoundland which estimated the number of animals entrapped by plastic bags in that area from a four-year period from 1981-1984” and replaced it with “A figure of 100,000 marine animals killed annually has been widely quoted by environmental groups; this was from a study in Newfoundland which estimated the number of animals entrapped by plastic debris in that area from a four-year period from 1981-1984.”

15cont.

See NOAA’s Marine Debris webpage, <http://marinedebris.noaa.gov/info/plastic.html#2>. Another source cited as support is a Seaworld website, which does little more than repackage concern that a sea turtle could eat a plastic bag – merely a speculative exercise and quite a reach from presenting actual evidence that they do (“Pollution, such as plastic bags resembling jellyfish, can also cause sea turtle deaths.”).

Page 1-6

Study: The study states that “The prevalence of litter from plastic bags in the urban environment also compromises the efficiency of systems designed to channel storm water runoff.”

Comment: No citation or support is provided for this claim. No data is presented to quantify the specific inefficiency claimed to be introduced by plastic bags. No data is presented to review the potential impacts of paper bag litter on storm water systems.

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Page 1-7

Study: “Furthermore, plastic bag litter leads to increased clean-up costs for the County, the California Department of Transportation (Caltrans), and other public agencies.”

Comment: Clearly, litter cleanup has an inherent cost to the County, and to the extent that plastic bags are a small component of the litter stream, they have an impact on cleanup costs. We have presented data in these comments, however, to show that the Project (plastic bag ban) may result in a net increase to the County in the amount of litter. Increased litter, or a shift in the composition of the litter stream to more paper, may actually increase litter cleanup costs to the County if wet paper litter is more difficult to remove.

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Page 1-7

Study: “In particular, the prevalence of plastic bag litter in the storm water system and coastal waterways hampers the ability of and exacerbates the cost to local agencies to comply with the National Pollutant Discharge Elimination System, and total maximum daily loads (TMDL) limits for trash as specified pursuant to the federal Clean Water Act.”

Comment: The only cited source for this claim is the Department of Public Works’ Report on Plastic Carryout Bags. The cited document provides no support for the specific claim that plastic bag litter hampers compliance or raises costs to local agencies. And to the contrary, a fair argument can be made that replacing plastic bag litter with paper bag litter may in fact increase costs, if the wet paper is more difficult to remove and more likely to clog systems, screens, grinders, or intakes. For that matter, a fair argument can also be made that an increase of paper bag waste in waterways may adversely affect water quality (as the organic matter degrades, it will impact the availability of dissolved oxygen in the water), which itself could impact compliance with TMDLs for water quality. See, e.g., [http://web.cecs.pdx.edu/~fishw/FT\\_L13-BOD25.pdf](http://web.cecs.pdx.edu/~fishw/FT_L13-BOD25.pdf)

18

(impact of degrading organic matter on dissolved oxygen levels of water and discussion of depletion levels at which fish suffocate). 18cont.

Page 1-7

Study: The study claims that “Plastic bag litter is also a major economic operational issue for landfills and other solid waste processing facilities.”

Comment: We suspect that this statement was made in error, and that the authors intended to refer to plastic bags in the solid waste stream rather than the litter stream. That said, the County’s own reports note that 12 million tons of trash were disposed of in 2006, with about 80% being landfilled in the County. It is further reported that “...approximately 45,000 tons of plastic carryout bags are disposed by residents countywide each year, comprising approximately 0.4 percent of the 12 million tons of solid waste disposed each year.” See <http://ladpw.org/epd/pdf/PlasticBagReport.pdf>.

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We find it curious that the study would claim that less than one half of one percent of the solid waste stream presents a “major” economic operational issue for “landfills” and “other solid waste processing facilities.” We fail to find any support for this claim in the supporting documentation.

It is well known that landfill operators need to implement best practices to prevent trash from leaving the landfill site and becoming litter. These practices are already in place, not just to address plastic bags, but other film, paper, fibers, and lighter weight wastes of all kinds. There is no basis for the implied claim here that these best management practices are used only due to the presence of plastic bags in solid municipal waste, nor that these best management costs would be reduced or go away with a corresponding reduction in landfilled plastic bag waste. Without such data, the claim is merely speculative.

Page 1-9

Study: The study claims that, “based on the available evidence, paper carryout bags are less likely to become litter than are plastic carryout bags.”

Comment: No such evidence has been presented to support such a claim. In these comments, we have presented behavioral evidence that suggests the opposite is likely: that people predisposed to intentionally litter will be more likely to litter paper bags than plastic. This likelihood is borne out by existing litter audit data, which shows a significant amount of the existing litter stream to be paper, including paper bags, paper fast food bags, and napkins. See, [http://www.kab.org/site/DocServer/Litter\\_Literature\\_Review.pdf?docID=481](http://www.kab.org/site/DocServer/Litter_Literature_Review.pdf?docID=481) and Keep Los Angeles Beautiful “Littering in the I-generation” 2009.

20

Page 1-9

Study: The study claims that, “...life-cycle studies have also indicted that reusable bags are the preferable option to both paper and plastic bags.”

Comment: The Project is predicated on the notion that consumers will, when faced with a ban of plastic carryout bags, switch to free paper carryout bags and reusable bags. A careful analysis therefore must occur of the potential adverse environmental impacts of such a switch. This analysis is wholly lacking from the study, and should be conducted. In addition to accurately anticipating product switches so that informed calculations about environmental consequences can be made, additional review of the potential adverse environmental consequences of reusable bags (including potential human health impacts) needs to be conducted.

21

Page 1-13

Study: The study claims that, “The County anticipates that a measurable percentage of affected consumers would subsequently use reusable bags (this percentage includes consumers currently using reusable bags) once the proposed ordinances take effect.”

Comment: Testing this assumption with behavioral and other available information is absolutely essential to this exercise. First, we note that the anticipated environmental benefits, and adverse

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environmental consequences, cannot “count” the existing use of reusable bags, since the ordinances would not impact this pre-existing behavior. Second, given that paper bags will be readily available as free substitutes to plastic bags, it can be fairly argued that a large majority of consumers will continue to request free bags at checkout, and will therefore switch to paper similar to results in San Francisco. 22cont.

Page 2-2 Study: The study concludes, on the basis of the initial evaluation, that the proposed project may have a significant effect on the environment, and that an Environmental Impact Report is required. 23

Comment: We agree with this conclusion and support the preparation of an Environmental Impact Report. We urge the preparation of a complete report with the broadest scope possible.

Page 2-4 Study: For section 2.3, Air Quality, items (b) and (c) are checked as “potentially significant unless mitigation incorporated.” 24

Page 2-7 Study: For section 2.7, Greenhouse Gas Emissions, (a) and (b) are checked as “potentially significant unless mitigation incorporated.”

Comment: Both of these items, in both sections, should be redesignated as “potentially significant impact.” As we have noted, reduced availability of plastic carryout bags will increase use of paper carryout bags. This substitution will carry with it significant adverse environmental impacts because the environmental footprint of paper bags, over their lifecycle, is more damaging than plastic.

The proposed CEQA Guidelines, Section 15064.4 (Determining the Significance of Impacts from Greenhouse Gas Emissions) call for “a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” The lead agency should use either a model or methodology to quantify greenhouse gas emissions resulting from a project or a qualitative analysis or performance based standards. Importantly, the lead agency has authority “to consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.” 25

Energy consumption during manufacture: Plastic grocery bags require 70 percent less energy to manufacture than paper bags. Boustead Consulting & Associates Ltd. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper* (2007) at

[http://www.americanchemistry.com/s\\_plastics/doc.asp?CID=1106&DID=7212](http://www.americanchemistry.com/s_plastics/doc.asp?CID=1106&DID=7212) The more efficient manufacturing process for plastic bags translates into fewer greenhouse gas emissions.

Transportation (greenhouse gas emissions from trucking): Plastic bags are much lighter than paper bags: 2,000 plastic bags weigh 30 lbs; 2,000 paper bags weigh 280 lbs. This weight differential is extremely important when calculating transportation costs, and in particular, truck emissions for trucks delivering plastic bags. At end of life, these same plastic bags are lighter to transport than paper to the recycling facility, or lighter to transport to landfill. Each time an equivalent number of plastic bags is trucked versus paper bags, it takes only one truck for the plastic and seven trucks for the paper. U.S. Environmental Protection Agency. *Questions about Your Community Shopping Bags: Paper or Plastic* at

<http://web.archive.org/web/20060426235724/http://www.epa.gov/region1/communities/shopbags.html>

In terms of actual figures, 2 million plastic bags can be carried on one truck, so all 6 million plastic bags the study estimates are used annually in Los Angeles can arrive on only 3 trucks. On the other hand, it takes 7 times as many trucks to haul an equivalent number of paper bags – 21 trucks. This multiplier applies every time the products are transported, whether to be transported to recycling or to landfill.

25cont.

Energy consumption during recycling: It takes 91% less energy to recycle a pound of plastic than it takes to recycle a pound of paper. U.S. Environmental Protection Agency. *Questions about Your Community Shopping Bags: Paper or Plastic* at <http://web.archive.org/web/20060426235724/http://www.epa.gov/region1/communities/shopbags.html>

Page 2-8

Study: The study indicates that the impact of the proposed ordinances would be “potentially significant unless mitigation incorporated” for subsection (a) of Section 2.9, Hydrology and Water Quality. For subsection (f), “no impact” is noted.

Comment: Subsections (a) and (f) should be recategorized to “potentially significant impact.” As noted in these comments, a shift to additional paper litter entering waterways could significantly impact dissolved oxygen in waters, which could have a detrimental impact on fish or other water organisms.

In addition, we note a significant omission from the checklist. Although Section 2.9 does address the potential to adversely impact groundwater supplies, it does not include a category for water usage, or depletion of water resources, and it should, as this is highly relevant to a complete analysis of environmental impacts under CEQA. The production of plastic bags consumes less than 6 percent of the water needed to make paper bags, so any shift from utilization of plastic bags to paper bags will necessitate a significant additional burden on water use. Boustead Consulting & Associates Ltd. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper* (2007), [http://www.americanchemistry.com/s\\_plastics/doc.asp?CID=1106&DID=7212](http://www.americanchemistry.com/s_plastics/doc.asp?CID=1106&DID=7212) Likewise, any shift from plastic bags to reusable bags will need to include calculated water use (washings) and detergent use for the needed care and maintenance of reusable bags.

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Page 2-14

Study: The study categories the potential impact for 2.17(f), which relates to landfill capacity impacts, as “potentially significant unless mitigation incorporated.”

Comment: The County’s own reviews, and indeed this study, insist that landfill capacity is a significant environmental issue for the county. Paper bags are much bulkier and heavier than plastic bags, and substitution of plastic bags with paper bags will generate five times as much waste. U.S. Environmental Protection Agency. *Questions about Your Community Shopping Bags: Paper or Plastic*. See: <http://web.archive.org/web/20060426235724/http://www.epa.gov/region1/communities/shopbags.html>.

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The consequences of this additional waste burden on the County’s landfills must be evaluated. In addition, as the County is forced to close landfills and truck waste out of the county for landfilling, heavier paper bags in the waste stream will have a significant environmental impact due to the greenhouse gas emissions generated during the transportation process. See, e.g., memo from Carrier Bag Consortium reporting on failure of plastic bag taxes:

In fact one retailer in one country where a plastic bag tax was introduced now has to transport four 40 foot containers of paper sacks (protected from moisture by plastic) where previously it shipped only 3 pallets of plastic carriers to do the same the job. This unpredicted result of a misguided tax is doing far more environmental damage because it results in increased exhaust

emissions, more congestion on the roads and much more waste going to landfill. [www.carrierbagtax.com/downloads/7035FactorFiction.doc](http://www.carrierbagtax.com/downloads/7035FactorFiction.doc).

Another item completely unaddressed in the study is the substitution dilemma facing consumers who currently reuse the free plastic bags obtained at the grocery store. Nationwide, a large majority of consumers report reusing these bags for trash bags, lunch bags, pet pick up, extra containment of items that might leak in the refrigerator, wet bathing suits or gym clothes, and toting or disposing items that could leak or spill. If free plastic bags are no longer available at checkout, consumers will need to buy plastic bags for these functions. Very few, if any, commercially available plastic bags are designed and made to be as thin as grocery bags, which means that substitution will likely occur with a thicker plastic product, using more energy to manufacture and transport, and more space in a landfill for disposal. The Ireland experiment with a plastic bag tax bears this out. The Ireland tax in fact resulted in more plastic bags being used in Ireland after the tax than before it – the total amount of bags used in Ireland actually rose by 10%. Why? The sales of substitute plastic bags, such as garbage bags, increased by 400%. PIFA, 2004 (also validated by the Scottish Parliament ERDC Committee – Economic and Rural Development Committee) PIFA/Mike Kidwell Associates 2006.

27cont.

### Section 2.18, Mandatory Findings of Significance

Study: The study concludes “no impact” for subsection (a), which addresses “potential to degrade the quality of the environment” and affect habitat. Comment: The categorization should be changed to “potentially significant impact.” As discussed in these comments, the proposed ordinances present numerous significant environmental impacts as a result of substituted product usage for plastic bags.

One key area overlooked by the analysis is water consumption. Water conservation is one of the most significant environmental concerns of our time. Almost uniformly, life cycle studies by independent and government groups have shown that paper grocery bags made at least in part from recycled material have far greater impacts in terms of global warming and use of valuable water resources. See Appendix A. Water conservation and consumption are going to become increasingly more important.

The paper industry is the largest single water consumer of any sector in the national economy. American Forest & Paper Association, Biennial Report, December, 2006. About one gallon of water is used to make each paper grocery bag – significantly more water than is needed to make a plastic bag (it takes less than 6% of the water needed to make a plastic bag than a paper bag). Therefore, if 6 billion plastic bags (as estimated by the County) are converted to the use of paper bags, 6 billion gallons of water are consumed.

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Pulp and papermaking processes also contribute additional environmental contaminants to waterways and the air. These impacts need to be carefully studied and understood before the ordinances are prepared.

Study: The study concludes “less than significant impact” for cumulative impacts.

Comment: The categorization should be changed to “potentially significant impact.” Data has been presented that indicates that the greenhouse gas consequences of moving from plastic bags to paper bags are significant. Greenhouse gas impacts must be analyzed for cumulative impacts, and must be analyzed to understand impacts on other requirements of state law.

### Section 3.3, Air Quality

Study: The study concludes that further analysis is not required.

Comment: The study makes a number of unsupported and flawed assumptions that require correction. First, the study correctly notes that the impacts of the ordinances on air quality as a result of decreased

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vehicle emissions related to the distribution of bags, transport of bag waste, and litter collection, should be considered. These impacts, however, need to be evaluated with respect to both plastic bags and the anticipated substitute product, paper bags.

The study incorrectly assumes that “any increases would be offset to some extent due to the fact that paper bags can contain a larger volume of groceries than plastic.” This statement is not only untrue and unsubstantiated but ignores the fact that most paper and plastic bags are “double bagged” at checkout, and that very few consumers ask for a fully packed paper bag, which is then too heavy for many people to comfortably handle.

29cont.

### Section 3.7, Greenhouse Gas Emissions

Study: The study assumes consumers will select reusable bags and there will be minimal greenhouse gas impacts.

Comment: This entire section is severely flawed. The entire discussion is premised on the notion that consumers will switch from plastic bags to reusable bags, but as we have noted in these comments, there is no data to suggest that this behavioral change will occur as long as free paper bags are offered, and data from a 2008 San Francisco litter audit suggests the opposite – that consumers will in fact select free paper bags. This assumption is absolutely critical, since a shift to paper bags will have significant greenhouse gas impacts.

It is widely noted the single biggest environmental issues of our time is “global warming”. A careful discussion of greenhouse gas impacts and global warming is essential for consistency with California’s environmental goals. The very purposes of CEQA are undermined if these significant environmental impacts are not assessed and presented to the public. As we noted in our general comments, these important cumulative impacts must be properly identified and fully evaluated. The public deserves to know the consequences of the ordinances under consideration.

Recommendation: Given the importance of this issue, the lead agency should request clarification with respect to the order of importance of program goals, and that the results of the order be understood before ordinances are prepared. There are many scientific techniques available to deal with trade-offs related to environmental goals, therefore the appropriate studies should be conducted first.

30

Almost uniformly, life-cycle studies by independent and government groups have shown that paper grocery bags made at least in part from recycled material have far greater impacts than plastic bags in terms of global warming. See Appendix A. More than 60% of paper grocery bags end up in landfills. American Forest & Paper Association Biennial Report, December 2006. Paper grocery bags in landfill decompose and release methane gas, which contributes significantly to global warming (23 times more than carbon dioxide over a 100 year horizon). Methane emissions from landfills were estimated at 8.0 million metric tons in 2001. In addition, 2.5 million tons were recovered for energy use and 2.4 million tons were recovered and flared. Therefore, more than 60% of the methane is not recovered. Plastic bags in landfills, on the other hand, contribute insignificantly to the global warming problem.

To further appreciate the significance of the impact of a conversion to paper bags, an examination is needed of how many trees would potentially be cut down each year if plastic bags are replaced by paper bags. The Technical Association of the Pulp and Paper Industry (TAPPI) provided a discussion in its “Earth Answers: How Much Paper Can Be Made From a Tree.” Although somewhat simplified, some experts suggests 17 trees per ton of paper.” The Technical Association of the Pulp and Paper Industry (TAPPI), www.TAPPI.org. Therefore, if 6 million plastic bags (as estimated by the County) are converted to the use of paper bags, ***about 4 million more trees will be cut down each year.***

Paper bags are made from a renewable resource and plastic bags are currently made from fossil fuels (i.e., natural gas). However, the fossil fuel energy required to manufacture and transport paper bags is greater than that required for plastic bags. Even paper bags made from 100% recycled fiber use more fossil fuels than plastic bags. Since global warming has become a worldwide concern and global warming emissions are significantly greater with the use of paper bags and compostable plastic bags than using plastic bags, a closer examination of some consequences of global warming is warranted.

30cont.

For more extensive reviews, one EPA website lists a multitude of climate news releases. The website is: [www.epa.gov/climatechange/newsroom.html](http://www.epa.gov/climatechange/newsroom.html).



## **Appendix A: Life Cycle Assessments of Paper and Plastic Bags**

### **What is Life Cycle Assessment?**

LCA is a method that provides a systems approach to examining environmental factors. The system is cradle to grave. Which means taking things from the environment such as fuels, water and raw materials; processing them; using them; and then disposing of them. At each of these levels the activities required to complete these steps lead to potential environmental impacts from emissions to the air, water and ground as emissions and solid waste. The purpose of the system studied is the way for consumers to carry their purchases using either paper, plastic or compostable plastic bags.

The concept of LCA has been practiced since the early 1970s, and in the 1990s standardized through several organizations including SETAC (Society of Environmental Toxicology and Chemistry) and ISO (International Standards Organization). Using LCA, one examines all aspects of the system used to produce a product from cradle (the extraction of raw materials necessary for producing a product) all the way through to the grave (final disposal of the product). LCA studies provide results on resource and energy use, and emissions to air, water (effluents), and land (solid wastes) for local, regional, and global effects.

All products are produced using a system, and as such, have environmental characteristics that are multifaceted and result in global, regional, and local environmental impacts. This is important to recognize as it is at the core of understanding how to make choices that actually provide for an overall benefit to the environment rather than simply trade off one environmental consequence for another or simply push environmental impacts to other jurisdictions. All materials, products, and packaging use resources, require energy for manufacturing and transport, and produce wastes either in the form of air emissions, water effluents, or solid wastes. Choosing an environmentally preferable product system requires that one or more environmental characteristics of the product are better than the product it is replacing – where better is defined as reducing impacts across the entire system which does not include decreases in some areas while allowing increases in other areas.

Based on this basic introduction of why LCAs are critical to our environmental understanding, one can see that it is necessary fully understand how one system compares to another system when trying to make a determination between the use of different products such as grocery bags (paper bags, compostable plastic bags and plastic bags). As a result, it is instructive to determine if previous LCAs have been conducted on the products in question, and if so, if the results from previous studies are similar or different, and if different what is the cause of the underlying differences.

### **Life Cycle Assessments of Paper and Plastic Bags**

The following is a brief review of four selected Life Cycle studies conducted in the past twenty years; starting with the most recent study.

1. “Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper” was prepared for the Progressive Bag Alliance by Boustead Consulting & Associates Ltd., Sep 2007.

To ensure that the results of this study are reliable, repeatable, and robust, the findings of this study were peer reviewed by an independent third party - Professor Michael Overcash of North Carolina State University - with significant experience in life cycle assessments. The following are quotes from the review of Professor Overcash.

“This report provides both a sound technical descriptions of the grocery bag products and the processes of life cycle use.”

“The conclusions regarding the relative environmental impact when using a life cycle view are consistent with previous studies and need to be reinforced in the policy arena. The policies to discourage plastic bags may have more to do with litter than the overall environment. Whatever the goals of the policy makers, these need to be far more explicit than general environmental improvement, since the life cycle story is consistent in favor of recyclable plastic bags. It is possible that the emphasis of another report might be that the full benefit of plastic bags is even higher when large recycling is in place.”

The LCA study conducted by BCAL shows that when compared to 30% recycled fiber paper bags, polyethylene grocery bags use less energy in terms of fuels for manufacturing, less oil, and less potable water. In addition, polyethylene plastic grocery bags emit fewer global warming gases, less acid rain emissions, and less solid wastes.

The same trend exists when comparing the typical polyethylene grocery bag to grocery bags made with compostable plastic resins - traditional plastic grocery bags use less energy in terms of fuels for manufacturing, less oil, and less potable water and emit fewer global warming gases, less acid rain emissions, and less solid wastes.

The results support the conclusion that any decision to ban traditional polyethylene plastic grocery bags in favor of bags made from alternative materials (compostable plastic or recycled paper) will result in an increase in environmental impacts across a number of categories from global warming effects to the use of precious potable water resources. So no matter what benefits consumers and legislators believe may come from banning traditional plastic grocery bags, such as a reduction in litter, the unintended consequences are real and long lasting. The significance of the increased impacts will depend largely on the level of and type of replacement that may be invoked as a result of any specifically imposed industrial or legislative requirements (this is addressed later in this document).

2. “Evaluation des impacts environnementaux des sacs de caisse Carrefours...Analyse du cycle de vie de sacs de caisse en plastique, papier et materiau biodegradable” prepared for CARREFOUR by Ecobilian a division of PriceWaterhouseCooper, France, 2004.

Carrefour is a very large French retailer that has an extensive presence in many parts of Europe and indeed the world. Carrefours also conducted a life cycle analysis of the carry out sacks utilized by its chain, and the following table summarizes the results of the study.

Consumption of nonrenewable energy	Paper 10% more than plastic
Consumption of water	Paper 4 times as much as plastic
Emissions of greenhouse gases	Paper 3.3 times as much as plastic
Emission of acid rain gases	Paper 1.9 times as much as plastic
Eutrophication*	Paper 14 times as much as plastic

\* Eutrophication is the process of introducing excess nutrients such as phosphorous and nitrogen into water bodies thereby promoting the growth of plants and algae which lower the available dissolved oxygen.

The report, conducted by Ecobilan for Carrefours, concludes that plastic bags are more environmentally friendly than paper bags.

3. “Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks” prepared for The Council for Solid Waste Solutions by Franklin Associates, Ltd., 1990.

The following are key quotes from the Franklin Associates report:

Even paper bags made from 100% recycled fiber use more fossil fuels than plastic bags.

The manufacture of paper bags impacts significantly more than plastic bags on the global warming issue and on the acid rain issue.

For all environmental impacts related to air emissions, water emissions and solid waste ---paper bags are significantly greater than plastic bags.

The solid waste from paper bags disposed of in landfills, as compared to plastic bags, is more significant in both weight and volume.

The Franklin Associates report, like the other reports noted above, illustrates that plastic bags in many environmental reporting categories have fewer impacts than paper bags made from either virgin or recycled fibers.

4. “Life Cycle Inventory of Packaging Options For Shipment of Retail Mail-order Soft Goods”, Prepared For Oregon Dept. of Environmental Quality (DEQ) and U.S. EPA Environmentally Preferable Purchasing Program, by Franklin Associates, Ltd., 2004.

Although this study is not a grocery bag LCA, this LCA is instructional as it does compare plastic bag packaging with kraft paper bag packaging of packaging configurations that are of similar size to grocery bags. The following are key quotes from the Franklin Associates report:

The most critical factor influencing environmental burdens is the weight of packaging---more weight; more environmental burdens or impacts.

Compared to all types of packaging the unpadded LLDPE plastic bag had the lowest environments impacts---lowest energy used; lowest greenhouse gases; lowest solid waste.

Compared to the unpadded kraft bag, the unpadded LLDPE plastic bag had the lower environments impacts---lower energy used; lower greenhouse gases; lower solid waste.

Again, the study conducted by Franklin Associates illustrates that that plastic bag packaging has fewer environmental impacts across a number of environmental reporting categories than paper bag packaging.

It is clear that if plastic bags are replaced with either plastic bags made from compostable materials or paper bags made from various amounts of recycled fibers, there will be significant increases in environmental impacts on a per bag basis. The use of plastic and paper in the packaging industry has been studied for more than 20 years – and the results are consistent. The scientific data regarding the environmental impacts of paper bags show that paper has significant adverse environmental consequences in a number of impact categories when compared to plastic bags. The following are a few examples of environmental impacts that are worse when using paper instead of plastic in retail bags.

Global warming: Paper bags result in significantly higher greenhouse gas emissions than plastic bags, even though they are recyclable and often contain as much as 40% recycled materials. Compostable plastic bags result in significantly higher greenhouse gas emissions than plastic bags.

Use of fossil fuels: Although paper bags are made from a renewable resource and currently, plastic bags are made from fossil fuels (primarily natural gas), the amount of energy required to manufacture and transport paper bags is great enough to offset the differences based on resource use and cause an overall increase in fossil fuel use associated with paper bags. The energy required to manufacture and transport compostable plastic bags is also greater than that required for single-use recyclable plastic bags.

It should also be noted that the raw feedstock needed to make polyethylene is ethylene, a simple hydrocarbon molecule made up of carbon and hydrogen. Ethylene can be readily obtained by cracking hydrocarbons, but it can also be synthesized, or even obtained from biomass (plant matter). Because ethylene occurs naturally in plants, fruits and vegetables, work is currently underway to develop a commercially viable source for ethylene from plant

products such as sugar cane. See, e.g., <http://www.chalmers.se/chem/EN/centres/plus/research6483/ethylene-from-renewable>; <http://www.dow.com/commitments/studies/sugar.htm>; [http://www.ethanolproducer.com/article.jsp?article\\_id=4535](http://www.ethanolproducer.com/article.jsp?article_id=4535).

**Use of potable water:** The manufacturing of paper uses significant amounts of water, a critical resource which is fast becoming limited by a number of factors including climate change and population increases. The paper bag and compostable plastic bag consumption of water are significantly greater than that required for plastic bags. **Water pollution** Paper bag manufacturing releases far more water pollutants than plastic bags and are known to have significant local and regional impacts to waterways. **Solid waste** Paper bags and compostable plastic bags require more materials than do plastic bags and therefore will increase solid wastes.

**Acid rain:** The production of acid rain is recognized as a regional problem. It can affect streams, lakes, soils and the growth of trees. Paper bags and compostable bags generate more acid rain emissions than plastic bags. The level of impact associated with these emissions will vary depending on the location of manufacture.

**Use of natural resources:** Paper bags require the use of wood fiber that comes from a variety of sources including forests. Given the uncertainty of the effects from poor forest management and maintenance practices in different regions of the world, making more paper bags is counter to an objective of reducing the use of natural resources.

This review of a number of life cycle studies have examined the environmental impacts of paper and plastic grocery bags, and these studies all show that paper bags have considerably more environmental impacts than plastic bags. Global warming and water conservation are two of the most significant environmental concerns of our time. Life cycle studies by independent and government groups have shown that paper grocery bags and compostable plastic grocery bags have far greater impacts in terms of global warming and use of valuable water resources than plastic grocery bags.



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN  
FIRE CHIEF  
FORESTER & FIRE WARDEN

August 19, 2010

Mr. Coby Skye  
Department of Public Works  
Environmental Programs Division  
900 South Fremont Avenue, 3rd Floor  
Alhambra, CA 91803

Dear Mr. Skye:

### **NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), ORDINANCES TO BAN PLASTIC CARRYOUT BAGS IN LOS ANGELES COUNTY (FFER #201000109)**

The Notice of Availability has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

#### **PLANNING DIVISION:**

1. We have no comments at this time.

#### **LAND DEVELOPMENT UNIT:**

1. We have no comments at this time.

#### **FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

#### SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKESWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDDORA	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

Mr. Coby Skye  
August 19, 2010  
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**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. We have no comments at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

A handwritten signature in black ink, appearing to read "John R. Todd". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

JOHN R. TODD, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

JRT:ss

**SECTION 13.0**  
**RESPONSE TO COMMENTS**  
**ON THE DRAFT ENVIRONMENTAL IMPACT REPORT**

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The Draft EIR for the proposed ordinances was completed and forwarded to the Governor's Office of Planning and Research (OPR) and a Notice of Completion (NOC) was posted at both OPR and the Office of Los Angeles County Clerk on June 2, 2010. Copies of the Draft EIR and Notice of Availability (NOA) were mailed to 27 agency representatives. The Draft EIR was made available for public review at the Los Angeles County Department of Public Works (LACDPW), Environmental Programs Division, 900 South Fremont Avenue, Alhambra, California 91803 and on the Internet at <http://www.bragaboutyourbag.com> for a period of 45 days from June 2, 2010, to July 16, 2010. An electronic copy of the Draft EIR was made available at all public libraries in the County, and a hard copy of the Draft EIR was made available at 10 public libraries. An NOA of the Draft EIR for public review was advertised in the *Los Angeles Times*, delivered to all public libraries in the County, and sent via regular mail and/or e-mail to 27 public agency representatives and approximately 459 stakeholders, including private organizations and individuals. Copies of the Draft EIR were also available for purchase, at reproduction cost, from the County.

The public comment period closed on July 16, 2010, at 5 p.m. A total of 11 letters of comment and a petition including over 1,800 signatures were received on the Draft EIR. In addition, the County hosted six public meetings throughout the County to provide the public with key findings of the Draft EIR and to solicit comments. Section 13, Response to Comments on the Draft Environmental Impact Report, provides responses to letters of comment, to the more than 1,800 petition signatures received, and to comments resulting from the public meetings.

This section of the EIR contains a summary of the distribution list for the Draft EIR and a listing of the parties that provided comments during the public review period. The distribution/respondents list has been divided into seven categories: (1) federal agencies, (2) State agencies, (3) regional agencies, (4) County agencies, (5) local agencies, (6) private organizations and individuals, and (7) public meetings.

### **13.1 SUMMARY DISTRIBUTION LIST/RESPONDENTS**

#### **13.1.1 Federal Agencies**

There were no federal agencies identified as responsible or trustee agencies pursuant to the California Environmental Quality Act (CEQA); therefore, the NOA and Draft EIR were not distributed to any federal agencies. No comment letters were received from federal agencies.

#### **13.1.2 State Agencies**

Twelve State of California agencies received copies of the NOA and the Draft EIR: California Department of Parks and Recreation; California Department of Transportation (Caltrans); California Environmental Protection Agency; California Coastal Commission; California Natural Resources Agency; California Native American Heritage Commission; California Department of Conservation; California Air Resources Board (CARB); California Integrated Waste Management Board (CIWMB); State Water Resources Control Board; California Water Quality Control Board, Region 4; and OPR State Clearinghouse.

The County received one letter of comment from a State agency:

- OPR State Clearinghouse

### **13.1.3 Regional Agencies**

Six regional agencies received copies of the NOA and the Draft EIR: Los Angeles Unified School District, Antelope Valley Air Quality Management District (AVAQMD), South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments, Sanitation Districts of Los Angeles County, and County of Los Angeles Flood Control District. No comment letters were received from regional agencies.

### **13.1.4 County Agencies**

Four County agencies received copies of the NOA and the Draft EIR: County of Los Angeles Fire Department, County of Los Angeles Sheriff's Department, County of Los Angeles Metropolitan Transportation Authority, and the Los Angeles County Clerk. Each of the five supervisorial districts of the County also received copies of the NOA and the Draft EIR. No timely letters of comment were received from County agencies. The County received one letter of comment after the public review and comment period:

- County of Los Angeles Fire Department

### **13.1.5 Local Agencies**

All 88 incorporated cities in the County received copies of the NOA. All County libraries received a hard copy of the NOA and an electronic copy of the Draft EIR. Ten County libraries received a copy of the NOA and a hard copy of the Draft EIR: Montebello Library, Carson Regional Library, A C Bilbrew Library, Culver City Julian Dixon Library, Agoura Hills Library, Angelo M. Iacoboni Library, Rowland Heights Library, Valencia Library, West Covina Library, and Lancaster Regional Library. The local newspaper, the *Long Beach Press Telegram*, also received a notice for publication. The County received two letters of comment from local agencies:

- City of Palmdale
- City of Pasadena

### **13.1.6 Private Organizations and Individuals**

A NOA of the Draft EIR was sent to approximately 459 private organizations and individuals. The County received five letters of comment from private organizations:

- American Chemistry Council
- Heal the Bay
- Renewable Bag Council
- Symphony Environmental Technologies
- Save the Plastic Bag Coalition



The County received two letters of comment from individuals:

- Mr. Lars Clutterham
- Ms. Hillary Gordon

In addition, the County received a petition from Environment California with signatures from over 1,800 petitioners urging the County to ban plastic carryout bags.

### **13.1.7 Public Meetings**

The County, with technical assistance provided by Sapphos Environmental, Inc., conducted one public meeting in each of the County Supervisorial Districts, totaling six public meetings.

- District 1: June 15, 2010, from 6:00 p.m. to 8:00 p.m. at Yvonne B. Burke Community and Senior Center, 4750 West 62nd Street, Los Angeles, California 90056
- District 2: June 16, 2010, from 6:00 p.m. to 8:00 p.m. at East Los Angeles College, 1700 Avenida Cesar Chavez, Monterey Park, California 91754
- District 3: June 22, 2010, from 6:00 p.m. to 8:00 p.m. at Jackie Robinson Park, 8773 East Avenue R, Littlerock, California 93543
- District 4: June 24, 2010, from 6:00 p.m. to 8:00 p.m. at Los Angeles County Arboretum and Botanic Garden, 301 North Baldwin Avenue, Arcadia, California 91007
- District 5: June 29, 2010, from 6:00 p.m. to 8:00 p.m. Agoura Hills / Calabasas Community Center, 27040 Malibu Hills Road, Calabasas, California 91301
- District 6: July 1, 2010, from 6:00 p.m. to 8:00 p.m. City of Long Beach Employee Development Center, 2929 East Willow Street, Long Beach, California 90806

The meetings were held to address public and agency comments on the Draft EIR. The comments from this meeting are included in Memoranda for the Record, which describe the manner in which the workshops were conducted.

## **13.2 LETTERS OF COMMENT AND RESPONSES**

The letters of comment received on the Draft EIR are presented in this subsection with the comments numbered and annotated in the right margin. Responses to the comments follow each comment letter. All changes and additions to the mitigation measures are made for clarification only.

### **13.2.1 Federal Agencies**

No letters of comment were received from federal agencies.

### **13.2.2 State Agencies**

Office of Planning & Research  
State Clearinghouse  
Scott Morgan, Acting Director  
1400 Tenth Street, P.O. Box 3044  
Sacramento, California 95812  
Phone: (916) 445-0613



ARNOLD SCHWARZENEGGER  
GOVERNOR

July 19, 2010

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT  
DIRECTOR

Mr. Coby Skye  
Los Angeles County  
900 South Fremont Avenue, 3rd Floor  
Alhambra, CA 91803

Subject: Ordinances to Ban Plastic Carryout Bags in Los Angeles County  
SCH#: 2009111104

Dear Mr. Coby Skye:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 16, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Acting Director, State Clearinghouse

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2009111104  
**Project Title** Ordinances to Ban Plastic Carryout Bags in Los Angeles County  
**Lead Agency** Los Angeles County

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**Type** EIR Draft EIR  
**Description** The proposed ban on the issuance of plastic carryout bags consists of an ordinance to be adopted prohibiting certain retail establishments from issuing plastic carryout bags in the unincorporated territories of the County of Los Angeles. The County would also encourage adoption of comparable ordinances by each of the 88 incorporated cities in the County.

The proposed ordinances being considered would ban the issuance of plastic carryout bags by any retail establishment that is located in the unincorporated territories or incorporated cities of the County. The retail establishments that would be affected by the proposed ordinances include any that (1) meet the definition of a "supermarket" as stated in the California Public Resources Code, Section 14526.5; or (2) are buildings with over 10,000 sf of retail space that generates sales or use tax pursuant to the Bradley-Burns Uniform Local Sales and Use Tax Law and have a pharmacy licensed pursuant to Chapter 9 of Division 2 of the Business and Professions Code.

---

**Lead Agency Contact**

**Name** Mr. Coby Skye  
**Agency** Los Angeles County  
**Phone** 626-458-5163 **Fax**  
**email**  
**Address** 900 South Fremont Avenue, 3rd Floor  
**City** Alhambra **State** CA **Zip** 91803

---

**Project Location**

**County** Los Angeles  
**City**  
**Region**  
**Lat / Long**  
**Cross Streets**  
**Parcel No.**  
**Township** **Range** **Section** **Base**

---

**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use**

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**Project Issues** Air Quality; Biological Resources; Coastal Zone; Cumulative Effects; Solid Waste; Water Quality; Water Supply; Wildlife; Growth Inducing; Other Issues

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**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Toxic Substances Control; Native American Heritage Commission

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**Date Received** 06/02/2010 **Start of Review** 06/02/2010 **End of Review** 07/16/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Office of Planning & Research  
State Clearinghouse  
Scott Morgan, Acting Director  
1400 Tenth Street, P.O. Box 3044  
Sacramento, California 95812  
Phone: (916) 445-0613**

***Response to Letter***

The County of Los Angeles thanks OPR for the July 19, 2010, letter confirming that the State Clearinghouse did not receive any letters of comment from State agencies during the public review period for the Draft EIR. The County of Los Angeles also appreciate that OPR confirmed compliance of the Draft EIR with review requirements for draft environmental documents, pursuant to CEQA.

### **13.2.3 Regional Agencies**

No letters of comment were received from regional agencies.

#### **13.2.4 County Agencies**

County of Los Angeles Fire Department  
1320 North Eastern Avenue  
Los Angeles, California 90063  
Phone: (323) 890-4330





# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN  
FIRE CHIEF  
FORESTER & FIRE WARDEN

August 19, 2010

Mr. Coby Skye  
Department of Public Works  
Environmental Programs Division  
900 South Fremont Avenue, 3rd Floor  
Alhambra, CA 91803

Dear Mr. Skye:

### **NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), ORDINANCES TO BAN PLASTIC CARRYOUT BAGS IN LOS ANGELES COUNTY (FFER #201000109)**

The Notice of Availability has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

#### **PLANNING DIVISION:**

1. We have no comments at this time.

#### **LAND DEVELOPMENT UNIT:**

1. We have no comments at this time.

#### **FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

#### SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENORA	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

Mr. Coby Skye  
August 19, 2010  
Page 2

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. We have no comments at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

A handwritten signature in black ink, appearing to read "John R. Todd". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

JOHN R. TODD, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

JRT:ss

**County of Los Angeles Fire Department  
1320 North Eastern Avenue  
Los Angeles, California 90063  
Phone: (323) 890-4330**

***Response to Comment Letter***

The County of Los Angeles appreciates that the County of Los Angeles Fire Department took the time to review the Draft EIR. This letter, dated August 19, 2010, notes that the County of Los Angeles Fire Department does not have any substantive comments on the content of the EIR at this time.

### **13.2.5 Local Agencies**

City of Pasadena  
Steve Mermell, Assistant City Manager  
Planning and Development Department  
175 North Garfield Avenue  
Pasadena, California 91101

City of Palmdale  
Richard Kite, Assistant Director of Planning  
38300 Sierra Highway  
Palmdale, California 93550



PLANNING AND DEVELOPMENT DEPARTMENT

July 14, 2010

Coby Skye  
County of Los Angeles  
Department of Public Works  
Environmental Programs Division  
900 S. Fremont Ave, 3<sup>rd</sup> Floor Annex  
Alhambra, CA 91803-1331

RE: Review of Draft Environmental Impact Report for Ordinances to Ban Plastic Carryout Bags  
in Los Angeles County

Dear Mr. Skye,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Ordinances to Ban Plastic Carryout Bags in Los Angeles County. The Planning and Development Department staff has conducted a cursory review of the DEIR and does not have any substantive comments on the content at this time, however Pasadena appreciates Los Angeles County assisting local cities in permanently reducing the consumption of plastic and paper single-use carryout bags by providing the environmental analysis necessary for establishing bag reduction ordinances.

The City of Pasadena values the opportunity to review the referenced document and supports the concept of placing limitations on the distribution of single-use bags in order to reduce solid waste generation and litter reduction throughout the County. The County's efforts are supportive of the City of Pasadena's adopted Green City Action Plan Goal of achieving zero waste to landfills by 2040.

Should you have any questions regarding this letter, please contact me at (626) 744-6936.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Mermell".

Steve Mermell  
Assistant City Manager

SM:us

Cc: Theresa Fuentes, City Attorney

**City of Pasadena  
Steve Mermell, Assistant City Manager  
Planning and Development Department  
175 North Garfield Avenue  
Pasadena, California 91101**

***Response to Comment No. 1***

The County of Los Angeles appreciates that the City of Pasadena took the time to review the Draft EIR. This letter, dated July 14, 2010, notes that the City of Pasadena does not have any substantive comments on the content of the EIR at this time, and supports the concept of placing limitations on the distribution of carryout bags to reduce generation of solid waste and facilitate reduction of litter throughout the County of Los Angeles.



# PALMDALE

*a place to call home*

June 30, 2010

JAMES C. LEDFORD, JR.  
Mayor

TOM LACKEY  
Mayor Pro Tem

LAURA BETTENCOURT  
Councilmember

MIKE DISPENZA  
Councilmember

STEVEN D. HOFBAUER  
Councilmember

38300 Sierra Highway

Palmdale, CA 93550-4798

Tel: 661/267-5100

Fax: 661/267-5122

TDD: 661/267-5167

County of Los Angeles c/o Department of Public Works  
Attn: Mr. Colby Skye  
Environmental Programs Division  
900 South Fremont Avenue, 3<sup>rd</sup> Floor  
Alhambra, CA 91803

**RE: Notice of Availability for the Draft Environmental Impact Report  
(EIR) for the Proposed Ordinances to Ban Plastic Carryout  
Bags in Los Angeles County**

Dear Mr. Skye:

Thank you for the opportunity to review the above referenced project. In response to your Notice of Availability, staff has reviewed the draft EIR. At this time, the City of Palmdale has no comment on the proposed project.

If you have any questions regarding this matter, please contact Susan Koleda or myself at (661) 276-5200.

Sincerely

 Richard Kite  
Assistant Director of Planning

RK:sk

cc: Ben Lucha

*Auxiliary aids provided for  
communication accessibility*

*upon 72 hours' notice and request.*

**City of Palmdale  
Richard Kite, Assistant Director of Planning  
38300 Sierra Highway  
Palmdale, California 93550**

***Response to Comment No. 1***

The County of Los Angeles appreciates that the City of Palmdale took the time to review the Draft EIR. This letter, dated June 30, 2010, notes that the City of Palmdale does not have any substantive comments on the content of the EIR at this time.



### **13.2.6 Private Organizations and Individuals**

American Forest & Paper Association  
Patrick Rita, Renewable Bag Council  
Phone: (202) 261-1324

Heal the Bay  
Sarah Abramson Sikich, Coastal Resources Director  
1444 9th Street  
Santa Monica, California 90401  
Phone: (310) 451-1500

Lars Clutterham

Hillary Gordon

Environment California

Symphony Environmental Technologies Plc  
6 Elstree Gate, Elstree Way  
Borehamwood  
Hertfordshire WD6 1JD  
England  
Phone: + 44 (0)20 8207 5900

Save the Plastic Bag Coalition  
Stephen Joseph, Counsel  
350 Bay Street, Suite 100-328  
San Francisco, California 94133  
Phone: (415) 577-6660

American Chemistry Council  
Shari M. Jackson, Director, Progressive Bag Affiliates



**American  
Forest & Paper  
Association**

July 16, 2010

County of Los Angeles Department of Public Works  
Attn: Mr. Coby Skye  
Environmental Programs Division  
900 South Fremont Avenue, 3<sup>rd</sup> Floor  
Alhambra, California 91803

Dear Mr. Skye:

The Renewable Bag Council (RBC), a subsidiary of the American Forest & Paper Association (AF&PA), appreciates the opportunity to comment on the draft Environmental Impact Report. Members of the RBC manufacture and convert renewable, recyclable Kraft paper used for checkout bags used at grocery and retail outlets in Los Angeles County and across the United States.

1

First, we commend the Department for commissioning such a comprehensive study. Clearly, considerable effort was made at compiling this draft report.

In reading the findings, we noted with interest that the draft EIR cited plastic industry claims that “paper bags are significantly worse for the environment” and used this assertion to opine that green house gas emissions would increase with a shift to paper. Interestingly, the source for plastics industry claims against paper bags is based on the Boustead study, a comparative life cycle assessment that the American Chemistry Council commissioned to compare the performance of paper versus plastic in the natural environment. As plastics industry claims against paper have begun to proliferate in the wake of numerous governmental efforts to ban plastic bags, the RBC took the initiative to review the Boustead study in depth. What we found is that the plastics industry’s own LCA actually concludes that paper bags generate 59 percent fewer green house gas emissions compared to plastics from manufacture to point of disposal. The reason is because the Boustead study is based on the faulty premise that plastic and paper bags have identical capacity, when in fact it typically requires 2 to 3 plastic bags to equal the capacity of a single Kraft paper bag. When comparing the two products under this real world

2

3

scenario, not only does paper outperform plastics from a green house gas perspective, but using paper bags results in a 33 percent reduction in fossil fuel use.

3 cont.

In terms of overall environmental performance, we would like to reiterate some of the attributes of our product. First, the paper bag is a recycling success story. Many paper bags contain more than 30 percent recycled material, and in some cases, retailers use bags made of 100 percent recycled paper. Paper bags are highly recyclable and are a fixture in community recycling programs throughout California. In fact, California residents frequently use paper bags as their containers when recycling other paper products such as newspapers, magazines, envelopes, and printer paper. According to the U.S. Environmental Protection Agency, paper bags and sacks boast a national recycling rate of more than 37 percent. For paper bags offered at retail that would be covered by the Los Angeles ordinance, the recycling rate is likely significantly higher as many of these bags are routinely recycled at curbside collection programs in the county.

4

5

The paper bag is also compostable as evidenced by its use throughout the country for municipal leaf mulching programs. Paper bags are made from a natural fiber, so they are biodegradable, making them ideal for composting applications. In addition, the paper bag is made from a renewable resource – managed forests – that provides habitat for animals and removes large amounts of carbon dioxide from air we breathe. In its stewardship of these lands, the U.S. forest products industry plants 1.7 million new trees each day. In fact, U.S. Forest Service data show that there is more forest land in this country today than existed in 1953.

6

7

The Renewable Bag Council stands ready to work with the Department and County lawmakers in crafting a bag policy that results in measurable litter reduction and real benefits for the environment.

8

Sincerely,



Patrick Rita  
Renewable Bag Council

Contact: 202/261-1324  
Email: [prita@orionadvocates.com](mailto:prita@orionadvocates.com)

**American Forest & Paper Association**  
**Patrick Rita, Renewable Bag Council**  
**Phone: (202) 261-1324**

***Response to Comment No. 1***

The County of Los Angeles appreciates that the American Forest & Paper Association, Renewable Bag Council took the time to review the Draft EIR and provide comments in a letter dated July 16, 2010. As noted by the Renewable Bag Council, the Draft EIR is comprehensive, and a considerable amount of time was spent analyzing and evaluating the environmental impacts resulting from the proposed ordinances at issue, as well as a number of reasonable alternatives to the proposed ordinances.

***Response to Comment No. 2***

Comment No. 2 notes that the Boustead Study referenced in the EIR was commissioned by the plastic bag industry. The County of Los Angeles is aware that the Boustead Study was prepared in 2007 on behalf of the Progressive Bag Affiliates. As discussed in the EIR, including, but not limited to, the description on page 3.1-20, the Progressive Bag Alliance was founded in 2005 and is a group of American manufacturers of plastic carryout bags who advocate recycling plastic shopping bags as an alternative to banning the bags. In 2007, they became the Progressive Bag Affiliates of the American Chemistry Council. The County of Los Angeles has included the results of the Boustead Study in the EIR to present the worst-case scenario of the environmental impacts of the proposed ordinances. However, other studies were analyzed, evaluated, and included in the EIR, including the Ecobilan Study, to ensure a more accurate and comprehensive analysis regarding the environmental effects of plastic versus paper carryout bags.

***Response to Comment No. 3***

Comment No. 3 states that the conclusions of the Boustead Study can be significantly altered depending on the bag capacity assumptions that are used. Comment No. 3 notes that the capacity of a single Kraft paper bag is typically equal to the capacity of two or three plastic bags. In the interest of being conservative, the County of Los Angeles reasonably assumed that the capacity of a paper carryout bag is equal to approximately 1.5 plastic bags. This assumption is supported by several studies that have noted similar conclusions regarding bag size.<sup>1,2</sup>

***Response to Comment No. 4***

Comment No. 4 addresses the recyclable content of paper carryout bags. For the purposes of the proposed ordinances, recyclable paper carryout bags are defined on page 2-5 of Section 2.2.3, Definitions, as containing a minimum of 40 percent post-consumer recycled content.

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<sup>1</sup> Franklin Associates, Ltd., 1990. *Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks*. Prairie Village, KS

<sup>2</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Report prepared for: Carrefour Group.

### **Response to Comment No. 5**

Comment No. 5 notes the U.S. Environmental Protection Agency's (USEPA's) statistic, stated in Section 2.0, page 2-14, that paper bags and sacks are recycled at a rate of 36.8 percent nationwide. The County of Los Angeles also acknowledges that paper bags are highly recyclable and are commonly recycled via curbside recycling programs throughout California. The recycling rate of 36.8 percent is used for calculations throughout the EIR based on the USEPA's statistic. The County of Los Angeles is aware that this recycling rate includes all types of paper bags, and that recycling rates for paper carryout bags may be even higher in the County of Los Angeles. If the County of Los Angeles assumed a higher rate of recycling for paper carryout bags, the environmental impacts disclosed in the EIR would be proportionally reduced.

### **Response to Comment No. 6**

Comment No. 6 addresses the biodegradability of paper carryout bags. As discussed in the EIR, including, in but not limited to, page 3.2-18, the County of Los Angeles acknowledges that paper bags are biodegradable and compostable,<sup>3</sup> and that they do not persist in the marine environment for as long as plastic bags.<sup>4</sup> The paper used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally biodegradable and compostable material. Due to the biodegradable nature of paper carryout bags, it is acknowledged that paper carryout bags do not pose the same threat to wildlife as plastic carryout bags and associated microplastics.

### **Response to Comment No. 7**

Comment No. 7 notes the number of new trees planted by the forest products industry. This information is acknowledged for the record.

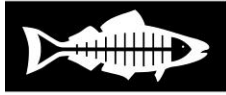
### **Response to Comment No. 8**

The County of Los Angeles appreciates the Renewable Bag Council's willingness to assist the County of Los Angeles in crafting a carryout bag policy that will result in measureable benefits to the environment. That information is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

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<sup>3</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

<sup>4</sup> Andrady, Anthony L. and Mike A. Neal. 2009. "Applications and Societal Benefits of Plastics." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.



## Heal the Bay®

July 16, 2010

County of Los Angeles Department of Public Works  
Attn: Mr. Coby Skye  
Environmental Programs Division  
900 South Fremont Avenue, 3rd Floor  
Alhambra, CA 91803  
Sent via e-mail (cskye@dpw.lacounty.gov)

### **RE: Ordinance to Ban Plastic Carryout Bags in Los Angeles County, Draft Environmental Impact Report (SCH # 2009111104)**

Dear Mr. Skye:

On behalf of Heal the Bay and our 13,000 members, we thank you for the opportunity to review and provide comments on Los Angeles County's Draft Environmental Impact Report ("DEIR") for an ordinance to ban plastic carryout bags. For over 25 years we have worked to make Southern California's watersheds, including Santa Monica Bay, safe, healthy and clean through science, education, research and advocacy.

From our cleanups in Los Angeles County, plastic single-use bags have been one of the top five most abundant items of plastic debris found on Santa Monica Bay beaches.<sup>1</sup> Despite both voluntary and statewide efforts to implement recycling programs, less than 5% of plastic bags are actually recycled<sup>2</sup>; the majority end up in our landfills and litter stream, polluting inland and coastal environments. We provide detailed comments below regarding the DEIR for the proposed plastic bag ban policy.

1

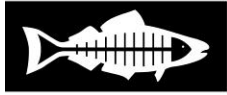
#### **Alternative 4 should be selected as the preferred alternative**

We applaud the County for moving forward with evaluating project alternatives that include a ban or fee on both single-use plastic and paper carryout bags. As reflected in the DEIR, plastic carryout bags blight Los Angeles communities and pose local environmental threats. Designed only for single-use, plastic bags have a high propensity to become litter and marine debris. These lightweight bags are easily carried great distances by wind when littered or blown from trash receptacles. As plastic debris makes its way into the ocean via stormdrain systems it becomes a persistent threat to marine life. Although plastic may photodegrade, or breaking into smaller

---

<sup>1</sup> Heal the Bay Adopt-A-Beach Program, Santa Monica Bay Trash Totals since 1999. Data compiled from Heal the Bay's Marine Debris Database available at: [www.healthebay.org/mddb](http://www.healthebay.org/mddb).

<sup>2</sup> California Integrated Waste Management Board (Available at: [www.zerowaste.ca.gov/PlasticBags/default.htm](http://www.zerowaste.ca.gov/PlasticBags/default.htm)); US EPA 2005 Characterization of Municipal Solid Waste, Table 7.



## Heal the Bay®

pieces when exposed to sunlight, it never completely biodegrades.<sup>3</sup> Over 267 species have been affected by plastic debris, including plastic bags, through ingestion or entanglement.<sup>4</sup> As the most ubiquitous alternative to plastic, and as indicated in the DEIR, paper bags also pose broad environmental threats.

1 cont.

We support the County’s inclusion of biodegradable plastic carryout bags in the DEIR and proposed ordinances. Biodegradable plastic bags do not decompose on land or in aquatic environments. Instead, they require high heat and bacteria, such as those present in industrial composting facilities, to break down into constituents that assimilate back into the environment. If the County allows continued use of biodegradable plastic bags but bans plastic carryout bags, it is likely that retailers will shift to the biodegradable alternative, which will not alleviate the environmental blight and impacts caused by single-use bag litter. Allowance of biodegradable bag alternatives would also likely complicate compliance and enforcement, as it is difficult to distinguish these bags from their synthetic plastic counterparts.

2

Alternative 4, a ban on plastic (including compostable plastics) and paper carryout bags at supermarkets, pharmacies and convenience stores, is the most environmentally preferable alternative. Regulatory action on both plastic and paper bags is critical in driving the use of the most sustainable option, reusable bags, rather than shifting consumer behavior from plastic to paper carryout bags. This double-pronged approach is consistent with single-use bag ordinances being considered by the Cities of Santa Monica and San Jose.

3

### **Alternative 2 should be expanded to include a detailed fee provision**

The DEIR evaluates a series of potential project alternatives - including a plastic carryout bag ban, a ban on both plastic and paper bags and a plastic bag ban paired with a paper bag fee – however, its analysis of the fee-based alternatives lacks sufficient detail. Alternative 2 would ban plastic carryout bags and place a fee on paper carryout bags at Los Angeles County retail establishments. We recommend that the County use the studies completed to date to include a paper bag fee of \$0.20 cents or higher in the final environmental impact report analysis for Alternative 2.

4

Several studies have tested a range of fees from \$0.10 to \$0.25 to gauge consumer behavior change and environmental effects.<sup>5,6,7</sup> One study found that when a range of fees were compared,

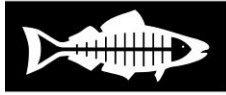
5

<sup>3</sup> Thompson, R. C. (2004-05-07). "Lost at Sea: Where Is All the Plastic?,". *Science* **304** (5672): 843.

<sup>4</sup> Laist, D. W. (1997). "Impacts of Marine Debris: Entanglement of Marine Life in Marine Debris Including a Comprehensive List of Species with Entanglement and Ingestion Records." In: Coe, J. M. and D. B. Rogers (Eds.), *Marine Debris -- Sources, Impacts and Solutions*. Springer-Verlag, New York, pp. 99-139.

<sup>5</sup> City of Seattle Public Utilities (Jan 2008) "Alternatives to Disposable Shopping Bags and Food Service Items," Prepared by Herrera Environmental Consultants, Inc. Available at:

[www.seattle.gov/mayor/issues/bringYourBag/docs/Report\\_Executive\\_Summary.pdf](http://www.seattle.gov/mayor/issues/bringYourBag/docs/Report_Executive_Summary.pdf).



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a fee of \$0.25 showed greater environmental benefits (i.e., a reduction in litter, energy use and greenhouse gas emissions) compared to lower levies, a voluntary levy, or retailers’ voluntary reusable bag promotion efforts.<sup>8</sup> A recent Seattle study found that when a ban on plastic bags is implemented without a fee or other instrument to regulate paper, it would result in a 40% shift in the use of paper.<sup>9</sup> However, when a fee was equally applied to both plastic and paper or used in conjunction with a ban on plastic, the resulting behavior shift favored reusable bags over all other types of bags.<sup>10</sup> The City of Santa Monica also completed a paper bag fee study in January 2010, which found that a \$0.20 fee would be appropriate for the City based on an estimated 50% reduction in paper bags. As demonstrated in these studies, placing a high enough fee on consumers rather than on manufacturers and retailers results in the greatest shift to the use of reusable bags, and increases overall environmental benefit.<sup>11,12</sup> We urge the County to include a minimum \$0.20 fee on paper bags in the Alternative 2 assessment provided in the final environmental impact report.

5 cont.

The DEIR discourages the selection of Alternative 2 as the preferred alternative by stating that a fee on paper carryout bags has the potential to cause increased administrative costs to the County and grocery stores, which would not be expected to result if a ban were issued.<sup>13</sup> While Heal the Bay supports Alternative 4 as the environmentally preferable option, we believe Alternative 2 would also result in strong environmental benefits throughout the County. Heal the Bay disagrees with the assessment regarding the administrative costs of Alternative 2, as revenues generated from the fee should be used to offset any costs to the County for implementation and enforcement of the ordinances. Furthermore, a portion of the paper carryout bag fee could be retained (we suggest no more than \$0.05 per bag) at the affected stores to cover any compliance costs.

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<sup>6</sup> Cadman, J. et al. (2005). “Proposed Plastic Bag Levy – Extended Impact Assessment Final Report.” Prepared for the Scottish Executive Environment and Rural Affairs Department by AEA Technology Environment.

<sup>7</sup> Australia Department of the Environment and Heritage (Dec 2002). “Plastic Shopping bags - Analysis of Levies and Environmental Impacts.” Prepared by Nolan-ITU Pty Ltd.

<sup>8</sup> Australia Dept. of Environment & Heritage (Dec 2002). *Plastic Shopping bags - Analysis of Levies and Environmental Impacts*. Melbourne, Australia. Prepared by Nolan-ITU Pty Ltd, Victoria, Australia. 2002., Table 6.2.

<sup>9</sup> City of Seattle Public Utilities (Jan 2008) “Alternatives to Disposable Shopping Bags and Food Service Items,” Prepared by Herrera Environmental Consultants, Inc., Table 6-3.

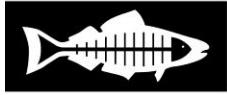
<sup>10</sup> Ibid.

<sup>11</sup> Convery, F., McDonnell, S. et al. (2007). “The Most Popular Tax in Europe? Lessons from the Irish Plastic Bag Levy,” *Environmental Resource Economics*, 38:1-11.

<sup>12</sup> Pearce D.W., Turner R.K. (1992) “Packaging Waste and the Polluter Pays Principle: A Taxation Solution.” *Journal of Environmental Management Planning* 35(1):5–15.

<sup>13</sup> Sapphos Environmental, Inc. Ordinances to Carryout Plastic Bags in Los Angeles County, June 2 2010 pg. 4-14





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### **The scope of the ordinances and environmental review should be expanded to include a wider range of retailers**

The DEIR limits qualifying stores for the proposed ordinances to supermarkets and pharmacies with over 10,000 square feet of retail space. However, the DEIR also states that "... the County is considering extending the jurisdiction of the proposed ordinances to stores that are part of a chain of convenience food stores, including franchises primarily engaged in retailing a limited line of goods that includes milk, bread, soda, and snacks, that have a total combined area of 10,000 square feet or greater within the County."<sup>14</sup> We support this approach and strongly urge the County to include convenience stores within the affected stores by the ordinances. Heal the Bay volunteers frequently encounter plastic bags from convenience stores at beach and river clean-ups. This approach is consistent with AB 1998, currently being considered by the California's legislature.

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We further encourage the County to expand the scope of the ordinances and environmental review to include all retail stores, restaurants, liquor stores, and food vendors that distribute single-use carryout bags since these types of establishments also contribute to the plastic bag proliferation problem.<sup>15</sup> A similar approach was taken by the City of Malibu, where the plastic bag ban ordinance applies to all retail stores, regardless of size.<sup>16</sup> Thus, we strongly urge the incorporation of a broader set of retailers within the scope of the final ordinance. To assist with the education period leading up to the ordinance's effective date and any challenges associated with implementation at smaller stores, we support a phased approach, where the ordinance would apply to large grocery stores and pharmacies before smaller convenience stores. This is similar to the approach taken in AB 1998 and the City of Malibu plastic bag ban.

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### **The definition of reusable bags should be strengthened to avoid promotion of thick boutique-type plastic bags**

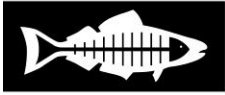
The current definition for "reusable bag," defined in section 2.2.3, may create a loophole to allow slightly thicker and heavier plastic bags from being sold or distributed in lieu of more

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<sup>14</sup> Sapphos Environmental, Inc., "Ordinances to Ban Plastic Carryout Bags in Los Angeles County INITIAL STUDY." Prepared for: County of Los Angeles Department of Public Works Environmental Programs Division, December 1, 2009.

<sup>15</sup> S. Lopez. "Awash in the Muck of a Single-Use Society" *Los Angeles Times*, September 12, 2007. Steve Lopez observed wrappers and plastic bags from stores such as 7-Eleven and Circle K floating in Compton Creek. Clearly, convenience stores and other retailers are part of the problem.

<sup>16</sup> The City of Malibu Ordinance to Ban Use of Non-compostable Shopping Bags, adopted May 12, 2008. (available at: <http://www.ci.malibu.ca.us/download/index.cfm/fuseaction/download/cid/12168/>).



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durable cloth-like or woven polypropylene bags as was the case in San Francisco according to news reports.<sup>17</sup> The DEIR states that the County will consider the inclusion of a performance standard and carrying capacity for reusable bags. Instead of mere consideration, these standards should be included in the reusable bag definition within the environmental impact report and ordinance. The absence of a performance standard and weight capacity in the definition may compromise the durability and potential for reuse of a reusable bag, instead allowing for boutique-type bags to qualify for as a reusable bag. The DEIR demonstrates the environmental impacts of reusable bags to air quality, biological resources, water quality, utilities and service systems and green house gas emissions are further reduced each additional time the reusable bag is used, therefore it is critical that the definition for reusable bag truly reflect reusability.

11 cont.

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An example of a more appropriate definition is the following:

*“Reusable bag” means a bag that is specifically designed and manufactured for multiple reuse and is either made of cloth or other machine washable fabric or made of durable fabric, and has a lifespan of at least 200 uses, with a carrying capacity of 30 pound per use.*

An alternative standard for reusable bags is offered by Green Seal™, an independent, non-profit certification organization, which recommends reusable bags have a minimum lifespan of 300 uses and must be durable enough to withstand typical loads under wet conditions.<sup>18</sup>

### **The program objectives should be strengthened**

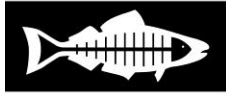
Given the magnitude of the plastic bag pollution problem, Heal the Bay believes that the program objectives, outlined in section 1.10 of the DEIR, need to be strengthened to adequately address this issue. The DEIR currently includes the following areas in the program objectives:

- Reduce the Countywide consumption of plastic carryout bags from the estimated 1,600 plastic carryout bags per household in 2007, to fewer than 800 plastic bags per household in 2013.
- Reduce the Countywide contribution of plastic carryout bags to litter that blights public spaces Countywide by 50 percent.
- Substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and reach at least 50,000 residents (5 percent of the County population with an environmental awareness message).

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<sup>17</sup> Gorn, D. “San Francisco’s Plastic Bag Ban Interests Other Cities,” National Public Radio, March 27, 2008. <http://www.npr.org/templates/story/story.php?storyId=89135360> (Retrieved October 26, 2009).

<sup>18</sup> Green Seal GS-16 Standard for Reusable Utility Bags. Available at: [http://www.green Seal.org/certification/standards/reusable\\_utility\\_bags\\_gs-16.pdf](http://www.green Seal.org/certification/standards/reusable_utility_bags_gs-16.pdf)



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Approximately six billion plastic carryout bags are consumed in Los Angeles County each year. A 50 percent reduction in the status quo would result in the distribution of three billion plastic carryout bags annually throughout the County and would not yield a sufficient reduction in plastic bag pollution. Supermarkets, pharmacies, and convenience stores are the largest providers of plastic carryout bags in the County, therefore banning plastic bags at these retailers would likely generate a much larger reduction of their distribution than 50 percent. Most waterways in Los Angeles County, including the Los Angeles River, Malibu Creek, Ballona Creek, and Santa Monica Bay are impaired for trash. An aggressive target would help the County meet the zero trash TMDL requirements or the receiving water quality standards for those impaired waters. Therefore, we urge the County to set stronger, yet realistic objectives, and aim for a minimum of a 90 percent reduction in plastic bag distribution to adequately address this issue.

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Additionally, we encourage the County and its retail partners to move forward with a public education and awareness campaign focusing on the negative impacts of plastic carryout bags and the benefits of reusable bags. However, we believe targeting 50,000 residents is a weak objective. Banning plastic carryout bags is inherently a public education action since the majority of residents shop at grocery, pharmacy and convenience stores, so the ban itself is a major step in raising public awareness about the issue. Furthermore, there are simple and mutually beneficial ways to involve retail partners in educational campaigns, such as notices in store parking lots reminding customers to remember their reusable bags. We encourage the County to set a goal of educating 500,000 residents, or 50 percent of the population about the negative impacts of plastic carryout bags and benefits of choosing reusable bags.

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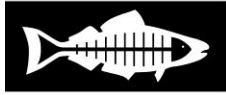
### **The impacts of single use plastics on biological resources should include a lifecycle component**

Heal the Bay strongly agrees with the DEIR’s assessment that the proposed ordinances would benefit biological resources in the County. We support the thorough analysis within the DEIR on the potential benefits of the proposed ordinances on biological resources within Los Angeles County, including special-status marine species, riparian species and seabirds.

17

Although the analysis on plastic bag impacts to biological resources is comprehensive, we encourage the County to expand the analysis to include biological impacts from the entire lifecycle of plastic bags. Many of the potential impacts and benefits from the various alternatives outlined in the DEIR are based on a lifecycle assessment methodology. Therefore, biological impacts associated with various stages within the lifecycle of a plastic bag should also be assessed.

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Plastic resin pellets are a key component in the manufacturing process of single use plastic carryout bags and are known to have adverse biological impacts.<sup>19,20</sup> Plastic resin pellets are often used as feedstock for the manufacture of plastic bags. These plastic resin pellets, also known as “nurdles” are a problematic type of litter due to their small size and persistence in aquatic and terrestrial environments.<sup>21</sup> Plastic resin pellets are not retained by most trash capture devices and if, improperly managed, have a high propensity to be transported through waterways to coastal environments.<sup>22</sup> Once in the environment, they can be mistaken for food by birds and other marine life.<sup>23,24</sup> Plastic resin pellets have also been shown to adsorb toxic chemicals within the marine environment. For example, concentrations of PCBs and DDE on plastic resin pellets collected from Japanese coastal waters were found to be up to 1 million times higher than the levels detected in surrounding seawater.<sup>25</sup> The abundance of plastic pellets in the litter stream is a significant environmental issue that has been addressed by a number of environmental agencies including the EPA<sup>26</sup> and Ocean Protection Council.<sup>27</sup> In 2007, Heal the Bay-sponsored AB 258 was adopted into law, requiring industrial facilities to implement best management practices to control against the release of nurdles into the environment. This law is currently being implemented by the State Water Resources Control Board, yet compliance rates by plastics manufacturers are unknown. Therefore, Heal the Bay requests the County address plastic resin pellets in their final Environmental Impact Report as a plastic bag related threat to biological resources.

19

### **Additional environmental impacts associated with single-use plastic carryout bags should be discussed in the Existing Conditions section and assessed in the EIR**

Section 2.3.1 of the DEIR evaluates the existing conditions associated with single-use plastic bags in Los Angeles County. This section discusses recycling and disposal rates of plastic bags

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<sup>19</sup> Takada, H. et.al. Pellet Watch: Global Monitoring of Persistent Organic Pollutants (POPs) using Beached Plastic Resin Pellets; Marine Pollution Bulletin, Vol 58, Issue 10 Oct 2009.

<sup>20</sup> Derraik, J. 2002. The pollution of the marine environment by plastic debris. Mar Pollution Bulletin; 44, 842-852

<sup>21</sup> State water resources control board 2010 (MEA).

<sup>22</sup> Ocean Protection Council: An Implementation strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter, Nov. 2008.

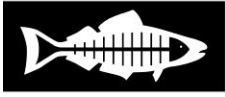
<sup>23</sup> Derraik, J. 2002. The pollution of the marine environment by plastic debris. Mar Pollution Bulletin; 44, 842-852.

<sup>24</sup> Ocean Protection Council Resolution on Reducing and Preventing Marine Debris, adopted February 8, 2007.

<sup>25</sup> Takada, H. et.al. Pellet Watch: Global Monitoring of Persistent Organic Pollutants (POPs) using Beached Plastic Resin Pellets; Marine Pollution Bulletin, Vol 58, Issue 10 Oct 2009. FEE 2007, as reported in Herrera et al (2008). (MEA).

<sup>26</sup> US EPA Office of Water, Plastic Pellets in the Aquatic Environment: Sources and Recommendations Final Report, December 1992.

<sup>27</sup> Ocean Protection Council: An Implementation strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter, Nov. 2008.



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and accurately reflects the low plastic carryout bags. However, we also recommend the County discuss the challenges associated with plastic bag disposal, recycling and litter management within this section. There is a lack of available domestic plastic bag recycling markets.<sup>28</sup> In fact the majority of plastic bags that are recovered to be recycled are sold to foreign markets, including China.<sup>29</sup> In Los Angeles County, over 90% of the bags collected in municipalities surveyed ended up being shipped to a landfill rather than recycled, due to contamination from food or pet waste, and their tendency to jam recycling machinery.<sup>30</sup> Furthermore, when plastic bags become litter, they frequently clog trash full capture devices, like catch basins and screens. Plastic bags that block these devices render them ineffective and increase screen maintenance cost and local flood risks. Discussion of these challenges in the final environmental impact report will help reflect the existing conditions and impacts associated with single-use plastic bag usage and management in Los Angeles.

20 cont.

### Additional Comments:

- Page ES-5 states “although the No Project Alternative would reduce potential impacts to air quality and GHG emissions compared with the proposed ordinances, impacts to biological resources, hydrology and water quality, and utilities and service systems would be exacerbated, rather than avoided or reduced.” The DEIR fails to provide substantiation for a reduction in air quality and greenhouse gas emissions impacts caused by the no action alternative. Currently consumers use both plastic and paper carryout bags at Los Angeles County retail establishments. Without the implementation of a single-use bag ordinance, bag consumption would likely go unchanged, and could potentially be reduced due to non-profit environmental organizations, retail establishments, and local government efforts to promote consumer use of reusable bags.

21

### Conclusion

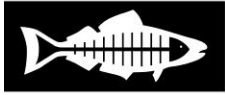
Local momentum is building throughout the state to ban or place fees on single-use carryout bags. We applaud the County for coordinating with other cities that are in the process of conducting environmental assessments of potential policy action to reduce the distribution of single-use bags, and encourage continued local government coordination. Specifically, we encourage the County to coordinate with the City of San Jose, which has proposed to ban both

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<sup>28</sup> International Coastal Cleanup 2009 Report. “A Rising Tide of Ocean Debris”, p. 9. (Accessed on October 23, 2009).

<sup>29</sup> [2007 National Post-Consumer Recycled Plastic Bag and Film Report](#). Prepared by Moore Recycling Associates, Inc. of Sonoma, CA for the Plastics Division of the American Chemistry Council. [Testimony](#) provided by Patty Moore of Moore Recycling Associates at City of Vancouver Planning Commission Meeting, 7 Oct 2008.

<sup>30</sup> Los Angeles County (August 2007). “An Overview of Carryout Bags in Los Angeles County - Staff Report to the Board of Supervisors,” p. 21.



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plastic and paper bags, and the City of Santa Monica, which has proposed to ban plastic and compostable bags and charge a fee on paper bags.

We urge the County to move forward with Alternative 4 as the preferred alternative and adopt the recommendations outlined in this letter to improve the analyses supporting the final environmental impact report. As zero trash TMDLs and waste diversion requirements draw near, it is even more imperative that the County move expeditiously to implement this critical policy.

22 cont.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Abramson Sikich".

Sarah Abramson Sikich  
Coastal Resources Director

/s/

Marisa Villarreal  
Legislative Coordinator

**Heal the Bay**  
**Sarah Abramson Sikich, Coastal Resources Director**  
**1444 9th Street**  
**Santa Monica, California 90401**

***Response to Comment No. 1***

The County of Los Angeles appreciates that Heal the Bay took the time to review and provide comments on the Draft EIR in a letter dated July 16, 2010. Comment No. 1 notes that plastic carryout bags have been one of the top five most abundant items of plastic debris found by Heal the Bay on Santa Monica Bay beaches since 1999. Comment No. 1 confirms the information and discussion included throughout the EIR regarding the prevalence of plastic carryout bags in the litter stream and their high propensity to be littered. In addition, Comment No. 1 confirms the discussion in Section 3.2 about the impacts of plastic carryout bag litter on biological resources and its potential to pollute inland and coastal waterways. This discussion states, in part, that although plastics break down into smaller pieces over time, these small plastic pieces never completely biodegrade, and thus pose a threat to marine wildlife.

Comment No. 1 also states that paper carryout bags, like their plastic counterparts, pose threats to the environment. The potential environmental impacts of both plastic and paper carryout bags, as discussed in detail throughout the various subsections of Section 3.0, will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR. Section 4.0 also studies the potential environmental impacts resulting from alternatives that impose a fee or a ban on the issuance of paper carryout bags.

***Response to Comment No. 2***

Comment No. 2 conveys support for a ban on biodegradable plastic carryout bags as part of the proposed ordinances. Comment No. 2 asserts that biodegradable plastic bags do not decompose on land or in aquatic environments, but require high heat and bacteria similar to the environment of industrial composting facilities, a point that is noted in Section 4.1 and Appendix B. Comment No. 2 also asserts that biodegradable bags would not alleviate the environmental blight and impacts from bag litter, another point that is discussed in Section 4.1 and Appendix B. The information related to biodegradable bags is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 3***

Comment No. 3 notes Heal the Bay's preference for Alternative 4 as the most environmentally preferable alternative. Comment No. 3 also notes that regulatory action for both plastic and paper bags is important to encouraging reusable bag use, rather than shifting consumer behavior from plastic to paper carryout bags, with this approach being consistent with ordinances being considered by the Cities of Santa Monica and San Jose. The efforts of both cities were considered during preparation of the EIR. As described in Section 4.2.5, Alternative 4 proposes to ban the issuance of plastic and paper carryout bags at all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores in the County of Los Angeles. The County of Los Angeles developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4, to ensure a maximum environmental benefit from a fee on the issuance of paper carryout bags and to mitigate

greenhouse gas–related impacts from a shift to paper bag usage to the greatest extent feasible. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 (see Clarifications and Revisions to the Draft Environmental Impact Report, Section 12.2). The commenter’s preference for Alternative 4 as the environmentally preferable alternative is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

#### ***Response to Comment No. 4***

Comment No. 4 recommends that the analysis of Alternative 2 in Section 4.2.3 be expanded to include a more detailed analysis of the implementation of a fee. As described in Section 4.2.3 , Alternative 2 proposes to ban the issuance of plastic carryout bags and impose a fee on the issuance of paper carryout bags in the County of Los Angeles. The EIR discusses fees and bans in place for plastic and/or paper carryout bags, including in, but not limited to, Section 2.2.4. So that there may be a maximum environmental benefit realized from a fee on paper carryout bags and to mitigate impacts related to greenhouse gas (GHGs) emissions from a shift to paper bag usage to the greatest extent feasible, the County also developed Alternative 5, which is a hybrid of Alternatives 2, 3 and 4. Alternative 5 would ban the issuance of plastic carryout bags and place a fee of at least \$0.05 on the issuance of paper carryout bags at all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores. The analysis of Alternative 5 has been added to Section 4.0 (see Section 12.2). The analysis of Alternative 5 acknowledged the effectiveness of fee or charge of at least \$0.05, based on the effects of the fee implemented in Washington, DC, which resulted in an 86-percent decrease in the number of carryout bags used in the first month after the fee was implemented.<sup>5</sup> Accordingly, any amount over \$0.05 could reasonably be expected to better deter the use of paper carryout bags. Comment No. 4 recommends that the County of Los Angeles apply a fee of \$0.20 or higher for paper carryout bags. This suggestion is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

#### ***Response to Comment No. 5***

Comment No. 5 discusses the various completed studies that have tested a range of fees on carryout bags. The studies referenced were considered during preparation of the EIR and are part of the record. An additional statement has been added to Section 4.2.3.3, Comparative Impacts, for the analysis of Alternative 2 in the EIR discussing the effectiveness of a fee greater than \$0.05 at encouraging a transition to reusable bags (see Section 12.2).

#### ***Response to Comment No. 6***

Comment No. 6 notes that the Draft EIR appears to discourage the selection of Alternative 2 based on increased administrative costs to the County of Los Angeles and grocery stores, and that Alternative 2 would result in strong environmental benefits throughout the County of Los Angeles. The inclusion of public scoping comments relating to a fee were included in the discussion of

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<sup>5</sup> ABC News. 30 March 2010. “Nickel Power: Plastic Bag Use Plummets in Nation's Capital.” Available at: <http://abcnews.go.com/Politics/plastic-bag-plummets-nations-capital/story?id=10239503>



Alternative 2 in Section 4.2.3 to present a full record of the issues raised, and were not intended to discourage the consideration or selection of any alternative. The environmental benefits of Alternative 2, along with any beneficial or adverse socioeconomic impacts, will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 7***

Comment No. 7 notes that Alternative 2 would generate revenues that should be used to offset any costs to the County of Los Angeles for implementation and enforcement of the proposed ordinances. This would be true if the County of Los Angeles elects to remit a portion of any potential fee to the County of Los Angeles. In Section 4.2.3.3, the County of Los Angeles acknowledges that revenues from the implementation of a fee on the issuance of paper carryout bags could be used for County of Los Angeles programs such as litter clean up, recycling, or public awareness campaigns. However, as noted in public scoping comments received from grocery store representatives, placing a fee on the issuance of paper carryout bags could result in increased administration costs to grocery stores and a reduction in checkout speed. Their comments were included for the benefit of a complete record.

Comment No. 7 also suggests that a portion of the paper carryout bag fee be retained at the affected stores for compliance costs. The suggestion is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 8***

Comment No. 8 addresses the range of retailers included in the proposed ordinances and encourages the County of Los Angeles to expand the scope of the proposed ordinances to include convenience food stores. Comment No. 8 notes that Heal the Bay frequently encounters plastic carryout bags from convenience stores at beach and river cleanup events. That information and the suggestion to include convenience stores is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR. The EIR analyzes the potential environmental impacts of Alternatives 3 and 4, which include a ban on the issuance of plastic carryout bags at a wide range of stores, including convenience stores. In addition, as a result of this and other comments, the County of Los Angeles has developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volume. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 (see Section 12.2).

### ***Response to Comment No. 9***

Comment No. 9 urges the incorporation of a broader set of retailers within the scope of the final ordinance and indicates a preference that all retail stores, restaurants, liquor stores, and food vendors that distribute carryout bags be included in the range of retailers affected by the proposed ordinances. As indicated in Alternatives 3 and 4 and hybrid Alternative 5, the EIR does study the environmental impacts resulting from an expanded scope of any proposed ordinance to a broader set of retailers, including all supermarkets and other grocery stores, convenience stores,

pharmacies, and drug stores in the County of Los Angeles. The recommendation to expand the scope of the final ordinance is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 10***

Comment No. 10 states support of a phased approach where the proposed ordinances would apply to large grocery stores and pharmacies before they apply to smaller convenience stores. The suggestion is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR. The County of Los Angeles has also analyzed an alternative to the proposed ordinances (Alternative 5) that would apply to large grocery stores and pharmacies before smaller grocery stores, convenience stores, and drug stores. The analysis of Alternative 5 has been added to Section 4.0 (see Section 12.2).

***Response to Comment No. 11***

Comment No. 11 suggests that there may be a potential “loophole” in the definition of “reusable bag” in Section 2.2.3 that could allow slightly thicker and heavier plastic bags to be sold or distributed. The County of Los Angeles is aware of the potential problem that may be caused if slightly thicker and heavier plastic bags were distributed instead of more durable reusable bags. In response to comments received from the public, including Comment No. 11, the definition of reusable bags has been modified in Section 2.2.3 to include a requirement for reusable bags to have a minimum lifetime of 125 uses (see Section 12.2).

***Response to Comment No. 12***

Comment No. 12 pertains to the inclusion of a performance standard and carrying capacity for reusable bags in the definition of a reusable bag described in Section 2.2.3. In response to comments received from the public, including Comment No. 12, the definition of reusable bags has been modified in the EIR to include a requirement for reusable bags to have a minimum lifetime of 125 uses and a volume of at least 15 liters (see Section 12.2).

***Response to Comment No. 13***

Comment No. 13 reiterates the program objectives outlined in Section 2.4.2, and recommends that the program objectives be strengthened. The Countywide objectives do not suggest a limit on the success of any reduction efforts to the minimum levels established by the objectives. The County of Los Angeles Board of Supervisors will evaluate the program objectives during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 14***

Comment No. 14 expresses support for a minimum 90-percent reduction in plastic carryout bag distribution to assist with the zero-trash total maximum daily loads requirements. A 90-percent reduction in distribution of plastic carryout bags may not be a feasible objective for the proposed ordinances if they were applied only to stores within the unincorporated areas of the County of Los Angeles that (1) meet the definition of a “supermarket” as found in the California Public Resources Code, Section 14526.5, or (2) are buildings that have over 10,000 square feet of retail space that

generate sales or use tax pursuant to the Bradley-Burns Uniform Local Sales and Use Tax Law and have a pharmacy licensed pursuant to Chapter 9 of Division 2 of the Business and Professions Code. However, the County of Los Angeles may be able to achieve a more aggressive target of reductions in plastic carryout bag distribution if the scope of the proposed ordinances were expanded to include all supermarkets, pharmacies, and convenience stores within the County of Los Angeles, with no limits on square footage or sales volumes, as part of Alternatives 3, 4, and hybrid Alternative 5, which are discussed within Section 4.0. The County of Los Angeles Board of Supervisors will consider Alternatives 3, 4, and 5 during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 15***

Comment No. 15 notes that the objective of the County of Los Angeles to target a minimum of 50,000 residents with a public education and awareness campaign could be strengthened. As previously stated, the current objectives are not intended to be limitations, and they do not suggest that the success of any public education and awareness efforts cannot exceed the minimum levels currently contained in the Countywide objectives. The County of Los Angeles Board of Supervisors will evaluate the program objectives during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 16***

Comment No. 16 suggests that the public education and awareness campaign should target 500,000 residents of the County of Los Angeles, or 50 percent of the population. Comment No. 16 notes that placing notices in store parking lots reminding customers to use reusable bags could be a simple yet effective way to increase public education and awareness. The suggestions are acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 17***

Comment No. 17 supports the analysis and conclusion in Section 3.2 stating that the proposed ordinances would benefit biological resources.

***Response to Comment No. 18***

Comment No. 18 recommends expanding the analysis in Section 3.2 to include biological impacts from the entire lifecycle of plastic carryout bags. The County of Los Angeles reviewed several life cycle assessments during preparation of the EIR, and discussed a broad range of life cycle impacts throughout the subsections in Section 3.0. The County of Los Angeles is aware that life cycle impacts of plastic carryout bags, such as impacts on water quality, have the potential to cause indirect impacts to biological resources. The County of Los Angeles Board of Supervisors will consider this comment during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 19***

Comment No. 19 addresses the potential impacts of plastic resin pellets (nurdles) to biological resources, and notes that plastic resin pellets are often used for the manufacture of plastic bags.

As noted in the comment, Assembly Bill 258 requires industrial facilities to implement best management practices (BMPs) to control the release of plastic resin pellets into the environment, but this issue is beyond the scope of the proposed ordinances. However, the County of Los Angeles is aware of the potential environmental impacts of plastic resin pellets and recognizes that the proposed ordinances may play a role in the reduction in use of plastic resin pellets by the plastic bag industry. An additional statement about the threat of plastic resin pellets to biological resources has been added to Section 3.2 (see Section 12.2).

#### ***Response to Comment No. 20***

Comment No. 20 recommends that the discussion in Section 2.3.1 be expanded to discuss the challenges associated with plastic bag disposal, recycling, and litter management. Comment No. 20 notes the lack of available domestic plastic bag recycling markets. Comment No. 20 also notes that in the County of Los Angeles, over 90 percent of the bags collected in municipalities surveyed were shipped to a landfill rather than recycled, due to contamination from food or pet waste, and their tendency to jam recycling machinery. That information is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

#### ***Response to Comment No. 21***

Comment No. 21 notes that the potential reduction in impacts to air quality and greenhouse gas emissions caused by the No Project Alternative lacks substantiation in Section ES.6. As discussed in Sections 3.1 and 3.3, there is a potential for indirect increases in the emission of certain air pollutants and greenhouse gases as a result of the proposed ordinances, should there be a shift to paper carryout bags, due to the life cycle of paper carryout bags. Therefore, it was concluded that the No Project Alternative would result in less indirect emissions of certain air pollutants (while increasing the emissions of others) and less indirect emissions of greenhouse gases in comparison to a shift to paper carryout bag usage resulting from the proposed ordinances, due to the fact that the No Project Alternative would not result in an increase in distribution of paper carryout bags. The comparative impacts of the No Project Alternative are discussed in detail in Section 4.2.1.

#### ***Response to Comment No. 22***

Comment No. 22 supports coordination with other cities regarding proposed ordinances to ban or place fees on single-use carryout bags. The County of Los Angeles has coordinated with a number of cities regarding this issue, beginning with the Voluntary Single Use Bag Reduction and Recycling Program, and will continue coordination with cities during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR. In addition, Comment No. 22 indicates a preference for adoption of Alternative 4. As noted in the response to Comment No. 3, the preference is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

## Public Comment on the Draft Environmental Impact Report

My name is Lars Clutterham. I am a resident of Downey, and my comments here reflect those I made at the public hearing on July 1, 2010, simply from my perspective as a concerned and involved citizen of the greater Los Angeles community.

I'd like to thank the L.A. County DPW Environmental Programs Division and Sapphos Environmental, Inc., for their diligence in creating such a thorough report. Also thank you to the L.A. County Board of Supervisors for having the foresight to raise the issues addressed in the report.

My brief comments include four areas of observation narrowing in focus to my own personal experiences with reusable grocery bags, and a conclusion based on that perspective.

First, as a citizen I am outraged at the egregious obstructionism displayed by the Coalition to Save the Plastic Bag as evidenced not only by its comments in this report, but also in its public statements, including a recalcitrant telephone presence at LADPW Single-Use Bag Reduction Working Group meetings. The Coalition has created a sea of red herrings in its ongoing efforts to thwart the public's interest solely for the purpose of saving its own industry. (There is one exception, to which I'll return in conclusion.) Any reasonable person can see through the false premises, fallacious arguments, and dilatory questions posed by the Coalition, not only in this report, but also on its website.

Second and third, a word about the political climate with respect to plastic bag reduction in Downey, my city of residence, and about my own efforts within the city structure to effect change:

In October 2008, Downey City Council rejected a proposal for a citywide ban on plastic bags, holding the issue over for an as yet to be appointed Green Task Force. The following spring I was appointed as a volunteer member of that same task force, which was commissioned for a one-year term by City Council.

I volunteered to chair an education subcommittee within the task force, charged with finding meaningful educational opportunities outside the sphere of city regulation. After several months of lip service within the task force to the concept of educating through the schools, I approached the Superintendent of the Downey Unified School District directly and obtained permission to create a pilot program at one school in the district for the purpose of teaching the environmental benefits of reusable bags, provided it had the approval of the school's principal. After approaching the Green Task Force with this proposal, its endorsement was recommended to and approved by City Council.

In January 2010, a three-tier program was initiated at one Downey elementary school. It began with a full day of instruction including presentations to each grade level, K-5, after which every student received a reusable grocery bag. The second tier was a 1<sup>1/2</sup>-week school-wide bag redemption program during which approximately 12,000 single-use plastic bags were turned in by students for an additional 1,200 reusable bags awarded to the students. The third tier was a bag decoration contest culminating in an assembly on the 40<sup>th</sup> anniversary of Earth Day, at which prizes were awarded for all grade levels. (Late in the school year a second school in the district also experienced a day of instruction, including the distribution of reusable grocery bags to

all participating students. I fully expect this program to expand within the school district in the upcoming school year.)

2 cont.

Four area supermarkets were approached to provide reusable bags in support of this program, yet only one, Stater Bros., made \$25 available for the purchase of bags, at market price. Moreover, one aspect of City Council's endorsement of the program authorized the purchase of up to 1,000 bags to support it. Yet the city never made any effort to purchase the bags that Council had approved. Consequently, the entire pilot project was supported exclusively by private donations.

3

This experience, as well as recent statements from at least one City Council member, leads me to conclude that the current political/business climate in the City of Downey is not conducive to regulatory change where the reduction of single-use plastic bags is the issue.

Fourth, as a way of bringing a personal perspective to my views on this issue, I have a collection of reusable shopping bags, which I displayed at the July 1 public hearing. The first is a bag I acquired while a music student in Paris, France, in 1970. It's made from woven string, and the French call it a "filet." Though it's not as large as a typical American grocery bag, it was big enough during my time in Paris to do one day's shopping for two at the local market.

4



I also have 3 cotton reusable grocery bags purchased from major grocery chains in San Diego more than 20 years ago, less than a decade after single-use plastic bags came into widespread usage. Even then these bags displayed the phrases “Join the Lucky Environmental Savings Plan” and “Together we can do it . . . CARE: Consumer Action to Restore the Environment,” suggesting an early awareness of the environmental toll of carryout grocery bags.

4 cont.





Sadly, I did not recognize at the time the wisdom of using these now 40- and 20+-year-old bags continuously, though I am using them again today. That recognition came about 5 years ago, when my wife and I purchased pocket reusable bags from the Pacific Whale Foundation, a non-profit devoted to preserving the world's oceans.

4 cont.



Since about then, both my wife and I have used reusable bags exclusively for all our shopping. At the public hearing on July 1, I lastly displayed 2 reusable bags that I've been using constantly for about the last 3 years. Each of them has had at least 125 uses, counting conservatively, and I anticipate they've got 3 more years of continuous use.

4 cont.



In conclusion, while I have always made some effort towards being environmentally responsible, I have become a strong advocate for reusable bags over the past several years since fully recognizing the astonishing and frightening impact of throwaway bags on local, regional, national and global environments. In this conviction I belong to a very small minority, as bag recycling statistics and public attendance at these very hearings attest. Neither the general public nor local government in my home community shows any real concern over the horrific environmental costs of this practice. It may have had its day, but the tradition of single-use bags for public shopping needs to give way to a more sustainable practice for the future. In all enterprise, technology and tradition become outmoded and are superseded by new products and practices, as in my own profession, the field of music, where the ophicleide (which you've probably never heard of) gave way to the saxophone. Plastic bag manufacturers, such as those represented by the Coalition to Save the Plastic Bag need to retool to provide more responsible products. The Coalition, in the midst of all its specious argumentation, makes one good point: paper bags are not an environmentally acceptable alternative to carryout plastic bags. Their environmental costs are also too high. Therefore, for the good of all citizens of Los Angeles County, and to demonstrate the public leadership that smaller cities such as my own community of Downey so desperately need (even though they may not recognize it), I want to close by expressing my heartfelt wish that the Los Angeles County Board of Supervisors will implement Alternative 4 of the DEIR, banning plastic and paper carryout bags for all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores in Los Angeles County.

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I thank you for your time and for your consideration of my comments.

Lars Clutterham  
July 15, 2010

## **Lars Clutterham**

### ***Response to Comment No. 1***

The County of Los Angeles appreciates that the commenter took the time to review the Draft EIR and to provide comments on the document and the proposed ordinances at issue. Comment No. 1 expresses appreciation to the County of Los Angeles for preparing the EIR and to the Board of Supervisors for raising the issues addressed in the EIR. Comment No. 1 notes the commenter's displeasure with the actions of the Save the Plastic Bag Coalition regarding reduction efforts for plastic carryout bags. The commenter states that the ban on plastic carryout bags is in the public's interest and that the effort is being disrupted by Save the Plastic Bag Coalition's efforts and opposition to the ban for the purpose of saving its own industry. This comment is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 2***

Comment No. 2 discusses a pilot program implemented at an elementary school in the City of Downey designed to educate students about the benefits of reusable bags by allowing students to redeem plastic carryout bags for reusable bags. While this comment is outside of the scope of CEQA in relation to the EIR, the County of Los Angeles commends the commenter for participating in the pilot program, and hopes that such a program will be expanded within the Downey Unified School District in the future. The County of Los Angeles Board of Supervisors will consider this comment during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 3***

Comment No. 3 notes that the pilot reusable bag education program implemented at the elementary school in the City of Downey was supported exclusively by private donations. Comment No. 3 asserts that City of Downey is not likely to regulate the distribution of plastic carryout bags. As discussed in Section 2.4.2, one of the objectives of the proposed ordinances is to collaborate with all 88 incorporated cities of the County of Los Angeles to encourage adoption of comparable ordinances to ban the issuance of plastic carryout bags in their respective cities.

### ***Response to Comment No. 4***

Comment No. 4 describes and provides images of several types of reusable bags that the commenter has used throughout his lifetime as alternatives to plastic carryout bags, and notes that several of the reusable bags are at least 30 to 40 years old, and that some have been used as least 125 times. In addition, Comment No. 4 states that the particular bags demonstrated are anticipated to be able to withstand 3 more years of continuous use. The information regarding durability of reusable bags and the potential number of uses of reusable bags will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 5***

Comment No. 5 conveys the commenter's support for reusable bags and his discomfort with the lack of concern from the general public and local government in his home community regarding

the environmental impacts of carryout bags. As discussed in Section 2.4.2, one of the objectives of the proposed ordinances is to substantially increase the public's awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and to reach at least 50,000 residents (5 percent of the population) with an environmental awareness message. The County of Los Angeles also intends to conduct outreach to all 88 incorporated cities of the County of Los Angeles to encourage adoption of comparable ordinances to ban the issuance of plastic carryout bags in their respective cities.

### ***Response to Comment No. 6***

Comment No. 6 conveys the commenter's support for implementation of Alternative 4 and opinion that paper carryout bags are not an environmentally acceptable alternative to plastic carryout bags. The EIR does study the potential environmental impacts of paper carryout bags in light of the proposed ordinances, as well as the potential environmental impacts that would result from several reasonable alternatives. As described in Section 4.2.5, Alternative 4 proposes to ban the issuance of plastic and paper carryout bags at all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores in the County of Los Angeles. In addition, as described in Section 4.2.3, Alternative 2 also evaluates the potential environmental impacts resulting from placement of a fee on the issuance of paper carryout bags, and notes that the potential environmental impact would indeed be less, considering evidence showing that fees are highly effective in reducing the number of carryout bags used. The greater number of stores at which a fee is implemented, the greater the reduction in potential environmental impacts. The County of Los Angeles has developed an alternative (Alternative 5) that combines Alternatives 2, 3, and 4 to maximize the environmental benefit from a fee on the issuance of paper carryout bags and to mitigate, to the greatest extent feasible, potential greenhouse gas-related impacts resulting from a shift to paper carryout bag usage. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. Section 4.0 has been modified to include the environmental analysis of Alternative 5 (see Section 12.2). The commenter's preference for Alternative 4 is noted for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

Hillary Gordon  
1823 Camden Ave. #2  
Los Angeles, CA 90025  
hillgordon@verizon.net

July 16, 2010

County of Los Angeles Department of Public Works  
Attn: Mr. Coby Skye  
Environmental Programs Division  
900 South Fremont Avenue, 3rd Floor  
Alhambra, CA 91803  
Sent via e-mail (cskye@dpw.lacounty.gov)

Dear Coby Skye,

Thank you for the opportunity to submit comments on the DEIR for Los Angeles County's proposed ban on single-use plastic carryout bags.

I commend the County for tackling this very important issue. I appreciated having the opportunity to attend a public scoping meeting, at which I offered verbal comments. At this time I would like to just make a very brief statement for the written record.

Having now had a chance to read through the DEIR, I would like to voice my support for Alternative 4. While the County is to be commended for proposing the ban on plastic carryout bags, I feel that this, while a good start, does not go quite far enough in addressing the various environmental impacts of the use of any kind of single use bag, whether that be paper or plastic. While I agree that it is absolutely essential that we immediately ban the use of plastic bags, as proposed by this ordinance, I also believe that we must begin to at least phase out, if not entirely eliminate, the use of paper bags as well. As the EIR notes, the production and use of paper bags also has environmental consequences, especially with respect to GHG emissions and the potential impact on solid waste disposal in landfills. As a Zero Waste activist, I firmly believe that we must quickly wean consumers off not only plastic, but paper bags as well. Reusable bags are easily accessible, and if made with safe and durable materials (something that the County should actively pursue, regulate, and enforce), have a life span far in excess of the number of uses noted in the DEIR. I have cloth bags that I have been using for many, many, years; moreover, when, if ever, they reach the end of their lives they will not end up in the trash, but their material will be reused and refashioned for some other purpose.

I recognize that the typical L.A. County shopper has become used to the idea of getting bags at the point and time of purchase. It will undoubtedly take some encouragement to get those consumers into the habit of bringing their own reusable bags to the store every time they shop. But the time for relaxed encouragement has passed. I believe that the time has come for that encouragement to come in the form of a complete ban on single-use bags, both paper and plastic.

Thank you,

Hillary Gordon

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2

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## **Hillary Gordon**

### ***Response to Comment No. 1***

The County of Los Angeles appreciates that the commenter took the time to review the Draft EIR and to provide comments. Comment No. 1 expresses the commenter's gratitude to the County of Los Angeles for addressing this important issue, and conveys the commenter's support for implementation of Alternative 4 due to the concern for potential greenhouse gas emissions and solid waste impacts of paper carryout bags. As described in Section 4.2.5, Alternative 4 proposes to ban the issuance of plastic and paper carryout bags by all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores in the County of Los Angeles. The commenter's preference for Alternative 4 is noted for the record and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 2***

Comment No. 2 pertains to the use of reusable bags. The EIR, specifically including, but not limited to, Section 2.3.3, discusses the use and lifespan of reusable bags. The County of Los Angeles acknowledges that the EIR conservatively assumed a low number of uses of reusable bags in order to evaluate the environmental impacts in a worst-case scenario. Comment No. 2 also recommends that the County of Los Angeles should impose and enforce a standard for reusable bags to ensure that the bags are made from safe and durable materials. The definition of reusable bags has been modified in Section 2.2.3 to include a requirement for reusable bags to be designed for a minimum of 125 uses to minimize the potential environmental impacts from reusable bags (see Section 12.2). The measures that will be used to enforce the proposed ordinances will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 3***

Comment No. 3 encourages the County of Los Angeles to comprehensively ban both paper and plastic carryout bags. The commenter's preference is part of the record and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Jeannie Min

Street [REDACTED]

City Glendale State CA ZIP 91208

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Camille Garmendia

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Jeff Gilbert

Street [REDACTED]

City LA State CA ZIP 90030

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Marvin Wunlienger

Street [REDACTED]

City Pasadena State CA ZIP 91101

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Manuel Hernandez

Street [REDACTED]

City Glendale State CA ZIP 91208

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Kelly Jensen

Street [REDACTED]

City Sunland State CA ZIP 91040

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



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Sincerely,

Print name Adrian Munabi

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Ellen Keer

Street \_\_\_\_\_

City Charleston State SC ZIP 29403

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Miguel Barrera

Street \_\_\_\_\_

City Storm Cakes State CA ZIP 91423

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Clare Zing

Street \_\_\_\_\_

City Sherman Oaks State CA ZIP 91423

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Lakinya Thomas

Street \_\_\_\_\_

City LA State CA ZIP 90013

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name STEPHANIE DALAN

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name David W. Bettarista

Street [REDACTED]

City Long Beach State CA ZIP 90804

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Darin Christ

Street [REDACTED]

City Burbank State CA ZIP 91506

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SATWIG STOICK MILK

Street [REDACTED]

City STUDIO CITY State CA ZIP 91604

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Angie Reynolds

Street [REDACTED]

City Cocoyles State CA ZIP 90066

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BERNADETTE IRIZARDEY

Street [REDACTED]

City LOS ANGELES State CA ZIP 90066

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name R. Chew

Street [REDACTED]

City LA State CA ZIP [REDACTED]

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PATRICIA O'NEILL  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SHELLEY MILLS  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name MIKE PETERSON  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name NAVY BAEZ  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name VEVA STAMBERG  
Street [REDACTED]  
City STUDIO CITY State CA ZIP 91604  
E-mail \_\_\_\_\_  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Gene Brinkman  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name TASSO FELDMAN  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name LA FRENAYS  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Kelli Bass  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name LEOW JHEE  
Street [REDACTED]  
City STUDIO CITY State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sylvia Collins  
Street [REDACTED]  
City Stevenson State CA ZIP 92684  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michelle Fitzgerald  
Street [REDACTED]  
City Stevenson State CA ZIP 92684  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name MARGARET LETAUVE

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name PAUL LAGLOIRE

Street [REDACTED]

City GLENDALE State CA ZIP 91200

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Laura Farrell

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Matthew OROZCO

Street [REDACTED]

City Los Angeles State CA ZIP 90013

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jordan McDaniel

Street [REDACTED]

City Los Angeles State CA ZIP 90016

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Shanaya Sutton

Street [REDACTED]

City Covina State CA ZIP 91722

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Alon Not

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Samuel Atkins

Street \_\_\_\_\_

City LA State CA ZIP 90009

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Roberto Martinez

Street \_\_\_\_\_

City Wilmington State CA ZIP 90780

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Margarita Rojas

Street \_\_\_\_\_

City Los Angeles State CA ZIP 90033

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Angel Cervillo

Street \_\_\_\_\_

City LA State CA ZIP 90063

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Maria Tarin

Street \_\_\_\_\_

City LA State CA ZIP 90021

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

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Sincerely, Edwin Hovens  
Print name  
Street [redacted]  
City LA State CA ZIP 90021  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely, JURI FLORES  
Print name  
Street [redacted]  
City LOS ANGELES CA ZIP 90001  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely, [Signature]  
Print name  
Street [redacted]  
City STUDIO CITY State CA ZIP 91604  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely, AUDI DOMESHEK  
Print name  
Street [redacted]  
City STUDIO CITY State CA ZIP 91604  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely, JUDY MILLAR  
Print name  
Street [redacted]  
City STUDIO CITY State CA ZIP 91604  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely, Amy Small  
Print name  
Street [redacted]  
City SM State CA ZIP 90405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Maria S. Villa Lobos

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Paul Kaufman

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name KARIN CRAVEN

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Helen W Kim

Street [REDACTED]

City Glendale State CA ZIP 91260

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Leonardo Ortega

Street [REDACTED]

City Glendale State CA ZIP 91206

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Oswaldo Lopez

Street [REDACTED]

City LA State CA ZIP 90079

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Joseph Williams

Street [REDACTED]

City Glendale State CA ZIP [REDACTED]

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name STEPHAN ROSSENBUCK

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Alastair Shearman

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Seychelle deVries

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SAUL VARGAS

Street [REDACTED]

City LA State CA ZIP 90033

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rob Schwarz

Street [REDACTED]

City Gainesville State FL ZIP 32608

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Ambruster, Stephen  
Street [REDACTED]  
City Burbank State CA ZIP 91521  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Mickey Beravidez  
Street [REDACTED]  
City CANARD State cal ZIP 93033  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jennifer Kress  
Street [REDACTED]  
City NORTHridge State CA ZIP 91324  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name John Santos  
Street [REDACTED]  
City Los Angeles State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Zuben Iglesias  
Street [REDACTED]  
City Hollywood State CA ZIP 91606  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Brian Cuphart  
Street [REDACTED]  
City Los Angeles State CA ZIP 90017  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Aaron Moskowitz

Street [REDACTED]

City Laurel State NM ZIP 87508

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Julia Zepf

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jennifer Kim

Street [REDACTED]

City L.A. State CA ZIP 90012

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Andrew Tang

Street [REDACTED]

City Tamelen State CA ZIP 47591

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Stephen Vincena

Street [REDACTED]

City Los Angeles State CA ZIP 90029

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name J. Sutter

Street [REDACTED]

City Los Angeles State CA ZIP 90034

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely, *Bill Marx*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Stebbins* State *CA* ZIP *91607*  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely, *Heather Kenney*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *S.C.* State *Ca.* ZIP *91604*  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely, *JRUBS HERNANDEZ*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Stebbins* State *CA* ZIP *91607*  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely, *Debbie Wesley*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Stebbins* State *CA* ZIP *91607*  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely, *Zeni Ross*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Stebbins* State *CA* ZIP *91607*  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely, *Shirley Gulin*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Stebbins* State *CA* ZIP *91607*  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Blair Hillen

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Amy Stewart

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name PAULA GUENON

Street [REDACTED]

City NO HO State CA ZIP 91601

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Cheeryl Levy

Street [REDACTED]

City LA State CA ZIP 90036

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name MATHEW SPARROW

Street [REDACTED]

City LOS ANGELES State CAL ZIP 90038

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Kefa Mason

Street [REDACTED]

City Santa Monica State CA ZIP 90403

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name DAN FILIE

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Allison Murtha

Street [REDACTED]

City Burbank State CA ZIP 91506

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Nicole Shinn

Street [REDACTED]

City Burbank State CA ZIP 91506

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name F. Sciarrotti

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Heather Crumley

Street [REDACTED]

City SE State CA ZIP 91400

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Anna Mouradian

Street [REDACTED]

City Nolito State CA ZIP 91605

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Janarda Boyd  
Street [redacted]  
City N. Hollywood State CA ZIP 91606  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Joan Castro  
Street [redacted]  
City North Hollywood State CA ZIP 91601  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Connor Daly  
Street [redacted]  
City Leverett State MA ZIP 01054  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Cassie Boughton  
Street [redacted]  
City Sheiran Oaks State CA ZIP 91423  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Anthony Villa  
Street [redacted]  
City Van Nuys State CA ZIP 91405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Lee Guthrie  
Street [redacted]  
City San Dimas State CA ZIP 91773  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ERIN BIDA

Street [REDACTED]

City Studio City State CA ZIP 91614

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name MICHAEL HALLE

Street [REDACTED]

City Santa Monica State CA ZIP 90403

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name GABRIEL FULTON

Street [REDACTED]

City SANTA MONICA State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rox M Chan Adams

Street [REDACTED]

City Los Angeles State CA ZIP 90029

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Gabriel Burian-Mohr

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MICHAEL TORRES

Street [REDACTED]

City Hollywood State CA ZIP 90228

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name S. Megan Mulet  
Street [REDACTED]  
City LA State CA ZIP 90019  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ben Teresi  
Street [REDACTED]  
City Los Angeles State CA ZIP 90019  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nick Turner  
Street [REDACTED]  
City Los Angeles State CA ZIP 90036  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Catherine Wilder  
Street [REDACTED]  
City Los Angeles State CA ZIP 90036  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name STEFANIE EWING  
Street [REDACTED]  
City Fontana State CA ZIP 92337  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ROBERT SCHUBANN  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Catherine Sadler  
Street [REDACTED]  
City LA State CA ZIP 90004  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Arnaldo A. Penwell  
Street [REDACTED]  
City Balcer's Field State CA ZIP 93309  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name KAREN WILLIAMS  
Street [REDACTED]  
City 307th Pl State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) - Volunteer?

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Sincerely,

Print name Bree School  
Street [REDACTED]  
City Hawthorne State CA ZIP 92649  
E-mail [REDACTED]  
Phone ( ) - Volunteer?

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Sincerely,

Print name Brooke C. Thatawat  
Street [REDACTED]  
City LA State CA ZIP 90019  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name KIRSTY HUME  
Street [REDACTED]  
City STADIUM CITY State CA ZIP 91601  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name GAIL DRAPER  
Street [REDACTED]  
City LA State CA ZIP 90038  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Suzanne Cheatham  
Street [REDACTED]  
City Santa Monica State CA ZIP 90403  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name JOE STEINER  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Robert Baker  
Street [REDACTED]  
City LA State CA ZIP 90004  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Alexa Amin  
Street [REDACTED]  
City Los Angeles State CA ZIP 90014  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Eloise Delawentis  
Street [REDACTED]  
City SM State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name David Guggenheim  
Street [REDACTED]  
City Santa Monica State CA ZIP 90401  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



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Sincerely,

Print name PATRICIA HARRIS  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



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Sincerely,

Print name Nickelle Watkins  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



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Sincerely,

Print name Josh Mills  
Street [REDACTED]  
City L.A. State CA ZIP 90016  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name TIM CHEN  
Street [REDACTED]  
City IRVING State CA ZIP 92612  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name DREW HARWOOD  
Street [REDACTED]  
City SNOW GUM State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Holly Stenof

Street [REDACTED]

City CA State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name ANDREW CHESHIRE

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Mrs. Ethel S. Odeberg  
[REDACTED]  
Los Angeles, CA 90066-1305

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Lisa Aoki

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Katie Lau

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name NIURA BAND

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Stacy Green  
Street [Redacted]  
City Studio City State CA ZIP 91604  
E-mail [Redacted]  
Phone ( [Redacted] ) [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name LYNDCA UZAR  
Street [Redacted]  
City LA State CA ZIP 90006  
E-mail [Redacted]  
Phone ( [Redacted] ) [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Robin Derby  
Street [Redacted]  
City Santa Monica State CA ZIP 90405  
E-mail [Redacted]  
Phone ( [Redacted] ) [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Patricia Lewis  
Street [Redacted]  
City SM State CA ZIP 90405  
E-mail [Redacted]  
Phone ( [Redacted] ) [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Rebecca Urias  
Street [Redacted]  
City S.M. State CA ZIP 90403  
E-mail [Redacted]  
Phone ( [Redacted] ) [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Anne Wille  
Street [Redacted]  
City Santa Monica State CA ZIP 90405  
E-mail [Redacted]  
Phone ( [Redacted] ) [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Carrie Rosner

Street [Redacted]

City Studios City State CA ZIP 91604

E-mail [Redacted]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Amy Schulerberg

Street [Redacted]

City LA State CA ZIP 91604

E-mail [Redacted]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name RICHARD DORN

Street [Redacted]

City STUDIO CITY State CA ZIP 91604

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Liz Ratzel

Street [Redacted]

City STUDIO CITY State CA ZIP 91604

E-mail [Redacted]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Elmer Rivera

Street [Redacted]

City Los Angeles State CA ZIP 90008

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Colt McIvor

Street [Redacted]

City Edmonton State Alaska ZIP T56 1M2

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name PEPPA CHAPPLE  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Tiffany Karamani  
Street [REDACTED]  
City LA State CA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Michelle Grubbay  
Street [REDACTED]  
City Los Angeles State CA ZIP 90032  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name SHAWNA CUPPLES  
Street [REDACTED]  
City GARDENA State CA ZIP 90249  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Mark Austin  
Street [REDACTED]  
City Brea State CA ZIP 92821  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Rodney Mitchell  
Street [REDACTED]  
City LA State CA ZIP 90042  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Cody Cheminsky  
Street [REDACTED]  
City Edmonton State Alberta ZIP T5X 2X9  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kara Thoms  
Street [REDACTED]  
City Topanga State CA ZIP 90290  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lairi Cuen  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name LYNN LUECKOFF  
Street [REDACTED]  
City SM State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name DONNA BEERY  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name CHRIS MICHEL  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Don Stasi  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Trace Denai  
Street [REDACTED]  
City Glendale State CA ZIP 91205  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SHERI SUTTON  
Street [REDACTED]  
City Altadena State CA ZIP 91001  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name KRISTEN COLE  
Street [REDACTED]  
City Los Angeles State CA ZIP 90046  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Alan Buchan  
Street [REDACTED]  
City Glendale State CA ZIP 91206  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Fco A. Anzaldo  
Street [REDACTED]  
City Fontana State CA ZIP 92335  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Christ'ian Morrison  
Street [REDACTED]  
City Los Angeles State CA ZIP 90016  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Danny Bopp  
Street [REDACTED]  
City Los Angeles State CA ZIP 90068  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sarah Zins  
Street [REDACTED]  
City LA State CA ZIP 90038  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Stephen Peck  
Street [REDACTED]  
City LA State CA ZIP 90009  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name KRISTIN LUNDQUIST  
Street [REDACTED]  
City SANTAMONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Denise Bohannon  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name WILLIAM SELICK  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Edna Garcia  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name ARIANNA VONORA  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Elena Polatoev  
Street [REDACTED]  
City Glendale State CA ZIP 91205  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name GAIL W. JENKINS  
Street [REDACTED]  
City Paradise State CA ZIP 94606  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name JERRIN CRENSHAW  
Street [REDACTED]  
City S.C. State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Carlton Clay  
Street [REDACTED]  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Melissa Bliz  
Street [REDACTED]  
City Shore City State TX ZIP 75084  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name STEVE DIAMANT  
Street [REDACTED]  
City 372012 6197 State CA ZIP 91604  
E-mail \_\_\_\_\_  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Bill Hoover  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Matt Hughes  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Norm Billings  
Street [REDACTED]  
City Santa Monica Ca ZIP 90404  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name ANDRE LAFLAMME

Street [REDACTED]

City STUDIO CITY State CA ZIP 91604

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Thomas Heys

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name KEILA BACA

Street [REDACTED]

City LANDALE State CA ZIP 90260

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Diane Reynolds

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Polly Schaffner

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Daniel Solomon

Street [REDACTED]

City Santa Monica State CA ZIP 90409

E-mail [REDACTED]

Phone ( ) Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Joseph Stephens

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Dana Maxwell

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Melissa Collins

Street [REDACTED]

City Santa Monica State CA ZIP 90406

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name TRIST HALSTED

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Monica Ornel

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Karina Alvarez

Street [REDACTED]

City L.A. State CA ZIP 90039

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MELAN MENDENTAL

Street [REDACTED]

City LOS ANGELES State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ROB FATE

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name MACE LOMBARDO

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Jennifer Reyes

Street [REDACTED]

City Los Angeles State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name BERNIE ESPINOSA

Street [REDACTED]

City LOS ANGELES State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name JUDITH COSAROW

Street [REDACTED]

City EVERETT State WA ZIP 90230

E-mail [REDACTED]

Phone ( ) Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Edward Foshem Jr  
Street [REDACTED]  
City North Hollywood State CA ZIP 91602  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lana Nunez  
Street [REDACTED]  
City Glendale State CA ZIP 91206  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Val Kuklouska  
Street [REDACTED]  
City Los Angeles State CA ZIP 90038  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name David J. McCarthy  
Street [REDACTED]  
City Mar Vista State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name P.J. HANKE  
Street [REDACTED]  
City LA State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michael Sibo  
Street [REDACTED]  
City Glendale State CA ZIP 91207  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name STEPHEN NDUNGA  
Street [REDACTED]  
City TUJUNGA State CA ZIP 91022  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jason Dixon  
Street [REDACTED]  
City Glendale State CA ZIP 91205  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John Mullins  
Street [REDACTED]  
City Glendale State CA ZIP 91204  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Jasper Pence  
Street [REDACTED]  
City Lakewood State CO ZIP 80228  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Alfred Alarcon  
Street [REDACTED]  
City Chico State CA ZIP 91207  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Claudia Alfaro  
Street [REDACTED]  
City Glendale State CA ZIP 91201  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Shannon Scott  
Street [REDACTED]  
City Burbank State CA ZIP 91506  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name WIDEA ROGERS  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP 90278  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nicholas Pugh  
Street [REDACTED]  
City West Hollywood State CA ZIP 90046  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name TRACY WINTERS  
Street [REDACTED]  
City LA State CA ZIP 90050  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Joshua Hope  
Street [REDACTED]  
City Long Beach State CA ZIP 90804  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Briette Robillard  
Street [REDACTED]  
City Long Beach State CA ZIP 90815  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JEFF GILBERT  
Street [redacted]  
City SANTA MONICA State CA ZIP 90405  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JENNIFER WAGNER  
Street [redacted]  
City LA State CA ZIP 90066  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Scott Fish  
Street [redacted]  
City Santa Monica State CA ZIP 90405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Aubrey Miller  
Street [redacted]  
City Santa Monica State CA ZIP 90405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name MADONNA MARCELO  
Street [redacted]  
City SANTA MONICA State CA ZIP 90405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Melisa Newecchia  
Street [redacted]  
City SANTA MONICA State CA ZIP 90405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Tues Garstecki

Street [Redacted]

City LA State CA ZIP 90066

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name JC CAREY

Street [Redacted]

City LOS ANGELES State CA ZIP 90066-6110

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name Stephen Stein

Street [Redacted]

City SM State CA ZIP 90505

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name STEVE FLOWERS

Street [Redacted]

City LA State CA ZIP 90066

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name Robert Simon

Street [Redacted]

City LA State CA ZIP 90066

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name Rebecca Wheeler

Street [Redacted]

City W Hollywood State CA ZIP 91602

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name

Ed Chuah

Street

City

Los Angeles State CA ZIP 90064

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Stacy Kreisberg

Street

City

LA State CA ZIP 90064

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Danielle Egerer

Street

City

Los Angeles State CA ZIP 90064

E-mail

Phone

Volunteer?

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Sincerely,

Print name

Alex Jacobs

Street

City

Los Angeles State CA ZIP 90064

E-mail

Phone

Volunteer?

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Sincerely,

Print name

Suzanne Winch

Street

City

Kanata State Colorado ZIP 81122

E-mail

Phone

Volunteer?

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Sincerely,

Print name

Taylor Winch

Street

City

Bayfield State Colorado ZIP 81122

E-mail

Phone

Volunteer?

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Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Sara Lydic  
Street [REDACTED]  
City West Hollywood State CA ZIP 90042  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Aja Bowman  
Street [REDACTED]  
City West Hollywood State CA ZIP 90069  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name GABRIELA ANKER  
Street [REDACTED]  
City San Marino State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jack DShawen  
Street [REDACTED]  
City Hollywood State CA ZIP 90028  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Shivali Madan  
Street [REDACTED]  
City West Hollywood State CA ZIP 90046  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Roger Brown  
Street [REDACTED]  
City TORQUAY State VIC ZIP 3228  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Margaret Probbin

Street [Redacted]

City Malibu State CA ZIP 90265

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Lauren Linhardt

Street [Redacted]

City Malibu State CA ZIP 90265

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Q Kramer

Street [Redacted]

City Malibu State CA ZIP 90265

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Brouk Gresson

Street [Redacted]

City Malibu State CA ZIP 90265

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Stephen Bellieq

Street [Redacted]

City Malibu State CA ZIP 90265

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Theresa K. Gormly

Street [Redacted]

City Malibu State Calif ZIP 90265

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name CLINTON ROSEN

Street [REDACTED]

City MALIBU State CA ZIP 90265

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Maria Gabriela

Street [REDACTED]

City Malibu State CA ZIP 90265

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

Help this!  
For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Brock Carlson

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name ELIEN BARRES

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Maelle Fonteneau

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JASON YOO

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name D. JOHNSON  
Street [REDACTED]  
City MALIBU State CA ZIP 90265  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name  Mr. Kenneth Stringer  
Street Santa Monica, CA 90405-1202  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mrs. Novrell  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Carly Gottlieb  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Chuck Lioi  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jen Goldsmith  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Susan Weisinger

Street

City

Studio City State CA ZIP 91604

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Cynthia Ford

Street

City

SM State CA ZIP 90105

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Margaret Valles

Street

City

Santa Monica State CA ZIP 90405

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

JAMISON MORRIS

Street

City

LA State CA ZIP 90027

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

A E ABLESON

Street

City

L.A State CA ZIP 90027

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Maira Repreza

Street

City

Glendale State CA ZIP 91205

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Edwin Flores  
Street [REDACTED]  
City Huntington State CA ZIP 93065  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JOSE J HERNADEZ (USA)  
Street [REDACTED]  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Luke Boor  
Street [REDACTED]  
City Hollywood State CA ZIP 90028  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Dennis Melendez  
Street [REDACTED]  
City LA State Ca ZIP 90025  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Serges  
Street [REDACTED]  
City Hollywood State CA ZIP 90028  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Dolores Munkenzoza  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Rich McDonald  
Street [REDACTED]  
City Shoreline State CA ZIP 91423  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,  
Print name JERREL REECE  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Brandi McMillan  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,  
Print name Cara Sullivan  
Street [REDACTED]  
City LA State CA ZIP 90046  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,  
Print name Scott Gruber  
Street [REDACTED]  
City LA State CA ZIP 90076  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,  
Print name SARAH S. MARCOTTE  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name OLIVER PHILLIPS  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name DAVID STEINBERG  
Street [REDACTED]  
City L.A. State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ERIC PEGGY ORAM  
Street [REDACTED]  
City San Antonio State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Carol Breitweiser  
Street [REDACTED]  
City San Monica State CA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name DAVID ELSENJOHN  
Street [REDACTED]  
City L.A. State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name COREY REMINGTON  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Angela Connell

Street [REDACTED]

City LA State CA ZIP 90064

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name William FARRAN

Street [REDACTED]

City LA State CA ZIP 90064

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jesus Carballo

Street [REDACTED]

City LA State CA ZIP 90006

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jessica Prutti

Street [REDACTED]

City Pasadena State CA ZIP 91106

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name MICHAEL SYLVESTER

Street [REDACTED]

City Los Angeles State CA ZIP 90005

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Amen Biker

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ricky Harfen  
Street [REDACTED]  
City Sherman Oaks CA ZIP 91403  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Fernanda Martin del Campo  
Street [REDACTED]  
City South Gate State CA ZIP 90280  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Stephanie Perez  
Street [REDACTED]  
City Sun Valley State CA ZIP 91352  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PETER P. MABRIÉ  
Street [REDACTED]  
City LAKE ELSINDRE State CA ZIP 92530  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name YORNA FAITH ZECKMAN  
Street [REDACTED]  
City LA State CA ZIP 90036  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Vanessa Veilleto  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Stephen Camargo

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name LYNN SCOTT SMITH

Street \_\_\_\_\_

City LA State CA ZIP 90045

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jennifer Evans

Street \_\_\_\_\_

City Santa Monica State CA ZIP 90405

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lucia Wiltrout

Street \_\_\_\_\_

City Sealton State CA ZIP 91040

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Markie Post Ross

Street \_\_\_\_\_

City Toluca Lake State CA ZIP 91602

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ronald Reismar

Street \_\_\_\_\_

City LA State CA ZIP 90069

E-mail \_\_\_\_\_

Phone \_\_\_\_\_ Volunteer?

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Sincerely, *Stephen J. Amico*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City CA State CA ZIP 90061  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

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Sincerely, *MARY GOLVIN*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90064  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Wil Rivers*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City CA State CA ZIP 90038  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely, *Deices Adelta*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City Los Angeles State Ca ZIP 90025  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely, *Christiana Knowl*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City NORTHRIAGE State CA ZIP 91326  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely, *Jeffrey Hines*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90016  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Emmanuel Morelos  
Street [REDACTED]  
City Los Angeles State CA ZIP 90011  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Brandy Hamilton  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP 90097  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SILVIA VEGA  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Stella Sender  
Street [REDACTED]  
City LA State CA ZIP 90065  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sherry Moradi  
Street [REDACTED]  
City LA State CA ZIP 90025  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Paula McMahon  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *Janet Keizle*

Street [REDACTED]

City *San Monica* State *CA* ZIP *90405*

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *Prisca Glor*

Street [REDACTED]

City *LA* State *CA* ZIP *90066*

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *Brian Rimmer*

Street [REDACTED]

City *San Monica* State *CA* ZIP *90405*

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *BARBARA SCHWARTZ*

Street [REDACTED]

City *San Monica* State *CA* ZIP *90405*

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *William Greenberg*

Street [REDACTED]

City *San Monica* State *CA* ZIP *90405*

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name *Meghan Westman*

Street [REDACTED]

City *San Monica* State *CA* ZIP *90405*

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JAL MESSINA  
Street [REDACTED]  
City LA State CA ZIP 90038  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name KEVIN ESTRADA  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Heather Scott  
Street [REDACTED]  
City VENICE State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nelson Morales  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Antonio Sarmiento  
Street [REDACTED]  
City Beverly Hills State CA ZIP 90213  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jessie Martinez  
Street [REDACTED]  
City SM State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name John P. Thomas  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lexi Bagheri  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

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Sincerely,

Print name MK LEVERENCE  
Street [REDACTED]  
City STUDIO City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Riley M. Sreen  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Gloria Shen  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

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Sincerely,

Print name Teddie Moir  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Gloria M. Lambden  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Chelsea Scalci  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Edward Huckle  
Street [REDACTED]  
City Los Angeles State CA ZIP 90025  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Alex Street  
Street [REDACTED]  
City SM State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Hermes Rex  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Katharina Haber  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JAMES HONG

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Lauren Picca

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Harold Cane

Street [REDACTED]

City S.M State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michelle Russell

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Adrian Vesquez

Street [REDACTED]

City Rosadena State CA ZIP 91105

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Claire Abbott

Street [REDACTED]

City SM State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



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Sincerely,

Print name Matt Perry  
Street [REDACTED]  
City San Juan Ave State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Graciela Barba-Castro  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Candis Berens  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Telma Rojas  
Street [REDACTED]  
City LA State CA ZIP 90014  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Patrick Feneel  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name MARILYN SPADEN  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Ara Darakhian  
Street [REDACTED]  
City STUDIO State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name BRADY CUNNINGHAM  
Street [REDACTED]  
City ENCINO State CA ZIP 91436  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sean Datowale  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Richard [unclear]  
Street [REDACTED]  
City Studio City State CA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Ashkon Mobei  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Suzanne Morris  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name MIJU JUNG  
Street [REDACTED]  
City LA State CA ZIP 90015  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Kelly Bates  
Street [REDACTED]  
City Topanga State CA ZIP 90290  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name GUY COURIER  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name RANDY STREET  
Street [REDACTED]  
City SM State CA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name JAMES MCNAHARA  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Charles Larsen  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jennifer Thornton  
Street [REDACTED]  
City santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name KARI Adamsen  
Street [REDACTED]  
City LA State CA ZIP 90038  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name ANITA DARTUNING  
Street [REDACTED]  
City LA State CA ZIP 90038  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name ISRAEL CASTELLANOS  
Street [REDACTED]  
City LA State CA ZIP 90019  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jim ARMASU  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Emma Alexandra Diaz

Street [REDACTED]

City N Hollywood State CA ZIP 91606

E-mail [REDACTED]

Phone ( [REDACTED] ) [REDACTED] Volunteer?

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Sincerely,

Print name AMANDA DORAME

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) [REDACTED] Volunteer?

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Sincerely,

Print name Thomas Ortiz

Street [REDACTED]

City Montebello State CA ZIP 90073

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name JOHN M GAVIN

Street [REDACTED]

City SODAS State CA ZIP 91020

E-mail [REDACTED]

Phone ( [REDACTED] ) [REDACTED] Volunteer?

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Sincerely,

Print name Jack Lee

Street [REDACTED]

City Bakersfield State CA ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Ron Roe  
Street [redacted]  
City LA State CA ZIP 90041  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Omari Wise  
Street [redacted]  
City Los Angeles State CA ZIP 90008  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Daniel Muller  
Street [redacted]  
City San Francisco State CA ZIP 94102  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Molly Freeman  
Street [redacted]  
City Los Angeles State CA ZIP 90060  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Katie Moriarty  
Street [redacted]  
City Los Angeles State CA ZIP 90006  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Roland Eaven  
Street [redacted]  
City Nashville State TN ZIP 37212  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Chris Harmon  
Street [REDACTED]  
City San Dimas State CA ZIP 90424  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Blake Overman  
Street [REDACTED]  
City West Hollywood State CA ZIP 90024  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Michael Santana  
Street [REDACTED]  
City South State CA ZIP 90280  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Cheryl J Ward  
Street [REDACTED]  
City Los Angeles State CA ZIP 90056  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Rafa Kaplan  
Street [REDACTED]  
City LA State CA ZIP 90015  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name CARL STUTE  
Street [REDACTED]  
City VENICE State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Verenia Alarcon

Street [REDACTED]

City Los Angeles State Cal ZIP 90011

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Deena Gregg

Street [REDACTED]

City North Hollywood State CA ZIP 91606

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jenny Doyle

Street [REDACTED]

City North Hollywood State Cal ZIP 91601

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jessie Wilky

Street [REDACTED]

City S. LA State CA ZIP 90008

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name DINA FOUJ

Street [REDACTED]

City LA State CA ZIP 90038

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Lee Bennett

Street [REDACTED]

City SM State CA ZIP 90404

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Catherine Leonard

Street [REDACTED]

City North Hollywood State CA ZIP 91601

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Damon Wolf

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name EDNA PUREL

Street [REDACTED]

City Sherman Oaks State CA ZIP 91423

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Vartan Duvendjian

Street [REDACTED]

City Sherman Oaks State CA ZIP 91423

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Marcy Lavender

Street [REDACTED]

City Sherman Oaks State CA ZIP 91423

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Linda Hammond

Street [REDACTED]

City Sherman State ca. ZIP 91423

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PATRICIA K. ROGER

Street [REDACTED]

City SHELMAN PARK State CA ZIP 91723

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name TINA JUNG

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name STEPHEN RADONCICHER

Street [REDACTED]

City RESEDA State CA ZIP 91335

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JOSE ALFREDO GOMEZ

Street [REDACTED]

City LOS ANGELES State CA ZIP 90038

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SANDY SAEHAN

Street [REDACTED]

City LA State CA ZIP 90038

E-mail N/A

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kimberly Rodriguez

Street [REDACTED]

City LA State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Deana Arina Mayland

Street [REDACTED]

City Venice State CA ZIP 90294

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ana Carpio

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone (213) 531-6930 Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Cathy Kobowski

Street [REDACTED]

City Glendale State CA ZIP 91201

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Sergio De La Torre

Street [REDACTED]

City Los Angeles State CA ZIP 90042

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Amanda Bradley

Street [REDACTED]

City S. Pasadena State CA ZIP 91030

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Joshua Zeman

Street [REDACTED]

City S. Pasadena State CA ZIP 91030

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jake Kerkos

Street [REDACTED]

City Tujunga State CA ZIP 91042

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Ben Weyner

Street [REDACTED]

City Topanga State CA ZIP 90290

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Geoff Nichols

Street [REDACTED]

City Topanga State CA ZIP 90290

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Virginia Snyder

Street [REDACTED]

City Topanga State CA ZIP 90290

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name John Williams

Street [REDACTED]

City Topanga State CA ZIP 90290

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Juan T. Buncz

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely, *Harrison Darling*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *L A* State *CA* ZIP *90026*  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely, *Kerri Krusinski*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *W Hollywood* State *CA* ZIP *90048*  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely, *Skelly Hwang*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *L A* State *CA* ZIP *90066*  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely, *JULIE Rasmussen*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Los Angeles* State *CA* ZIP *90026*  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely, *Jesse Doland*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Glendale* State *CA* ZIP *91206*  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely, *Chris Cilucci*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City *Los Angeles* State *CA* ZIP *90070*  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name KRAG B BASTER

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jennie Hyun

Street [REDACTED]

City Torrance State Ca. ZIP 90504

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name JENNIFER SALAZAR

Street [REDACTED]

City LA State CA ZIP 9004

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jaob T

Street [REDACTED]

City North Hollywood State CA ZIP 91601

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Emily Garding

Street [REDACTED]

City Sun Valley State CA ZIP 91352

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Kenny Pearson

Street [REDACTED]

City Sunnyvale State CA ZIP 95050

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Kevin Gracias

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP 91343

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Ashley Ramsey

Street \_\_\_\_\_

City LA State CA ZIP 90049

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Diedra Rubler

Street \_\_\_\_\_

City Fontana State CA ZIP 92337

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name K. Teranian

Street \_\_\_\_\_

City N. Hollywood State CA ZIP 91601

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Mike Burks

Street \_\_\_\_\_

City Hesperia State CA ZIP 92345

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jorge Morales

Street \_\_\_\_\_

City LA State CA ZIP 90020

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely, *Melissa Perrino*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 92006  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely, \_\_\_\_\_  
Print name Ramon Sebastian  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90026  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely, \_\_\_\_\_  
Print name Glace Tatum  
Street \_\_\_\_\_  
City Studio City State CA ZIP 91602  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely, \_\_\_\_\_  
Print name K BURR  
Street \_\_\_\_\_  
City Studio City State CA ZIP 91602  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely, \_\_\_\_\_  
Print name Bob Hart  
Street \_\_\_\_\_  
City Malibu State CA ZIP 90248  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely, \_\_\_\_\_  
Print name Madaraz  
Street \_\_\_\_\_  
City LA State CA ZIP 90009  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Toni Benson  
Street [REDACTED]  
City L.A. State Cal. ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Laura Ke'  
Street [REDACTED]  
City TOULCA LAKE State CA ZIP 91602  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Stu Lager  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PAUL KEREBICH  
Street [REDACTED]  
City L.A. State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rachel Davenezzi  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mark Czyszanski  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Edward M. Solomon  
Street [REDACTED]  
City Malibu State CA ZIP 90265-4720  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name RICHARD BOGNA  
Street [REDACTED]  
City MONTEBELLO State CA ZIP 90640  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jacob Handler  
Street [REDACTED]  
City N. Hollywood State CA ZIP 91601  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Sam Contreras  
Street [REDACTED]  
City Music Hills State CA ZIP 91345  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Aisha Norris  
Street [REDACTED]  
City N. Hollywood State CA ZIP 91601  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Tim Shingler  
Street [REDACTED]  
City Los Angeles State CA ZIP 90027  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name LANCE BROZNICH

Street [REDACTED]

City LA State CA ZIP 90601

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name RYAN JACKSON

Street [REDACTED]

City LA ESCROW CA ZIP 91049

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name J.D. Lee

Street [REDACTED]

City N. Hollywood State CA ZIP 91601

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Natalie Martins

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jasmine Coger

Street [REDACTED]

City Panorama State CA ZIP 91402

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name ANTHONY HASKE

Street [REDACTED]

City SANTA MONICA State CA ZIP 90403

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

*A. Pohlig*

Street

City *Santa Monica* State *CA* ZIP *90409*

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

*KRISTINA KEGEVA*

Street

City *Belvedere* State *CA* ZIP *91602*

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

*Corey Butler*

Street

City *SM* State *CA* ZIP *90405*

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

*Leonard Trubin*

Street

City *LA* State *CA* ZIP *90034*

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

*Mrs. Pomeroy*

Street

City *Santa Monica* State *CA* ZIP *90405*

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

*Kate Greenberg*

Street

City *Santa Monica* State *CA* ZIP *90405*

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Adam Brooks  
Street [REDACTED]  
City Los Angeles State CA ZIP 90028  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Dana Colwell  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Elizabeth Ortiz  
Street [REDACTED]  
City Compton State CA ZIP 90272  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Matt Veng  
Street [REDACTED]  
City LA State CA ZIP 90006  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Esteban Benilla  
Street [REDACTED]  
City Mecca State CA ZIP 92254  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Hilary Harris  
Street [REDACTED]  
City LA State CA ZIP 90016  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kwinn Anderson  
Street [REDACTED]  
City LA State CA ZIP 90204  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Brian Antonucci  
Street [REDACTED]  
City Northridge State CA ZIP 91325  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Molly Ruttan-Moffat  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jana Solla  
Street [REDACTED]  
City Northridge State CA ZIP 91356  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rebecca Mann  
Street [REDACTED]  
City Echo Park State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Alfredo Ake  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BETH BITNER  
Street [redacted]  
City Topanga State CA ZIP 90290  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ISMAEL MARTINEZ  
Street [redacted]  
City LA State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Vicente Frank  
Street [redacted]  
City Topanga State CA ZIP 90290  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mercedes Solis  
Street [redacted]  
City LA State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John Dupreux  
Street [redacted]  
City Los Angeles State CA ZIP 90027  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Dmitry Borisov  
Street [redacted]  
City LA State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *Kay Respyan-Aliza*  
Street [redacted]  
City *LA* State *CA* ZIP *90066*  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *Tom Field*  
Street [redacted]  
City *TOLUCA LAKE* State *CA* ZIP *91602*  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *JANE WESTMORELAND*  
Street [redacted]  
City *LA* State *CA* ZIP *90066*  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *Romulo Osorio*  
Street [redacted]  
City *Los Angeles* State *CA* ZIP *90026*  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *GARY WILLIAMS*  
Street [redacted]  
City *Los Angeles* State *CA* ZIP *90001*  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name *Chie Willert*  
Street [redacted]  
City *Orange* State *CA* ZIP *92790*  
E-mail [redacted]  
Phone [redacted] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name

Ruslyn Dahl

Street

City

LA State CA ZIP 90026

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Junki K. Prior

Street

City

LA State CA ZIP 90066

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

ROBERT WIEDER

Street

City

LA State CA ZIP 90066

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Kathryn Williams

Street

City

LA State CA ZIP 90066

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

BONNIE COLEMAN

Street

City

Los Angeles State CA ZIP 90026

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name

JILL FRANK

Street

City

LA State CA ZIP 90066

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name TOM NOWELL  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Louie Bosan  
Street [REDACTED]  
City Hollywood State CA ZIP 90078  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Marie Rafalko  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name James Tabb  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Richard Hernandez  
Street [REDACTED]  
City Lincoln State CA ZIP 91306  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jeff Onchitti  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Evelyn Long  
Street [REDACTED]  
City LA State CA ZIP 90064  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SARAH MARZEN  
Street [REDACTED]  
City LA PASADENA State CA ZIP 91126  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jim Frohna  
Street [REDACTED]  
City LA State CA ZIP 90067  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Deborah Bliss  
Street [REDACTED]  
City LA State CA ZIP 90044  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Amia Brandt Burgoyne  
Street [REDACTED]  
City LA State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Deborah Ross  
Street [REDACTED]  
City LA State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name MATTHEW ELY  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( ) Volunteer?

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Sincerely,

Print name Ron May  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Elizabeth Lomas  
Street [REDACTED]  
City \_\_\_\_\_ State CA ZIP 90028  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ATHO NEWMAN  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Timothy Hennessey  
Street [REDACTED]  
City Los Angeles State CA ZIP 90036  
E-mail [REDACTED]  
Phone ( ) Volunteer?   
Possible

## Great Pacific Cleanup



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Sincerely,

Print name Martha Cueva  
Street [REDACTED]  
City SM State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Brian Crono  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Luis A. Centeno  
Street [REDACTED]  
City M.P. State CA ZIP 91755  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Concepcion  
Street [REDACTED]  
City Topanga State CA ZIP 90240  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Teff Ferguson  
Street [REDACTED]  
City El Cajon State CA ZIP 92026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name R. BRADGEMAN  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90064  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Jobhan Dennis

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Alway Stern

Street [REDACTED]

City Los Angeles State CA ZIP 90035

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ivy Tai

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rebecca Ross

Street [REDACTED]

City Los Angeles State CA ZIP 90028

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nava Cooper

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Chris Tarantino

Street [REDACTED]

City LA State CA ZIP 90006

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Yvez Lorain Estrada

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Kirsten Hoder

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mario Lopez

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Tim Griffin

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Jonathan Crown

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Edith Quathmen

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Warner Ebbink

Street [Redacted]

City Studio City State CA ZIP 91604

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Rachel Craven

Street [Redacted]

City LA State CA ZIP 90026

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name CAROLYN K. HONDA

Street [Redacted]

City Los Angeles State CA ZIP 90066

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Joshua Marullo

Street [Redacted]

City Studio City State CA ZIP 91601

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name YURIKO KUGIZAKI

Street [Redacted]

City L.A. State CA ZIP 90066

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Parkeer Timm

Street [Redacted]

City Mar Vista State CA ZIP 90666

E-mail [Redacted]

Phone [Redacted] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Harriet Natsuyama

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Eva Zaret

Street [REDACTED]

City Los Angeles State CA ZIP 90041

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Billboard hosts

Street [REDACTED]

City Malibu State CA ZIP 90261

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Norton Virginia

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Manga Sundqvist

Street [REDACTED]

City Malibu State CA ZIP 90265

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Natalie Levine

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Frank Duarte  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Mike Hughes  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Scheila Adli  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Wendy Stetten  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Neemah Yamin  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jeanne Beres  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michael Loprete  
Street [REDACTED]  
City Los Angeles State CA ZIP 90068  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Duheik Mouammar  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jon Paul Tilleman  
Street [REDACTED]  
City Los Angeles State CA ZIP 90068  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nathan Blumenthal  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Andre' Hyland  
Street [REDACTED]  
City Los Angeles State CA ZIP 90068  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Wenceslao Ramirez  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SEAN H. ERVIN

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SANFORD GORDEN

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name STEPHEN GREBB

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name STEW LASSETER

Street [REDACTED]

City SANTA MONICA State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Elizabeth Yochim

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name HANDELEY SUTHERIE

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kay Hammer  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John O'Brien  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name CHRISTY BELT  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Laura Franke  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Marcus Davis  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BARBARA T. SMITH  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name PHILLIP BARNES  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,  
Print name MARIA Apostolof  
Street \_\_\_\_\_  
City PANDER PARKS State CA ZIP 91304  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,  
Print name JULIA TORRES  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,  
Print name MELISSA WILLIAMS  
Street \_\_\_\_\_  
City LOS ANGELES State CA ZIP 90018  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name TARA CRESPO  
Street \_\_\_\_\_  
City SHERMAN OAKS State CA ZIP 91403  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,  
Print name JENNIFER SAELIEB  
Street \_\_\_\_\_  
City EB ARLETA State CA ZIP 91331  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Trauis Moitz  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Tom Buckles  
Street [REDACTED]  
City Irving State CA ZIP 92614  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Conzuler, Samantha  
Street [REDACTED]  
City Los Angeles State CA ZIP 90028  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

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Sincerely,

Print name Michael The  
Street [REDACTED]  
City Alhambra State CA ZIP 91805  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Taylor Marr  
Street [REDACTED]  
City LA State CA ZIP 90028  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name SUSAN L. STROM  
Street [REDACTED]  
City VENICE State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Harvey A. Higgins  
Street: [Redacted]  
City: L.A. State: CA ZIP: 90017  
E-mail: [Redacted]  
Phone: [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Thomas Gilbert  
Street: [Redacted]  
City: Los Angeles State: CA ZIP: 90044  
E-mail: [Redacted]  
Phone: [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Larry H. Jenkins III  
Street: [Redacted]  
City: North Hollywood State: CA ZIP: 91606  
E-mail: [Redacted]  
Phone: [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: ROBERT SANTANGELO  
Street: [Redacted]  
City: LA State: CA ZIP: 90015  
E-mail: [Redacted]  
Phone: ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: ART WYDEN  
Street: [Redacted]  
City: LOS ANGELES State: CA ZIP: 90015  
E-mail: [Redacted]  
Phone: [Redacted] Volunteer?

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Sincerely,

Print name: Roman A. Stankiv  
Street: [Redacted]  
City: LA State: CA ZIP: 90017  
E-mail: [Redacted]  
Phone: ( ) Volunteer?



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Sincerely,

Print name Milton R. Dowf

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name JARRET BURETT

Street \_\_\_\_\_

City Van CO State CA ZIP 92911

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name CARSON MOTE

Street \_\_\_\_\_

City Ardenado State CA ZIP 95623

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name CARIE MANICHALCO

Street \_\_\_\_\_

City Venice State CA ZIP 90291

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name INDIA BARLET

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP 90401

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Allen Vash

Street \_\_\_\_\_

City SM State CA ZIP 90403

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name RAY RIVERA  
Street [REDACTED]  
City L.A. State CA ZIP 90029  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Karla Legason  
Street [REDACTED]  
City L.A. State CA ZIP 90063  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name GABE SMAILY  
Street [REDACTED]  
City L.A. State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name JACQUE GOLDBERG  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Peter Blood  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( ) Volunteer?

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Sincerely,

Print name LAURE ARCENT  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( ) Volunteer?

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Sincerely,

Print name MEYER LIGHTMAN

Street [REDACTED]

City SHERMAN OAKS State CA ZIP 91923

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name L. ORBEY

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Patrick Kelley

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Erick Alvarez

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name RENE PHILLIPS

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name ELLEN ISAI SEGORIA

Street [REDACTED]

City LONGBEACH State CA ZIP 93535

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Benjamin Kutsko  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jose Sanchez  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Ryan Lee  
Street [REDACTED]  
City San Monica State CA ZIP 90403  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Barbara McKinley  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ruth Berkowitz  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Julie Garcia  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Steven Lowenstein

Street [REDACTED]

City Los Angeles State CA ZIP 90035

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Bernko Curtis

Street [REDACTED]

City LA State CA ZIP 90035

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nicole Santiago

Street [REDACTED]

City El Segundo State CA ZIP 90245

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SPRAY M. CATIZONE

Street [REDACTED]

City LA State CA ZIP 90004

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Chris Serra

Street [REDACTED]

City Canyon Country State CA ZIP [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name HarSimran Khalsa

Street [REDACTED]

City LA State CA ZIP 90035

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Dermott Down  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Greg Mauer  
Street [REDACTED]  
City Los Angeles State CA ZIP 90034  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Leslie Stewart  
Street [REDACTED]  
City LA State CA ZIP 90034  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name CHRISTINE STEERN  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90403  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JOHN ANDREWS  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name NATHALIE C. LEIGHTON  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Sara Carnodian  
Street [redacted]  
City Culver City State CA ZIP 90232  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Gale Greene  
Street [redacted]  
City Montrose State CA ZIP 91020  
E-mail [redacted]  
Phone ( ) NONE Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Juden Carbajal  
Street [redacted]  
City Los Angeles State CA ZIP 90011  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jason Sheffer  
Street [redacted]  
City Van Nuys State CA ZIP 91405  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Laura Simanonek  
Street [redacted]  
City LA State CA ZIP 90028  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Dairiana Derez  
Street [redacted]  
City Woodland Hills State CA ZIP 91303  
E-mail [redacted]  
Phone [redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jonathan Brock

Street [Redacted]

City Beverly Hills State CA ZIP 90211

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name DAN BOUL

Street [Redacted]

City Van Nuys State CA ZIP 91407

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Marcus Jimenez

Street [Redacted]

City Los Angeles State CA ZIP 90031

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Samah Johnson

Street [Redacted]

City North Hollywood State CA ZIP 91601

E-mail [Redacted]

Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Tom Tucker

Street [Redacted]

City GLENDALE State CA ZIP 91208

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Mik Delaney

Street [Redacted]

City North Hollywood State CA ZIP 91601

E-mail [Redacted]

Phone [Redacted] Volunteer?



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Sincerely,

Print name

Mike Kerkman

Street

City

LA State CA ZIP 90039

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Bridget Bloom

Street

City

LA State CA ZIP 90026

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Amy Hanel

Street

City

LA State CA ZIP 90031

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Chris Mills

Street

City

Los Angeles State CA ZIP 90026

E-mail

Phone

Volunteer?

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Sincerely,

Print name

BARRY WIENER

Street

City

L.A. State CA ZIP 90037

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Ann Fleming

Street

City

Los Angeles State CA ZIP 90032

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jade Cook  
Street [REDACTED]  
City Beverly Hills State CA ZIP 90212  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kelly Nipper  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name CRAIG HAINES  
Street [REDACTED]  
City LA State CAL ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Sadie Van Geider  
Street [REDACTED]  
City LA State CA ZIP 90766  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Bert Scoll  
Street [REDACTED]  
City Los Angeles State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Tammy Ellis  
Street [REDACTED]  
City LA State CA ZIP 90020  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name David Gray

Street [redacted]

City Topanga State CA ZIP 90290

E-mail [redacted]

Phone [redacted] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Ariana Rouhi

Street [redacted]

City LA State CA ZIP 90064

E-mail [redacted]

Phone [redacted] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jenny Griffiths

Street [redacted]

City Topanga State CA ZIP 90290

E-mail [redacted]

Phone [redacted] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Patrick Ramsey

Street [redacted]

City Topanga State CA ZIP 90290

E-mail [redacted]

Phone [redacted] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Carmen Busley

Street [redacted]

City LA State CA ZIP 90066

E-mail [redacted]

Phone [redacted] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name DAVID E. TROY III

Street [redacted]

City TOCANGA State CA ZIP 90290

E-mail [redacted]

Phone [redacted] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Sharon PUGH  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Stephanie Gholson  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name DEBRA MERRILL  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90044  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Cathy Guthrie  
Street [REDACTED]  
City LA State CA ZIP 90004  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Rich Jacobs  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Oscar Gonzalez  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely, *Albe Michaels*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City LA State CA ZIP 90026  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely, *ANTHONY MILLER*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City LA State CA ZIP 90064  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely, *Joan Silk*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90064  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely, *ALIX WILSON*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City LA State CA ZIP 90064  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely, *Matt Miller*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90026  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely, *ERIC LARWIN*  
Print name \_\_\_\_\_  
Street \_\_\_\_\_  
City LA State CA ZIP 90026  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Connie Whalley

Street [REDACTED]

City Topanga State CA ZIP 90290

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Damon Neckless

Street [REDACTED]

City Los Angeles State CA ZIP 90025

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jayne Bunels

Street [REDACTED]

City Topanga State CA ZIP 90290

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Pamela Johnson

Street [REDACTED]

City Los Angeles State CA ZIP 90089

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Marlena Miller

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Clint & Kelly Rockwell

Street [REDACTED]

City Topanga State CA ZIP 90290

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Dawn Fine  
Street [REDACTED]  
City Torrance State CA ZIP 90290  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Potencia Smith  
Street [REDACTED]  
City L.A. State CA ZIP 90057  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Sandra Sanchez  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name GAGY BARBARA  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name CANDACE DEPUY  
Street [REDACTED]  
City Torrance State CA ZIP 90290  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MIKE LANTIER  
Street [REDACTED]  
City TORRANCE State CA ZIP 90290  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name April Davila  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jonathan Kewse  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ms Susan Wong  
Street [REDACTED]  
City Los Angeles, CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name C. SCOTT POWEN  
Street [REDACTED]  
City NORTH HOLLYWOOD State CA ZIP 91601  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name LAURE LIESKE  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Alex Wainman  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



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Sincerely,

Print name CHUCK MESSEBA  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Mary Beland  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PACCA IGNACIO  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Aissa Klein  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name MATT Bloomfield  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name OLIVIA BEALL  
Street [REDACTED]  
City LA State CA ZIP 90042  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Shiroua Suge  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Arthur Lussel  
Street [REDACTED]  
City Los Angeles State CA ZIP 90011  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Rita OLIVA  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Anuja Ravi  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name TED BURNE  
Street [REDACTED]  
City LA State CA ZIP 90076  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jeff Surlakian  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name C. Michael Frey  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Patricia Bayo  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Stephanie Dor  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Hanh Nauyen  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Scott Valdes  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Glenn Fitzgerald  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Tony Molina  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Margaret Turner  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Paulina Sabagun  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Mark Guebert  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Leah Paz  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Joan Bolman  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Cathy Gordon  
Street [REDACTED]  
City SM State CA ZIP 90408  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Leila Winick  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Neysa Pelletier  
Street [REDACTED]  
City Santa Monica State CA ZIP 90407  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name TOMIO FUCHIGAMI  
Street [REDACTED]  
City LA State CA ZIP 90037  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name LAWRENCE J. GONZALEZ  
Street [REDACTED]  
City LA State CA ZIP 90065  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Tricia Berman  
Street [REDACTED]  
City Los Angeles State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Dori Boudreau

Street [Redacted]

City Valley Glen State CA ZIP 91401

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Sonia Lee

Street [Redacted]

City Los Angeles State CA ZIP 90025

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Dana Bsciso

Street [Redacted]

City Los Angeles State CA ZIP 90048

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Nancy Buge

Street [Redacted]

City Van Nuys State CA ZIP 91401

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Mussa Shams

Street [Redacted]

City Studio City State CA ZIP 91604

E-mail [Redacted]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Adi Ben-Ami

Street [Redacted]

City Studio City State CA ZIP 91606

E-mail [Redacted]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name

Jovani Davoudin

Street

City

State

ZIP

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Johnathan Tom

Street

City

State

ZIP

E-mail

Phone

Volunteer?

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Sincerely,

Print name

Catie Beck

Street

City

State

ZIP

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Lorena Sandoval

Street

City

State

ZIP

E-mail

Phone

Volunteer?

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Sincerely,

Print name

Jeff Beck

Street

City

State

ZIP

E-mail

Phone

Volunteer?

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Sincerely,

Print name

David Buckley

Street

City

State

ZIP

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jana Barrios  
Street [REDACTED]  
City Glendale State CA ZIP 91204  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Brandon Carter  
Street [REDACTED]  
City Culver City State CA ZIP 90016  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Mike Moreno  
Street [REDACTED]  
City Glendale State CA ZIP 91207  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Matt P. Wimberly  
Street [REDACTED]  
City Wichita State KS ZIP 67203  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Dan Lopez  
Street [REDACTED]  
City Glendale State CA ZIP 91206  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Tanya Karim-Maharian  
Street [REDACTED]  
City Glendale State CA ZIP 91206  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Arnone Nesh  
Street [REDACTED]  
City Los Angeles State CA ZIP 90002  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MARtha E. Cisneros  
Street [REDACTED]  
City S. Pasadena State CA ZIP 91030  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name David Minas  
Street [REDACTED]  
City W. LA. State CA ZIP 91369  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JOAN + JOHN PASTANO  
Street [REDACTED]  
City SOUTH PASADENA State CA ZIP 91030  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name DAVID SMITH  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90046  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BETH REITHMAN  
Street [REDACTED]  
City PASADENA State CA ZIP 90272  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name A. Block  
Street [redacted]  
City Beverly Hills State CA ZIP 90213  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Micela Shorelee  
Street [redacted]  
City Pasadena State CA ZIP 9126  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Aldayin Jack  
Street [redacted]  
City L.A. State CA ZIP 90047  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Jason Fresco  
Street [redacted]  
City W Hollywood State CA ZIP 90047  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Daniel S. Dominguez  
Street [redacted]  
City Los Angeles State CA ZIP 90027  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Megan Heun  
Street [redacted]  
City LA State CA ZIP 90035  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name ERIC MURKIN  
Street [REDACTED]  
City Los Angeles State CA ZIP 90029  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Mike Kruska  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Tiff in Poley  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name PETER WINTERSTELTER  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name AARON KRAPEK  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Anne Kido  
Street [REDACTED]  
City Los Angeles State CA ZIP 90027-3207  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Tilliann Giacalone  
Street [REDACTED]  
City Los Angeles State CA ZIP 90046  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

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Sincerely,

Print name Steve Richardson  
Street [REDACTED]  
City L.A. State CA ZIP 90077  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Roman Blatt  
Street [REDACTED]  
City Los Angeles State CA ZIP 90046  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

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Sincerely,

Print name KARL BLATT  
Street [REDACTED]  
City L.A. State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Robert Federico  
Street [REDACTED]  
City ESCONDIDO State CA ZIP 92026  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name AJ Adams Jr  
Street [REDACTED]  
City Pasadena State CA ZIP 91107  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Mitchell Myers  
Street [REDACTED]  
City Santa Barbara State CA ZIP 91030  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Brian Anthony Brown  
Street [REDACTED]  
City L.A. State CA ZIP 90048  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Yvonne Hoang  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Stefany Murillo  
Street [REDACTED]  
City San Gabriel State CA ZIP 91776  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name L. W. LAG  
Street [REDACTED]  
City Los Angeles State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name RICHARD TORNUST  
Street [REDACTED]  
City Los Angeles State CA ZIP 90049  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Ray Hemphill

Street

City West Hollywood State CA ZIP 90046

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

JEREMY CRACE

Street

City VALLEY GLEN State CA ZIP 91401

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name

[Signature]

Street

City State ZIP

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Danny Rich

Street

City Van Nuys State CA ZIP 91401

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name

Suey Price

Street

City ENCLINO State CA ZIP 91436

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Quinton Nixon

Street

City Valley View State CA ZIP 91607

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Megan Barrett  
Street [REDACTED]  
City Sherman Oaks State CA ZIP 91423  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Brittany Belz  
Street [REDACTED]  
City ENCINO State CA ZIP 91436  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Heather McCall  
Street [REDACTED]  
City Santa Monica State CA ZIP 90401  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Karina Hurtado  
Street [REDACTED]  
City LA State CA ZIP 90036  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Afshen Towhid  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Amy Smith  
Street [REDACTED]  
City Studio City State CA ZIP 91602  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Katherine Austin

Street [REDACTED]

City Bloomfield Hills State mi ZIP 48301

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Kathleen Tia

Street [REDACTED]

City S.M State CA ZIP 90024

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Matthew Needleman

Street [REDACTED]

City Beverly Hills State CA ZIP 90210

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JACK M. ZOLTAK

Street [REDACTED]

City L.A. State CA ZIP 90035

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jesse Swaffin

Street [REDACTED]

City L.A. State CA ZIP 90028

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Gabriel Jarrett

Street [REDACTED]

City Malibu State CA ZIP 90265

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?



## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Maagie Snelgrove

Street [REDACTED]

City Los Angeles State CA ZIP 90064

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Joe Arthur

Street [REDACTED]

City Santa Monica State CA ZIP 90403

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Margaret Oliveira

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name James Northwood

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Arden Westlake

Street [REDACTED]

City L.A. State CA ZIP 90039

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name LINDA CALDER

Street [REDACTED]

City S.M. State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Jennifer O'Grady Ayoa  
Street [REDACTED]  
City Montebello State CA ZIP 90640  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Shawn Nelson  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Geoffrey Smyer  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Drew Cummins  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Andres Morales  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Jeff Kwong  
Street [REDACTED]  
City Los Angeles State CA ZIP 90039  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Kirsten Osthus

Street [Redacted]

City LA State CA ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Barbara Haberman

Street [Redacted]

City LA State CA ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Sharon Alcazer

Street [Redacted]

City Los Angeles State CA ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Brigid Faith

Street [Redacted]

City LA State CA ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Olivia Birdwell

Street [Redacted]

City LA State Cal. ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Eduardo Barrazo

Street [Redacted]

City Los Angeles State LA ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name John Roberts

Street [REDACTED]

City Manhattan State CA ZIP 90726

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Cesar Garcia

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Debra Loren

Street [REDACTED]

City Altadena State CA ZIP 91001

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name FELTA VIZCARRA

Street [REDACTED]

City Los Angeles State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Niels-Christian Kielland

Street [REDACTED]

City Los Angeles State CA ZIP 90029

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name MICHAEL SHEN

Street [REDACTED]

City LA State CA ZIP 90035

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ANA L. COBICIN  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name GREG KING  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name ANGELA HADNAGY  
Street [REDACTED]  
City Los Angeles State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Joanna Heavt  
Street [REDACTED]  
City Los Angeles State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Steven Benilla  
Street [REDACTED]  
City Los Angeles State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MARIO REYES  
Street [REDACTED]  
City Los Ang. State CA. ZIP 90027  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BAMBOS CHARALAKOULOS

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BERT WAUMARK

Street [REDACTED]

City LOS ANGELES State CA ZIP 90027

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Anna Kondo

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Karen Gilbaugh

Street [REDACTED]

City La Crescenta State CA ZIP 91214

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Debra Light

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Ann Patterson

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SUSAN M HEUNDERSON

Street [REDACTED]

City SANTAMONICA State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JAMES WAYTON

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name James Lin

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name RICHARD PHILLIPS

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Pete Martinez

Street [REDACTED]

City santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Veronica Pato

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name SHERRY CARLSON  
Street [REDACTED]  
City SHERMAN OAKS State CA ZIP 91423  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Alex Zaniel  
Street [REDACTED]  
City Los Angeles State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name ANTHONY CRUZ  
Street [REDACTED]  
City MDR State CA ZIP 90212  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name R. Sherman  
Street [REDACTED]  
City SO State CA ZIP 91423  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,  
Print name Raymond Markan  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Jason Carnova  
Street [REDACTED]  
City Sherman Oaks State CA ZIP 91423  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name John F. MARIS

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ALONSO RAMIREZ

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John Rizzi

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

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Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Norm Skaggs

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name An'ana Gabisan

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John Adams

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name HEUSER VALLADARES

Street [REDACTED]

City HAWTHORNE State CA ZIP 90250

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rob Kish

Street [REDACTED]

City Sherman Oaks State Ca ZIP 91423

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kim Murkowski

Street [REDACTED]

City LA Crescenta State CA ZIP 91214

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name AMANDA HIDE

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Justin Hoppensteadt

Street [REDACTED]

City LA State CA ZIP 90013

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MAN PAT ALVARO

Street [REDACTED]

City L.A. State CA ZIP 90068

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Benjamin Wallace

Street [REDACTED]

City Van Nuys State CA ZIP 91406

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Philip Gershwin

Street [REDACTED]

City T.O. State CA ZIP 91360

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name LUCIA LOERA

Street [REDACTED]

City L.A. State CA ZIP 90065

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Celia G. Chavez

Street [REDACTED]

City LA State CA ZIP 90065

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mark Arnold

Street [REDACTED]

City Exeter State CA ZIP 93221

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name The Rivas Family

Street [REDACTED]

City Los Angeles State CA ZIP 90032

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Regina Thomas  
Street [REDACTED]  
City La Crescenta State CA ZIP 91214  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name gil nevo  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jo Anne Schaack  
Street [REDACTED]  
City La Crescenta State CA ZIP 91214-3364  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kim Bush  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Kim Dye  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Karla Peterson  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Michael Luna

Street [REDACTED]

City Alhambra State CA ZIP 91801

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Rico

Street [REDACTED]

City \_\_\_\_\_ State \_\_\_\_\_ ZIP 91803

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name MICHAEL WEINSTEIN

Street [REDACTED]

City LD State CA ZIP 90068

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Danielle Duquette

Street [REDACTED]

City LA State CA ZIP 90066

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Northalie Ignatyan

Street [REDACTED]

City LA State CA ZIP 90068

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name LUCY ORLANDI

Street [REDACTED]

City MONTEREY PARK CA ZIP 91752

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Laura Meade

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mark Bassett

Street [REDACTED]

City Los Angeles State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SHAHID BROWN

Street [REDACTED]

City LOS ANGELES State CA ZIP 90017

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ryan McDowell

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name ANTHONY PEARCE

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name PATRICE QUINN

Street [REDACTED]

City LOS ANGELES State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nancy Wena

Street [REDACTED]

City LA State CA ZIP 90005

E-mail [REDACTED]

Phone (     )         Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Matthew Beeston

Street [REDACTED]

City Longleton State CA ZIP 91740

E-mail [REDACTED]

Phone (     )         Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Andrea Ferrario

Street [REDACTED]

City Pasadena State CA ZIP 91030

E-mail [REDACTED]

Phone (     )         Volunteer?

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Sincerely,

Print name Steve Morris

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone (     )         Volunteer?

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Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Doris Robin

Street [REDACTED]

City Temple City State CA ZIP 91780

E-mail [REDACTED]

Phone (     )         Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Vanna Melfi

Street [REDACTED]

City Los Angeles State CA ZIP 90045

E-mail [REDACTED]

Phone (     )         Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Alice Halburton

Street [REDACTED]

City Redondo State CA ZIP 90277

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name DAVID LOCKE

Street [REDACTED]

City Glendale State CA ZIP 91206

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name GUADALUPE BRUBAKER

Street [REDACTED]

City Panorama City State CA ZIP 91402

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jessica Dooley

Street [REDACTED]

City Glendale State CA ZIP 91011

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Denis Tessier

Street [REDACTED]

City Redondo Beach State CA ZIP 90277

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name LINDA LUAN

Street [REDACTED]

City Glendale State CA ZIP 91202

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name William Clark

Street [Redacted]

City Sherman Oaks State CA ZIP 91423

E-mail [Redacted]

Phone ( ) [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Barbie Perez

Street [Redacted]

City Manhattan State CA ZIP 90246

E-mail [Redacted]

Phone ( ) [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Joel Flynn

Street [Redacted]

City [Redacted] State [Redacted] ZIP [Redacted]

E-mail [Redacted]

Phone ( ) [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Dominic Cooney

Street [Redacted]

City Venice State CA ZIP 90291

E-mail [Redacted]

Phone ( ) [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Leticia Martinez

Street [Redacted]

City Santa Monica State CA ZIP 90404

E-mail [Redacted]

Phone ( ) [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jacklyn & David Loma

Street [Redacted]

City Venice State CA ZIP 90291

E-mail [Redacted]

Phone ( ) [Redacted] Volunteer?

## Great Pacific Cleanup



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Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Kevin Sabbe  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JULIE PALUCH  
Street [REDACTED]  
City SM State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name DONN UMBER  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name GAELA ASPINALL  
Street [REDACTED]  
City SM State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jennifer Gardner  
Street [REDACTED]  
City SM State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Amy Wiczorek  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nick Holbein

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Danny St Pierre

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Royk Massih

Street [REDACTED]

City SM State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Laura Schuffman

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Martha Clark

Street [REDACTED]

City Sherman Oaks State CA ZIP 91423

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jonathan Mendonca

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name

Chrysten Clark

Street

City

LA

State

CA

ZIP

90405

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Donna Pink

Street

City

Sherman Oaks

State

CA

ZIP

91423

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

FABIO TORRES

Street

City

LA

State

CA

ZIP

90005

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Chris Buckle

Street

City

Sherman Oaks

State

CA

ZIP

91423

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name

Zina Josephs

Street

City

Santa Monica

State

CA

ZIP

90405

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Judith Van Gordon

Street

City

Sherman Oaks

State

CA

ZIP

91423

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MARGARITA ARIAGADA

Street [REDACTED]

City STUDIO CITY State CA ZIP 91604

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Destiny Ford

Street [REDACTED]

City Pasadena State CA ZIP 91106

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name LISA TOBIN

Street [REDACTED]

City Studio City State CA ZIP 91605

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Nadren Roberts

Street [REDACTED]

City Los Angeles State CA ZIP 90032

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Diane + Robert Cohen

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name N. HAUSSER

Street [REDACTED]

City STUDIO CITY State CA ZIP 91604

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Jan Togo  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JAMES COOPER  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MASON LAI  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90042  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name RALPH FRANCESCHINI  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MIKE KELLEY  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michelle Asidok  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
**AND WE VOTE!!**

Print name Lisa Block  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Rosa Zavala

Print name \_\_\_\_\_  
Street [REDACTED]  
City LA CA State CA ZIP 90005  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,  
Silvia Garrad

Print name \_\_\_\_\_  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,  
Heidi Rothman

Print name \_\_\_\_\_  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,  
Eddie White

Print name \_\_\_\_\_  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,  
Chanel Burrell

Print name \_\_\_\_\_  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Valerie Sausbelle

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Mehli Kheraj

Street [REDACTED]

City SAN State CA ZIP 90305

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Elizabeth Talamantes

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name CARISIN AGY

Street [REDACTED]

City SANTA MONICA State CA ZIP 90405

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Amie Szekieson

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Jairo M... ..

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) Volunteer?



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Sincerely,

Print name Jose Romero

Street [REDACTED]

City Los Angeles State CA ZIP 90019

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Kristina Flores

Street [REDACTED]

City Los Angeles State CA ZIP 90024

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Darlene Hernandez

Street [REDACTED]

City Sherlake State CA ZIP 90004

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Dashonna Ego

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Carlos Zenteno

Street [REDACTED]

City LA State CA ZIP 90032

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Margaret Shelton

Street [REDACTED]

City LA State CA ZIP 90034

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Travis Hensley  
Street [REDACTED]  
City La Verne State CA ZIP 91750  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Irene Miracle  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Scott SETTEBERG  
Street [REDACTED]  
City South Pasadena State CA ZIP 91068  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Nicole DIAB/SUMNER HABAN  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90005  
E-mail [REDACTED]  
Phone ( ) Volunteer?

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Sincerely,

Print name Lisa Clark  
Street [REDACTED]  
City Santa Monica State CA ZIP 90406  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Carol Popichak  
Street [REDACTED]  
City Bunedale State CA ZIP 93907  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Henry Beron  
Street [redacted]  
City San Antonio State CA ZIP 90404  
E-mail [redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name Jacob Merson  
Street [redacted]  
City LA State CA ZIP 90024  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name ANDREW WENDER  
Street [redacted]  
City LA State CA ZIP 90064  
E-mail [redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name ERIN FOX  
Street [redacted]  
City SANTA MONICA State CA ZIP 90405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Melissa Hill  
Street [redacted]  
City San Antonio State CA ZIP 91154  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Governor Schwarzenegger,

Our oceans are in crisis.

In the middle of the Pacific, there is an island of trash twice the size of Texas, where there is six times more plastic than plankton. Every year, our oceans and beaches are littered with thousands of pounds of Styrofoam, bottle caps and other pollution. It threatens our health, mars our beautiful beaches and kills countless marine animals every year.

We need to reduce the amount of plastic that we use every year, and eliminate the most damaging types of plastic being used. California can lead the way in this fight by banning single-use Styrofoam takeout containers. We urge you to take action on this serious issue today.

Sincerely,

Print name Hina Moech  
Street [redacted]  
City SM State CA ZIP 91045  
E-mail [redacted]  
Phone [redacted] Volunteer?

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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Vanny Eric

Street [REDACTED]

City Imperial City State CA ZIP 91750

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Vivian Ingalls

Street [REDACTED]

City Los Angeles State CA ZIP 90019

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Governor Schwarzenegger,

Our oceans are in crisis.

In the middle of the Pacific, there is an island of trash twice the size of Texas, where there is six times more plastic than plankton. Every year, our oceans and beaches are littered with thousands of pounds of Styrofoam, bottle caps and other pollution. It threatens our health, mars our beautiful beaches and kills countless marine animals every year.

We need to reduce the amount of plastic that we use every year, and eliminate the most damaging types of plastic being used. California can lead the way in this fight by banning single-use Styrofoam takeout containers. We urge you to take action on this serious issue today.

Sincerely,

Print name Nils Wager

Street [REDACTED]

City Los Angeles State CA ZIP 90069

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Governor Schwarzenegger,

Our oceans are in crisis.

In the middle of the Pacific, there is an island of trash twice the size of Texas, where there is six times more plastic than plankton. Every year, our oceans and beaches are littered with thousands of pounds of Styrofoam, bottle caps and other pollution. It threatens our health, mars our beautiful beaches and kills countless marine animals every year.

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Sincerely,

Print name Barbara Kuehrt

Street [REDACTED]

City LA State CA ZIP 90037

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Laurie Pescoe

Street [REDACTED]

City Santa Monica State CA ZIP 90403

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jonathan Goldber

Street [REDACTED]

City Los Angeles State CA ZIP 90046

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Ceraldine Garcia

Street [REDACTED]

City LA State CA ZIP 90004

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JAMES EVANS

Street [REDACTED]

City ALHAMBRA State CA ZIP 91803

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Sean Carrigan

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Alexis P... ..

Street [REDACTED]

City Fullerton State CA ZIP 92620

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Meagan Aravio

Street [REDACTED]

City N. Hollywood State CA ZIP 91601

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Tony Frederick

Street [REDACTED]

City Reseda State CA ZIP 91324

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JESSE ANEZCUA

Street [REDACTED]  
City N Hollywood State CA ZIP 91606  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Ramie Becker

Street [REDACTED]  
City LA State CA ZIP 90045  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Teri Bibb  
Street [REDACTED]  
City Van Nuys State CA ZIP 91405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Patricia Allen  
Street [REDACTED]  
City N Hollywood State CA ZIP 91601  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Parrish Cochr  
Street [REDACTED]  
City LA State CA ZIP 90006  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Alexis LaCerna  
Street [REDACTED]  
City San Valley State CA ZIP 91352  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Steve Reynolds

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Laura Hartman

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Carrie Gillogly

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Lee Zosun

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jeff Spurrer

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Michael Johnston

Street [REDACTED]

City S.M. State CA ZIP 90407

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sharon Goodman

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name John Kim

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Stephen Sticker

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name CLARK THOMPSON

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lisa Celaya

Street [REDACTED]

City San Jose CA State CA ZIP 95121

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ariana Gutierrez

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,  
Print name Michael Champion  
Street [REDACTED]  
City LA State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name MATT EDDY  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Anthony Vero  
Street [REDACTED]  
City STUDIO CITY State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name John Nestor  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name JOHN WAYNE  
Street [REDACTED]  
City STUDIO CITY State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name AL WOOD  
Street [REDACTED]  
City MONTROSE State CA ZIP 91325  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kevin Kelley

Street [REDACTED]

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

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Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name JAIME BANCOS

Street [REDACTED]

City pasadena State CA ZIP 91104

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name HASSAN BANKS

Street [REDACTED]

City LA State CA ZIP 90013

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Katherine Baxter-Habib

Street [REDACTED]

City Cincinnati State OH ZIP 45219

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Judy McClary

Street [REDACTED]

City El Dorado Hills State CA ZIP 95762

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name EMORY DOWNES

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail \_\_\_\_\_

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rachelle Rubin  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jennifer Baum  
Street [REDACTED]  
City SM State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Wendy Miller  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michael Peeler  
Street [REDACTED]  
City W. Hollywood State CA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JULIAN ABIODUN  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Chris O'Flaherty  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Scott Moses  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ERIC ROSENBERG  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Angela Garcia  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Andrey Belinas  
Street [REDACTED]  
City Studio City State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Johnny Brown  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jared Winterhawk  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lauren Karolt  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Marie Chambers  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name AMY ALTECHMEANI  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jessica Moore  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name EMY COLIGADO  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Edwin Figueroa  
Street [REDACTED]  
City Pearl City State HI ZIP 96782  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name TODD MUSCAT  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90404  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Miguel Perez  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Rose Cole  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ray Lee  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name  Ms. Veronica Deutsch  
Street [REDACTED]  
City Santa Monica, CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ANDREW ANDREW  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michael Maugham

Street [REDACTED]

City Burbank State CA ZIP 91502

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JASON FANG

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ryan Small

Street [REDACTED]

City LA State CA ZIP 90038

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Louisa Leone

Street [REDACTED]

City Los Angeles State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Joe Hager

Street [REDACTED]

City Plano State TX ZIP 75075

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Esmeralda Vasquez

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Ernest R. Lindner

Street [REDACTED]

City Glendale State CA ZIP 91208

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jason George Proffers

Street [REDACTED]

City Studio City State CA ZIP 91602

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Dear Los Angeles County Board of Supervisors,

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Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name FREDERICK McORMACK

Street [REDACTED]

City STUDIO CITY State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Chris Lowe

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John Hinton

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Miluska Propersi

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Julius Robinson  
Street [REDACTED]  
City Sancho City State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Carla Esquivel  
Street [REDACTED]  
City Panorama State CA ZIP 91402  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name DAVID TAMMENGA  
Street [REDACTED]  
City Glendale State CA ZIP 91201  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Cheryl Allen  
Street [REDACTED]  
City Pine Grove State Cal ZIP 91506  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kurt Henkle  
Street Sm  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Patricia A. Grace  
Street [REDACTED]  
City Burbank State Cal ZIP 91501  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Eugene Porcan  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Melissa J. Blake  
Street [REDACTED]  
City Santa Monica State Ca. ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jerry Ricker  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Carmen Q. Brody  
Street [REDACTED]  
City Santa Monica State Cal ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Cathleen Young  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Janette FRISTAD  
Street [REDACTED]  
City Glendale State CA ZIP 91201  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Austin Michael

Street \_\_\_\_\_

City \_\_\_\_\_ State CA ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name BEAUW LEE

Street \_\_\_\_\_

City LA State CA ZIP 90034

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Paul DeCunzio

Street \_\_\_\_\_

City Sherman Oaks State CA ZIP 91423

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name KRISTEN STAUCH

Street \_\_\_\_\_

City Santa Clarita State CA ZIP 91350

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Andrew

Street \_\_\_\_\_

City Santa Monica State CA ZIP 90403

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Theresa de los Santos

Street \_\_\_\_\_

City Santa Monica State CA ZIP 90403

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Scott D. Haver

Street [Redacted]

City LA State CA ZIP 90065

E-mail [Redacted]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Effe Lennox

Street [Redacted]

City Sebastopol State CA ZIP 95472

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Anthony Navarrete

Street [Redacted]

City Los Angeles State CA ZIP 90039

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Charlie Wilkin

Street [Redacted]

City West Hollywood State CA ZIP 90096

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Robert L Pollard

Street [Redacted]

City Hollywood State CA ZIP 90039

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Jose Saavedra

Street [Redacted]

City Wendle State CA ZIP [Redacted]

E-mail [Redacted]

Phone ( ) Volunteer?

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Sincerely,  
 Print name Anne Craig  
 Street [Redacted]  
 City Glendale State CA ZIP 91209  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

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Sincerely,  
 Print name Tavan Somprasithi  
 Street [Redacted]  
 City L.A State C.A. ZIP 90038  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

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Sincerely,  
 Print name Brendan  
 Street [Redacted]  
 City Los Angeles State [Redacted] ZIP [Redacted]  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
 Print name EDUARDO ESCOBEDO  
 Street [Redacted]  
 City LOS ANGELES State CA ZIP 90038  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
 Print name [Signature]  
 Street [Redacted]  
 City LA State CA ZIP 90038  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
 Print name Conrad Ruzicko  
 Street [Redacted]  
 City LA State CA ZIP 90028  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name DESIREE CANCHAMAN

Street [REDACTED]

City LA State CA ZIP 90023

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MICHAEL OKUM

Street [REDACTED]

City LOS ANGELES State CA ZIP 90065

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Timara Gould

Street [REDACTED]

City LA State CA ZIP 9006

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name MICHAEL GYR

Street [REDACTED]

City Sherman Oaks State CA ZIP 91423

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Emily Gomez Ramsey

Street [REDACTED]

City San Diego State CA ZIP 92131

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Robbie Hunt

Street [REDACTED]

City LA State CA ZIP 90038

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name AKIKO SATO  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JOE BATES  
Street [REDACTED]  
City STUDIOS CITY State CA ZIP 91604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MICHAEL BRANNON  
Street [REDACTED]  
City LA State CA ZIP 90029  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SHELLIE FRY  
Street [REDACTED]  
City SANTA MONICA State CA ZIP 90402  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ASPIED WILLIAMS  
Street [REDACTED]  
City SMOOTH CITY State CA ZIP 91604  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name D. D. BUSH  
Street [REDACTED]  
City LA State CA ZIP 90007  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Patrick Kellagy

Street [REDACTED]

City Los Angeles State CA ZIP 90004

E-mail [REDACTED]

Phone (     )     Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Cwick Hwang

Street [REDACTED]

City Los Angeles State CA ZIP 90000

E-mail [REDACTED]

Phone (     )     Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Vince Klaseus

Street [REDACTED]

City LA State CA ZIP 90027

E-mail [REDACTED]

Phone (     )     Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name EVAN SEGOTA

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone (     )     Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rebecca Simmen

Street [REDACTED]

City LA State CA ZIP 90007

E-mail [REDACTED]

Phone (     )     Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rebecca Simmen

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone (     )     Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name DAVE BERGMANN  
 Street [redacted]  
 City LOS ANGELES State CA ZIP 90064  
 E-mail [redacted]  
 Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Paulette Terry  
 Street [redacted]  
 City Venice State CA ZIP 90281  
 E-mail [redacted]  
 Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name VICTORIA CRUPROVSKY  
 Street [redacted]  
 City Santa Monica State CA ZIP 90405  
 E-mail [redacted]  
 Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ERIN ZIMRING  
 Street [redacted]  
 City Hollywood State CA ZIP 90068  
 E-mail [redacted]  
 Phone ( ) Volunteer?

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Sincerely,

Print name Tylen Schoenberg  
 Street [redacted]  
 City Orange State CA ZIP 92866  
 E-mail [redacted]  
 Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mary Ota  
 Street [redacted]  
 City Los Angeles State CA ZIP 90066  
 E-mail [redacted]  
 Phone ( ) Volunteer?

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Sincerely,

Print name Charlotte Peter

Street [redacted]

City Los Angeles State CA ZIP 90066

E-mail [redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name Lizette Orozco

Street [redacted]

City Los Angeles State CA ZIP 90020

E-mail [redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name CRUZ SOLIZ

Street [redacted]

City LONG BEACH State CA ZIP 90813

E-mail [redacted]

Phone [redacted] Volunteer?

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Sincerely,

Print name Aurora Mickaelian

Street [redacted]

City Studio City State CA ZIP 91604

E-mail [redacted]

Phone [redacted] Volunteer?

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Sincerely,

Print name Jeff Grippe

Street [redacted]

City LA State CA ZIP 90066

E-mail [redacted]

Phone ( ) Volunteer?

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Sincerely,

Print name BRIAN ALVAREZ

Street [redacted]

City L.A. State CA ZIP 90066

E-mail [redacted]

Phone [redacted] Volunteer?

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Sincerely,

Print name *Oliver Harris*

Street \_\_\_\_\_

City *Sebastopol* State *CA* ZIP *95472*

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup

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Sincerely,

Print name *Jim Gerard*

Street \_\_\_\_\_

City *Los Angeles* State *CA* ZIP *90066*

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup

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Sincerely,

Print name *Olivia Yeh*

Street \_\_\_\_\_

City *South Pasadena* State *Ca* ZIP *91030*

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



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Sincerely,

Print name *MANNIG GUREKIAN*

Street \_\_\_\_\_

City *LA* State *CA* ZIP *90066*

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup

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Sincerely,

Print name *JEROME MORGAN*

Street \_\_\_\_\_

City *Los Angeles* State *Ca* ZIP *90066-3044*

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup

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Sincerely,

Print name *Larry Mueller*

Street \_\_\_\_\_

City *LA* State *CA* ZIP *90066*

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name James Webb  
 Street [REDACTED]  
 City Los Angeles State CA ZIP 90066  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Lee  
 Street [REDACTED]  
 City Los Angeles State CA ZIP 90066  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name SHANNON BRAZER  
 Street [REDACTED]  
 City LA State CA ZIP 90066  
 E-mail [REDACTED]  
 Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Robert Rutherford  
 Street [REDACTED]  
 City LA State CA ZIP 90060  
 E-mail [REDACTED]  
 Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Chris L. Choate  
 Street [REDACTED]  
 City SM State CA ZIP 90414  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Celia Owens  
 Street [REDACTED]  
 City STANISLIS State CA ZIP 91604  
 E-mail [REDACTED]  
 Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name CHERYL JUNOD  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ([REDACTED]) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name JAMES A. HANNA  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ([REDACTED]) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Michelle de Veen  
Street [REDACTED]  
City North Hills State CA ZIP 91343  
E-mail [REDACTED]  
Phone ([REDACTED]) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Beatrice Solis  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ([REDACTED]) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Robert Wright  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ([REDACTED]) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name SUSAN C PRICE  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ([REDACTED]) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Karissa Conefny  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Ariel Ashworth  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name ROSITA BASTOW  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name RENE MORENTIN  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Tim Farrell  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Erin Gehle  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( [REDACTED] ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jon Fitzgerald

Street [Redacted]

City Van Nuys State CA ZIP 91411

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Patricia Lopez

Street [Redacted]

City LA State CA ZIP 90006

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Est Miller

Street [Redacted]

City LA State CA ZIP 90006

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MARIA VICTORIA

Street [Redacted]

City LA State CA ZIP 90039

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Yesenia Rodriguez

Street [Redacted]

City Los Angeles State CA ZIP 90023

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Redio Anaya

Street [Redacted]

City Moore Valley State CA ZIP 92553

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name SHENIE BARNES

Street [REDACTED]

City JUSTIN State CA ZIP 92702

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Louise DeLwitz

Street [REDACTED]

City LA State CA ZIP 90027

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name MARGARITA CHOW

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Edith Liu

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Colleen Paeff

Street [REDACTED]

City L.A. State CA ZIP 90039

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Cassandra Green

Street [REDACTED]

City LA State CA ZIP 90039

E-mail [REDACTED]

Phone ( ) Volunteer?



### Great Pacific Cleanup



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Sincerely,  
Print name DIK HEENEN  
Street [redacted]  
City LA State CA ZIP 90031  
E-mail [redacted]  
Phone ( [redacted] ) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup



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Sincerely,  
Print name ELLEN M. JACOBS  
Street [redacted]  
City Los Angeles State CA ZIP 90029  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup



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Sincerely,  
Print name Paula Mounihan  
Street [redacted]  
City LA State CA ZIP 90039  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



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Sincerely,  
Print name Barbara Drake  
Street [redacted]  
City BH State CA ZIP 90210  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup



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Sincerely,  
Print name NARCISO MONES  
Street [redacted]  
City W. Hollywood State CA ZIP 90069  
E-mail [redacted]  
Phone [redacted] Volunteer?



### Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Yosh Torrey  
Street [redacted]  
City Dis-nd Box State CA ZIP 91265  
E-mail \_\_\_\_\_  
Phone [redacted] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Charles Bice

Street [Redacted]

City Knoxville State TN ZIP 37919

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Theresa Gould

Street [Redacted]

City LA State CA ZIP 90016

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Shalew Netanel

Street [Redacted]

City Easton State CA ZIP 91316

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

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Sincerely,

Print name Laura Bente

Street [Redacted]

City LA State CA ZIP 90025

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name VONDA FINLEY

Street [Redacted]

City Los Angeles State CA ZIP 90035

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name LAURALEE PHILLIPS

Street [Redacted]

City LA State CA ZIP 90035

E-mail [Redacted]

Phone ( [Redacted] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Amy Freeman  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mark McGrath  
Street [REDACTED]  
City Los Angeles State CA ZIP 90075  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sarah LaMantua  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mike Wiggett  
Street [REDACTED]  
City N Hollywood State CA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Judy Nguyen  
Street [REDACTED]  
City Herndon State VA ZIP 20170  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Danielle Bern  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name WALTER G. ROE III  
Street [Redacted]  
City AGUA HILLS State CA ZIP 91301  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jennifer MATSUKO  
Street [Redacted]  
City VALLEY VILLAGE State CA ZIP 91607  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Anthony Tomaseillo  
Street [Redacted]  
City Valley Village State CA ZIP 91607  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jessica Durlacher  
Street [Redacted]  
City Sylmar State CA ZIP 91703  
E-mail [Redacted]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name John Forrest  
Street [Redacted]  
City Los Angeles State CA ZIP 90027  
E-mail [Redacted]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name SILVIA WEAVER  
Street [Redacted]  
City Santa Monica State CA ZIP 90403  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jesse Costaro  
Street [REDACTED]  
City Pasadena State CA ZIP 91101  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name T. Cohen  
Street [REDACTED]  
City Donner State CA ZIP 95020  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Charles Aircraft  
Street [REDACTED]  
City Glendale State CA ZIP 91205  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Michael Valle  
Street [REDACTED]  
City Los Angeles State CA ZIP 90017  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Maria Leo  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Eugene Bakman  
Street [REDACTED]  
City LA State CA ZIP 90046  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Christian Moore

Street [Redacted]

City Los Angeles State CA ZIP 90069

E-mail [Redacted]

Phone [Redacted] Volunteer?



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Sincerely,

Print name KELSEY PRICE

Street [Redacted]

City SANTA MONICA State CA ZIP 90405

E-mail [Redacted]

Phone [Redacted] Volunteer?



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Sincerely,

Print name DARA NAZARYAN

Street [Redacted]

City LA State CA ZIP 90015

E-mail [Redacted]

Phone [Redacted] Volunteer?



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Sincerely,

Print name Lanadon Faust

Street [Redacted]

City LA State CA ZIP 90027

E-mail [Redacted]

Phone ( ) Volunteer?



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Sincerely,

Print name Rovena Cardiel

Street [Redacted]

City LA State CA ZIP 90027

E-mail [Redacted]

Phone ( ) Volunteer?



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Sincerely,

Print name Kim Jones

Street [Redacted]

City LA State CA ZIP 90027

E-mail [Redacted]

Phone [Redacted] Volunteer?



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Sincerely, *Kristen McLornick*  
Print name  
Street [REDACTED]  
City *Pacific Palisades CA* State *CA* ZIP *90272*  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely, *Caroline Pironian*  
Print name  
Street [REDACTED]  
City *LA* State *CA* ZIP *90004*  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely, *Robert Hyams*  
Print name  
Street [REDACTED]  
City *TOLOCA Lake* State *CA* ZIP *91610*  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely, *Maki Akayan*  
Print name  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

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Sincerely, *Beatrice Castro*  
Print name  
Street [REDACTED]  
City *SM* State *CA* ZIP *90405*  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely, *Tammy Huxton*  
Print name  
Street [REDACTED]  
City *LA* State *CA* ZIP *90027*  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Take Smith  
Street [REDACTED]  
City Los Angeles State CA ZIP 90065  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Emily Yaron  
Street [REDACTED]  
City Los Angeles State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Robert Fisher  
Street [REDACTED]  
City LA State CA ZIP 90006  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name ROMAN FLEMING  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90057  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Nuria Heyck  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Christopher Soto  
Street [REDACTED]  
City Los Angeles State CA ZIP 90022  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Rachel Smith-Weinstein  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Jorge L. Simental  
Street \_\_\_\_\_  
City Cerritos State CA ZIP 90703  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Daniel Benabe  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90026  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Andrea Lui  
Street \_\_\_\_\_  
City Yuba City State TX ZIP 79023  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Carrie Macy  
Street \_\_\_\_\_  
City Studio City State CA ZIP 91604  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Jay Brown  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90073  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jewels Solomon-Rice

Street [redacted]

City Pacific Palisades State CA ZIP 91272

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name IAN SEARS

Street [redacted]

City SANTA MONICA State CA ZIP 90405

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Markus Craven

Street [redacted]

City Santa Monica State CA ZIP 90405

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jean L. Bigelow

Street [redacted]

City S. Monica State CA ZIP 90405

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Barry L. Slotnick

Street [redacted]

City LA State CA ZIP 90078

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Meadhan Camp

Street [redacted]

City Santa Monica State CA ZIP 90405

E-mail [redacted]

Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

David Carter Thompson

Street

City

Van Nuys

State

CA

ZIP

91405

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

P. Bottaro

Street

City

Santa Monica State CA

ZIP 90405

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

FRANK LOUIS MARE

Street

City

LOS ANGELES

State

CA

ZIP

90066

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

JASMINE ALHAMBRA

Street

City

SANTA MONICA State CA

ZIP 90405

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Hei di Sasaki

Street

City

N Hollywood State CA

ZIP

91602

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

MARY LOWE

Street

City

Santa Monica State CA

ZIP 90405

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John F. Montoya  
 Street [REDACTED]  
 City Los Angeles State CA ZIP 90012  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name RANESH RAMANIGAM  
 Street [REDACTED]  
 City San Diego State CA ZIP 92105  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Adam Brum  
 Street [REDACTED]  
 City LA State CA ZIP 90029  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Stefan Kirchenki  
 Street [REDACTED]  
 City San Marcos State CA ZIP 90405  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rafael Trujillo  
 Street [REDACTED]  
 City San Diego State CA ZIP 92105  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

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Sincerely,

Print name Caroline Jones  
 Street [REDACTED]  
 City San Diego State CA ZIP 92105  
 E-mail [REDACTED]  
 Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Alison Dorell

Street [redacted]

City River State CA ZIP 9005

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Leon Hernandez-Aranda

Street [redacted]

City River State CA ZIP 90005

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Alexandra Aguilar

Street [redacted]

City Santa Monica State CA ZIP 90405

E-mail \_\_\_\_\_

Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nina Scott

Street [redacted]

City SANTA MONICA State CA ZIP 90401

E-mail \_\_\_\_\_

Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lisa Whiteman

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Will Orantes

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Cecil Gooch  
Street [Redacted]  
City N. Hollywood State CA ZIP 91605  
E-mail [Redacted]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name DeAnna Graziano  
Street [Redacted]  
City LA State CA ZIP 90066  
E-mail [Redacted]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Leon Dawes  
Street [Redacted]  
City Santa Monica State CA ZIP 90404  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Brianna Bucks  
Street [Redacted]  
City Kingshill State VI ZIP 00850  
E-mail [Redacted]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name KAREN SCHNEIDER  
Street [Redacted]  
City SANTA MONICA State CA ZIP 90405  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Michael Beans  
Street [Redacted]  
City Los Angeles State CA ZIP  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Thomas Cushing

Street [REDACTED]

City S.M. State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Matthew Eakin

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name FRANK JAMES CASE II

Street [REDACTED]

City BELL GARDENS State CA ZIP 90204

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name John and Kimiko Prosky

Street [REDACTED]

City Delucy Lake State CA ZIP 91602

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



ENVIRONMENT  
CALIFORNIA

Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Samuel L. Hersch  
Street [redacted]  
City Santa Monica CA ZIP 90404  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



ENVIRONMENT  
CALIFORNIA

Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Courtney Wright  
Street [redacted]  
City Burbank State CA ZIP 91504  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



ENVIRONMENT  
CALIFORNIA

Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Marlin Cueva  
Street [redacted]  
City Los Angeles State CA ZIP 90006  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



ENVIRONMENT  
CALIFORNIA

Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name CHINMAY PATEL  
Street [redacted]  
City Alhambra State CA ZIP 91701  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



ENVIRONMENT  
CALIFORNIA

Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name John Evans  
Street [redacted]  
City L.A. State CA ZIP 90049  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



ENVIRONMENT  
CALIFORNIA

Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Taylor  
Street [redacted]  
City Burbank State CA ZIP 91505  
E-mail [redacted]  
Phone [redacted] Volunteer?



# Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Marquis Lucien

Street [Redacted]

City Los Angeles State CA ZIP 90013

E-mail [Redacted]

Phone [Redacted] Volunteer?

# Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Ruth Hertz

Street [Redacted]

City LA State CA ZIP 90023

E-mail [Redacted]

Phone [Redacted] Volunteer?

# Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Ruth Burke

Street [Redacted]

City LA State CA ZIP 90057

E-mail [Redacted]

Phone [Redacted] Volunteer?

# Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Derek Donald

Street [Redacted]

City Los Angeles State CA ZIP 90034

E-mail [Redacted]

Phone [Redacted] Volunteer?

# Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Michael Koontz

Street [Redacted]

City LA State CA ZIP 90016

E-mail [Redacted]

Phone [Redacted] Volunteer?

# Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name R. Cook Cedillo

Street [Redacted]

City South El Monte State CA ZIP 91753

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name SEBASTION SEDAG

Street [REDACTED]

City Los Angeles State CA ZIP 90049

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Micaela Collins

Street [REDACTED]

City C. A State CA ZIP 90006

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Angela Amara

Street [REDACTED]

City Los Angeles State CA ZIP 90065

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Andrey Russell

Street [REDACTED]

City Forest Falls State CA ZIP 92339

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name BENNETT CORDON

Street [REDACTED]

City GRAND HILLS State CA ZIP 91344

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name PAPIGNY GLEGORY

Street [REDACTED]

City BEVERLY HILLS State CA ZIP 90210

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Richard Strayhorn  
Street [redacted]  
City Los Angeles state CA ZIP 90043  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Carlos Meira  
Street [redacted]  
City Los Angeles state CA ZIP 90043  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Richard Katz  
Street [redacted]  
City LA State CA ZIP 90010  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Lesly Davis  
Street [redacted]  
City LA State CA ZIP 90044  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name CHARLA FRANKS  
Street [redacted]  
City BIT State CA ZIP 90212  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name LISA SWARTZ  
Street [redacted]  
City Tomb City State CA ZIP 91324  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Jase A Figueroa  
Street [redacted]  
City east LA State CA ZIP 90063  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,  
Print name Annie Bautista  
Street [redacted]  
City Van Nuys State CA ZIP 91405  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,  
Print name Lois Flover  
Street [redacted]  
City LA State CA ZIP 90011  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,  
Print name SUSAN Prasad  
Street [redacted]  
City Van Nuys State CA ZIP 91401  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,  
Print name Rosie Pantaja  
Street [redacted]  
City LA State CA ZIP [redacted]  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,  
Print name CLEO SOLTERO  
Street [redacted]  
City LA State CA ZIP 90010  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name **MIA BROSOD**  
Street [REDACTED]  
City **L.A.** State **CA** ZIP **90010**  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name **WIKHO BROSDOW**  
Street [REDACTED]  
City **LA** State **CA** ZIP **90028**  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name **Karita Manier**  
Street [REDACTED]  
City **LA** State **CA** ZIP **90004**  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name **Brandon Anderson**  
Street [REDACTED]  
City **Los Angeles** State **CA** ZIP **90016**  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name **BRYAN ESTRELLOR**  
Street [REDACTED]  
City **Los Angeles** State **CA** ZIP **90034**  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name **Nicole Shellcraft**  
Street [REDACTED]  
City **No. Hills** State **CA** ZIP **91343**  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Vanessa Herty  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Charisse ONeal  
Street [REDACTED]  
City Wynwood State CA ZIP 90267  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Max Hayward, CSW  
Street [REDACTED]  
City LA State CA ZIP 90042  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Liliana Rivera  
Street [REDACTED]  
City Walnut Park State CA ZIP 90255  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely,  
Print name JEANNETTE LOPEZ  
Street [REDACTED]  
City LA State CA ZIP 90005  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely,  
Print name Georgy Reyes  
Street [REDACTED]  
City PASADENA State CA ZIP 90042  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely,

Print name Brandon Lund  
Street [REDACTED]  
City Los Angeles State CA ZIP 90015  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name Anne Onliger  
Street [REDACTED]  
City Los Angeles State CA ZIP 90007  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

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Sincerely,

Print name Brandbn Eddings  
Street [REDACTED]  
City Indlewood State CA ZIP 90301  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

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Sincerely,

Print name Veruca Torres  
Street [REDACTED]  
City LA State CA ZIP 90024  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

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Sincerely,

Print name RCA CAD  
Street [REDACTED]  
City L.A. State CA ZIP 90001  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

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Sincerely,

Print name Kyrste n Barber  
Street [REDACTED]  
City N. Hollywood State CA ZIP 91601  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

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Sincerely,  
Print name Linde Conway  
Street [REDACTED]  
City Alhambra State CA ZIP 91803  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,  
Print name Arthur David Mortell  
Street [REDACTED]  
City MALIBU State CA ZIP 90265  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,  
Print name Bill Monskeper  
Street [REDACTED]  
City Pr. Co State UT ZIP 84501  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,  
Print name Jonathan Luna  
Street [REDACTED]  
City Los Angeles State CA ZIP 90005  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,  
Print name Frank Ramirez  
Street [REDACTED]  
City Normal State CA ZIP 90650  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,  
Print name MARAL TAHMIZIAN  
Street [REDACTED]  
City LA State CA ZIP 90010  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



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Sincerely,

Print name KATHERINE STOLTZ

Street \_\_\_\_\_

City AUBURN State CA ZIP 91302

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Darth Harris

Street \_\_\_\_\_

City Van Nuys State CA ZIP 91405

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Alex Sicola

Street \_\_\_\_\_

City RESEDA State CA ZIP 91335

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name sunid A. stoltz

Street \_\_\_\_\_

City Auburn State CA ZIP 91302

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Raymond Johnson

Street \_\_\_\_\_

City La Puente State CA ZIP 91744

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Nate Lyons

Street \_\_\_\_\_

City L.A. State CA ZIP 90005

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Nancy Selez  
Street [REDACTED]  
City LA State CA ZIP 90022  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Bill Wilston  
Street [REDACTED]  
City LA State CA ZIP 90010  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely,

Print name SHAN RADOCAJ  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90010  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely,

Print name Chae Jung  
Street [REDACTED]  
City LA State CA ZIP 90007  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely,

Print name Callie Pomroy  
Street [REDACTED]  
City BUTTE State MT ZIP 59701  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely,

Print name Melugala Tejaswini  
Street [REDACTED]  
City LA State CA ZIP 90008  
E-mail [REDACTED]  
Phone ([REDACTED]) Volunteer?

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Sincerely, Erik Koelle  
 Print name Erik Koelle  
 Street [Redacted]  
 City Los Angeles State CA ZIP 90039  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

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Sincerely, Gary Haines  
 Print name Gary Haines  
 Street [Redacted]  
 City Sherman Oaks State CA ZIP 91423  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

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Sincerely, Richard Torres  
 Print name Richard Torres  
 Street [Redacted]  
 City L.A State CA ZIP 90005  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely, Oscar Delcid  
 Print name Oscar Delcid  
 Street [Redacted]  
 City L.A State CA ZIP 90005  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely, Fernando Ramirez  
 Print name Fernando Ramirez  
 Street [Redacted]  
 City Los Angeles State CA ZIP 90057  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely, Daniel Thomas  
 Print name Daniel Thomas  
 Street [Redacted]  
 City WA State CA ZIP 90019  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Mia Lee  
 Street [redacted]  
 City Burbank State CA ZIP 91504  
 E-mail [redacted]  
 Phone ( [redacted] ) Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Teeray Lopez  
 Street [redacted]  
 City LA State CA ZIP 90007  
 E-mail [redacted]  
 Phone ( [redacted] ) Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Daniel Kang  
 Street [redacted]  
 City Burbank State CA ZIP 91501  
 E-mail [redacted]  
 Phone ( [redacted] ) Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Tatiana Sandoval  
 Street [redacted]  
 City LA CA State CA ZIP 90005  
 E-mail [redacted]  
 Phone [redacted] Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Harold Lee  
 Street [redacted]  
 City Los Angeles State CA ZIP 90042  
 E-mail [redacted]  
 Phone ( [redacted] ) Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Miguel Garcia  
 Street [redacted]  
 City L.A. State CA ZIP 90065  
 E-mail [redacted]  
 Phone ( [redacted] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Joseette Welch  
Street [REDACTED]  
City L.A. State CA ZIP 90037  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Paula Carr  
Street [REDACTED]  
City LA State CA ZIP 90016  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Elizabeth Valenzuela  
Street [REDACTED]  
City Los Angeles State CA ZIP 90011  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Lindsey Hansen  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JIN Lee  
Street [REDACTED]  
City FRANCE State CA ZIP 90503  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Francine Reza  
Street [REDACTED]  
City SANGABRIEL State CA ZIP 91776  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name David Mayorga

Street [REDACTED]

City Los Angeles State CA ZIP 90050

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name KATE PANTON

Street [REDACTED]

City [REDACTED] State CA ZIP 90027

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JERRY CLARK

Street [REDACTED]

City LA State CA ZIP 90016

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Louise Uy

Street [REDACTED]

City Chino State CA ZIP 9170

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name VANESSA GERALD

Street [REDACTED]

City PASADENA State CA ZIP 91323

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jonathan Duran

Street [REDACTED]

City Los Angeles State CA ZIP 90062

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Mia KTM

Street [Redacted]

City LA State CA ZIP 90005

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name JOHN BELL

Street [Redacted]

City 1000 OAKS State CA ZIP 91361

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name ERIC SHORTE

Street \_\_\_\_\_

City Los Angeles State CA ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Amhi Ardiano

Street [Redacted]

City L.A. State CA ZIP 90063

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Mary Sene

Street [Redacted]

City LA State CA ZIP 90003

E-mail [Redacted]

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Sonia Rios

Street [Redacted]

City Los Angeles State CA ZIP 90005

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name CALI MALIC  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90020  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Josh Bernstein  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Julia Lee  
Street [REDACTED]  
City Beverly Hills State CA ZIP 90212  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Pamela Nelson  
Street [REDACTED]  
City Eastwood State CA ZIP 90301  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name OSCAR R.  
Street [REDACTED]  
City Los X State LA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jorge F. Buenavista  
Street [REDACTED]  
City 2460 State CA ZIP 40014  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name DEBRAUNA BROWN

Street [Redacted]

City Los Angeles State CA ZIP 90008

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name DIVINIA D. BREALBA

Street [Redacted]

City LA State CA ZIP 90026

E-mail [Redacted]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Juan Carril

Street [Redacted]

City LA State CA ZIP 90904

E-mail [Redacted]

Phone ( ) C Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Nichelle Jimenez

Street [Redacted]

City LA State CA ZIP 90092

E-mail [Redacted]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Rebeca Cruz

Street [Redacted]

City Los Angeles State Calif ZIP 90020

E-mail [Redacted]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jeanette Valquez

Street [Redacted]

City Los Angeles State CA ZIP 90005

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jeffrey Salenger

Street [REDACTED]

City LA State CA ZIP 90020

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Paulina Sanchez

Street [REDACTED]

City Los Angeles State Cal ZIP [REDACTED]

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Morris Altaleg

Street [REDACTED]

City LA State CA ZIP 90037

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a **mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Rafael Vazquez

Street [REDACTED]

City L.A. State ca. ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Ulisses Paris

Street [REDACTED]

City LA State CA ZIP 90020

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Victor Johnson

Street [REDACTED]

City Wardena State Ca ZIP 90249

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Elizabeth Arredondo

Street [REDACTED]

City Los Angeles State CA ZIP 90002

E-mail [REDACTED]

Phone [REDACTED]

Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Sonia J. Ponce

Street [REDACTED]

City Los Angeles State CA ZIP 90001

E-mail [REDACTED]

Phone [REDACTED]

Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Hector Escobedo

Street [REDACTED]

City Dunwoody State CA ZIP 90242

E-mail [REDACTED]

Phone [REDACTED]

Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Mark Delamen

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED]

Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Dennis Carpenter

Street [REDACTED]

City LA State Ca ZIP 90011

E-mail [REDACTED]

Phone [REDACTED]

Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Ezequiel Garcia

Street [REDACTED]

City Pico Rivera State CA ZIP 90660

E-mail [REDACTED]

Phone [REDACTED]

Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Tanisha Dickerson

Street [REDACTED]

City Indenwood State Ca ZIP 90302

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Andrew Kennedy

Street [REDACTED]

City Culver City State CA ZIP 90232

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Nancy Rons

Street [REDACTED]

City Westwood Park State Ca ZIP 90215

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Anti Lee

Street [REDACTED]

City Woodland Hills State CA ZIP 91364

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Adam Madrid

Street [REDACTED]

City Monterey State Ca ZIP 90840

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Nicholas Lopez

Street [REDACTED]

City Garland State CA ZIP 90249

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Gabriela Flores

Street [REDACTED]

City Paramount State CA ZIP 90723

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name SYEDA JUMRA BOND

Street [REDACTED]

City CANOGA PARK State CA ZIP 91306

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name Moses Flores

Street [REDACTED]

City Sherman Oaks State CA ZIP 90028

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name Jindaby Clark

Street [REDACTED]

City Stark Marina State CA ZIP 91304

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name Luis Aldana

Street [REDACTED]

City Los Angeles State CA ZIP 90006

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name JENNIFER GROR

Street [REDACTED]

City VALENCIA State CA ZIP 91355

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

ENVIRONMENT CALIFORNIA

## Great Pacific Cleanup



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Sincerely,

Print name MICHAEL GRIFFIN

Street [REDACTED]

City LOS ANGELES State CA ZIP 90057

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John Thurman, Jr

Street [REDACTED]

City Northridge State CA ZIP 91325

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Jessica Semajon

Street [REDACTED]

City Sylmar State CA ZIP 91342

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Zack Schultz

Street [REDACTED]

City Los Angeles State CA ZIP 90028

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name pazlin Romero

Street [REDACTED]

City South Gate State CA ZIP 90280

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Muhammad Riaz

Street [REDACTED]

City LA State CA ZIP 90020

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Staci Owen  
Street [REDACTED]  
City LA State CA ZIP 90004  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name IRMA GARCIA  
Street [REDACTED]  
City MISSION HILLS State CA ZIP 91345  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BEVAN A. WEIMAN  
Street [REDACTED]  
City Long Beach State CA ZIP 90805  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Aerin Berry  
Street [REDACTED]  
City San Juan Capistrano State CA ZIP 92675  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name DIANNA GAGNON  
Street [REDACTED]  
City BURBANK State CA ZIP 91502  
E-mail N/A  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Mike Margarian  
Street [REDACTED]  
City Woodbury Hills State CA ZIP 91367  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name **JOHNA DALRYMPLE**

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name **Mikela Velasquez**

Street \_\_\_\_\_

City **Burbank** State **CA** ZIP **91505**

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name **Jesse M. Carral**

Street \_\_\_\_\_

City **Pasadena** State **CA** ZIP **91106**

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name **Max Collins**

Street \_\_\_\_\_

City **Sturtington** State **CA** ZIP **91104**

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name **AUDREY KIDAKO**

Street \_\_\_\_\_

City **Burbank** State **CA** ZIP **91501**

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name **Irene Bustillo**

Street \_\_\_\_\_

City **Los Angeles** State **CA** ZIP **90026**

E-mail \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Volunteer?



### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,  
Print name Joshua Lee  
Street [Redacted]  
City Burbank State CA ZIP 91504  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,  
Print name MASOW LINDAH  
Street [Redacted]  
City GARLAND State CA ZIP 94608  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,  
Print name Michelle Curtis  
Street [Redacted]  
City LA State CA ZIP 90026  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Ileana Vega  
Street [Redacted]  
City LA State CA ZIP 90026  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,  
Print name Jessica Whang  
Street [Redacted]  
City Burbank State CA ZIP 91501  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



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Sincerely,  
Print name Francis De Leon  
Street [Redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name FRANCO VALDEZ  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Leobardo Baima  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Senobia Gonzalez  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ROMMEO ALVAREZ  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90016  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Elodia de la cruz  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Raul Baltazar  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Logan Pather

Street [REDACTED]

City No Ho State CA ZIP 91162

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Victoria Vu

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Rosa H. Vizquez

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Urda B-Hall

Street [REDACTED]

City Toluca Lake State CA ZIP 91102

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Georgina Peralta

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Judy McAllister

Street [REDACTED]

City Malibu State CA ZIP 90265

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely, *Lisette Gold*  
Print name Lisette Gold  
Street [REDACTED]  
City SM State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Guido Lemell*  
Print name Guido Lemell  
Street [REDACTED]  
City SM State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Heather Romero*  
Print name Heather Romero  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Nina Geibel*  
Print name Nina Geibel  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Sandra S. Stirling*  
Print name Sandra S. Stirling  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Hepps*  
Print name Hepps  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name: Holly Ghilotti  
Street: [REDACTED]  
City: WLA State: CA ZIP: 90066  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name: Nicole FARIES  
Street: [REDACTED]  
City: Santa Monica State: CA ZIP: 90405  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Kelly Hill  
Street: [REDACTED]  
City: Los Angeles State: CA ZIP: 90066  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: RICARDO VILLARROJOS  
Street: [REDACTED]  
City: LA State: CA ZIP: 90066  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name: Lianne Sakamoto  
Street: [REDACTED]  
City: LA State: CA ZIP: 90066  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Lois A Thornton  
Street: [REDACTED]  
City: Los Angeles State: CA ZIP: 90026  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name LINDA GRUBBER

Street [REDACTED]

City Malibu State CA ZIP 90265

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Pran Denecker

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MARTIN A SADOWSKI

Street [REDACTED]

City MALIBU State CA ZIP 90265

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Ali Nayeri

Street [REDACTED]

City Malibu State CA ZIP 90265

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MARTA SAMOLON

Street [REDACTED]

City MALIBU State CA ZIP 90265

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Lois Hurwitz

Street [REDACTED]

City Moreno Valley State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Rick Ota

Street [REDACTED]

City Los Angeles State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sandra Zepeda

Street [REDACTED]

City Los Angeles State CA ZIP 90005

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Debbie Davidson

Street [REDACTED]

City Los Angeles State CA ZIP 90010

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Thomas Schneider

Street [REDACTED]

City Los Angeles State CA ZIP 90005

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Luz M. Gonzalez

Street [REDACTED]

City Los Angeles State C.A. ZIP 90020

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name TEAL SHARPE

Street [REDACTED]

City SANTA MONICA State CA ZIP 90405

E-mail [REDACTED]

Phone ( ) Volunteer?

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Sincerely,

Print name Soyden W. Pillora

Street [Redacted]

City Los Angeles State CA ZIP 90035

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name STEPHEN CHIN

Street [Redacted]

City LA State CA ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name John W

Street [Redacted]

City LA State CA ZIP 90025

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name Greg Bohner

Street [Redacted]

City LA State CA ZIP 90093

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ken Peters

Street [Redacted]

City Los Angeles State CA ZIP 90039

E-mail [Redacted]

Phone [Redacted] Volunteer?

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Sincerely,

Print name SANDY PERKINS

Street [Redacted]

City Van Nuys State CA ZIP 91406

E-mail [Redacted]

Phone [Redacted] Volunteer?



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Sincerely,

Print name Alicia Wilson  
Street [Redacted]  
City HB State CA ZIP 90254  
E-mail [Redacted]  
Phone ( [Redacted] ) Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Andrea Jones  
Street [Redacted]  
City SM State CA ZIP 90405  
E-mail [Redacted]  
Phone ( [Redacted] ) Volunteer?

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Sincerely,

Print name Francis Fisher  
Street [Redacted]  
City LA State CA ZIP 90046  
E-mail [Redacted]  
Phone ( [Redacted] ) Volunteer?

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Sincerely,

Print name Susan Moran  
Street [Redacted]  
City Santa Barbara State CA ZIP 93101  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

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Sincerely,

Print name Man Hoefele  
Street [Redacted]  
City San Marcos State CA ZIP 92405  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

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Sincerely,

Print name FRIEND  
Street [Redacted]  
City SM State CA ZIP 90405  
E-mail [Redacted]  
Phone ( [Redacted] ) Volunteer?

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Sincerely,  
 Print name DEB FALLENDER  
 Street [REDACTED]  
 City S.M State CA ZIP 90405  
 E-mail [REDACTED]  
 Phone [REDACTED] Volunteer?

# Great Pacific Cleanup



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Sincerely,  
 Print name Tiffany Nguyen  
 Street [REDACTED]  
 City Huntington Beach State CA ZIP 92646  
 E-mail [REDACTED]  
 Phone [REDACTED] Volunteer?

# Great Pacific Cleanup



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Sincerely,  
 Print name Tara DeWario  
 Street [REDACTED]  
 City LA State CA ZIP 90076  
 E-mail [REDACTED]  
 Phone ( ) Volunteer?

# Great Pacific Cleanup



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Sincerely,  
 Print name CHRISTIAN FOSTER  
 Street [REDACTED]  
 City Los Angeles State CA ZIP 90026  
 E-mail [REDACTED]  
 Phone [REDACTED] Volunteer?

# Great Pacific Cleanup



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Sincerely,  
 Print name Janice Wood  
 Street [REDACTED]  
 City Los Angeles State CA ZIP 90064  
 E-mail [REDACTED]  
 Phone [REDACTED] Volunteer?

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Sincerely,  
 Print name JUDITH WINSTON  
 Street \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
 E-mail \_\_\_\_\_  
 Phone ( ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Natalie Abel  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Kun Meyer, ITINY  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Katerina Mekeny  
Street [REDACTED]  
City LA State CA ZIP 90003  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

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Sincerely,

Print name Hadi Hawkins  
Street [REDACTED]  
City Santa Monica State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Carolyn Hammersley  
Street [REDACTED]  
City SM State CA ZIP 90405  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

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Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Gerardo Zamora  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Richard Brake

Street

City

LA State CA ZIP 90016

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Brent Parisse

Street

City

LA State CA ZIP 90026

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Robert Alden

Street

City

South Marina State CA ZIP 90405

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Olivia Henderson

Street

City

South Marina State CA ZIP 90405

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Lucy Lawrence

Street

City

Pal Pal State CA ZIP 90272

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Olga Polimovsky

Street

City

Santa Monica State CA ZIP 90405

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Charles Diamon

Street [redacted]

City Santa Monica State CA ZIP 90405

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name ROBERT CROCKER

Street [redacted]

City SANTAMONICA State CA ZIP 20405

E-mail [redacted]

Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Gil Jungar

Street [redacted]

City Santa Monica State CA ZIP 90404

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JOHN C. LEPREVOST

Street [redacted]

City MALIBU State CA ZIP 90265

E-mail [redacted]

Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Christy Desai

Street [redacted]

City Pacific Palisades State CA ZIP 90272

E-mail [redacted]

Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name William Selby

Street [redacted]

City Santa Monica State CA ZIP 90405

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Katherine Miller*  
 Print name Katherine Miller  
 Street [Redacted]  
 City Los Angeles State CA ZIP 90006  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Natalie Valadez*  
 Print name Natalie Valadez  
 Street [Redacted]  
 City Los Angeles State CA ZIP 90026  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

### Great Pacific Cleanup



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Sincerely, *Katelin Lehman*  
 Print name Katelin Lehman  
 Street [Redacted]  
 City Los Angeles State CA ZIP 90025  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

### Great Pacific Cleanup



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Sincerely, *June Lovks*  
 Print name June Lovks  
 Street [Redacted]  
 City Mallan State CA ZIP 90066  
 E-mail [Redacted]  
 Phone ( ) Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely, *Audi Fields*  
 Print name Audi Fields  
 Street [Redacted]  
 City SM State CA ZIP 90405  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

### Great Pacific Cleanup



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Sincerely, *Herbert May*  
 Print name Herbert May  
 Street [Redacted]  
 City Santa Monica State CA ZIP 90405  
 E-mail [Redacted]  
 Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name ELTINE CORRIE

Street [Redacted]

City LA State CA ZIP 90066

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name JOHN LEMKEUST JR.

Street [Redacted]

City LA State CA ZIP 90045

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name JOEC POE

Street [Redacted]

City LA State CA ZIP 90076

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name BRETT WATSON

Street [Redacted]

City LA State CA ZIP 90035

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Safika Erselcuk

Street [Redacted]

City LA State CA ZIP 90066

E-mail [Redacted]

Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name See Bishop

Street [Redacted]

City LA State CA ZIP 90035

E-mail [Redacted]

Phone [Redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Tina Chearing  
Street [REDACTED]  
City Los Angeles State CA ZIP 90035  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jonathan Friedman  
Street [REDACTED]  
City L.A. State CA ZIP 90035  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Emily Dillbinsky  
Street [REDACTED]  
City L.A. State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ANTHONY TOBEY  
Street [REDACTED]  
City H. LXXXIX State CA ZIP 90078  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Deb Diehl  
Street [REDACTED]  
City LA CA State 90076 ZIP 90076  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Marina Roman  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Kirsten Reeder  
Street [REDACTED]  
City Los Angeles State CA ZIP 90035  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name BETTY CLARKE  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kristen Solomon  
Street [REDACTED]  
City Glendale State CA ZIP 91206  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name GUADALUPE MARIA  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Matthew Brie Fields  
Street [REDACTED]  
City Granada Hills State CA ZIP 91344  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Yanesses Zelada  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name STEVEN FRISINA

Street [REDACTED]

City LOS ANGELES State CA ZIP 90035

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Benjamin Parke

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Chris Clark

Street [REDACTED]

City Los Angeles State CA ZIP 90024

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name George Rivers

Street [REDACTED]

City Los Angeles State [REDACTED] ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Nancy Gorza

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Isla Rivers

Street [REDACTED]

City Los Angeles State [REDACTED] ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Paul Henderson  
Street [redacted]  
City Los Angeles State Ca ZIP 90026  
E-mail [redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name VAL DEZ MATHIAS  
Street [redacted]  
City San Gabriel State Ca ZIP 91735  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name PATRICK FROST  
Street [redacted]  
City LA State CA ZIP 90026  
E-mail [redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name Zab Rojas  
Street [redacted]  
City Van Nuys State CA ZIP 91405  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Wesley Barker  
Street [redacted]  
City Los Angeles State CA ZIP 90045  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Charlie Bell  
Street [redacted]  
City Sunnyvale State CA ZIP 95089  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Jad Merhi  
Street [REDACTED]  
City Santa Monica State CA ZIP 90401  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Clarence James  
Street [REDACTED]  
City Tarzana State Ca ZIP 91356  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Michael Cory  
Street [REDACTED]  
City San Diego State CA ZIP 92107  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Michael Duna  
Street [REDACTED]  
City LA State CA ZIP 90012  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Kristal Gittens  
Street [REDACTED]  
City Los Angeles State CA ZIP 90010  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name DAVID PARKS  
Street [REDACTED]  
City Los Angeles State CA ZIP 90061  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name JESUS DIAZ

Street [Redacted]

City LOS ANGELES State CA ZIP 90061

E-mail [Redacted]

Phone ( [Redacted] ) [Redacted] Volunteer?

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Sincerely,

Print name Scott Gobel

Street [Redacted]

City LA State CA ZIP 90012

E-mail [Redacted]

Phone ( [Redacted] ) [Redacted] Volunteer?

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Sincerely,

Print name Laura Anderson

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Ricardo Gonzalez

Street [Redacted]

City LA crescenta State CA ZIP 91214

E-mail [Redacted]

Phone ( [Redacted] ) [Redacted] Volunteer?

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Sincerely,

Print name JENNIFER CHA

Street [Redacted]

City COMALINDA State CA ZIP 92354

E-mail [Redacted]

Phone ( [Redacted] ) [Redacted] Volunteer?

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Sincerely,

Print name RC Everbeck

Street [Redacted]

City SM State CA ZIP 90405

E-mail [Redacted]

Phone ( [Redacted] ) [Redacted] Volunteer?

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Sincerely,

Print name Keith P Donahue

Street [redacted]

City Santa Monica State CA ZIP 90405

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Jacqueline Osario

Street [redacted]

City Gardena State CA ZIP 90249

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Kristen Cayin

Street [redacted]

City El Segundo State CA ZIP 90245

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name BILL MCCARRON

Street [redacted]

City WEST PALM BEACH State FL ZIP 33409

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Stephanie Dittus

Street [redacted]

City Los Angeles State CA ZIP 90017

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Ana Lopez

Street [redacted]

City Los Angeles State C.A. ZIP 90021

E-mail [redacted]

Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Julie Wilson  
Street [Redacted]  
City Santa Monica State CA ZIP 90405  
E-mail [Redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name Diane Tablou  
Street [Redacted]  
City LA State CALIF. ZIP 90064  
E-mail [Redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name Jane Margolis  
Street [Redacted]  
City LA State CA ZIP 90064  
E-mail [Redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name Lore Stone  
Street [Redacted]  
City Los Angeles, State CA ZIP 90064  
E-mail [Redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name Lioto Addis  
Street [Redacted]  
City San Marino State CA ZIP 91108  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

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Sincerely,

Print name Arthur Ysiquez  
Street [Redacted]  
City LA State CA ZIP 90060  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

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Sincerely,

Print name ANGELA  
Street [REDACTED]  
City La State ca ZIP 9006  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Steve Springer  
Street [REDACTED]  
City Los Angeles State CA ZIP 90060  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Christopher Harati  
Street [REDACTED]  
City Santa Monica State CA ZIP 92604  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Anna Aust  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name JOSIE HEIMAN  
Street [REDACTED]  
City LOS ANGELES State ca ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Heidi Johnson  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name See Orloff  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name A. Klein  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Amantasia White  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name EDDY GARASIN  
Street [REDACTED]  
City LA State CA ZIP 90066  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Joe Luckinbill  
Street [REDACTED]  
City North Hollywood State CA ZIP 91607  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Audrey Tess  
Street [REDACTED]  
City LA State CA ZIP 90036  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the Pacific Garbage Patch, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jenny Davidson  
Street [Redacted]  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name HEATHER SILVA  
Street [Redacted]  
City LA State CA ZIP 90018  
E-mail [Redacted]  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Ann K Bowman  
Street [Redacted]  
City Santa Monica State CA ZIP 90402  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name ISABELA BRAGA  
Street [Redacted]  
City Los Angeles State CA ZIP 90026  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name WIL RUIZ  
Street [Redacted]  
City LA State CA ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

# Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name ALICE DINNEAN  
Street \_\_\_\_\_  
City LOS ANGELES State \_\_\_\_\_ ZIP 90046  
E-mail \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name GREGORY C RIVERS  
Street [REDACTED]  
City CLEAR WATER BAY State HI ZIP HONO KONA  
E-mail [REDACTED]  
Phone ( ) Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name JACKIE VAN DER SAAG  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name RICHARD GARY  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone ( ) Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Sarah Kankelvitte  
Street [REDACTED]  
City Santa Monica State CA ZIP 90403  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Becky Gerwin  
Street [REDACTED]  
City Santafe State NM ZIP 87506  
E-mail [REDACTED]  
Phone ( ) Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Grai Aubrey  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Lauren Thomas  
Street [REDACTED]  
City LA State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Shula Kitzendeh  
Street [REDACTED]  
City Mountain View State CA ZIP 90246  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Lucy Hamberg  
Street [REDACTED]  
City LA State CA ZIP 90049  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name VICTOR GRENNER  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Lace Dill  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Mary Lee Ryan  
Street [REDACTED]  
City Los Angeles State CA ZIP 60218  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name PATRICK MURGUA

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Michele Williams

Street [REDACTED]

City Malibu State CA ZIP 90265

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Chris Maxon Maldonado

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name M. Clente

Street [REDACTED]

City Orange State CA ZIP 92650

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name MICHELE STUEN

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name AMY DORN

Street [REDACTED]

City STUDIO CITY State CA ZIP 91601

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Staci Eddy  
Street [REDACTED]  
City Los Angeles State CA ZIP 90026  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name MARTHA VITALE  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name STAN SMITH  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail \_\_\_\_\_  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Kurt Baker  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Bruno Russell  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone ( ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Julia Dunlap  
Street [REDACTED]  
City Los Angeles State CA ZIP 90066  
E-mail \_\_\_\_\_  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely, (Beau)  
KEVAN RILEY  
Print name  
Street [REDACTED]  
City MALIBU State CA ZIP 90265  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Andrey Kazantsev  
Print name  
Street [REDACTED]  
City Playa Del Rey State CA ZIP 90293  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Kathy Lardman  
Print name  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Matthew French  
Print name  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,  
R. BERRY  
Print name  
Street [REDACTED]  
City LA State CA ZIP 90060  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Victoria Contreras  
Print name  
Street [REDACTED]  
City Los Angeles State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name LARRY BOBATZ

Street [REDACTED]

City LA State CA ZIP 90031

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Kim Jahn

Street [REDACTED]

City LA State CA ZIP 90061

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Julia Furrer

Street [REDACTED]

City LA State CA ZIP 90035

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Howard Wredin

Street [REDACTED]

City LA State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jacob Ritoy

Street [REDACTED]

City Los Angeles State CA ZIP 90066

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Tyler Crosby  
Street [redacted]  
City Los Angeles State CA ZIP 90019  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Bw Gwde  
Street [redacted]  
City Sherman Oaks State CA ZIP 91423  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name THOMAS DAVIS  
Street [redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Heather Wittington  
Street [redacted]  
City LA State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Melissa Allen-Dutton  
Street [redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kristi Dasset  
Street [redacted]  
City LA State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Alex Morales  
Street [REDACTED]  
City Sherman Oaks State CA ZIP 91423  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name ALISON DADDO  
Street [REDACTED]  
City J.A. State CA ZIP 90064  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name JOSEPH PAUM  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Carlo Brandon  
Street [REDACTED]  
City S. OAKS State CA ZIP 91423  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Howard Weiman  
Street [REDACTED]  
City Sherman Oaks State CA ZIP 91423  
E-mail [REDACTED]  
Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Mahe Louy  
Street [REDACTED]  
City LA State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: SAAR KATHAR  
Street: [REDACTED]  
City: Sherman Oaks State CA ZIP 91423  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Aria Yarmod  
Street: [REDACTED]  
City: Venice State CA ZIP 90292  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Haku Fuselier  
Street: [REDACTED]  
City: Venice State CA ZIP 90291  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: RICHARD ASCARIAN  
Street: [REDACTED]  
City: Vanke State CA ZIP 90291  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Joe D Santoyo  
Street: [REDACTED]  
City: Sherman Oaks CA ZIP 91423  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name: Tony Kozlowski  
Street: [REDACTED]  
City: Venice State CA ZIP  
E-mail: [REDACTED]  
Phone: [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Charlene McGehee  
Street [redacted]  
City LA State CA ZIP 90037  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,  
Print name Jeffrey Basley  
Street [redacted]  
City LA State CA ZIP 90068  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Renee Krumweide  
Street [redacted]  
City Los Angeles State CA ZIP 90068  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,  
Print name Nils Leok  
Street [redacted]  
City VENICE State CA ZIP 90291  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,  
Print name NICK OSHEROFF  
Street [redacted]  
City VENICE State CA ZIP 90291  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Rosalind Pead  
Street [redacted]  
City Venice State CA ZIP 90291  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Antoine Selem

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Diane Korrmann

Street [REDACTED]

City La Crescenta State CA ZIP 91214

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JEFF JONES

Street [REDACTED]

City GLENDALE State CA ZIP 91216

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name TOM PEJC

Street [REDACTED]

City LA State CA ZIP 90026

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JASON DAVIS

Street [REDACTED]

City Los Angeles State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name ED BENN MILLER

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Sharon Weiss  
Street [Redacted]  
City LA State CA ZIP 90064  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Michelle Solis  
Street [Redacted]  
City LA State CA ZIP 90064  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Bonnie Davis  
Street [Redacted]  
City LA State CA ZIP 90064  
E-mail [Redacted]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Sharon Tomkhon  
Street [Redacted]  
City Los Angeles State CA ZIP 90064  
E-mail [Redacted]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name CAROL POTTER  
Street [Redacted]  
City LA State CA ZIP 90064  
E-mail [Redacted]  
Phone [Redacted] Volunteer?

### Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Roberto Oraci  
Street [Redacted]  
City LA State CA ZIP 90064  
E-mail [Redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Barron Hillen  
Street [redacted]  
City Malibu State CA ZIP 90265  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Susan Shreebati  
Street [redacted]  
City Malibu State CA ZIP 90265  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Sasha Crescentini  
Street [redacted]  
City Malibu State CA ZIP 90265  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Natalie Stern  
Street [redacted]  
City N Hollywood State CA ZIP 91602  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Not Listed  
Street [redacted]  
City Malibu State CA ZIP 90265  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,  
Print name Pam Wirth  
Street [redacted]  
City Malibu State CA ZIP 90265  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Troxie Jones  
Street [Redacted]  
City LA State CA ZIP 90064  
E-mail [Redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Saverio, Italia  
Street [Redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [Redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name MARTINA M BALANI  
Street [Redacted]  
City LA State CA ZIP 90026  
E-mail [Redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Felipe Mendez  
Street [Redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [Redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Tania Cintiso  
Street [Redacted]  
City Pasadena State CA ZIP 91104  
E-mail [Redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Teri Sussman  
Street [Redacted]  
City Toluca Lake State CA ZIP 91602  
E-mail [Redacted]  
Phone ( ) Volunteer?



### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Brandt Marshall

Street [redacted]

City L.A. State CA ZIP 91006

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Loena Bardon

Street [redacted]

City Anaheim State CA ZIP 91331

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Lindsey Neiman

Street [redacted]

City [redacted] State [redacted] ZIP [redacted]

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Steve Edlund

Street [redacted]

City West Hollywood State CA ZIP 90048

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Maureen Meyer

Street [redacted]

City South Landstate State MI ZIP 48033

E-mail [redacted]

Phone [redacted] Volunteer?

### Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Joan Eustice

Street [redacted]

City LA State CA ZIP 90028

E-mail [redacted]

Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Marcela Ramos  
Street [REDACTED]  
City L.A. State CA ZIP 90011  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Zoe Norman-Hunt  
Street [REDACTED]  
City Brooklyn State NY ZIP [REDACTED]  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name DAVID TALIAFERO  
Street [REDACTED]  
City COVINA State CA ZIP 91722  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name R. Stott  
Street [REDACTED]  
City LA State CA ZIP 90026  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Foyce N. Fowler  
Street [REDACTED]  
City La Brea State CA ZIP 90046  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Scott Duncan  
Street [REDACTED]  
City Upland State CA ZIP 91760  
E-mail [REDACTED]  
Phone ( ) Volunteer?

### Great Pacific Cleanup



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Sincerely,

Print name Chiriz Dautel  
Street [redacted]  
City L.A. State CA ZIP 90028  
E-mail [redacted]  
Phone ( ) Volunteer?

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Sincerely,

Print name Erik Goodrich  
Street [redacted]  
City Sunland State CA ZIP 91601  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name JOAN MAKAROV  
Street [redacted]  
City Studio City State CA ZIP 91604  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Behrooz Williams  
Street [redacted]  
City L.A. State CA ZIP 90046  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Kimberly Bianco  
Street [redacted]  
City North State CA ZIP 91601  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Kim Mink Huberman  
Street [redacted]  
City Los Angeles State CA ZIP 90027  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Aliya Chesler

Street \_\_\_\_\_

City Los Angeles State \_\_\_\_\_ ZIP 90045

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Greg Deau

Street \_\_\_\_\_

City Battle Creek State Mi ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Clark Carr

Street \_\_\_\_\_

City LA State CA ZIP 90065

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Anne Edgar

Street \_\_\_\_\_

City LA State CA ZIP 90027

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Argentina Eisenhower

Street \_\_\_\_\_

City Los Angeles State CA ZIP 90039

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Cristoba Lava

Street \_\_\_\_\_

City Lancaster State CA ZIP 93535

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Dalila Corry

Street [REDACTED]

City [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Patricia Kloeris

Street [REDACTED]

City S. Pasadena State CA ZIP 91030

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Chris DelValve

Street [REDACTED]

City W. Hollywood State CA ZIP 90069

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Holly Green

Street [REDACTED]

City Studio City State CA ZIP 91604

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Gric Hargeave

Street [REDACTED]

City Santa Monica State CA ZIP 90405

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Hanna Morrison

Street [REDACTED]

City Los Angeles State CA ZIP 90027

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Chris Tveemán  
Street [REDACTED]  
City Burbank State CA ZIP 91501  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Pinar Ibrahim  
Street [REDACTED]  
City Los Angeles State CA ZIP 90011  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Mari Chichester  
Street [REDACTED]  
City [REDACTED] State [REDACTED] ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Josh EGGEBEEN  
Street [REDACTED]  
City LA State CA ZIP 90045  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Frank Fartha  
Street [REDACTED]  
City Van Nuys State CA ZIP 91401  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name STEVE HENBENT  
Street [REDACTED]  
City WENING State CA ZIP 91266  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name ELIZABETH JONES  
Street [redacted]  
City LOS ANGELES State CA ZIP 90029  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Ben Jindra  
Street [redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Jessica Pagan  
Street [redacted]  
City Valley Village State CA ZIP 91607  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name MICHAEL DOTTAVIO  
Street [redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name JESSE CALUGUIGAN  
Street [redacted]  
City GILBERT State AZ ZIP 85233  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Amber Hinopio  
Street [redacted]  
City Whittier State CA ZIP 90601  
E-mail [redacted]  
Phone [redacted] Volunteer?

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Sincerely,

Print name Armeen Abella  
Street [REDACTED]  
City La Crescenta State CA ZIP 91214  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name CHRIS OWEN  
Street [REDACTED]  
City LA CROSCENTA State CA ZIP 91214  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Steve McAdams  
Street [REDACTED]  
City LA CROSCENTA State CA ZIP 91214  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Kirsten Winter  
Street [REDACTED]  
City LA CROSCENTA State CA ZIP 91214  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Tom Connor  
Street [REDACTED]  
City Glendale State CA ZIP 91214  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name JOE SMITH  
Street [REDACTED]  
City LA CROSCENTA State CA ZIP 91214  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name DAVID STONE  
Street [REDACTED]  
City LA State 90068 ZIP  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Gilchrist M Macquinn  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Steve Agee  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Danielle Mentzer  
Street [REDACTED]  
City Los Angeles State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michael George  
Street [REDACTED]  
City LA State CA ZIP 90068  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Hilwe Hardwick  
Street [REDACTED]  
City La Grange State CA ZIP 91714  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Randy Lederman

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Laura Dupuis

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jeffrey Goldstein

Street [REDACTED]

City Los Angeles State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name MAC SWERMAN

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name MARIA GLASSO

Street [REDACTED]

City LA State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name J THEISINGER

Street [REDACTED]

City LA RESERVA State CA ZIP 91214

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Savina Skeehan

Street [REDACTED]

City La Crescenta State CA ZIP 91214

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Jan Leung

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Thomas Karp

Street [REDACTED]

City [REDACTED] State [REDACTED] ZIP [REDACTED]

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name John Blong

Street [REDACTED]

City La Crescenta State CA ZIP 91214

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Tim Karp

Street [REDACTED]

City Westminster State CA ZIP 92683

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PAT SPERRY

Street [REDACTED]

City L.A. State CA ZIP 90008

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Victoria Carrillo

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name CYNTHIA GUEDEA

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name TAIN EMEIJAH

Street [REDACTED]

City EVANING State CA ZIP 91200

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Olga Soto

Street [REDACTED]

City Venice State ca ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Marshall Todd Morgan Jr.

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name GREGORY WOOD

Street [REDACTED]

City Hollywood State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Ged Chopping

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name JEANIE CHANG

Street [REDACTED]

City GLENDALE State CA ZIP 91201

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Frederic Fan

Street [REDACTED]

City Glendale State CA ZIP 91203

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name RICHARD LOIT

Street [REDACTED]

City GLENDALE State CA ZIP 91203

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Lavonne Zekavat

Street [REDACTED]

City Burbank State CA ZIP 91501

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Syd Howlack

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Celia Feldberay  
Street [redacted]  
City Newhall State CA ZIP 91321  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Pat Taylor-Tatum  
Street [redacted]  
City L.A. State CA ZIP 90037  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Sond Kempt.  
Street [redacted]  
City Studio City State CA ZIP 91602  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Malcolm Burman  
Street [redacted]  
City Sherman Oaks State CA ZIP 91423  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Daniel Dominguez  
Street [redacted]  
City [redacted] State [redacted] ZIP [redacted]  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

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Sincerely,

Print name Brian Scot  
Street [redacted]  
City Winnetka State CA ZIP 91306  
E-mail [redacted]  
Phone ( [redacted] ) Volunteer?

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Dear Los Angeles County Board of Supervisors,

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Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Audrey Baird

Street [Redacted]

City LADESIGN State CA ZIP 91214

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name In Cop

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Chetara Clark

Street [Redacted]

City LA State CA ZIP 90048

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jonathan Carcamo

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Beverly Kaine

Street [Redacted]

City Los Angeles State CA ZIP 90048

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name William May

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name REBECCA DRAPER

Street [REDACTED]

City LA State CA ZIP 90035

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name David V. Megias

Street [REDACTED]

City Los Angeles State CA ZIP 90027

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name astrik hazandryan

Street [REDACTED]

City Los Angeles State CA ZIP 90027

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name [Signature]

Street [REDACTED]

City L.A. State CA ZIP 90025

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name KRISTEN MORRISON

Street [REDACTED]

City LA State CA ZIP 90048

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name E Weissman

Street [REDACTED]

City Los Angeles State CA ZIP 90035

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



## Great Pacific Cleanup



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Sincerely,  
Print name Lucky Kelly  
Street [REDACTED]  
City Los Angeles State CA ZIP [REDACTED]  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name MARILYN THOMAS  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name SANDRA HARMAN  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name KALI NIRMANN  
Street [REDACTED]  
City LA State CA ZIP 90029  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Michelle McCauley  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name FATHY ROSENBLATT  
Street [REDACTED]  
City LA State CA ZIP 90035  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name ISAAC Smith  
Street [REDACTED]  
City Pasadena State CA ZIP 91102  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Laurie Lamoreaux  
Street [REDACTED]  
City LA State CA ZIP 90048  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Hannah R. Passman  
Street [REDACTED]  
City LA State CA ZIP 90037  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Cholawit Songchitpon  
Street [REDACTED]  
City LA State CA ZIP 90029  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Lynne Robbins  
Street [REDACTED]  
City Los Angeles State CA ZIP 90035  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Zach Passman  
Street [REDACTED]  
City LA State CA ZIP 90027  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Matt Nguyen

Street [REDACTED]

City Santa Monica State CA ZIP 90403

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Suzanne Skerich

Street [REDACTED]

City LA State CA ZIP 90013

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Tamara Wexler

Street [REDACTED]

City Los Angeles State CA ZIP 90068

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name David Levine

Street [REDACTED]

City Pasadena State CA ZIP 91103

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name DAVE MARTINE

Street [REDACTED]

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

E-mail \_\_\_\_\_

Phone ( \_\_\_\_\_ ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name AIDA MARINA

Street [REDACTED]

City So. PASADENA State CA ZIP 91030

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Robin Ziebar  
Street [REDACTED]  
City Malibu State CA ZIP 90265  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Matthew Bohne  
Street [REDACTED]  
City Pasadena State CA ZIP 91107  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Jeffrey Peterson  
Street [REDACTED]  
City Thousand Oaks State CA ZIP 91360  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Kevin Shirayizu  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Eduardo Pardo  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Donelle Schaeffer  
Street [REDACTED]  
City N. Hollywood State CA ZIP 91601  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Dominic Zamproena  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Eric S. Gould  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Brantley Berlin  
Street [REDACTED]  
City Los Angeles State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name YENKETA ERICA  
Street [REDACTED]  
City LONGVIEW State CA ZIP 90134  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Khari Bailey  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name JUSTIN K  
Street [REDACTED]  
City LA State CA ZIP 90039  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Tom Beyer  
Street [redacted]  
City LA State CA ZIP 90039  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Toad Powers  
Street [redacted]  
City Fresno State AZ ZIP 85712  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Ryan McGowan  
Street [redacted]  
City LA State CA ZIP 90035  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Rosa Ann Lee  
Street [redacted]  
City Mira Loma State CA ZIP 91752  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Mike Johnson  
Street [redacted]  
City LA State CA ZIP 90039  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name CHRIS KELLY  
Street [redacted]  
City Los Angeles State CA ZIP 90026  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jen Bush  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Daryl G. Jones  
Street [REDACTED]  
City Pinson State ALA ZIP 35146  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Shawn King  
Street [REDACTED]  
City Dale City State VA ZIP 22193  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name MATT OSIAS  
Street [REDACTED]  
City SM State CA ZIP 90403  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Carole Monville  
Street [REDACTED]  
City SM State CA ZIP 90403  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Shelton Jenkins  
Street [REDACTED]  
City San Jose State CA ZIP 90403  
E-mail [REDACTED]  
Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Michele Moreno

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Jacob Weder

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Ken Ray

Street [REDACTED]

City Sherman Oaks State CA ZIP 91422

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Laurie Stuebel

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name ROBERT CUESTA

Street [REDACTED]

City LA CRESSENTA State CA ZIP 91219

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Beverly Parkhurst

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?



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Sincerely,

Print name Daniel Barazani

Street [REDACTED]

City Sherman Oaks State CA ZIP 91423

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name BRIAN LUND

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Michael Park

Street [REDACTED]

City Los Angeles State CA ZIP 90006

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Robert Kurron

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Eugenia Sevilla

Street [REDACTED]

City Rosemead State CA ZIP 91770

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

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Sincerely,

Print name Brian Barreto

Street [REDACTED]

City Cerritos State CA ZIP 90703

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name William Lee

Street [REDACTED]

City Los Angeles State CA ZIP 90005

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Lisa M. Stevens

Street [REDACTED]

City Woodland Hills State CA ZIP 91367

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name MARCEL SCHOPPER

Street [REDACTED]

City PASADENA State CA ZIP 91103

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Hayuma Tetei

Street [REDACTED]

City Tempe State CA ZIP 91780

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Chris Hartman

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name GARNETT SULLIVAN

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone ( ) [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Tonya Hays

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Chanelle Evans

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Ben Kufra

Street [REDACTED]

City Venice State CA ZIP 90294

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Denny Kennedy

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Robert Snider

Street [REDACTED]

City Santa Monica State CA ZIP 90403

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name AL LAZO

Street [REDACTED]

City FULLERTON State CA ZIP 72833

E-mail \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Catherine Sun  
Street [REDACTED]  
City LA State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Melissa Kojima  
Street [REDACTED]  
City Santa Monica State CA ZIP 90403  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Leah Foley  
Street [REDACTED]  
City Venice State CA ZIP 90294  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Mary C. Campbell  
Street [REDACTED]  
City Santa Monica State CA ZIP 90407  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Ricardo Sanchez  
Street [REDACTED]  
City Los Angeles State CA ZIP 90064  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Cathy Gonzalez-Sime  
Street [REDACTED]  
City Pasadena State CA ZIP 91103  
E-mail CA  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Patrick A. Henry Jr

Street

City

LA State CA ZIP 90029

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Ahmed Johnson

Street

City

Los Angeles State CA ZIP 90084

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Guillermo Merino

Street

City

LA State CA ZIP 90068

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Jacob H Mallins

Street

City

LA State CA ZIP 90034

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

David Crist

Street

City

Redondo Beach State CA ZIP 90276

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Jorgen Christiansson

Street

City

Venice State CA ZIP 90291

E-mail

Phone

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Esther O'Brien  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Bonnie Binion  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name TOM LAICHAS / JENNIFER MALAMUD  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Peter Clark  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name JORGE ROSENBER  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MIFE L. MAYFIELD  
Street [REDACTED]  
City GLENDALE State CA ZIP 91204  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Jordan Snyder  
Street [REDACTED]  
City Venice State Ca ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Linda Crooks  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name KEVIN JARRETT  
Street [REDACTED]  
City VENICE State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PAULA ROSELAND  
Street [REDACTED]  
City VENICE State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name MARK KIRKIN  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Paul Taylor  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Chris Gee  
Street [redacted]  
City LA State CA ZIP 90025  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name TOM CHOW  
Street [redacted]  
City VENICE State CA ZIP 90290  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,  
Print name NICK LOMBARDI  
Street [redacted]  
City VENICE State CA ZIP 90291  
E-mail [redacted]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Moises Garcia  
Street [redacted]  
City Los Angeles State CA ZIP 90007  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name PALOMA VERGARA  
Street [redacted]  
City Venice State CA ZIP 90291  
E-mail [redacted]  
Phone [redacted] Volunteer?

## Great Pacific Cleanup



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Sincerely,  
Print name Collin Mahoney  
Street [redacted]  
City San Dimas State CA ZIP 90402  
E-mail [redacted]  
Phone ( ) Volunteer?



## Great Pacific Cleanup



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Sincerely,

Print name Eugenia McPart

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name CECILIA BELTRAN

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name VANITA GUPTA

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Lisa Cordero

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Elizabeth Schwartz

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name Demetri Stewart

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( [REDACTED] ) Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. I urge you to take action to ban single-use plastic grocery bags.

Sincerely,

Print name BARBARA HOLZMANN

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Esteban Hernandez

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Michele Bornheim

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Lisa Lau

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Benjamin Rutenberg

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Dan BOWSER

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



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Sincerely,

Print name Leigh Anna Moore-Jones

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Aki I. Luoman

Street [REDACTED]

City West Hollywood State CA ZIP 90069

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JOEL HOLLAND

Street [REDACTED]

City SANTA MONICA State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Josh Krebs

Street [REDACTED]

City Malibu State CA ZIP 90263

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Eva Lesner

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Estimated size of the Pacific Garbage Patch



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name Brannon Mascarenas

Street [REDACTED]

City Venice State CA ZIP 90271

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Robert J. Virato  
Street [REDACTED]  
City Santa Monica State Ca ZIP 90404  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name John Trautman  
Street [REDACTED]  
City Santa Monica State CA ZIP 90404  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

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Sincerely,

Print name PATRICIA SEE  
Street [REDACTED]  
City LOS ANGELES State CA ZIP 90006  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name JAMES ESTED  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Myra Muna  
Street [REDACTED]  
City LA State CA ZIP 90017  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas**. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Amy Stone  
Street [REDACTED]  
City Venice State CA ZIP 90291  
E-mail [REDACTED]  
Phone ( ) Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Erik Jansen

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name LYNDIA TAYLOR

Street [REDACTED]

City VENICE State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name Daisy Chavez

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Dewi Winy

Street [REDACTED]

City Santa Monica State CA ZIP 90404

E-mail [REDACTED]

Phone [REDACTED] Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Andy Lipkis

Street [REDACTED]

City Venice State CA ZIP 90291

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name PIERRETTE DAVANNE

Street [REDACTED]

City VENICE State CA ZIP 90292

E-mail [REDACTED]

Phone ( ) Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Aleksei Archer

Street

City Venice

State CA ZIP 90591

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

BABETE ZILCH

Street

City VESICE

State CA ZIP 90291

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Julie Hulbert

Street

City Santa Monica State CA ZIP 90404

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

EDITH DELGADO

Street

City SANTA MONICA State CA ZIP 90404

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name

Louis Sepe

Street

City LA

State CA ZIP 90025

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch**, a mass of trash that's twice the size of Texas. All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

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Sincerely,

Print name

Samuel Dangel

Street

City Los Angeles State CA ZIP 90016

E-mail

Phone ( )

Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Tony Han  
Street \_\_\_\_\_  
City Los Angeles State CA ZIP 90006  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Scott Grandis  
Street \_\_\_\_\_  
City L.A. State CA ZIP 90014  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name Humberto J. Carmona  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



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Sincerely,

Print name George Winarno  
Street \_\_\_\_\_  
City S. Oaks State CA ZIP 91423  
E-mail \_\_\_\_\_  
Phone \_\_\_\_\_ Volunteer?

## Great Pacific Cleanup



Dear Los Angeles County Board of Supervisors,

For decades, billions of pounds of plastic and other trash have been carried by wind and waves into the Pacific. The plastic swirling around in the ocean has formed the **Pacific Garbage Patch, a mass of trash that's twice the size of Texas.** All this trash is creating an environmental disaster for ocean wildlife: Plastic and other marine trash kill more than 1 million seabirds and 100,000 mammals and sea turtles each year.

Fortunately, there are dozens of ways in which we can stop the flow of plastic pollution into the Pacific. Los Angeles can lead the way in taking on this sea of plastics. **I urge you to take action to ban single-use plastic grocery bags.**

Sincerely,

Print name Eleanor Blum  
Street \_\_\_\_\_  
City Shoreline Oaks State CA ZIP 91423  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name MATT POLSKY  
Street \_\_\_\_\_  
City SHORELINE OAKS State CA ZIP 91423  
E-mail \_\_\_\_\_  
Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Volunteer?

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Sincerely,

Print name Shane Goldsmith  
Street [REDACTED]  
City LA State 90061 ZIP  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?

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Sincerely,

Print name Stacey Young  
Street [REDACTED]  
City Santa Monica State CA ZIP 90403  
E-mail [REDACTED]  
Phone [REDACTED] Volunteer?



## **Environment California**

The petitions from Environment California contain over 1,800 signatures supporting a ban on the issuance of plastic carryout bags. The petitions were received on July 15, 2010, during the public comment period. The County of Los Angeles appreciates the efforts of each petitioner to notify the County of Los Angeles of his/her support for a ban on the issuance of plastic carryout bags. The petitions have been included as part of the record; the County of Los Angeles Board of Supervisors will consider the petitions during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

5<sup>th</sup> July 2010

By e-mail to [CSKYE@dpw.lacounty.gov](mailto:CSKYE@dpw.lacounty.gov)

and by air mail

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**OBJECTIONS**  
to  
**ANNEX B TO THE LOS ANGELES COUNTY DRAFT EIR**

Plastic bag bans are not a good idea (<http://www.biodeg.org/position-papers/Plastic-bag-bans/?domain=biodeg.org> ). If plastic carry-out bags are banned, consumers will be forced to pay for bags and bin-liners, and will expect to see some serious justification for this in the middle of a recession. There is no such justification in the draft EIR. If plastic bags made in California are replaced by imported durable bags, people employed in the California plastics industry will lose their jobs.

1

Research by Guelph Chemical Laboratories in Canada in 2008<sup>1</sup> has shown that “re-usable grocery bags can become an active microbial habitat and a breeding-ground for bacteria, yeast, mold, and coliforms. .... The unacceptable presence of coliforms - ie intestinal bacteria, in some of the bags tested, suggests that forms of E.Coli associated with severe disease could be present in a small but significant proportion of the bags.”

2

More recently, similar research has been carried out with similar conclusions at the University of Arizona<sup>2</sup> who noted that consumers cannot be relied upon to wash re-usable bags.

The only problem with plastic bags is that they can lie or float around in the environment for decades. Far from seeking to ban oxo-biodegradable plastic bags, **LA County should therefore require all short-life plastic products to be oxo-biodegradable.**<sup>3</sup>

3

4

**Dr. Caroline Jackson M.E.P**<sup>4</sup> made the following statement in July 2008: “Legislation has tended to concentrate on waste which can be collected, and to encourage people

<sup>1</sup> ([http://www.carrierbagtax.com/downloads/Microbiological\\_Study\\_of\\_Reusable\\_Grocery\\_Bags.pdf](http://www.carrierbagtax.com/downloads/Microbiological_Study_of_Reusable_Grocery_Bags.pdf))

<sup>2</sup>[http://www.necn.com/06/25/10/Study-Eco-friendly-bags-carry-bugs-bacte/landing\\_health.html?blockID=260864&feedID=4210](http://www.necn.com/06/25/10/Study-Eco-friendly-bags-carry-bugs-bacte/landing_health.html?blockID=260864&feedID=4210) <http://www.mirror.co.uk/news/top-stories/2010/07/01/killer-bugs-in-your-re-used-shopping-bags-115875-22373748/>  
<http://www.dailymail.co.uk/health/article-1290983/Beware-deadly-toxins-eco-friendly-shopping-bag.html>

<sup>3</sup> Governments in the Middle-East have made oxo-biodegradability compulsory. Other governments, in Latin America and Europe have legislated to encourage degradable plastic.

<sup>4</sup> Press statement 18th July 2008. Dr. Jackson is the former Chairman of the Environment, Public Health, and Food Safety Committee of the European Parliament, and was the Rapporteur for the EU Waste Framework Directive.

to reduce, re-use, and dispose responsibly of their waste, by recycling, incineration with energy-recovery, or by other disposal routes." **"However, we also need to take account of the fact that we will never succeed in collecting all the waste and that some may remain to disfigure the landscape.** Technologies have now become available which can produce plastic products such as shopping bags, garbage sacks, packaging etc. which are fit for purpose, but will harmlessly degrade at the end of their useful life."

**Oxo-biodegradable additives convert ordinary plastic in the presence of oxygen into a material with a completely different molecular structure which can be bio-assimilated in the open environment in the same way as a leaf.<sup>5</sup> Oxo-biodegradable plastics do not therefore leave fragments of petro-polymers in the environment.**

4 cont.

This conversion is done by an abiotic process within a short pre-determined time<sup>6</sup>, but there is no reason why complete biodegradation should be expected to occur in the timescale required for industrial composting by standards such as ASTM D6400.

**The lack of composting facilities in LA County is a good reason not to encourage compostable plastic, but it is no reason for not encouraging, still less for banning, oxo-biodegradable plastic products.**

5

**Oxo-biodegradable plastics and hydro-biodegradable ( compostable ) plastics are based on completely different technologies, and are designed for different purposes. These two products must not be confused.** Similarly, oxo-biodegradable plastics must not be confused with photo-degradable plastics - which require UV light to cause chain-scission.

Oxo-degradation is defined by CEN (the European Standards Organisation) in TR15351 as "degradation resulting from oxidative cleavage of macromolecules" and **oxo-biodegradation as degradation resulting from oxidative and cell-mediated phenomena, either simultaneously or successively.**

6

Oxo-biodegradable plastic is conventional plastic whose life can be made shorter (or longer) by adding a very small quantity of  $d_2w$ . Plastic made with  $d_2w$  **costs very little extra**, because it is made with the same machinery and substantially the same raw materials as conventional plastic, and it causes **no loss of jobs in the plastics industry.**

For a video of the plastic degrading see <http://www.youtube.com/watch?v=i3TGqcpWJTM>

As oxo-biodegradable plastics are designed to degrade then biodegrade if they get accidentally or deliberately into the open environment, they have a **built-in insurance policy.** The process of oxo-biodegradation requires oxygen and bacteria, and will be

7

<sup>5</sup> See eg Jakubowicz, I., "Evaluation of Degradability of Biodegradable Polyethylene," *Polym. Degrad. Stab.*, Vol 80, 2003, pp. 39-43.

<sup>6</sup> Timescale can be adjusted, by varying the additive formulation, from as little as a few weeks to a year or more.



accelerated by heat and light, all of which are available in the normal environment. **If all the plastic had been oxo-biodegradable there would be no Pacific Garbage Patch.**

**The Loughborough report leaves no doubt that abiotic degradation occurs in the open environment,**<sup>7</sup> They also found ample evidence<sup>8</sup> that **BIO-degradation of oxo-biodegradable plastic occurs** after the additive has reduced the molecular weight to the point where it no longer has the molecular structure of a plastic and can be accessed by naturally-occurring micro-organisms. They found between 15% and 60% in the laboratory<sup>9</sup> and **they have advanced no reason why biodegradation in the open environment, once begun, should stop.**

7 cont.

**Oxo-biodegradable plastics are not designed for degradation in landfills**, because if the plastic has been taken to landfill it has already been disposed of responsibly, and degradation in landfill is not necessary or desirable. There will however be limited degradation of oxo-biodegradable plastic in those parts of the landfill where oxygen is present, but unlike paper, compostable plastics and other organic wastes, it will not emit methane in anaerobic conditions.

8

Oxo-biodegradable additives **do not contain heavy metals**<sup>10</sup> and they are **fit for food-contact**.<sup>11</sup>

Oxo-biodegradable additives are **not harmful and have no negative environmental impact in the production and use phase**<sup>12</sup>

There is **no evidence of bio-accumulation**<sup>13</sup> nor any harmful effect on the environment<sup>14</sup>

9

There is **no evidence of accumulation of pollutants**<sup>15</sup>

Oxo-biodegradable plastics can be tested by the **test methods prescribed by ASTM D6954**. As to the difference between Standard Guides and Specifications see [http://www.biodeg.org/files/uploaded/biodeg/Bioplastics\\_Mag-GS\\_article\(6\).pdf](http://www.biodeg.org/files/uploaded/biodeg/Bioplastics_Mag-GS_article(6).pdf). Oxo-biodegradable plastics can be certified by the Oxo-biodegradable Plastics Association ([www.biodeg.org](http://www.biodeg.org)).

The Loughborough researchers say<sup>16</sup> “The length of time to degradation of oxo-degradable plastic cannot be predicted accurately because it depends so much on the environmental conditions.” This is correct, and it should not be claimed that an oxo-biodegradable product will degrade in anything other than an approximate

10

<sup>7</sup> Page 1/2

<sup>8</sup> 6.2

<sup>9</sup> 6.1, 6.2 Independent tests conducted to ISO 14855 by the government-accredited LGAI Laboratory in Spain found more than 80%.

<sup>10</sup> Loughborough 2.4 (p. 13)

<sup>11</sup> Loughborough 4.1.4, 6.5.1

<sup>12</sup> Loughborough p. 10

<sup>13</sup> Loughborough p 13, 6.3.1, 6.3.2

<sup>14</sup> Loughborough Page 13

<sup>15</sup> Loughborough 4.1.3.3

<sup>16</sup> 1(a)

timescale. The degradation period depends also on the formulation of the additive and the characteristics of the particular product. 10 cont.

Symphony's d<sub>2</sub>w technology is constantly improving, and we are developing a formulation which can cause degradation then biodegradation in a very short timescale, whilst still allowing a sufficient period of fitness-for-purpose. Symphony's d<sub>2</sub>w technology can be programmed to various timescales based on the purpose of the product and the likely environmental exposure. Testing and performance-evaluation is regularly done by natural aging in the environment as well as artificial aging of hundreds of samples every week in the laboratory. 11

**Even if biodegradation did not occur, oxo-degradable plastics would still be better for the environment** than normal plastic, because the material would rapidly lose its strength and would not block drains or entangle wildlife. Unsightly plastic waste would be reduced without human intervention to invisible non-toxic particles which would join the trillions of other particles already in the environment. 12

The Loughborough researchers have presented evidence that plastic fragments attract toxins in a marine environment, but no evidence that they are any more likely to attract toxins than fragments naturally present in the oceans. In any event a fragment of oxo-biodegradable plastic which has undergone the abiotic phase of degradation **is no longer a polymer** and has a completely different molecular structure. 13

**There is no evidence that degradable plastics encourage littering.**<sup>17</sup> This is a claim often made, but without a shred of evidence. Consumers who do not read the labels will not know that the bag is degradable, as it looks the same as ordinary plastic, and it is ridiculous to think that litter-louts will read the label to see whether it is degradable before deciding to throw it away. 14

But suppose for the sake of argument that 10% more bags were discarded. If 1,000 conventional and 1,100 oxo-biodegradable bags were left uncollected in the environment, 1,000 conventional bags would remain in the rivers, oceans, streets and fields for decades, but **none of the oxo-biodegradable bags would be left at the end of the short life programmed into them at manufacture.** 15

Education may have some effect, but there will always be people who will deliberately or accidentally discard their plastic waste. What will happen to all the plastic waste that will not be recycled or will not be incinerated, and instead will litter the countryside? - **would it not be better if the discarded plastic were all oxo-biodegradable?**

For those consumers who do read the labels **LA County should require compostable plastic bags to be labelled** as follows: *"For industrial composting only. Will not degrade in the open environment. Not recyclable. May emit methane in landfill. Please dispose of this and all other packaging responsibly."* and **should require oxo-biodegradable bags to be labelled as follows:** *"Oxo-biodegradable bag. Will degrade much more quickly than normal plastic. Recyclable. Not for composting. Limited degradability in landfill. Please dispose of this and all other packaging responsibly."* 16

<sup>17</sup> Loughborough Page 14

We agree with the Advertising Standards Authority of South Africa<sup>18</sup> that labelling oxo-degradable plastic products as “biodegradable” is **not likely to confuse consumers** into thinking that “biodegradable plastics” are compostable. In addition, it is obvious that in order to see the word “biodegradable” the consumer has looked at the label, which can and should be required to say “*Not for composting.*”

16 cont.

Ordinary plastics and oxo-biodegradable plastics are currently made from by-products of oil, natural gas, or coal. These by-products arise because the world needs fuels, and would arise whether or not the by-product were used to make plastic goods. So, **nobody is extracting or importing extra oil, gas or coal to make plastic.** Until other fuels have been developed, it makes good environmental sense to use the by-product, instead of **using scarce agricultural resources and water to make paper or cloth bags, or vegetable-based plastic.**

17

## RECYCLING

If collected for disposal during their useful life, **oxo-biodegradable plastics can be recycled together with normal oil-based plastics**, but “compostable” plastics cannot.

The Loughborough researchers were aware of the **Oxo-biodegradable Plastics Association s Position-paper on Recycling**<sup>19</sup>, but have not allowed it to inform their thinking<sup>20</sup> They failed to distinguish between recyclate for making short-life and long-life products; between recyclate whose provenance is known and not known; between products where rapid degradation is desirable and not desirable; between products where recyclate is allowed and not allowed; and cases where stabilisers are necessary whether there is any pro-degradant additive present or not.

18

Retailer B who gave evidence for the Loughborough Report<sup>21</sup> “uses oxo-degradable plastics in packaging **because they do not interfere with established recycling streams.**”

The researchers have focussed on recycling of post-consumer plastic waste, but the evidence of RECOUP<sup>22</sup> a national charity promoting plastics recycling in the UK, is that only “a limited amount of household films are currently collected, baled and sold to reprocessors, and this is often at a negative value. [Normal] plastic film also causes technical issues with sorting equipment in materials-reclamation facilities. The Recoup guide specifies that “[normal post-consumer plastic ] film **should not be collected for recycling.**”

19

**RECOUP have pointed out that it is the vegetable-based bioplastics, not the oil-based oxo-biodegradable plastics that cause problems for recyclers.**

<sup>18</sup> <http://www.asasa.org.za/ResultDetail.aspx?Ruling=5108>

<sup>19</sup> See <http://www.biodeg.org/position-papers/recycling/?domain=biodeg.org>

<sup>20</sup> 1(e)

<sup>21</sup> C 3.2

<sup>22</sup> C6.4

The Loughborough researchers themselves accept<sup>23</sup> that “Barriers to recycling include: the high volume-to-weight ratio of [normal] waste plastic, which makes it expensive to collect, store and transport; high levels of contamination, which compromise the quality of the recycle; the wide range of plastics, which requires sorting; and the low market price for recycle.”

19 cont.

They added “At present there seems to be **very little post-consumer recycling of the sort of plastic film products where oxo-degradable plastics are usually used**. This is mainly because such material is difficult to collect, is generally of poor quality and is therefore not economically viable for recyclers (Annex C6.4).”

The Quebec report<sup>24</sup> shows however that oxo-biodegradable plastic is compatible with recycling. Symphony has also commissioned independent trials which reach the same conclusion.

20

The best way to recover value from contaminated post-consumer plastic is incineration with energy-recovery, which is being done in other developed countries. This type of feedstock does not contain moisture and has a high calorific value equal to the fossil-resource from which it was made. Modern incinerators do not cause pollution, and the heat is employed for useful purposes instead of wasting this energy source by burying it in landfill.

21

## COMPOSTABLE PLASTICS

**These must not be confused with oxo-biodegradable plastics.**

Para. 1.1 of ASTM D6400 makes it clear that it is intended for plastic designed for “composting in **municipal and industrial aerobic composting facilities**.”

**It would be deceptive to describe most types of compostable plastics as biodegradable**, because they will readily biodegrade only in the special conditions found in industrial composting.

22

**Composting is not the same as biodegradation in the environment.** Composting is an artificial process operated for commercial reasons according to a much shorter timescale than the normal processes of nature. Therefore, Standards such as ISO 17088, EN13432, and their American (ASTM D6400-04; D6868) and Australian (AS 4736-2006) equivalents, designed for compostable plastic **should not be applied** to plastic which is designed to biodegrade if it gets into the environment. These Standards are specifications for the special conditions found in **industrial composting**.

**Compostable plastics are not in fact useful even for compost**, because ASTM D6400 and the other compostable standards require almost complete conversion of the plastic to CO<sup>2</sup> gas within 180 days, thus wasting it by emission to atmosphere – and contributing to climate-change.

23

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<sup>23</sup> 1.5

<sup>24</sup> Annex B6

The evidence of the composting company who contributed to the Loughborough report<sup>25</sup> is that “the best policy is to allow no plastic bags of any sort in the green waste.” Indeed in some countries<sup>26</sup> no plastic of any kind is permitted to enter an industrial composting process. Also, the Loughborough researchers found evidence that “compostable” plastic does not always work even in industrial composting.<sup>27</sup> This is particularly true of thick cross-section plastic.

The composting company who gave evidence, and the municipal authorities are not encouraging residents to use 'compostable' plastic bags, because of their potentially poor compostability and because of the risk of confusion with ordinary plastic bags by both the consumer and the collection crews.<sup>28</sup>

Those few industrial composters who are willing to accept plastic of any kind will therefore want to be sure that is in fact compostable in the particular process (windrow or in-vessel) which they operate. It will not therefore be accepted by them unless it is clearly marked as compostable, for even if oxo-biodegradable plastics did not exist, the composters would still need to make sure that they were not accepting normal plastic, - which would be even less likely to degrade in their composting process. At page 69 the Loughborough report says “The composting facility subsequently changed their policy to allow only certified “compostable” bags and since then **have not had any recurrence of the problem.**

23 cont.

We agree with the packaging manager of Tesco (Britain’s largest supermarket) who said on 20th October 2009 that the supermarket “**does not see the value in packaging that can only be industrially composted and that municipal authorities do not want it, as it can contaminate existing recycling schemes.**

“Compostable” plastics are up to 400% more expensive, they would not readily degrade if they found their way into the open environment; they emit methane deep in landfill; and they compete for land and water resources with food production (see <http://www.biodeg.org/position-papers/comparison/?domain=biodeg.org>

24

**Composting of organic waste makes sense, but compostable plastic does not<sup>29</sup>.** It is thicker and heavier and requires more trucks to transport it; recycling with oil-based plastics is impossible; and it uses scarce land and water resources to produce the raw material. It is not “renewable” or “sustainable” because substantial amounts of fossil fuels are burned and CO<sub>2</sub> emitted, by the tractors and other machines employed. If buried in landfill, compostable plastic will emit methane (a greenhouse gas 23 times more powerful than CO<sub>2</sub>) in anaerobic conditions.

25

We agree with Germany’s Institute for Energy and Environmental Research<sup>30</sup> and Ademe, the French Agency for the Environment,<sup>31</sup> who concluded that oil-based

26

<sup>25</sup> C6.2

<sup>26</sup> Eg French law NFU 44/051

<sup>27</sup> C6.2

<sup>28</sup> C6.2

<sup>29</sup> [http://www.biodeg.org/files/uploaded/biodeg/Oxo\\_vs\\_Hydro-biodegradable.pdf](http://www.biodeg.org/files/uploaded/biodeg/Oxo_vs_Hydro-biodegradable.pdf)

[http://www.biodeg.org/files/uploaded/biodeg/Hydro-biodegradable\\_Plastic\\_Production\\_Process.pdf](http://www.biodeg.org/files/uploaded/biodeg/Hydro-biodegradable_Plastic_Production_Process.pdf)

<sup>30</sup> June 2009 (<http://www.kunststoffverpackungen.de/en/news/LCA%20waste%20bags%20-%20Study%20Extract%20B.pdf>)

<sup>31</sup> December 2007



plastics, especially if recycled, have a better Life-cycle Analysis than compostable plastics.

26 cont.

## LONG-LIFE BAGS

**These are much thicker and more expensive to make and to transport**, and a large number of them would be required for the weekly shopping of an average family.

30,000 jute or cotton bags can be packed into a 20-foot container, but the same container will accommodate 2.5 million plastic carrier-bags. Therefore, to transport the same number of jute or cotton bags 80x more ships and trucks would be required than for plastic bags, using 80x more fuel, using 80x more road space and emitting 80x more CO<sub>2</sub>.

27

**Cloth bags are not hygienic** if a tomato is squashed or milk is spilled. As indicated above, research in Canada in 2008 and by the University of Arizona in 2010 has shown that re-usable grocery bags can become an active microbial habitat and a breeding-ground for bacteria, yeast, mold, and coliforms.

28

**Whilst sometimes called "Bags for Life" they have a limited life, depending on the treatment they receive, and become a very durable form of litter when discarded.**

29

Shoppers do not always go to the shop from home, where the re-usable bags would normally be kept, and consumers are unlikely to have a re-usable bag with them when buying on impulse items such as clothing, groceries, CDs, magazines, stationery etc. Research conducted for the Scottish Executive<sup>32</sup> showed that 92 % cent of people think re-using carrier bags is good for the environment but **59 forget their re-usable bags and have to take new ones at the checkout!**

30

As durable bags are a cost to the consumer and carrier-bags are expected to be provided free, one can understand why supermarkets are in favour of reducing the number of carrier bags and increasing the number of durable bags. Even those who give the profit to charity have saved themselves the cost.

31

**However, for those who believe in long-term re-usable bags, they can be made from washable extended-life oxo-biodegradable plastic which will last for 3-5 years before they will harmlessly self-destruct, leaving no harmful residues.**

32

**It is misleading and prejudicial to describe plastic carry-out bags as single-use bags.** Shoppers use them many times for their shopping, and then use them for other purposes about the home – ending their useful life often as a trash-can liner.

33

<sup>32</sup> <http://www.scotland.gov.uk/Topics/Environment/funding-and-grants/carrier-bag-case-studies/Q/EditMode/on>

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**England**

***Response to Comment No. 1***

Comment No. 1 expresses concern regarding the economic burdens of plastic bag bans that affect consumers and the California plastics industry. Although CEQA does not require the EIR to analyze of potential economic impacts, the County of Los Angeles Board of Supervisors will consider economic impacts, if any, during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR. The County of Los Angeles notes and appreciates that, despite its location in England, Symphony Environmental Technologies Plc has taken the time to comment on an EIR for proposed ordinances in the County of Los Angeles.

***Response to Comment No. 2***

Comment No. 2 discusses research conducted in 2008 by Guelph Chemical Laboratories that concluded that bacteria is present in reusable bags. Although CEQA does not require the EIR to analyze health impacts, Section ES.3 addresses potential health concerns related to reusable bags. As discussed in Section ES.3 and as is the case for any reusable household item that comes in contact with food items, such as chopping boards, countertops, tableware, or table linens, reusable bags do not pose a serious risk to public health if consumers care for the bags appropriately and/or clean the bags regularly. If reusable bags are made of cloth or fabric, they can be washed by machine. If reusable bags are made of durable plastic, they can be manually rinsed or wiped clean. Further, to control for any possible public health issues, the County of Los Angeles has clarified the definition for reusable bags to require that the material used in such bags be machine washable. The definition of reusable bags has been updated in Section 2.2.3 (see Section 12.2).

Health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps, such as washing and disinfecting the bags, using them only for groceries and using separate bags for raw meat products, being careful with where they are stored, and allowing bags to dry before folding and storing.<sup>6</sup> A representative of the County of Los Angeles Department of Public Health, the County department charged with protecting and improving the health of Los Angeles County residents has stated that the public health risks of reusable bags are minimal.<sup>7</sup> Further, as discussed in Section 2.2.4, the City and County of San Francisco, since enacting a plastic bag ban in 2007, have not reported negative public health issues related to the increased use of reusable bags.<sup>8</sup>

Comment No. 2 further states that a recent study conducted in 2010 by the University of Arizona noted that consumers cannot be relied upon to wash reusable bags. This comment is beyond the scope of CEQA. Furthermore, the study does not state that consumers cannot be relied upon to wash reusable bags, but it does indicate that any health risk can be minimized if proper care is

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<sup>6</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>7</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>8</sup> Galbreath, Rick, County of San Francisco, California. 10 May 2010. Telephone conversation with Angelica SantaMaría, County of Los Angeles, Department of Public Works, Alhambra, California.

taken with reusable bags, which is consistent with the discussion contained in Section ES.3. Indeed, the study found that washing reusable bags, either manually or by machine, reduced bacterial contamination by more than 99.9 percent.<sup>9</sup> This comment is noted for the record and will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 3***

Comment No. 3 states that the only problem with plastic bags is that they can lie or float around the environment for decades. This statement is accurate in stating that plastic carryout bags can persist in the environment for decades. The persistence of plastic carryout bag litter is discussed throughout subsections of Section 3.0, and is one of the many reasons why the County of Los Angeles has considered a ban on the issuance of plastic carryout bags. However, there are numerous other environmental problems associated with plastic carryout bags. For example, Section 2.2.1 discusses the significant contribution of plastic carryout bags to litter, particularly within catch basins, and Section 3.2.4 discusses the threat from plastic carryout bag litter and associated microplastics to rare, threatened, and endangered species in the marine environment.

### ***Response to Comment No. 4***

Comment No. 4 states that the County of Los Angeles should require that all short-life plastic products be oxo-biodegradable. As discussed in Appendix B to the EIR, synthetic plastics with oxo-biodegradable additives break down into smaller pieces, but the small pieces of plastic remain in the environment for undetermined periods of time. Prior to full degradation, these synthetic plastics can potentially result in adverse environmental impacts similar to those of regular plastic carryout bags with regard to litter and biological resources (described in, but not limited to, EIR Sections 3.5, Utilities and Service Systems, and Section 3.2, Biological Resources, respectively). In addition, the time span needed and extent to which these synthetic plastic fragments will degrade is unclear, as discussed in the study conducted for the United Kingdom Department for Environment, Food, and Rural Affairs: *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*.<sup>10</sup> The study prepared by Loughborough University concludes that oxo-biodegradable plastics have the potential to remain as litter for 2 to 5 years before they degrade.<sup>11</sup>

Comment No. 4 also states, “oxo-biodegradable additives convert ordinary plastic in the presence of oxygen into a material with a completely different molecular structure which can be bioassimilated in the open environment in the same way as a leaf. Oxo-biodegradable plastics do not therefore leave fragments of petro-polymers in the environment.” However, the Loughborough University study determined that “the fate of oxo-degradable plastic after it has fragmented to a fine

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<sup>9</sup> Charles P. Gerba, David Williams, and Ryan G. Sinclair. 8 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

<sup>10</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>11</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

powder is not clear.”<sup>12</sup> Although oxo-biodegradable plastic will degrade after an undetermined period of time, the environmental impacts of oxo-biodegradable plastic prior to complete degradation are uncertain.<sup>13</sup> Further, encouraging a transition to the use of oxo-biodegradable plastic carryout bags would not assist the County of Los Angeles in reducing the number of plastic carryout bags used or the number of plastic carryout bags that become litter on a daily basis, given the bags’ lightweight features (making them susceptible to becoming airborne and being littered) that are similar to regular plastic carryout bags. Therefore, requiring stores to issue oxo-biodegradable bags would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances. The proposed ordinances recommend banning the issuance of both compostable and biodegradable bags, including oxo-biodegradable bags.

### ***Response to Comment No. 5***

Comment No. 5 states that the lack of commercial composting facilities in County of Los Angeles is a good reason to ban compostable bags, but that it is not a good reason to ban oxo-biodegradable bags. Appendix B to the EIR discusses the inability of oxo-biodegradable products to degrade in accordance with American Society for Testing and Materials D6400; therefore, the County of Los Angeles is aware that oxo-biodegradable products would not degrade in a commercial composting facility. This clarification has been made to Section 2.2.2.3, Section ES.3, and Section 4.1 (see Section 12.2). The County of Los Angeles is also aware that oxo-biodegradable products would not degrade in a landfill, as they do not degrade in landfills or commercial composting facilities, but only degrade fully if left in the natural environment for an extended period of time. As discussed in Appendix B to the EIR, prior to full degradation, oxo-biodegradable plastic breaks apart into smaller pieces that can spread as litter into the marine and inland environments and cause similar negative impacts to the environment as standard plastic carryout bags can cause (described in, but not limited to, Draft EIR Sections 3.5 and 3.2, respectively). A transition to the use of oxo-biodegradable bags would not provide the same degree of environmental benefits as a ban on the issuance of plastic carryout bags.

### ***Response to Comment No. 6***

Comment No. 6 discusses compostable versus oxo-biodegradable plastic products. A discussion of the differences between compostable and biodegradable bags is provided in Appendix B to the EIR. Comment No. 6 also asserts distinctions between oxo-biodegradable plastics in contrast to photo-degradable plastics, and oxo-degradation in contrast to oxo-biodegradation. The comment is noted for the record. Comment No. 6 further provides a link to a video showing degradation of oxo-biodegradable bag that begins degrading only after 18 months in the environment. As discussed in Appendix B to the EIR, the County of Los Angeles is aware that the time span needed and extent to which oxo-biodegradable synthetic plastic fragments will degrade is unclear. The study prepared by Loughborough University concludes that oxo-biodegradable plastics have the potential to remain as litter for 2 to 5 years prior to degradation.<sup>14</sup>

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<sup>12</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>13</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>14</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

### **Response to Comment No. 7**

Comment No. 7 discusses the degradation process of oxo-biodegradable plastics. The County of Los Angeles has noted this comment for the record and will consider the comment during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR. However, as noted above, the time span needed and extent to which these synthetic plastic fragments will degrade is unclear.<sup>15</sup> The study by Loughborough University states that oxo-biodegradable plastics will remain as litter for 2 to 5 years prior to degradation.<sup>16</sup> Although oxo-biodegradable plastic will degrade after an undetermined period of time, encouraging a transition to the use of oxo-biodegradable plastic carryout bags would not assist the County of Los Angeles in reducing the number of plastic carryout bags used, or the number of disposed plastic carryout bags that become litter on a daily basis. While oxo-biodegradable bags are touted as a solution after bags are littered, the objective of the County of Los Angeles is to prevent the litter from occurring in the first place. Therefore, requiring stores to issue oxo-biodegradable bags would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances.

### **Response to Comment No. 8**

Comment No. 8 notes that oxo-biodegradable plastics are not designed for degradation in landfills and do not emit methane in anaerobic conditions when disposed of in landfills. This comment is noted for the record.

### **Response to Comment No. 9**

Comment No. 9 lists the benefits of oxo-biodegradable plastics and states that oxo-biodegradable additives have no negative environmental impacts. Comment No. 9 uses the study prepared by Loughborough University as the reference for the environmental benefits of oxo-biodegradable plastic.<sup>17</sup> However, the overall conclusion of the Loughborough University study, which is referenced in Appendix B to the EIR, is that “incorporation of additives into petroleum-based plastics that cause those plastics to undergo accelerated degradation does not improve their environmental impact and potentially gives rise to certain negative effects.”<sup>18</sup> As discussed in Appendix B to the EIR, prior to full degradation, oxo-biodegradable plastic breaks apart into smaller pieces that have the potential to spread into the marine and inland environments and cause similar negative impacts upon the environment as standard plastic carryout bags. Oxo-biodegradable plastics also have the potential to remain as litter for 2 to 5 years prior to degradation.<sup>19</sup> Therefore,

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<sup>15</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>16</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>17</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>18</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>19</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

requiring stores to issue oxo-biodegradable bags would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances.

### ***Response to Comment No. 10***

Comment No. 10 notes that the span of time oxo-biodegradable plastics degrade cannot be accurately predicted. The discussion presented within Appendix B to the EIR supports this statement. The undetermined period of time needed for degradation of oxo-biodegradable plastic carryout bags means that oxo-biodegradable plastic carryout bags will persist in the environment, and as litter, for an uncertain period of time prior to complete degradation. Comment No. 6 provides a link to a video showing degradation of oxo-biodegradable bag that does not begin degrading until after 18 months, and continues degrading for a period of 20 months. As discussed in Appendix B to the EIR, the time needed and extent to which oxo-biodegradable synthetic plastic fragments will degrade is unclear. The study prepared by Loughborough University concludes that oxo-biodegradable plastics have the potential to remain as litter for 2 to 5 years prior to degradation.<sup>20</sup>

### ***Response to Comment No. 11***

Comment No. 11 discusses Symphony Environmental Technologies Plc's efforts to develop an additive to achieve rapid degradation and biodegradation. Although faster degradation would ensure more rapid breakdown of oxo-biodegradable plastic in the natural environment, it could also be potentially disadvantageous to the consumer because the plastic could potentially begin to degrade during the distribution, issuance, or use of the plastic. The study prepared by Loughborough University states that "the fact that they are degradable limits the re-use of oxo-degradable bags: they are unsuitable for storing items for an extended length of time."<sup>21</sup> In addition, a biodegradable bag that degrades faster would still break down into small plastic pieces in the natural environment that would result in similar adverse impacts to those of regular plastic fragments, prior to full degradation. The degradable bags would also pose litter problems for the County of Los Angeles similar to those posed by standard plastic carryout bags until they degrade. Encouraging a transition to the use of oxo-biodegradable bags would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances.

### ***Response to Comment No. 12***

Comment No. 12 states that oxo-biodegradable plastics would be better for the environment than normal plastic, because the material would rapidly lose strength and would not block drains or entangle wildlife. As discussed in the response to Comment No. 4, the time span needed and extent to which oxo-biodegradable plastic fragments will degrade is unclear. Prior to complete degradation, oxo-biodegradable plastic bags would still have the potential to block storm drains or entangle wildlife. The link provided in Comment No. 6 indicates that, prior to degradation, the normal properties of the polymer, such as flexibility and strength, are maintained. If a plastic

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<sup>20</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>21</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

carryout bag rapidly loses strength as suggested in Comment No. 12, its function as a carryout bag would be impaired, calling into question the practicality of such a bag.

***Response to Comment No. 13***

Comment No. 13 states that a fragment of oxo-biodegradable plastic that has undergone degradation is no longer a polymer. This comment is noted for the record.

***Response to Comment No. 14***

Comment No. 14 states that there is no evidence that degradable plastics would encourage littering. This comment is noted for the record. The commenter also notes that an oxo-biodegradable bag looks similar to ordinary plastic, and would consequently have the same lightweight features as regular plastic carryout bags, making it just as susceptible to becoming airborne or being littered as an ordinary plastic bag.

***Response to Comment No. 15***

Comment No. 15 states that if oxo-biodegradable plastic carryout bags end up as litter, they will degrade and will not persist in the environment the same way as "conventional bags that would remain in the rivers, oceans, streets and fields for decades." As discussed in Appendix B to the EIR, prior to full degradation, oxo-biodegradable plastic breaks apart into smaller pieces that have the potential to spread into the marine and inland environments and cause similar negative impacts upon the environment as standard plastic carryout bags. Further, until full degradation has occurred, the oxo-biodegradable bags will remain as litter and still be an urban blight to affected areas. The study prepared by Loughborough University concludes that oxo-biodegradable plastics also have the potential to remain as litter for 2 to 5 years prior to degradation.<sup>22</sup> Therefore, requiring stores to issue oxo-biodegradable bags would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances.

***Response to Comment No. 16***

Comment No. 16 provides suggestions for labeling compostable plastic bags and oxo-biodegradable plastic bags. Although these suggestions do not pertain directly to the EIR, which evaluates proposed ordinances that would ban the issuance of both biodegradable and compostable plastic carryout bags in the County of Los Angeles, they have been noted for the record.

***Response to Comment No. 17***

Comment No. 17 notes that although plastics are made from byproducts of oil, natural gas, and coal, the production of plastics does not increase the current demand for extracting or importing additional oil, gas, or coal. Comment No. 17 also states that using the byproducts of oil, natural gas, and coal to make plastic is preferable to using scarce agricultural resources and water to make paper or cloth bags. This opinion is noted for the record and will be considered by the County of

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<sup>22</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

Los Angeles Board of Supervisors during the decision making process for the proposed County of Los Angeles ordinance and Final EIR.

It is important to note that unlike agricultural and water resources, the byproduct of petroleum refining that is used to manufacture plastic carryout bags is a non-renewable resource. This byproduct of petroleum refining used to manufacture plastic carryout bags is ethane, which is then converted to ethylene. Ethylene is in high demand across the globe and is used to manufacture a variety of products, including plastic resins and petrochemical intermediates.

### **Response to Comment No. 18**

Comment No. 18 notes that oxo-biodegradable plastics can be recycled with normal oil-based plastics, but compostable plastics cannot. This comment is noted for the record. The study prepared by Loughborough University, which is referenced in Appendix B to the EIR, states that “oxo-degradable plastics are not suitable for recycling with main-stream plastics. The recyclate will contain oxo-degradable additives that will render the product more susceptible to degradation. Although the additive producers suggest that stabilizers can be added to protect against the oxo-degradable additives, it would be problematic for recyclers to determine how much stabilizer needs to be added and to what extent the oxo-degradable plastic has already degraded. On this basis it seems unreasonable to claim recyclability of oxo-degradable plastics in existing recycling streams.”<sup>23</sup> In addition, the European Plastics Recyclers, the professional representative body of plastic recyclers in Europe, has stated that oxo-degradable additives are incompatible with mechanical recycling, stating, “the OXO degradable additives will jeopardize mechanical recycling as they will pollute the existing waste streams,” and that the “uncontrolled presents [sic] of additives result in an uncontrolled quality of recycled material.”<sup>24</sup>

### **Response to Comment No. 19**

Comment No. 19 discusses the barriers to and difficulties of recycling post-consumer plastic waste, such as plastic carryout bags, and that vegetable-based bioplastics cause problems for recyclers, too. The County of Los Angeles is aware of these difficulties and that, as a result, plastic carryout bags are not recycled as much as paper carryout bags are recycled.

### **Response to Comment No. 20**

Comment No. 20 notes that, according to the Quebec Report and trials conducted by Symphony Environmental Technologies Plc, oxo-biodegradable plastic is compatible with recycling. This comment is noted for the record. As mentioned in response to Comment No. 18, the study prepared by Loughborough University states, “oxo-degradable plastics are not suitable for recycling with main-stream plastics.”<sup>25</sup> The European Plastics Recyclers have noted that oxo-degradable

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<sup>23</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>24</sup> European Plastic Recyclers. June 10, 2009. Press Release: Oxo Degradable Additives are Incompatible with Mechanical Recycling. Available at: <http://www.plasticsrecyclers.eu/docs/press%20release/EuPR%20Press%20Release%20-%20OXO%20Degradables%20Incompatibility%20with%20Plastics%20Recycling.pdf>

<sup>25</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.



additives are incompatible with mechanical recycling, and have similarly stated, "the OXO degradable additives will jeopardize mechanical recycling as they will pollute the existing waste streams," and that the "uncontrolled presents [sic] of additives result in an uncontrolled quality of recycled material".<sup>26</sup>

#### ***Response to Comment No. 21***

Comment No. 21 notes that the best way to dispose of post-consumer plastics is via incineration with energy recovery. This comment is noted for the record. Currently, there is very little incineration of post-consumer waste in the County of Los Angeles. There are currently only three waste-to-energy facilities in California that process municipal solid waste.<sup>27</sup>

#### ***Response to Comment No. 22***

Comment No. 22 discusses composting standards and the differences between biodegradable bags and compostable bags. A discussion of the differences between compostable and biodegradable bags is provided in Appendix B to the EIR. The proposed ordinances recommend banning the issuance of both compostable and biodegradable bags, including oxo-biodegradable bags.

#### ***Response to Comment No. 23***

Comment No. 23 states that compostable bags emit greenhouse gases during degradation. Comment No. 23 also discusses the difficulties associated with composting compostable bags. This comment is noted for the record. The proposed ordinances currently include a recommended ban on the issuance of compostable plastic carryout bags, as described in Section ES.3 and Appendix B to the EIR, avoiding the greenhouse gases associated with degradation of compostable bags. In addition, Appendix B to the EIR also notes the lack of local commercial composting facilities in the County of Los Angeles that are willing to process such bags.

#### ***Response to Comment No. 24***

Comment No. 24 notes the costs and disadvantages of compostable plastics. This comment is noted for the record. The proposed ordinances currently include a recommended ban on the issuance of compostable plastic carryout bags as described in Section ES.3 and Appendix B to the EIR.

#### ***Response to Comment No. 25***

Comment No. 25 notes the environmental disadvantages of compostable plastics. This comment is noted for the record. The proposed ordinances currently include a recommended ban on the issuance of compostable plastic carryout bags, as described in Section ES.3 and Appendix B to the EIR.

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<sup>26</sup> European Plastic Recyclers. June 10, 2009. Press Release: Oxo Degradable Additives are Incompatible with Mechanical Recycling. Available at: <http://www.plasticsrecyclers.eu/docs/press%20release/EuPR%20Press%20Release%20-%20OXO%20Degradables%20Incompatibility%20with%20Plastics%20Recycling.pdf>

<sup>27</sup> Integrated Waste Services Association. June 2007. *The 2007 IWSA Directory of Waste-to-Energy Plants*. Available at: [http://energyrecoverycouncil.org/userfiles/file/IWSA\\_2007\\_Directory.pdf](http://energyrecoverycouncil.org/userfiles/file/IWSA_2007_Directory.pdf)

### **Response to Comment No. 26**

Comment No. 26 asserts that the life cycle impacts of oil-based plastics are less significant than the life cycle impacts of compostable plastics. This comment is not disputed in the EIR. For example, as discussed in the EIR, including, but not limited to, Section 3.4.4, life cycle impacts of compostable bags have been shown to have worse impacts upon eutrophication than the impacts from standard plastic carryout bags.

### **Response to Comment No. 27**

Comment No. 27 states that reusable bags would require 80 times more trucks for transportation than plastic bags. This comment is addressed in the EIR, including in Section 3.1 of the Draft EIR. The EIR concurs that an increase in demand for reusable bags would result in additional transport of reusable bags to stores. However, due to the fact that reusable bags are designed to be used multiple times, the number of reusable bags required would be expected to be far less than the number of carryout bags currently used. For example, assuming that the information in Comment No. 27 is accurate, if all reusable bags were to be used more than 80 times prior to disposal, there would be a reduction in truck trips overall as a result of a transition from plastic carryout bags to reusable bags. The definition of reusable bags has been modified in Section 2.2.3 to require that reusable bags have a minimum lifetime of 125 uses to minimize potential environmental impacts due to the transport of reusable bags (see Section 12.2).

### **Response to Comment No. 28**

Comment No. 28 notes that reusable bags can become an active microbial habitat and a breeding ground for bacteria, yeast, mold, and coliforms. Although CEQA does not require analysis of health impacts, Section ES.3 addresses potential health concerns related to reusable bags. As discussed in Section ES.3, and as is the case for any reusable household item that comes in contact with food items, such as chopping boards, countertops, tableware, or table linens, reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly. Reusable bags made of cloth or fabric can be wash by machine, and reusable bags made of durable plastic can be manually rinsed or wiped clean. Further, to control for any possible public health issues, the County of Los Angeles has clarified the definition of reusable bags established by the proposed County of Los Angeles ordinance to require such bags to consist of material that is machine washable. The definition of reusable bags has been modified in Section 2.2.3 (see Section 12.2). Health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps, such as washing and disinfecting the bags, using them only for groceries and using separate bags for raw meat products, being careful with where they are stored, and allowing bags to dry before folding and storing.<sup>28</sup> A representative of the County of Los Angeles Department of Public Health, which is charged with protecting and improving the health of County of Los Angeles residents, has stated that the public health risks of reusable bags are minimal.<sup>29</sup> Further, as discussed in Section 2.2.4, the City and County of San Francisco, since enacting their

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<sup>28</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>30</sup> Galbreath, Rick, County of San Francisco, California. 10 May 2010. Telephone conversation with Angelica SantaMaría, County of Los Angeles, Department of Public Works, Alhambra, California.

plastic bag ban in 2007, have not reported negative public health issues related to the increased use of reusable bags.<sup>30</sup>

### ***Response to Comment No. 29***

Comment No. 29 expresses concern regarding the durability of reusable bags, and notes that reusable bags become a durable form of litter when discarded. To minimize potential environmental impacts from reusable bags related to solid waste disposal, the definition of reusable bags has been modified in Section 2.2.3 to require such bags to be designed for a minimum of 125 uses (see Section 12.2). With respect to the comment that reusable bags are a durable form of litter, as discussed in Section 3.4 and Section 4.2, the more continued uses there are of reusable bags, the smaller the number of reusable bags in the waste stream. This results in reusable bags being less likely than plastic carryout bags to be littered, and less likely to end up in the ocean or other wildlife habitats. Further, reusable bags are heavier than plastic carryout bags and are less likely to be blown by the wind and end up as litter.

### ***Response to Comment No. 30***

Comment No. 30 states that a majority of shoppers tend to forget their reusable bags. As discussed in Section 2.4.2, one of the objectives of the proposed ordinances is to increase the public's environmental awareness with regard to reusable bags. A change to the use of reusable bags would be encouraged through public education program, as well as a ban on the issuance of plastic carryout bags. Consumer use of reusable bags would be expected to increase over time. The comment regarding consumers' tendency to forget to use their reusable bags to stores is noted for the record and will be considered by the County of Los Angeles Board of Supervisors in the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### ***Response to Comment No. 31***

Comment No. 31 notes that charging consumers for durable bags results in economic benefits to supermarkets. This comment is noted for the record. Comment No. 31 also asserts that "carrier bags" (that is, a plastic or paper carryout bag) are expected to be provided free of charge. However, carrier bags are often not actually free of charge to the consumer, because the cost can be hidden within higher grocery costs.<sup>31</sup>

### ***Response to Comment No. 32***

Comment No. 32 notes that washable, extended-life oxo-biodegradable plastic can be used to make reusable bags that will last 3 to 5 years before they degrade and that leave no harmful residues. However, as noted in the response to Comment No. 5, oxo-biodegradable plastic does not degrade in landfills or commercial composting facilities. Therefore, the assertion that reusable bags made from oxo-biodegradable plastic will degrade after 3 to 5 years, would only be true if the bags were left exposed to the elements of the environment, if at all. The proposed County of Los Angeles ordinance will not restrict the use of reusable bags made from oxo-biodegradable bags, as long as the bags meet the definition of a reusable bag as specified in Section 2.2.3 (see Section 12.2).

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<sup>31</sup> Herrera, et al. January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

***Response to Comment No. 33***

Comment No. 33 opposes references to plastic carryout bags as “single-use bags.” The EIR consistently refers to plastic grocery bags as plastic carryout bags. The term “single-use” is used to describe bags, whether plastic or paper, that are intended to be used only once to carry groceries and other goods from a store. The term is not meant to describe other possible uses that a shopper may have for a particular type of bag.

## SAVE THE PLASTIC BAG COALITION

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July 16, 2010

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**RE: Ordinances to ban plastic carryout bags in Los Angeles County: comments on and objections to Draft Environmental Impact Report**

### INTRODUCTION

Save The Plastic Bag Coalition (“STPB”) hereby submits its comments on and objections to the Draft Environmental Impact Report (“DEIR”). STPB’s letter dated January 4, 2010 is incorporated herein by reference. The numbered title headings herein are part of the objections.

The stated purpose of the project is to improve the environment and to increase environmental awareness. The DEIR states (at page 2-18) that one of the objectives of the “proposed ordinance *program*” is to “substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and reach at least 50,000 residents (5 percent of the population) with an environmental awareness message.” (Emphasis added.) The County is apparently proposing to give at least 50,000 residents a message that each time they use a paper bag or reusable bag, rather than a plastic bag, they are improving the environment. It is therefore crucial that each of those 50,000 or more residents be given the *correct* environmental message. That is one of the reasons (not the only reason) why it is so important to ensure that that the EIR strictly complies with CEQA in all respects and that all of the environmental impacts are disclosed to decision-makers and the public. If the County bases its environmental awareness message on the DEIR, that message will be *incorrect*.

Intro

The following statements were contained in a recent Los Angeles Times editorial (June 24, 2010):

“The Great Pacific Garbage Patch is an area of the ocean larger than Texas and thick with floating plastic debris: bottles, bottle caps, bits of packaging and uncountable plastic bags.”

“[Under pending bill AB 1998] consumers would pay a minimum of 5 cents each for paper bags, which are more expensive to produce than plastic ones but less environmentally damaging.”

<http://www.latimes.com/news/opinion/editorials/la-ed-bags-20100624,0,7190647.story>

The LA Times' assertions are incorrect.

- There is no such area of the ocean "larger than Texas and thick with floating plastic debris: bottles, bottle caps, bits of packaging and uncountable plastic bags." If such an area existed, it would be clearly visible and there would be photographs of it. There aren't any such photographs, as we can see from Google images.
- Paper bags are more damaging to the environment than plastic bags, not less damaging. This is especially relevant to the County's EIR as the County is not proposing any fee on paper bags. (The Cities of Santa Monica and San Jose are proposing 25-cent fees on paper bags.)

The following statement was contained in a recent editorial in the Daily Breeze (June 17, 2010):

"Plastic bags kill an estimated 1 million seabirds and 100,000 other animals every year, whether from eating the things or getting tangled in them."

[http://www.dailybreeze.com/ci\\_15322044](http://www.dailybreeze.com/ci_15322044). The same statement was made in an editorial in the Long Beach Press Telegram. <http://www.longbeach.gov/civica/filebank/blobdload.asp?BlobID=27697>.

Intro

*The Times* of London has exposed the allegation about 1 million seabirds and 100,000 sea animals being killed by plastic bags each year as a myth based on a typographical error! The survey on which the myth is based found that the deaths are caused by discarded fishing tackle including fishing nets, not plastic bags. A marine biologist at Greenpeace told *The Times*: "It's very unlikely that many animals are killed by plastic bags. The evidence shows just the opposite." <http://www.timesonline.co.uk/tol/news/environment/article3508263.ece>. Regrettably, the County in its DEIR has avoided addressing the marine wildlife issue directly, despite the clear request in STPB's January 4, 2010 letter that the issue be properly addressed.

These examples of blatant misinformation show why it is so important that the EIR be *accurate* and *informative*. STPB plans to cite a *correct* EIR in response to incorrect assertions such as those in the aforementioned editorials, to ensure that the "environmental awareness message" that the public and decision-makers receive and their evaluation of the proposed ordinance is not based on myths or misinformation.

STPB is not asserting objections to create a pretext for a lawsuit. The public and decision-makers need an accurate and informative EIR that complies with CEQA, not a lawsuit. The aforementioned editorials demonstrate that need. STPB is legitimately trying to respond to the very real and serious problem of environmental misinformation.

The DEIR is only a draft and STPB hopes that these objections will prompt the County to make corrections and changes that will result in an EIR that fully complies with CEQA and the avoidance of litigation based on a defective EIR.

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## OBJECTIONS

### **1. STPB OBJECTS TO THE FAILURE TO DISCUSS, DISCLOSE AND ADDRESS ISSUES AND POINTS IN STPB'S JANUARY 4, 2010 LETTER**

STPB objects to the failure of the DEIR to discuss disclose and address the following issues and points in STPB's January 4, 2010 letter.

- Section 1, page 11: ¶¶ B, D
  - Re ¶¶ B, see CEQA Guidelines §15124.
- Section 3, pages 12 to 19: ¶¶ B, C, D, E, F, G, H, I, J, K
  - Re ¶B, STPB objects to the failure to include any data in the EIR on the number of paper bags in the litter stream. This is highly relevant information. The DEIR indicates that plastic bags have a propensity to become litter, but paper bags may also have a propensity to become litter. Moreover, as the proposed ordinances will result in a switch to paper bags, the propensity of paper bags to become litter will be a bigger concern. See the following YouTube video that is hereby made part of the administrative record. The video was taken by STPB's counsel on Wednesday August 5, 2009. The location is Mason Street between Bay Street and Francisco Street in San Francisco. It was the day before street cleaning. Street cleaning on that block is on the first and third Wednesday of each month although it apparently didn't happen that day. There is a Trader Joe's on the same block. Trader Joe's provides paper carryout bags, not plastic. Paper bags are very much a part of the litter stream in San Francisco.

[http://www.youtube.com/watch?v=pazWMPTCDmE&feature=player\\_embedded](http://www.youtube.com/watch?v=pazWMPTCDmE&feature=player_embedded)  
(This replaces the link at page 11 of STPB's January 4, 2010 letter.)

- Note that the link for the Toronto litter survey has changed. The new link is as follows:

[http://www.plastics.ca/\\_files/file.php?fileid=fileXNqTOAdnvk&filename=file\\_3\\_2006\\_toronto\\_litter\\_report.pdf](http://www.plastics.ca/_files/file.php?fileid=fileXNqTOAdnvk&filename=file_3_2006_toronto_litter_report.pdf)

- Section 4, pages 19 to 26: ¶¶ A, B, C, D, E, F, G, H, I, J, K, L, M, N
  - The failure to properly address the marine wildlife issue is discussed below.
- Section 5, pages 26 to 29: ¶¶ A, B, C, D, E, F, G, H, I, J
- Section 6, page 29: ¶¶ A, B, C, D
  - STPB objects to the failure to disclose the costs of paper bag litter.
- Section 10, page 37

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- CO<sub>2</sub> emissions have major impacts on ocean acidification and marine life, which must be described and disclosed in the EIR. The County will do far more harm than good to marine life by banning plastic bags. STPB objects to the failure to address and disclose this point. See:

<http://royalsociety.org/Ocean-acidification-due-to-increasing-atmospheric-carbon-dioxide/>

<http://news.bbc.co.uk/2/hi/science/nature/8411135.stm>.

- Section 11, pages 37 to 39: ¶¶ A, B, C, D
- Section 12, page 40
- Section 13, page 40
- Section 14, page 41: ¶¶ A, B, C, D
- Section 15, pages 41 to 49: ¶¶ A, B, C, D
- Section 16, pages 49 to 50: ¶ A, B
- Section 17, pages 50 to 51
- Section 18, pages 51 to 52
- Section 19, pages 52 to 53: ¶¶ A, B
- Section 20, pages 53 to 54
  - As discussed below, the DEIR addresses the life cycle environmental impacts of low-density polyethylene (LDPE) reusable bags. However, the DEIR contains is no analysis or disclosure of environmental impacts of cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), or other non-LDPE reusable bags.
- Section 21, page 55: ¶¶ A, B, C, D
  - It is important to note that reusable bags are exempt from the toxic metals restrictions applicable to plastic and paper bags. Health & Safety Code §25214(h)(2). This exemption was given to reusable bags in a bill sponsored by Assembly Member Julia Brownley (D-Santa Monica). With the restrictions removed, reusable bags provided by stores in the City, including reusable bags imported from China, may legally contain lead, mercury, cadmium, and hexavalent chromium.
  - STPB is submitting herewith the results of testing by Polyhedron Laboratories, an independent laboratory, on two nonwoven polypropylene

1 cont.



“Brag about Your Bag” reusable bags that LA County gave away to the public. (Documents ## 67 and 68.) Three photographs of the actual bag tested in document # 68 are also provided herewith. (Documents ## 69, 70 and 71.) A sample of the bag in document #68 has been retained and will be provided by STPB to the County upon request. The test results show that the bags contained high levels of lead and mercury. Without waiving objection #6 below or any other objection, the County must address this issue and disclose the environmental impacts in the EIR and STPB objects if it does not do so. This is particularly important as the County intends to provide an “environmental awareness message” to consumers.

- Section 22, pages 55 to 56: ¶¶ A, B, C
  - Note that the second link in Section 22 ¶A of STPB’s January 4, 2010 letter has changed. The new link is:

[http://www.plastics.ca/files/file.php?fileid=0&filename=file\\_A\\_Microbiological\\_Study\\_of\\_Reusable\\_Grocery\\_Bags\\_May20\\_09.pdf](http://www.plastics.ca/files/file.php?fileid=0&filename=file_A_Microbiological_Study_of_Reusable_Grocery_Bags_May20_09.pdf)

- There is a new University of Arizona study (link below) issued in June 2010 that indicates that 97% of people who use reusable bags do not wash them. If people become concerned about the hygiene issues associated with reusable bags, many or most people will stop using them and will use paper bags instead if plastic bags are banned. Unfortunately, it only takes one publicized incident to create panic. There would need to be a comprehensive education campaign to make sure people properly and frequently wash their bags. In fact, a reusable bag should be wiped clean or washed after *every* use.

1 cont.

<http://www.prweb.com/releases/2010/06/prweb4185254.htm>

[http://uanews.org/pdfs/GerbaWilliamsSinclair\\_BagContamination.pdf](http://uanews.org/pdfs/GerbaWilliamsSinclair_BagContamination.pdf)

- Section 23, page 56: ¶¶ A, B
- Section 24, page 56: ¶¶ A, B, C
- Section 26, pages 59 to 60
- Section 27, page 69
- Section 28, pages 60 to 61

STPB objects on the ground that the DEIR fails to discuss all likely environmental impacts, all reasonably feasible alternatives, and all reasonably feasible mitigation measures, specifically the above sections and paragraphs of STPB’s January 4, 2010 letter. An EIR must provide public agencies and the public with detailed information about the effect that a proposed project is likely to have on the environment; list ways in which the significant effects of such a project might be minimized; and indicate alternatives to such a project. (Pub. Res Code §21061.)

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The core of an EIR is the mitigation and alternatives sections. (Pub. Res. Code §21001(g).) Specifically, the EIR must describe a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. (CEQA Guidelines §15126.6(a).) When an alternative is potentially reasonably feasible, an in-depth discussion is required; when an alternative is rejected, the EIR must describe the specific reasons for rejection. (CEQA Guidelines §15091(c).) Although the level of detail will vary depending upon an alternative's potential for feasibility, in every case, the EIR must disclose the analytic route the agency traveled from evidence to action. 1 cont.

*Nothing stated in this letter is intended to waive STPB's objections to the County's failure to address **each and every** section number and paragraph letter identified above.*

**2. STPB OBJECTS TO THE QUANTIFICATIONS OF THE INCREASE IN GREENHOUSE GAS EMISSIONS THAT WILL OCCUR IF PLASTIC BAGS ARE BANNED AS THEY ARE INCONSISTENT WITH THE COUNTY'S OWN 6 BILLION PLASTIC CARRYOUT BAGS FIGURE** 2

The DEIR purportedly discloses the greenhouse gas ("GHG") impacts of banning plastic bags in the following three tables:

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**TABLE 1**  
**BASED ON INCLUDING CONVENIENCE**  
**AND SMALLER STORES IN BAN**

**GHG EMISSIONS BASED ON ECOBILAN DATA USING 85-PERCENT CONVERSION FROM  
 PLASTIC TO PAPER CARRYOUT BAGS**

Emissions Areas	CO <sub>2e</sub> Emission Sources				2020 CO <sub>2e</sub> Target Emissions
	Plastic Carryout Bags	Increase Resulting from 85-percent Conversion from Plastic Carryout Bags to Paper Carryout Bags			
	Metric Tons Per Day	Metric Tons Per Day	Metric Tons Per Year	Metric Tons Per Year Per Capita <sup>1</sup>	Metric Tons Per Year Per Capita <sup>1</sup>
Emissions in the 1,091 stores in the unincorporated territory of the County	98.13	59.02	21,543	0.002	9.6
Emissions in the 5,084 stores in the incorporated cities of the County	469.96	282.68	103,176	0.010	
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>341.70</b>	<b>124,720</b>	<b>0.012</b>	

2 cont.

DEIR at page 3.1-15: “The Ecobilan LCA was chosen above the other studies reviewed during preparation of this EIR because it is relatively recent; contains relatively sophisticated modeling and data processing techniques; considers a wide range of environmental indicators; considers paper, plastic, and reusable bags; was critically reviewed by the French Environment and Energy Management Agency; and contains detailed emission data for individual pollutants.”

Note: The Ecobilan LCA is the basis for the Scottish report. All references in STPB’s January 4, 2010 letter to the Scottish report are in fact to the Ecobilan report. (See Scottish report page 17.)

Note: 85% conversion does not take into account the life cycle GHG impacts of reusable bags.

**TABLE 2**  
**BASED ON INCLUDING CONVENIENCE**  
**AND SMALLER STORES IN BAN**

**GHG EMISSIONS BASED ON ECOBILAN DATA USING 100-PERCENT CONVERSION FROM  
 PLASTIC TO PAPER CARRYOUT BAGS**

	CO <sub>2e</sub> Emission Sources				2020 CO <sub>2e</sub> Target Emissions
	Plastic Carryout Bags	Increase Resulting from 100-percent Conversion from Plastic Carryout bags to Paper Carryout Bags			Metric Tons Per Year Per Capita <sup>1</sup>
	Metric Tons Per Day	Metric Tons Per Day	Metric Tons Per Year	Metric Tons Per Year Per Capita <sup>1</sup>	
Emissions in the 1,091 stores in the unincorporated territory of the County	98.13	86.75	31,665	0.003	9.6
Emissions in the 5,084 stores in the incorporated cities of the County	469.96	415.49	151,655	0.014	
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>502.25</b>	<b>183,320</b>	<b>0.017</b>	

2 cont.

**TABLE 3**  
**BASED ON EXCLUDING CONVENIENCE**  
**AND SMALL STORES FROM BAN**

2 cont.

**GHG EMISSIONS DUE TO 85- AND 100-PERCENT CONVERSION FROM PLASTIC TO PAPER CARRYOUT BAGS BASED ON VARIOUS STUDIES**

LCA	Increase Resulting from 85-percent Conversion		Increase Resulting from 100-percent Conversion	
	Metric Tons Per Year	Metric Tons Per Year Per Capita	Metric Tons Per Year	Metric Tons Per Year Per Capita
Ecobilan	19,700	0.002	28,900	0.003
Boustead	38,300	0.004	54,100	0.005
ExcelPlas	73,700	0.007	90,700	0.009
<b>Emission Targets</b>				
California's GHG Target Emissions for 2020	427 million	9.6	427 million	9.6
County's GHG Target Emissions for 2020	108 million	9.6	108 million	9.6

The DEIR states (at page 2-2):

“According to research conducted by the Los Angeles County Department of Public Works (LACDPW), approximately 6 billion plastic carryout bags are consumed in the County each year, which is equivalent to approximately 1,600 bags per household per year.”

Based on the 6 billion figure and a 1 paper bag = 1.5 plastic bag ratio, the GHG increases would be as follows:

Increase in GHG emissions per 1,000 paper bag carrying capacity = 0.092 CO<sub>2</sub> equivalent tons (Boustead)

4 billion additional paper bags in LA County divided by 1,000 = 4 million

2 cont.

4 million x 0.092 = 368,000 added CO<sub>2</sub> equivalent metric tons (100% conversion)

85% of 368,000 = 312,800 added CO<sub>2</sub> equivalent metric tons (85% conversion, which does not take into account the life cycle impacts of reusable bags)

The figures of 183,320 (Table 2 100% conversion) and 124,720 (Table 1 85% conversion) CO<sub>2</sub> equivalent tons are inconsistent with the 6 billion plastic carryout bags figure. STPB objects to this inconsistent data in the DEIR on a subject of such paramount importance to decision-makers and the public, especially as the “voluntary” reduction program adopted by the Board of Supervisors on January 22, 2008 is based on percentage reductions. (The DEIR is an integral part of that resolution and the voluntary program.) The discrepancy must be explained or the figures must be corrected.

### **3. STPB OBJECTS TO THE 183,320 AND 124,720 GHG EMISSIONS FIGURES AS THE LATTER IS NOT 85% OF THE FORMER**

The figures of 183,320 (Table 2 100% conversion) and 124,720 (Table 1 85% conversion) CO<sub>2</sub> equivalent metric tons must be incorrect as 124,720 is not 85% of 183,320. This indicates that there are related problems with other figures in the DEIR based on the 100% and 85% conversion factors and possibly other figures. The burden is on the County to check the figures in the DEIR.

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### **4. STPB OBJECTS TO THE ASSERTION THAT BANNING PLASTIC BAGS WILL RESULT IN INCREASED USE OF REUSABLE BAGS**

The DEIR states (at page 3.1-14):

“Although the production, manufacture, distribution, and eventual disposal of reusable bags does cause air pollutant emissions, as is the case with any manufactured product, these emissions are significantly reduced when calculated on a per-use basis. Banning the issuance of plastic carryout bags is expected to increase the use

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of reusable bags, so the air quality impacts are anticipated to be reduced.”

The DEIR states (at page 3.3-16):

“Based on a survey of bag usage in the County conducted by Sapphos Environmental, Inc., reusable bags made up approximately 18 percent of the total number of carryout bags used in stores that did not make plastic carryout bags readily available to customers; however, reusable bags made up only approximately 2 percent of the total number of bags used in stores that did make plastic carryout bags readily available (Appendix A). Therefore, it is reasonable to estimate that a ban on the issuance of plastic carryout bags would increase the number of reusable bags used by customers by at least 15 percent. Therefore, it is reasonable to estimate that a ban on the issuance of plastic carryout bags would increase the number of reusable bags used by customers by at least 15 percent. Accordingly, it can be assumed that, in a reasonable worst-case scenario, the proposed ordinances would potentially prompt an 85-percent conversion from use of plastic carryout bags to use of paper carryout bags by store customers.”

4 cont.

STPB objects to the above-quoted statement on the ground that there is no basis for “expecting” that reusable bag usage will increase if plastic bags are banned. *As long as free paper bags are available, the vast majority of people will use them at stores in San Francisco where plastic bags are banned.* In contrast, the city of Santa Monica is proposing a 25-cent fee on paper bags as part of its plastic bag ban ordinance.

#### **5. STPB OBJECTS TO THE USE OF THE 85% AND 100% PLASTIC TO PAPER CONVERSION FACTORS**

In Tables 1 and 3 and throughout the DEIR, the rate of conversion from plastic to paper is proposed as 85% or 100%. Customers would have to shift from plastic bags to something. All manufactured products have negative environmental impacts, and reusable bags are no exception. STPB objects to the use of an 85% conversion factor because it does not factor in any environmental impacts for the remaining 15% which is presumably reusable bags. STPB objects to the use of a 100% conversion factor, because it assumes that no consumers whatsoever would switch to reusable bags.

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**6. STPB OBJECTS TO THE FAILURE TO DISCLOSE THE ENVIRONMENTAL IMPACTS OF CLOTH, JUTE, NONWOVEN POLYPROPYLENE, PET, AND OTHER NON-LDPE REUSABLE BAGS**

The DEIR (at page 2-4) defines reusable bags as follows:

“Definition. “Reusable bag(s): a bag with handles that is specifically designed and manufactured for multiple reuse and is either (a) made of cloth or other machine-washable fabric, or (b) made of durable plastic that is at least 2.25 mils thick.”

The DEIR states (at page 2-15):

“Furthermore, life cycle studies for plastic products have documented the adverse impacts related to various types of plastic and paper bags [footnote 92]; however, life cycle studies have also indicated that reusable bags are the preferable option to both paper bags and plastic bags. [Footnotes 93-95.]”

<sup>92</sup> Reusable bag manufacturers are also expected to enforce industry standards and recommendations to avoid adverse environmental impacts, including the use of recycled materials.

<sup>93</sup> Green Seal, Inc. 13 October 2008. Green Seal Proposed Revised Environmental Standard For Reusable Bags (GS-16). Washington, DC. Available at [link]

<sup>94</sup> Boustead Consulting & Associates, Ltd. 2007. Life Cycle Assessment for Three Types of Grocery Bags – Recyclable

Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper. Available at [link]

<sup>95</sup> Green Cities California. March 2010. Master Environmental Assessment on Single-Use and Reusable Bags. Prepared by: ICF International. San Francisco, CA.”

The DEIR states (at page 3.3-19):

“Comparisons of product LCAs for plastic versus paper provide varying results on the environmental impacts, although several studies show that production of plastic carryout bags generally produces less GHG emissions than the production of paper carryout bags. [Footnotes 49, 50.] The majority of LCAs and other studies that compare plastic, paper, and reusable bags concur that a switch to reusable bags would result in the most beneficial impacts to GHG emissions. [Footnotes 51-57.]

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Although the production, manufacture, distribution, and eventual disposal of reusable bags does generate GHG emissions, as is the case with any manufactured product, these emissions are significantly reduced when calculated on a per-use basis. As banning the issuance of plastic carryout bags is expected to increase the use of reusable bags, the GHG emission impacts are anticipated to be reduced. Also, the County is considering expanding the scope of the proposed County ordinance to include a performance standard for reusable bags, which would further reduce GHG emission impacts.”

<sup>49</sup> Ecobilan. February 2004. Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>50</sup> Boustead Consulting and Associates Ltd. 2007. Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper. Prepared for the Progressive Bag Affiliates.

<sup>51</sup> Nolan-Itu Pty. Ltd. 2002. Plastic Shopping Bags – Analysis of Levies and Environmental Impacts. Prepared for: Department of the Environment, Water, and Heritage: Canberra, AU.

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<sup>52</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. The Impacts of Degradable Plastic Bags in Australia. Moorabbin VIC, AU.

<sup>53</sup> Marlet, C., EuroCommerce. September 2004. The Use of LCAs on Plastic Bags in an IPP Context. Brussels, Belgium.

<sup>54</sup> The ULS Report. 1 June 2007. Review of Life Cycle Data Relating to Disposable Compostable Biodegradable, and Reusable Grocery Bags. Rochester, MI.

<sup>55</sup> Hyder Consulting. 18 April 2007. Comparison of existing life cycle analyses of plastic bag alternatives. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>56</sup> Herrera et al. January 2008. Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II. Prepared for: Seattle Public Utilities.

<sup>57</sup> Marlet, C., EuroCommerce. September 2004. The Use of LCAs on Plastic Bags in an IPP Context. Brussels, Belgium.

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The DEIR states (at page 4-8):

“As banning the issuance of both plastic and paper carryout bags is expected to increase the use of reusable bags, the air quality impacts are anticipated to be reduced in comparison with the proposed ordinances which would not ban paper carryout bags.”

The only kind of reusable bag analyzed in the Ecobilan study is an LDPE reusable bag. In this regard, the DEIR states (at page 3.3-22):

“The Ecobilan Study also presented an LCA analysis of a reusable bag that is approximately 2.8 mils thick, weighs 44 grams, and holds 37 liters of groceries. The conclusion from the analysis was that this particular reusable bag has a smaller impact on GHG emissions than a plastic carryout bag, as long as the reusable bag is used a minimum of three times (Table 3.3.5-4, Estimated Daily Emission Changes Due to Reusable Bags Used Three Times Based on Ecobilan Data, and Appendix C). [Footnote 65 citing Ecobilan report.] The impacts of the reusable bag are reduced further when the bag is used additional times. Although the Ecobilan data is particular to a specific type of reusable bag, it illustrates the general concept of how GHG emission impacts of reusable bag manufacture are reduced the more times a bag is used. As banning the issuance of plastic carryout bags is expected to increase the use of reusable bags, the GHG emission impacts are anticipated to be reduced. Therefore, a conversion from plastic carryout bag use to reusable bag use would be anticipated to have reduced impacts upon GHG emissions. Also, the County is considering expanding the scope of its ordinance to include a performance standard for reusable bags, which may further reduce GHG emission impacts.” (Emphasis added.)

6 cont.

None of the studies cited in the DEIR includes life cycle analyses of cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), or other non-LDPE reusable bags. The Ecobilan report analyzes only LDPE reusable bags. The ExcelPlas study analyzes plastic reusable bags, not cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), or other reusable bags. (See DEIR at page 3.3-25.) This is a fatal omission and a violation of CEQA. The assumption in the DEIR is that the life cycles of cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), and other non-LDPE reusable bags produce zero environmental impacts if they are reused many times. There is no substantial evidence for such an assumption. Reusable bags are manufactured items with life cycle environmental impacts. As the purpose of the proposed ordinance is to encourage a switch to reusable bags, the omission of life cycle analyses of cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), and other non-LDPE reusable bags makes the DEIR inapplicable to such an ordinance, unless reusable bags made of such non-LDPE materials are also banned by the ordinance.

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*STPB objects to any ordinance banning plastic bags if no EIR is prepared that includes a life cycle analysis of cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), and other non-LDPE reusable bags, unless all such reusable bags are also banned.*

It is the *County's* responsibility to address the life cycle environmental impacts analysis of cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), and other non-LDPE reusable bags, unless all such reusable bags are banned. We call the County's attention to the following statement of law in *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311:

6 cont.

“The agency [will] not be allowed to hide behind its own failure to gather relevant data.... CEQA places the burden of environmental investigation on government rather than the public.”

**7. STPB OBJECTS TO THE SWEEPING ASSERTION REGARDING ENVIRONMENTAL IMPACTS OF REUSABLE BAGS**

Footnotes 51 and 92 (at page 1-9 and 2-15 of the DEIR respectively) states

“Reusable bag manufacturers are also expected to enforce industry standards and recommendations to avoid adverse environmental impacts, including the use of recycled materials.”

STPB objects to this statement on the following grounds:

- A. It is speculation, argument, and baseless assertion that is not supported by substantial evidence.
- B. There is no explanation of what “industry standards and recommendations” are being referenced in the statement. Most reusable bags are imported. Industry standards in other countries such as China may permit environmental impacts that would be considered completely unacceptable in the United States. Moreover, industry standards may not be enforced and may be routinely violated.
- C. There is no reason why reusable bag manufacturers, especially in China where most reusable bags are made, can be expected to reduce environmental impacts.
- D. The existence of environmental standards and recommendations does not mean that environmental impacts will not occur. Environmental impacts will occur from the life cycles of reusable bags, including manufacturing overseas, and must be disclosed.
- E. There is no substantial evidence that recycling reduces any environmental impacts except the use of virgin source materials, solid waste disposal, and possibly some litter. Recycling is a collection, transportation, washing, and reprocessing operation with significant environmental impacts including energy usage, GHG omissions, and air and water pollution. The County cannot brush these negative recycling impacts aside and not disclose them.

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- F. Recycled materials cannot be used to make cloth, jute bags, or nonwoven polypropylene bags. Regarding nonwoven polypropylene and polyethylene terephthalate (PET) reusable bags, one supplier of such bags states as follows:

“Here is the truth about recycled plastic bags. After searching for several years to find a recycled content PP bag, we found that many claims of recycled content are -- at best -- unreliable.

Like you, we’ve seen bags that say: I used to be a plastic water bottle. But plastic bottles are made of plastic #2, and reusable bags are mostly made from plastic #5. These types of plastic are different materials, as different as cotton is from wool, or aluminum is from steel. Recycling one type into another is technically not possible. The problem with recycling plastic is that most plastic is mixed after the consumer cycle. Mixed plastics cannot be made into PP or other high quality items. When post-consumer plastic is recycled, the result is always black or brown because the inks and dyes used for consumers become part of the mix. I have seen up to 30% recycled content PP fabric, but the quality is not very good, and it is very expensive to make. Our fabric contains 10% recycled content from like-colored industrial scraps. It’s a clean and verifiable source of recyclable materials. Our openness and honesty about recycled content is another example of our dedication to corporate responsibility and corporate honesty.”

7 cont.

<http://www.onebagatatime.com/planet/how-our-bags-help/recycled-plastic/>

**8. STPB OBJECTS TO THE APPLICATION OF LOS ANGELES COUNTY AND SOUTHERN CALIFORNIA THRESHOLDS OF SIGNIFICANCE TO THE LIFE CYCLE ENVIRONMENTAL IMPACTS OF PLASTIC AND PAPER BAGS**

The DEIR states (at page ES-4):

“The analysis undertaken for this EIR determined that direct impacts related to greenhouse gas emissions that would be expected to arise from implementation of the proposed ordinances would be below the level of significance.”

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The County applies local thresholds of significance as if all of the life cycle environmental impacts of paper bags occur will occur in the Los Angeles area or Southern California. The tables (including but not limited to Tables 1 and 2 above) in the DEIR calculate total emissions “*in the County*.” Further, the DEIR states (at page 3.1-1):

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“The analysis of air quality consists of a summary of the regulatory framework to be considered during the decision-making process, a description of the existing conditions within the County, thresholds for determining if the proposed ordinances would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to air quality has been analyzed in accordance with Appendix G of the State CEQA Guidelines; the methodologies and significance thresholds provided by the County General Plan, the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), [footnote] and the CAA; guidance provided by the South Coast Air Quality Management District (SCAQMD), Antelope Valley Air Quality Management District (AVAQMD) and California Air Resources Board (CARB); and a review of public comments received during the scoping period for the Initial Study for the proposed ordinances.

Data on existing air quality in the SCAQMD portion of the South Coast Air Basin (SCAB) and the AVAQMD portion of the Mojave Desert Air Basin (MDAB), in which the unincorporated territory and the 88 incorporated cities of the County are located, is monitored by a network of air monitoring stations operated by the California Environmental Protection Agency (Cal/EPA), CARB, and the SCAQMD and AVAQMD. The conclusions contained herein reflect guidelines established by SCAQMD’s CEQA Air Quality Handbook.”

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Plastic and paper carryout bag manufacturing occurs within *and outside* of Southern California. The DEIR (at page 3.1-17) acknowledges this fact in the following statement:

Since the majority of paper carryout bags supplied to the greater Los Angeles metropolitan area are produced in and delivered from states outside of California, or from countries outside of the United States, such as Canada....

As the negative environmental impacts of an increase number of paper bags will occur primarily outside the Los Angeles and Southern California area, local thresholds of significance are inapplicable and legally unsupportable. This is a serious and fundamental defect in the DEIR that violates CEQA. The DEIR should have quantified life cycle GHG and other impacts *wherever they occur* such as in Canada, not only in Los Angeles County or Southern California. As the DEIR states (at page 3.1-22):

“The LCA results cannot reasonably be evaluated in relation to the operational thresholds of significance set by SCAQMD for the SCAB because the operational thresholds are intended for specific

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projects located in the SCAB, whereas LCA data cover all stages of production, distribution, and end-of-life procedures related to a particular product. The manufacture and production of paper carryout bags appears not to occur in the SCAB or MDAB, with manufacturing facilities located in other air basins in the United States and in other countries, which may have different emission thresholds and regulations. As noted before, any indirect increase in air pollutant emissions from paper carryout bag manufacturing facilities that would be affected by the proposed ordinances—though it appears none are located in the County unincorporated and incorporated areas or the SCAB and MDAB—would be controlled by the owners of the paper carryout bag manufacturing facilities in compliance with applicable local, regional, and national air quality standards. Since the majority of paper carryout bags supplied to the greater Los Angeles metropolitan area are produced in and delivered from states outside of California, or from countries outside of the United States, such as Canada, it is not necessary to extrapolate LCA data to determine emission levels for the SCAQMD portion of the SCAB and the AVAQMD portion of the MDAB.”

8 cont.

STPB objects to all determinations of significance based on local thresholds that are applicable only to LA County or Southern California. They should be removed from the DEIR in their entirety as they are inapplicable and therefore violate CEQA.

**9. STPB OBJECTS TO THE USE OF ALL GLOBAL OR STATEWIDE SOURCES OF CO2 EMISSIONS AS THE THRESHOLD OF SIGNIFICANCE OR TO EVALUATE SIGNIFICANCE**

The DEIR states (at page 3.329):

“Now that the analysis has been performed for each of the various studies, it is important to look at the quantitative results (1) in context with the GHG emission reduction goals of both California and the County and (2) in a cumulative context. If looking at GHG emissions of CO2e in terms of metric tons per year, concluding that the proposed ordinances would result in GHG emissions in excess of 19,000 to 73,000 metric tons per year for 85-percent conversion from plastic to paper carryout bags, and 28,000 to 90,000 metric tons per year for 100-percent conversion, does appear significant when considered out of context. However, because every nation is an emitter of GHGs and GHGs contribute to global climate change, GHG emissions from individual projects like the proposed ordinances must be considered on a global scale. Due to the fact that more than 28 billion tons of CO2 were emitted to the Earth's atmosphere due to human activities in 2006 alone,

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GHG emissions on a project level are not generally found to be significant, and it is more useful to consider GHG emissions in a cumulative context. [Footnote.]

In addition, while the Ecobilan, Boustead, and ExcelPas Studies are far from perfect and make a number of assumptions that may not be accurate for the County, the GHG emission impacts from an 85- and 100-percent conversion from plastic to paper carryout bags would be expected to be below the level of significance when considering that California's GHG emissions target for 2020 is 427 million metric tons per year (Table 3.3.2-1 and Table 3.3.5-9) and the County's GHG emissions target for 2020 is 108 million metric tons per year (Table 3.3.3-1 and Table 3.3.5-9). For an 85-percent conversion to paper carryout bags, the LCA results presented above would be equivalent to between 0.005 and 0.017 percent of the target 2020 emissions for California and 0.018 and 0.068 percent of the target 2020 emissions for the County. For a 100-percent conversion to paper carryout bags, the LCA results presented above would be equivalent to between 0.007 and 0.021 percent of the target 2020 emissions for California and 0.027 and 0.084 percent of the target 2020 emissions for the County.

9 cont.

As the proposed ordinances could affect the entire County, and the resultant indirect GHG emissions would not occur at any one particular facility, it is reasonable to also consider the indirect emissions on a per-person, or per capita, basis. If analyzing GHG emissions in terms of per capita per year, which takes into account the population of the entire County, an 85 and 100-percent conversion from plastic to paper carryout bags would be expected to be below the level of significance. For an 85-percent conversion to paper carryout bags, the LCA results presented above indicate that the proposed ordinances would indirectly generate between 0.002 and 0.007 metric tons of CO<sub>2</sub>e per capita, which is between 0.02 and 0.07 percent of the target 2020 carbon footprint per capita of 9.6 metric tons of CO<sub>2</sub>e per capita suggested by CARB in order to achieve the goals of AB 32. For a 100-percent conversion to paper carryout bags, the LCA results presented above indicate that the proposed ordinances would indirectly generate between 0.003 and 0.009 metric tons of CO<sub>2</sub>e per capita, which is between 0.03 and 0.09 percent of the target 2020 carbon footprint per capita of 9.6 metric tons of CO<sub>2</sub>e suggested by CARB. As carryout bags form such a small percentage of the daily carbon footprint per person, it would not be reasonable to assume that the proposed ordinances would result in GHG emissions that would conflict with the goals of AB 32. The GHG emissions impacts for 85-percent and 100-percent conversion from plastic to paper carryout

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bags would be expected to be below the level of significance in comparison with the global anthropogenic emissions of GHGs, which was over 28 billion tons of CO<sub>2</sub> in 2006 alone. [Footnote.] If viewed apart from the GHG emissions produced by activities elsewhere in the world, the mass of GHG emissions generated by individual projects such as the proposed ordinances would be so minute that the concentration of GHGs in the Earth's atmosphere would essentially remain the same. Therefore, the project's individual GHG emission impact is considered to be below the level of significance, and further analysis should be discussed in a cumulative context (see Cumulative Impacts subsection, page 3.3-36).”

The DEIR states (at page 3.3-18):

“Although the production of plastic, paper, and reusable carryout bags can be categorized as part of the industrial sector, it is not included in the top 10 contributors. Therefore, evidence indicates that the manufacture of paper carryout bags is not one of the major contributors to total GHG emissions.”

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Obviously the impact of paper bags appears small when considered on a “global scale.” However, that is not the applicable threshold of significance. If that standard is used, with everything being compared to all CO<sub>2</sub> emissions on the entire planet, then very few sources of emissions would appear significant. The same applies to per capita CO<sub>2</sub> emissions, given the broad range of CO<sub>2</sub> producing activities. Further, whether or not paper bags are one of the top 10 contributors to total GHG emissions is not an appropriate or relevant basis for evaluation of significance. All sources of GHG emissions accumulate.

STPB objects to the above-quoted sections of the DEIR as they are misleading to decision-makers and the public and violate CEQA by using inapplicable and invalid thresholds and baselines and thresholds for determining significance in the context of this project.

#### **10. STPB OBJECTS TO ANY THRESHOLD OF SIGNIFICANCE THAT IS NOT BASED ON EVERY BAG CHOICE MADE BY EVERY CONSUMER**

The stated purpose of the project is to improve the environment and to increase environmental awareness. The DEIR states (at page 2-18) that one of the objectives of the “proposed ordinance *program*” is to “substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and reach at least 50,000 residents (5 percent of the population) with an environmental awareness message.” (Emphasis added.) The County is proposing to give at least 50,000 residents a message that they are making bag choices that *significantly* impact the environment.

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*Significance in the context of this project is determined by the comparative environmental impacts of different bag choices: which is better for the environment—plastic, paper or reusable.*

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*In the context of this project, each consumer's bag choice has a significant environmental impact.*

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### **11. STPB OBJECTS TO THE FAILURE TO DISCLOSE THE RESULT OF THE US EPA EQUIVALENCIES CALCULATOR**

The DEIR states (at page 2-18) that one of the objectives of the “proposed ordinance program” is to “substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and reach at least 50,000 residents (5 percent of the population) with an environmental awareness message.” (Emphasis added.)

An EIR is an informational document for decision-makers and the public. The “environmental awareness message” that the County plans to send must be stated in terms that the public can understand. They cannot possibly understand and evaluate the significance of CO<sub>2</sub> equivalent tons. That is why the US Environmental Protection Agency (“US EPA”) has an online equivalencies calculator at:

<http://www.epa.gov/cleanrgy/energy-resources/calculator.html>

(Note that this hyperlink has changed since STPB’s January 4, 2010 letter)

Results of applying the US EPA calculator must be disclosed in the EIR to convey significances to decision-makers and the public as part of the environmental awareness message. Further, there must be a separate and discrete finding of the increase in GHG emissions using the equivalencies in the US EPA calculator. Failure to make such a disclosure and include such a finding will violate CEQA.

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For example, Table 2 quantifies CO<sub>2</sub> equivalent emissions based on 100% conversion from plastic to paper at 6,175 stores in the County. (We will assume for present purposes that the figure of 183,320 metric tons in Table 2 is correct, without conceding the point. We will also disregard for present purposes our objection to the use of a 100% conversion factor without waiving that objection.) The results of applying the US EPA equivalencies calculator to Table 2 are as follows:

- Annual greenhouse gas emissions from 35,052 passenger vehicles
- CO<sub>2</sub> emissions from 20,620,922 gallons of gasoline consumed
- CO<sub>2</sub> emissions from 426,326 barrels of oil consumed
- CO<sub>2</sub> emissions from 2,448 tanker trucks’ worth of gasoline
- CO<sub>2</sub> emissions from the electricity use of 22,248 homes for one year
- CO<sub>2</sub> emissions from the energy use of 15,602 homes for one year

Let us take as another example the figure of 368,000 added CO<sub>2</sub> equivalent metric tons, which is based on the County’s 6 billion plastic carryout bags figure and assumes a 100% conversion to 4 billion paper bags. (Again, we will also disregard for present purposes our objection to the use of a 100% conversion factor without waiving that objection.) The results of applying the US EPA equivalencies calculator are as follows:

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- Annual greenhouse gas emissions from 70,363 passenger vehicles
- CO<sub>2</sub> emissions from 41,394,826 gallons of gasoline consumed
- CO<sub>2</sub> emissions from 855,814 barrels of oil consumed
- CO<sub>2</sub> emissions from 4,914 tanker trucks' worth of gasoline
- CO<sub>2</sub> emissions from the electricity use of 44,660 homes for one year
- CO<sub>2</sub> emissions from the energy use of 31,319 homes for one year

11 cont.

The equivalencies figures must be based on the cumulative impacts analysis, taking into account all other past projects, current projects, and probable future projects. None of the tables in the DEIR are based on such cumulative impacts. The EPA equivalencies in the EIR would be higher than those above.

## **12. STPB OBJECTS TO THE FAILURE TO INCLUDE A CUMULATIVE IMPACT ANALYSIS**

The DEIR states (at page 3.3-37):

“On this basis, and specific to this project only, and because the County is attempting to evaluate the impacts of the proposed ordinances from a conservative worst-case scenario, it can be conservatively determined that the life cycle impacts resulting from an 85- and 100-percent conversion from plastic to paper carryout bags may be cumulatively significant when considered in conjunction with all other related past, present, or reasonably foreseeable, probable future projects or activities.”

While acknowledging in the above quoted statement that a cumulative impact analysis is required, there is no cumulative analysis in the DEIR. STPB objects to the lack of a cumulative impact analysis.

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CEQA Guidelines §15130(a) states that an EIR “shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable, as defined in section 15065(a)(3). CEQA Guidelines §15065(3) states that an EIR must be prepared if “the project has possible environmental effects that are individually limited but cumulatively considerable.” CEQA Guidelines §15065(3) states that “cumulatively considerable” means that the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” CEQA Guidelines §15355 defines “cumulative impacts” as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines §15355(b) states that “[c]umulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

In *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, the court stated:

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At 114: “Cumulative impact analysis is necessary because the full environmental impact of a proposed project cannot be gauged in a vacuum. [Footnote] One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact.

At 118: From *Kings County and Los Angeles Unified*, the guiding criterion on the subject of cumulative impact is whether *any* additional effect caused by the proposed project should be considered significant given the existing cumulative effect. (Emphasis added.)

At 119: However, under CEQA section 21083, under the Guidelines section 15355 definition of cumulative impacts, and under the *Kings County/Los Angeles Unified* approach, the need for an EIR turns on the impacts of *both* the project under review and the relevant past, present and future projects. [Emphasis by court.]”

12 cont.

In *San Franciscans for Reasonable Growth v. City and County of San Francisco*, (1984) 151 Cal.App.3d 61, 75, the court stated:

[W]e must reject the argument that, because some of the projects under review might never be built, it was reasonable for the Commission not to consider any of them in its cumulative analyses. Such argument is without merit. The fact that the EIR's subject project itself might be built, rather than the fact that it might not be built, creates the need for an EIR. Similarly, the fact that other projects being reviewed are as close to being built as the subject project makes it reasonable to consider them in the cumulative analyses.

Based on the foregoing, the EIR must consider the impact of the proposed County ordinance together with the following projects:

- The City of Berkeley proposed plastic bag ban.
- The City of Los Angeles resolution passed in 2008 to ban plastic bags in 2010 if no plastic bag fee bill is enacted by the Legislature by that time. (No bill has been enacted.)
- The City of Malibu plastic bag ban ordinance adopted in 2008.
- The City of Manhattan Beach plastic bag ban ordinance adopted in 2008 (if it is not invalidated in the case of *Save The Plastic Bag Coalition v. City of Manhattan Beach* which is pending in the California Supreme Court).

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- The City of Palo Alto plastic bag ban ordinance adopted in 2009.
- The City and County of San Francisco plastic bag ban ordinance adopted in 2007.
- The City of San Jose proposed plastic bag ban and paper bag fee (for which a draft EIR has been issued).
- The City of Santa Monica proposed plastic bag ban and paper bag fee (for which a draft EIR has been issued).
- All other plastic bag ban ordinances and reduction projects that are being considered or may be or have been implemented in California and outside California.

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**13. STPB OBJECTS TO THE SWEEPING, MISLEADING, AND BASELESS ASSERTIONS REGARDING IMPACTS OF PLASTIC BAGS ON MARINE LIFE**

The DEIR states (at page 2-17):

“The County has identified five goals of the proposed ordinances, listed in order of importance: (1) litter reduction, (2) blight prevention, (3) *coastal waterways and animal and wildlife protection*, (4) sustainability (as it relates to the County’s energy and environmental goals), and (5) landfill disposal reduction.” (Emphasis added.)

The DEIR further states (at page 2-12):

“Plastic carryout bags have been found to contribute substantially to the litter stream and to have adverse effects on marine wildlife.”

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The DEIR further states (at page 3.2-1):

“CIWMB states, “plastic film, especially grocery bags, constitutes a high percentage of litter, which is unsightly, costly to clean up, especially when it enters marine environments, and causes serious negative impacts to shore birds and sea life.” (Footnote 4: “California Integrated Waste Management Board. Accessed on: 1 March 2010. Plastic Film Cooperative Recycling Initiative. Problem Statement. Available at: <http://www.calrecycle.ca.gov/Plastics/Film/#Problem>.)”

The DEIR further states (at page 3.2-2):

“Based on the evidence that plastic carryout bags pose a significant threat to marine wildlife....”

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The DEIR further states (at page 3.2-3):

“Volunteers participating in the 2008 International Coastal Cleanup discovered 47 animals and birds entangled or trapped by plastic bags, including 1 amphibian, 9 birds, 24 fish, 11 invertebrates, and 2 reptiles. [Footnote 14: Ocean Conservancy. A Rising Tide of Ocean Debris and What We Can Do About It. International Coastal Cleanup 2009 Report.] Therefore, plastic bag usage has the potential to jeopardize federally endangered and threatened species by harming, wounding, killing, and trapping them. In banning the issuance of plastic carryout bags while encouraging the use of reusable bags, the proposed ordinances would help advance the goal of the federal ESA to protect wildlife.”

The DEIR further states (at page 3.2-19):

“Seabirds, sea turtles, and marine mammals that feed on or near the ocean surface are especially prone to ingesting plastic debris that floats. [Footnotes 55-57.] The impacts include fatalities as a result of ingestion, starvation, suffocation, infection, drowning, and entanglement. [Footnotes 58 & 59.] The recovery plan for the endangered leatherback turtle (*Dermochelys coriacea*) lists ingestion of marine debris, including plastic bags, as one of the factors threatening this species. The recovery plan says that leatherback turtles consume floating plastic, including plastic bags, because they appear to mistake the floating plastic for jellyfish. [Footnote 60.] The recovery plans for the threatened green turtle (*Chelonia mydas*), loggerhead turtle (*Caretta caretta*), and olive ridley turtle (*Lepidochelys olivacea*) also note plastic bag ingestion as a threat to those species. [Footnotes 61-63.] Ingestion of plastics is also noted as a threat in the recovery plan for the federally endangered short-tailed albatross (*Phoebastria albatrus*). [Footnote 64.] Preventing trash from entering water bodies, such as the Los Angeles River, has the potential to improve habitats and aquatic life. [Footnote 65.] The proposed ordinances would be anticipated to reduce the amount of trash entering water bodies in the County. [Footnote 66.]”

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<sup>55</sup> California Ocean Protection Council. 20 November 2008. An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter. Available at:

[http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

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<sup>56</sup> National Research Council. 2008. "Tackling Marine Debris in the 21st Century." Committee on the Effectiveness of National and International Measures to Prevent and Reduce Marine Debris and Its Impacts.

<sup>57</sup> U.S. Environmental Protection Agency. August 2002. Assessing and Monitoring Floatable Debris. Washington, DC.

<sup>58</sup> California Ocean Protection Council. 20 November 2008. An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter. Available at:

[http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>59</sup> Gregory, Murray R. 2009. "Environmental Implications of Plastic debris in Marine Settings -- Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions." In Philosophical Transactions of the Royal Society B: Biological Sciences, 364: 2013–2025.

<sup>60</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. Recovery Plan for U.S. Pacific Populations of the Leatherback Turtle. Available at:

[http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_leatherback\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_leatherback_pacific.pdf)

<sup>61</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. Recovery Plan for U.S. Pacific Populations of the East Pacific Green Turtle. Available at:

[http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_green\\_eastpacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_green_eastpacific.pdf)

<sup>62</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. Recovery Plan for U.S. Pacific Populations of the Loggerhead Turtle. Available at [link]

<sup>63</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. Recovery Plan for U.S. Pacific Populations of the Olive Ridley Turtle. Available at [link]

<sup>64</sup> U.S. Fish and Wildlife Service. September 2008. Short-tailed Albatross Recovery Plan. Available at [link]

<sup>65</sup> Regional Water Quality Control Board, Los Angeles Region. Revised 27 July 2007. "Trash Total Maximum Daily Loads for the

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Los Angeles River Watershed.” Los Angeles, CA.

<sup>66</sup> California Ocean Protection Council. 20 November 2008. An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter. Available at (link)”

The DEIR further states (at page 4-3):

“Certain types of degradable plastic carryout bags are able to float and pose a risk of ingestion by fish and marine mammals. [Footnote 3: ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. The Impacts of Degradable Plastic Bags in Australia. Moorabbin VIC, AU.]”

STPB objects to the foregoing quoted statements, and all other statements in the DEIR regarding marine wildlife, on the ground that there is no cited substantial evidence that plastic bags cause the deaths of marine mammals, marine animals, or seabirds, except for the following:

1. The results of the 2008 International Coastal Cleanup that discovered 47 animals and birds entangled or trapped by plastic bags, including 1 amphibian, 9 birds, 24 fish, 11 invertebrates, and 2 reptiles. (Ocean Conservancy. A Rising Tide of Ocean Debris and What We Can Do About It. International Coastal Cleanup 2009 Report.)
2. The UNEP study (link below). At page 199 of the study, it is stated that 71.9% of total entanglements were accounted for by fishing line, ropes and nets. In the table on the same page, the *global* results for marine entanglements by plastic bags were as follows:

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Invertebrates	2 plastic bags
Fishes	3 plastic bags
Reptiles	0 plastic bags
Birds	12 plastic bags
Mammals	5 plastic bags
Amphibian	0 plastic bags

[www.unep.org/regionalseas/marinelitter/publications/docs/Marine Litter A Global Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

The DEIR does not discuss, disclose, or address how many (if any) plastic bags from Los Angeles County reach the Pacific Ocean. There is no discussion in the DEIR of the North Pacific gyre, including how much of the gyre consists of plastic bags or plastic bag debris. The DEIR ignores all of the questions and points in section 4 of STPB’s January 4, 2010 letter (pages 19 to 26) regarding marine mammals, including the need for quantification, except for the aforementioned Ocean Conservancy and UNEP figures.

This omission is particularly important, because protection of marine wildlife is one of the stated objectives of the proposed ordinances. Decision-makers and the public need to know if

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the marine mammal and seabird issue is a major problem or not (especially if the impact of plastic bags on the marine environment are part of the County's environmental awareness message"). They need to know the approximate quantity of marine wildlife that is killed, in other words the *scale of the problem*. If the only quantification data available are the Ocean Conservancy and UNEP reports, then the EIR must state this clearly and delete all vague, sweeping and misleading statements that imply or suggest that there is other quantification data, including all of the statements in the DEIR quoted above.

The DEIR uses terms such as "serious negative impacts" (page 3.2-1) and "significant threat to marine wildlife..." (page 3.2-2). STPB objects to these and similar vague and ambiguous terms as applied to the impacts on marine life without any description or disclosure of those impacts or threats. Further, a "significant threat" is not an environmental impact at all; it falls short of an actual environmental impact.

Regarding turtles, there is no substantial evidence that plastic bags or plastic bag debris cause fatalities. In a paper entitled "The Occurrence, Effects and Fate of Small Plastic Debris in the Oceans" (copy provided herewith -- PDF document #32), US National Oceanic and Atmospheric Administration Marine Debris Program staff stated as follows:

"More recently, Tomas et al. (2002) documented plastic debris ingested by juvenile loggerhead sea turtles illegally caught for consumption in the western Mediterranean. Plastics accounted for the highest percentage of anthropogenic debris recovered from the digestive tracts of 41 of 54 turtles surveyed. Mascarenhas et al. (2004) documented plastic ingestion in two sea turtles in Brazil, one female *C. mydas* that defecated 10 small pieces of hard plastic and plastic bags, and one adult male *L. olivacea* with 9 small pieces of hard plastic. *Tomas et al. (2002) are in agreement with Bjorndal et al. (1994) that sea turtles are resistant to mortality from ingesting small foreign debris, though with the increasing number of turtles containing plastics, small plastics can be a major concern if they occlude the digestive tract.* Barreiros and Barcelos (2001) observed several pieces of soft plastic and a hard plastic cap in one leatherback sea turtle (*D. coriacea*) intestine. This particular turtle was by-caught in a long-line fishery near the Azores; the plastic did not cause the turtle apparent harm. Bugoni et al. (2001) identified marine debris and human impacts to green sea turtles in Brazil. Plastics were the most frequently encountered form of debris in the digestive tract, though hard plastics were present in only four turtles and plastic bags and ropes were the most prevalent forms of plastic debris, at 50% and 39.5%, respectively (Bugoni et al. 2001). *There are very few, if any, published records of small plastics as the direct cause of mortality in sea turtles.*" (Emphasis added.)

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Accordingly, STPB objects to all statements in the DEIR that imply or suggest that turtles are actually being killed by plastic bags.

Note that David Laist, a senior policy and program analyst with the federal Marine Mammal Commission, has recently stated:

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“In their eagerness to make their case, some of the environmental groups make up claims that are really not supportable.”

See: <http://www.npr.org/templates/story/story.php?storyId=127600685>

#### **14. STPB OBJECTS TO THE USE OF OUTDATED AND INAPPLICABLE PLASTIC BAG RECYCLING DATA**

The DEIR states (at page 3.2-1):

“Currently, CIWMB estimates that less than 5 percent of plastic film in California is recycled. (Footnote 5: California Integrated Waste Management Board. Accessed on: 1 March 2010. Plastic Film Cooperative Recycling Initiative. Problem Statement. Available at: <http://www.calrecycle.ca.gov/Plastics/Film/ - Problem>.”

The California Integrated Waste Management (“CIWMB”) information at the referenced URL is outdated. It is based on data gathered by the CIWMB before AB 2449 took effect in July 2007. (Pub. Res. Code §§42250-57.) AB 2449 requires stores that provide plastic carryout bags to customers to install plastic bag recycling bins in stores. AB 2449 requires that the plastic bags in those bins be recycled. Recycling data gathered before AB 2449 took effect are irrelevant, invalid and misleading.

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Moreover, there is no reason why the California rate would be lower than the national rate, especially as very few states have store plastic bag recycling bins or any form of plastic bag recycling. According to the DEIR (at page 20-14), the national plastic bag recycling rate in 2007 was 11.9%.

STPB objects to the use of an outdated, irrelevant, invalid and misleading California plastic bag recycling rate. This is critically important and decision-makers and the public need to know how well AB 2449 is working before a decision is made to ban plastic bags. The County has obtained data from the CIWMB (now the Department of Resources Recycling and Recovery (CalRecycle)) and more data may be available. The County has also been gathering its own data from individual stores in the County. STPB objects to the failure to include such updated recycling data in the DEIR.

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**15. STPB OBJECTS TO THE FAILURE TO DISCLOSE THAT THE NON-BIODEGRADIBILITY OF PLASTIC BAGS IN LANDFILLS IS ENVIRONMENTALLY BENEFICIAL**

The fact that plastic bags do not degrade in landfills and therefore do not emit methane is an environmental *benefit*. The carbon is trapped in the bags. The U.S. Government is trying to find ways to trap carbon. Plastic does it automatically. When paper decomposes in a landfill, it emits methane which is a greenhouse gas with 23 times the global warming power of CO<sub>2</sub>. STPB objects to the failure to disclose this information in the DEIR.

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**16. STPB OBJECTS TO THE FAILURE TO DISCLOSE THE IMPACTS OF REUSABLE BAGS IN LANDFILLS**

The DEIR does not address the impact of reusable bags in landfills. According to AB 2449, stores that do not provide plastic carryout bags to their customers are not required to maintain plastic bag collection bins in their stores. If those bins are removed, there will be no infrastructure to recycle any bags except paper bags. *Cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), and other non-polyethylene reusable bags are all non-recyclable.* There are no recycling options for any of those bags. *They must be disposed of in landfills.* The environmental impacts of such disposal must be addressed and disclosed in the DEIR. See:

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<http://www.theage.com.au/national/bag-the-bag-a-new-green-monster-is-on-the-rise-20100123-mrqq.html>

**17. STPB OBJECTS TO THE FAILURE TO DISCLOSE REUSABLE BAG HYGIENE IMPACTS**

The DEIR states (at page ES-2):

“However, as is the case for any reusable household item that comes into contact with food items, such as chopping boards, tableware, or table linens, reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly.”

The fact that reusable bags are cleanable does not mean that they will always be cleaned. STPB objects to the failure to address and disclose what may happen or what is likely to happen if they are not cleaned by consumers.

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There is a new University of Arizona study issued in June 2010 (link below) that indicates that 97% of people who use reusable bags do not wash them. If people become concerned about the hygiene issues associated with reusable bags, many or most people will stop using them and will use paper bags instead if plastic bags are banned. Unfortunately, it only takes one publicized incident to create panic. There would need to be a comprehensive education campaign to make sure people properly and frequently wash their bags. In fact, a reusable bag should be wiped clean or washed after *every* use.

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<http://www.prweb.com/releases/2010/06/prweb4185254.htm>

17 cont.

[http://uanews.org/pdfs/GerbaWilliamsSinclair\\_BagContamination.pdf](http://uanews.org/pdfs/GerbaWilliamsSinclair_BagContamination.pdf)

### **18. STPB OBJECTS TO THE DESCRIPTION OF PAPER BAGS AS REUSABLE**

The DEIR (at page 2-5) defines reusable bags as follows:

Definition. “Recyclable paper bag(s): a paper bag that (a) contains no old growth fiber, (b) is 100-percent recyclable overall and contains a minimum of 40-percent postconsumer recycled content, (c) is compostable, and (d) displays the words “reusable” and “recyclable” in a highly visible manner on the outside of the bag.”

Paper bags may not lawfully be described as “reusable.” The term “reusable bag” is defined in Public Resources Code §42250(d) as follows:

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“Reusable bag” means either of the following:

(1) A bag made of cloth or other machine washable fabric that has handles.

(2) A durable plastic bag with handles that is at least 2.25 mils thick and is specifically designed and manufactured for multiple reuse.

STPB objects to the description of a paper bag as reusable. STPB further objects to any and all data in the EIR that is based on the assumption that a paper bag can qualify as a “reusable” bag.

### **19. STPB OBJECTS TO STATEMENTS REGARDING THE SAN FRANCISCO PLASTIC BAG BAN ORDINANCE**

The DEIR states (at pages 2-5):

“Since adoption of the [San Francisco] ordinance, initial feedback from the public has been positive and the use of reusable bags has increased. [Footnote.] There has been no reported negative public health issues (salmonella, e. coli, food poisoning, etc.) related to the increased use of reusable bags. [Footnote.] As a result of the ordinance, San Francisco has not noted an increase in the number of waste discharge permits or air quality permits required for paper bag manufacturing in the district, nor has there been a noticeable increase in traffic congestion in proximity to major supermarkets due to increased paper bag delivery trucks. [Footnote.] San Francisco has also not noticed any increase in eutrophication in waterways due to increased use of paper bags. [Footnote.]”

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The above-quoted statement is disingenuous. There are no paper bag factories in San Francisco. Paper bags used in San Francisco are brought in from outside the city. Obviously there would be no “waste discharge permits or air quality permits required for paper bag manufacturing in the district” or “increase in eutrophication in waterways” in the city, because those impacts are caused by manufacturing, not usage. STPB objects to the statement as it is disingenuous and grossly misleading to decision-makers and consumers.

There is substantial evidence of a major increase in paper bag usage in San Francisco. To determine the impact of the San Francisco plastic bag ban ordinance, Robert Lilienfeld, President of The Cygnus Group and Editor of the ULS Report, traveled to San Francisco to observe store and customer bag usage and activity. A total of 25 retail stores were visited from September 14 to 17, 2008. Stores were walked through, store personnel were questioned, checkout activities were observed, and customers' bagging preferences were reviewed. Lilienfeld found that all food chains affected by the ordinance had switched to paper bags only. He also found that "very few people" brought reusable bags to the store -- no more than in other cities. Lilienfeld concluded as follows:

19 cont.

“If reducing environmental impact is the objective of the Ordinance, results to date do not indicate it will be successful. First, little use of reusable bags was observed. Second, the replacement of plastic by paper and the return to double bagging may actually increase environmental impact, as many peer reviewed lifecycle studies indicate that paper bags use more energy, produce more waste, and generate more greenhouse gas emissions than do plastic bags.”

The URL for the ULS San Francisco survey is as follows:

<http://www.use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>

STPB objects to the failure to including the findings of the ULS San Francisco survey. STPB mentioned the survey in its scoping comments. This is a critical omission, because the County is proposing to adopt an ordinance substantially similar to the one in San Francisco; plastic bags would be banned and free paper bags would be permitted.

**20. STPB OBJECTS TO THE FAILURE TO CONSIDER THE REASONABLY FEASIBLE ALTERNATIVE OF REQUIRING AN OXO-BIODEGRADABLE ADDITIVE IN PLASTIC BAGS**

The DEIR (Appendix B) defines “biodegradable plastic” as follows:

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Biodegradable Plastic a degradable plastic in which the degradation results from the action of naturally occurring microorganisms such as bacteria, fungi and algae.

As stated in STPB’s January 4, 2010 letter (at pages 37 to 38), there are two types of biodegradable additives. The above definition describes the type produced by ECM. That kind is

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not *oxo*-biodegradable.

The other type is *oxo*-biodegradable for which the additive is produced by Symphony and other companies. *Oxo*-biodegradation is degradation resulting from oxidative and cell-mediated phenomena, either simultaneously or successively. Symphony's *oxo*-biodegradation additive breaks the molecular chains within the polymer and makes it degrade and then biodegrade in the presence of air, on land or at sea, in the light or the dark, in heat or cold, leaving no methane, no toxic dust, and no other harmful residues. *Oxo*-biodegradation can be tested according to ASTM 6954. Plastics with Symphony's additive can be recycled and made from recycle, and there is little or no additional cost. Plastic bags containing the additive are fully recyclable. See: [www.biodeg.org/position-papers/recycling/?domain=biodeg.org](http://www.biodeg.org/position-papers/recycling/?domain=biodeg.org).

The DEIR mentions *oxo*-biodegradable bags, but confuses them with the ECM kind.

20 cont.

Symphony's d2w additive has been independently tested to prove degradation, biodegradation and non eco-toxicity and is certified safe for food-contact. Symphony's additive is fully available today and is being used in plastic bags around the world.

The County must consider the reasonably feasible alternative of requiring plastic bags to contain an *oxo*-biodegradable additive. If such an additive is required, there will be a major reduction in any marine debris from such plastic bags as they will biodegrade in the ocean.

Michael Stephen of Symphony requested a meeting with County officials when he was in California in May 2010, to explain *oxo*-biodegradable additives. County officials refused to meet with him. The County still has the opportunity to discuss *oxo*-biodegradable additives with him before the EIR is prepared.

## **21. STPB OBJECTS TO THE REFERENCE TO BIODEGRADABLE PRODUCT INSTITUTE AS A RECOGNIZED VERIFICATION ENTITY**

The DEIR contains the following definition (at page 2-4):

Definition. "Compostable plastic carryout bag(s): a plastic carryout bag that (a) conforms to California labeling law (Public Resources Code Section 42355 et seq.), which requires meeting the current American Society for Testing and Materials (ASTM) standard specifications for compostability; (b) is certified and labeled as meeting the ASTM standard by a recognized verification entity, such as the Biodegradable Product Institute; and (c) displays the word "compostable" in a highly visible manner on the outside of the bag (Appendix B)."

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STPB objects to the assertion that the Biodegradable Product Institute ("BPI") is a "recognized verification entity." There is no substantial evidence for the assertion. BPI is a trade association representing compostable bag manufacturers. It does not verify compliance with ASTM standards and is not recognized by anyone except as a trade association. It is not even an institute of any kind.

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## **22. STPB OBJECTS TO ALL REFERENCES TO JUNE 18, 2004 CITY OF LOS ANGELES SURVEY**

The DEIR states (at page 2-1):

“As an example of the prevalence of plastic bag litter found in catch basins, during the Great Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, it was observed that 25 percent weight and 19 percent by volume of the trash collected consisted of plastic bags. (Footnote 4: City of Los Angeles. 18 June 2004. Characterization of Urban Litter. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.)”

There are other references to the survey in the DEIR. STPB objects to all such references.

The survey determined that 19% of trash by weight and 25% by volume in 30 catch basins along a one-mile stretch of North Figueroa Street between Cypress Avenue and Avenue 43 was “plastic bags.”

The term “plastic bags” is not defined in the survey, so it could include produce bags, food packaging in the form of bags, restaurant take out bags, dry cleaning bags, merchandise and retail bags, newspaper bags, trash bags, and other plastic bags. The County has advised STPB that it does not have Attachments A and B to the survey. Attachment B include photographs of the survey including the litter material collected.

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The inability to determine what kind of plastic bags were in the storm drains in the survey is a serious problem and STPB objects to the use of or any reference to the survey without the attachments. This is important because the 25% figure is totally inconsistent with the Keep America Beautiful figure of 0.9% at storm drains. (See STPB’s January 4, 2010 letter at page 16.)

STPB further objects on the ground that said study is not representative of conditions across the county. The survey apparently determined that 19% of trash by weight and 25% by volume in 30 catch basins along a one-mile stretch of North Figueroa Street between Cypress Avenue and Avenue 43 was “plastic bags.” According to another study by the City of Los Angeles, the geographical area covered in the June 2004 survey is part of the central part of the city which

“contributes disproportionately more trash per unit area. The central part of the City is characterized with higher population density, has more commercial and industrial areas, and has more pedestrian traffic than other areas of the City.”

Watershed Quality Compliance Master Plan For Urban Runoff, Watershed Protection Division, Bureau of Sanitation, Department of Public Works, City of Los Angeles, May 2009 at page 4-2. The link to the document is as follows:

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STPB advised the County of this document in its January 4, 2010 letter (at page 12), but it is not mentioned in the DEIR. STPB objects to the fact that it is not mentioned because the City of Los Angeles June 2004 survey is effectively represented as being typical of conditions across the county, which is misleading and untrue.

22 cont.

**23. STPB OBJECTS TO THE FAILURE TO DISCLOSE THAT PURPOSE OF CATCH BASINS IS TO CATCH PLASTIC BAGS AND OTHER LITTER**

The DEIR states (at page 3.4-19):

“There are more than 80,000 catch basins that collect runoff throughout the six major watersheds within the RWQCB Los Angeles Region of the County: Dominguez Channel watershed, Ballona Creek watershed, San Gabriel River watershed, Los Angeles River watershed, Santa Clara Watershed, and Malibu Creek watershed (Figure 3.4.2-1, Northern Portion of the County Storm Drain System, and Figure 3.4.2-2, Southern Portion of the County Storm Drain System ). [Footnote.] During the Great Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, it was observed that 25 percent by weight and 19 percent by volume of the trash collected was plastic bags. [Footnote.] Results of a Caltrans study of catch basins alongside freeways in Los Angeles indicated that plastic film was 7 percent by mass and 12 percent by volume of the total trash collected. [Footnote.]The LACDPW contracts out the cleaning of all the catch basins in the County for a total cost of slightly over \$1 million per year, billed to 42 municipalities. Each catch basin is cleaned once a year before the rainy season, except for 1,700 priority catch basins that fill faster and have to be cleaned out more frequently. [Footnote.] Installation of catch basin inserts to improve the catch basins’ ability to prevent trash from entering the waterways, in compliance with adopted trash TMDLs, is about \$800 per insert. [Footnote.]”

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There are also similar statements in the DEIR regarding Los Angeles River catch basins, including at pages 3.4-12 and 3.5-5 and 3.5-11.

Without waiving the objection to all references to the City of Los Angeles June 2004 study, STPB further objects on the ground that the DEIR fails to mention that the purpose of a catch basin is to “catch” litter such as plastic bags. Obviously, the catch basins are *successful* at catching plastic bags, which is the proper conclusion to be drawn from the City of Los Angeles June 2004 study and this should be disclosed in the EIR. Without stating this point the DEIR is grossly misleading to decision-makers and the public.

**24. STPB OBJECTS TO THE ASSERTION THAT BANNING PLASTIC BAGS WILL RESULT IN REDUCED LITTER CLEANUP COSTS**

The DEIR states (at page 2-12):

“Furthermore, plastic bag litter leads to increased clean-up costs for the County, Caltrans, and other public agencies.”

The DEIR further states (at page 2-18):

Objective: “Reduce the County’s, Cities’, and Flood Control District’s costs for prevention, clean-up, and enforcement efforts to reduce litter in the County by \$4 million.”

STPB objects to these assertions on three grounds.

First, the basis for the \$4 million figure is not explained. There is no substantial evidence cited to support the figure. 24

Second, litter crews will still have to clean the same areas even if plastic carryout bags are removed from the litter stream. That means that plastic bag litter does not result in increased clean-up costs. Further, no money will be saved from litter cleanup costs if plastic bags are banned.

Third, as there would be an increased number of paper bags, there would be more paper bag litter and more bag bags going into landfills. Paper bags produce more solid waste, according to the Scottish/Ecobilan and Boustead reports, because they are heavier and use much more space in landfills. This is true even though paper bags have a higher recycling rate than plastic bags because 1,000 paper bags produce 33.9 kilograms of solid waste compared to 7.0 kilograms for plastic bags with the carrying capacity of 1,000 paper bags.

Landfill tipping fees are based on weight. STPB objects to the failure to factor in the cost of tipping fees in cleanup costs. Tipping fees will increase if there is an increase in the number of paper bags, because paper bags are bulkier and heavier.

**25. STPB OBJECTS TO THE REFERENCE TO THE CIT EKOLOGIK STUDY**

The DEIR states (at page 3.1-14):

“This contrasts with a more recent study in 2000, the CIT Ekologik Study, which found that the production of paper carryout bags contributes significantly less air emissions than does the production of plastic carryout bags. (Footnote 32: CIT Ekologik, Chalmers Industriteknik. 2000. Distribution in Paper Sacks. Goteborg, Sweden.)” 25

STPB objects to any reference to the CIT Ekologik study. In its January 4, 2010 letter (at page 35), STPB notified the County of the fact that CIT Ekologik report issued in 2000 on behalf

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of the European paper bag producers Eurofac and CEPI Eurokraft studied *55 lb capacity animal feed distribution sacks*. It is not substantial evidence for the proposition that paper *carryout* bags are better for the environment in any way than plastic *carryout* bags and its inclusion in the EIR would be grossly misleading to the County Board of Supervisors, other decision-makers, and the public.

25 cont.

Note: The study is apparently not available on the Internet and is not attached to the DEIR. STPB is submitting herewith the relevant pages of the South African FRIDGE report showing that the CIT Ekologic study analyzed 25 kg (55 lb) capacity animal feed distribution bags. The County has the burden of producing the entire CIT Ekologic document if it wishes to rely on it and demand it hereby made that it be produced.

## **26. STPB OBJECTS TO THE ASSERTION THAT NO PROJECT ALTERNATIVE MAY RESULT IN SIGNIFICANT IMPACT**

The DEIR states (at page 4-6):

“However, like the proposed ordinances, the No Project Alternative may have the potential to result in a cumulatively considerable significant impact due to indirect GHG emissions resulting from the production, distribution, transport, and disposal of plastic carryout bags.”

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STPB objects to this statement as the status quo does not in itself create a significant impact that does not already exist. The status quo is the baseline from which impacts are measured. Moreover, according to the tables in the DEIR including Tables 1, 2 and 3 above, the status quo results in less GHG and other negative environment impacts than banning plastic bags and STPB also objects for that reason.

## **27. OBJECTION TO FAILURE TO EXPLAIN HOW THE PROPOSED ORDINANCES WOULD ADVANCE THE COUNTY’S FOURTH AND FIFTH STATED GOALS**

The DEIR states (at page 2-17):

“The County has identified five goals of the proposed ordinances, listed in order of importance: (1) litter reduction, (2) blight prevention, (3) coastal waterways and animal and wildlife protection, (4) sustainability (as it relates to the County’s energy and environmental goals), and (5) landfill disposal reduction.”

27

As the DEIR and the Ecobilan and Boustead reports and Tables 1, 2 and 3 above show, including in the three tables at the beginning of this paper, paper bags are far worse for sustainability (as it relates to the County’s energy and environmental goals) and landfills than plastic bags. Paper bags use more nonrenewable energy and create more GHG emissions than plastic bags.

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The DEIR does not disclose the fact that the fourth and fifth stated goals would not be achieved and would be set back by the proposed ordinances. Therefore, STPB objects. 27 cont.

**28. STPB OBJECTS TO THE FAILURE TO CONSIDER A PAPER BAG BAN OR FEE**

An EIR must discuss reasonably feasible ways to mitigate environmental impacts or discuss reasonably feasible alternative proposals to achieve the stated objectives with less environmental impacts. The DEIR does not address and evaluate the possibility of imposing a fee on paper bags to reduce the environmental impacts of a plastic bag ban. STPB objects to this omission and major deficiency in the EIR. A 25 cent fee on paper bags, for example, would dramatically reduce the usage of paper bags and promote a switch to reusable bags. The City of Santa Monica is proposing a 25-cent paper bag fee. 28

**29. OBJECTION TO FAILURE TO INCLUDE SEPARATE DISCRETE FINDINGS**

There are no separate and discrete findings in the report on each of the points required to be considered in the EIR. Therefore, STPB objects. 29

**30. OBJECTION TO MISREPRESENTATION REGARDING DISPOSITION OF LITIGATION**

The DEIR states at page 2-10 that the Superior Court dismissed the CEQA petition in *Save The Plastic Bag v. County of Los Angeles, Los Angeles Superior Court, Case No. BS115845*. The assertion is incorrect and therefore STPB objects. The petition claim (Count I) was settled, not dismissed. The County stipulated as follows as part of the settlement: 30

The County hereby stipulates and agrees that the Board of Supervisors' resolution of January 22, 2008 does not commit the County to adopt an ordinance banning plastic bags if the program goals are not met.

STPB objects to the failure to state the wording of the stipulation in the discussion of the lawsuit.

**ADMINISTRATIVE RECORD**

All of the documents cited herein and in STPB's January 4, 2010 letter for which hyperlinks are provided constitute evidence supporting the objections herein and are part of the administrative record.

STPB is submitting contemporaneously herewith, by e-mail, downloaded copies in PDF format of all documents, web pages and photographs hyperlinked or cited in this letter and in STPB's January 4, 2010 letter.

## **REQUEST FOR NOTICES**

I request that you send me by e-mail and regular mail any future public notices regarding the DEIR, EIR and proposed ordinance.

## **CONTACT PERSON**

Stephen Joseph is the designated contact person for the Save The Plastic Bag Coalition regarding the DEIR, EIR and proposed ordinance.

## **PROPOSAL FOR GOOD FAITH DISCUSSIONS**

STPB invites and strongly urges County officials (and Sappho's Environmental) to meet with STPB to discuss and attempt to resolve each objection.

STPB wants the whole environmental truth to be disclosed to the Board of Supervisors and the public in a clear and informative EIR based on substantial evidence and a cumulative analysis, without baseless assertions, misleading statements, or other objectionable material. The primary goal of the STPB campaign is to ensure that decision-makers and the public know the environmental truth.

## **CONCLUSION**

All rights are reserved, including but not limited to the right to challenge the validity of a plastic bag ban based on the preemptive effect of Pub. Res. Code §42250-57.

The fact that particular parts of the DEIR are not mentioned herein does not mean that STPB accepts their accuracy or validity.

No rights or duties are waived by any statement or omission herein. Strict compliance with all the applicable provisions of CEQA is hereby demanded.

Dated: July 16, 2010



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STEPHEN L. JOSEPH  
Counsel, Save The Plastic Bag Coalition

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### ***Response to Introductory Comment***

The County of Los Angeles appreciates that the Save the Plastic Bag Coalition (STPB) took the time to review and provide comments on the Draft EIR for the proposed ordinances. The commenter asserts that its comment letter, dated January 4, 2010, in response to the Notice of Preparation (NOP) for the Draft EIR was incorporated by reference. However, the comment letter was written before the Draft EIR was prepared, and in many respects is not directly pertinent to the Draft EIR. For example, the letter states that the County of Los Angeles must consider various reports, but ultimately, preparation of the Draft EIR considered information from a number of sources, including the Boustead Study, endorsed by the STPB in its January 4, 2010, comment letter.

The commenter's introductory comment regarding the NOP restates one of the key objectives of the proposed ordinances, which is to "substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and reach at least 50,000 residents (5 percent of the population) with an environmental awareness message." The introductory comment on the NOP asserts that the information contained within a recent *Los Angeles Times* editorial makes incorrect statements and that the Great Pacific Garbage Patch discussed in this same editorial does not exist. The introductory comment states that evidentiary photographs would be available if an area "larger than Texas and thick with floating plastic debris" did indeed exist. In response to this comment, the County of Los Angeles notes that a large amount of available scientific literature documents the existence of a concentration of plastic within the North Pacific Gyre,<sup>32,33,34,35,36,37</sup> which is often referred to as the Great Pacific Garbage Patch. The patch has been acknowledged and studied by many reputed agencies and organizations, including the U.S. National Oceanic and Atmospheric Administration, Algalita Marine Research Foundation, the Ocean Conservancy, and the USEPA. The USEPA's regional administrator for the Pacific Southwest (Mr. Jared Blumenfeld) recently said that the ban on plastic carryout bags in American Samoa will help "prevent plastic shopping bags from ending up in the Great Pacific Garbage Patch – an enormous area of floating plastic waste."<sup>38</sup> Although the North Pacific Gyre does not have a visible patch or "island" of plastic debris, it is a location that contains a large concentration of

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<sup>32</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>33</sup> Moore, Charles James. October 2008. "Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat." In *Environmental Research*, 108 (2): 131139.

<sup>34</sup> Ryan, Peter G. et al. 2009. "Monitoring the Abundance of Plastic Debris in the Marine Environment." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999–2012.

<sup>35</sup> Crain, Caitlin M. et al. 2009. "Understanding and Managing Human Threats to the Coastal Marine Environment." In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>36</sup> McDermid, K. and McMullen, T. 2004. "Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago." *Marine Pollution Bulletin*, 48: 790–794.

<sup>37</sup> Ebbesmeyer C. C., et al. 2007. "Tub toys orbit the Pacific Subarctic gyre." In *EOS, Transactions of the American Geophysical Union*, 88 (1).

<sup>38</sup> U.S. Environmental Protection Agency. 30 September 2010. "U.S. EPA applauds American Samoa's decision to ban plastic shopping bags." Available at:  
<http://yosemite.epa.gov/opa/admpress.nsf/0/921A87D72D9AAFC1852577AE007394F1>

plastic debris, much of which is present as small plastic fragments.<sup>39</sup> The patch is not visible from satellite imagery because the area consists primarily of debris particles suspended below the surface of the ocean. The 2008 article by Charles James Moore referenced in Section 3.2.4, Impact Analysis, of the EIR presents a photograph of plastic fragments collected during a trawl of the North Pacific Gyre.<sup>40</sup> The EIR for the proposed ordinances does not make any misleading claims that the North Pacific Gyre has a visible patch or “island” of plastic debris.

The introductory comment also states that paper carryout bags are worse for the environment than plastic carryout bags. The County of Los Angeles has made a good faith effort to disclose the environmental impacts of paper carryout bags throughout the various subsections of Section 3.0 of the EIR, which contain detailed and comprehensive analyses of these impacts. Furthermore, the introductory comment states that the County of Los Angeles is not proposing a fee on the issuance of paper carryout bags; however, Alternative 2 in Section 4.2.3 discusses and analyzes impacts resulting from implementation of a fee on the issuance of paper carryout bags. The County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4, and has evaluated the impacts resulting from the implementation of a fee on the issuance of paper carryout bags at a greater number of stores. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.2.6 (see Section 12.2).

In addition, as disclosed in Section 3.1.4, for the purposes of this EIR and to conservatively evaluate impacts resulting from a worst case scenario, the County of Los Angeles assumed a larger number of plastic carryout bags used by affected stores in its impact analysis than the California Department of Resources Recycling and Recovery (CalRecycle) reported in 2008 were used by stores affected by Assembly Bill (AB) 2449.<sup>41</sup> Thereafter, the County of Los Angeles used this conservative number and evaluated the potentially resulting impacts again assuming a conservative worst case scenario of 85- and 100-percent conversion from plastic to paper carryout bags.

The introductory statement also states that a editorials in the *Daily Breeze* and the *Long Beach Press Telegram* assert a misleading and inaccurate statement that plastic bags “kill an estimated 1 million seabirds and 100,000 other animals every year.” The EIR for the proposed ordinances does not make this statement, and the County of Los Angeles did not reference these editorials in the EIR.

The introductory comment states that the Draft EIR has avoided addressing the marine wildlife issue directly, although the commenter requested in its January 4, 2010, letter that this issue be addressed. However, sections of the EIR, including, but not limited to, Section 3.2, discuss the impacts of plastic bags on marine wildlife:

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<sup>39</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>40</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>41</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

According to the Regional Water Quality Control Board (RWQCB) for the Los Angeles Region, trash has potentially harmful impacts to species, and plastic bags are one of the most common items of trash observed by RWQCB staff.<sup>42</sup> Seabirds, sea turtles, and marine mammals that feed on or near the ocean surface are especially prone to ingesting plastic debris that floats.<sup>43,44,45</sup> The impacts include fatalities as a result of ingestion, starvation, suffocation, infection, drowning, and entanglement.<sup>46,47</sup> The recovery plan for the endangered leatherback turtle (*Dermochelys coriacea*) lists ingestion of marine debris, including plastic bags, as one of the factors threatening this species.<sup>48</sup> The recovery plan says that leatherback turtles consume floating plastic, including plastic bags, because they appear to mistake the floating plastic for jellyfish.<sup>49</sup> The recovery plans for the threatened green turtle (*Chelonia mydas*), loggerhead turtle (*Caretta caretta*), and olive ridley turtle (*Lepidochelys olivacea*) also note plastic bag ingestion as a threat to those species.<sup>50,51,52</sup> Ingestion of plastics is also noted as a threat in the recovery plan for the federally endangered short-tailed albatross (*Phoebastria albatrus*).<sup>53</sup> Preventing trash from entering water bodies, such as the Los Angeles River, has the potential to improve habitats and aquatic life.<sup>54,55</sup>

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<sup>42</sup> Regional Water Quality Control Board, Los Angeles Region. Revised 27 July 2007. "Trash Total Maximum Daily Loads for the Los Angeles River Watershed." Los Angeles, CA.

<sup>43</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>44</sup> National Research Council. 2008. *Tackling Marine Debris in the 21st Century*. Committee on the Effectiveness of National and International Measures to Prevent and Reduce Marine Debris and Its Impacts.

<sup>45</sup> U.S. Environmental Protection Agency. August 2002. *Assessing and Monitoring Floatable Debris*. Washington, DC.

<sup>46</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>47</sup> Gregory, Murray R. 2009. "Environmental Implications of Plastic debris in Marine Settings –Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2013–2025.

<sup>48</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Leatherback Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_leatherback\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_leatherback_pacific.pdf)

<sup>49</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Leatherback Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_leatherback\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_leatherback_pacific.pdf)

<sup>50</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the East Pacific Green Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_green\\_eastpacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_green_eastpacific.pdf)

<sup>51</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Loggerhead Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_loggerhead\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_loggerhead_pacific.pdf)

<sup>52</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Olive Ridley Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_oliveridley.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_oliveridley.pdf)

<sup>53</sup> U.S. Fish and Wildlife Service. September 2008. *Short-tailed Albatross Recovery Plan*. Available at: [http://alaska.fws.gov/fisheries/endangered/pdf/stal\\_recovery\\_plan.pdf](http://alaska.fws.gov/fisheries/endangered/pdf/stal_recovery_plan.pdf)

<sup>54</sup> Regional Water Quality Control Board, Los Angeles Region. Revised 27 July 2007. "Trash Total Maximum Daily Loads for the Los Angeles River Watershed." Los Angeles, CA.

<sup>55</sup> County of Los Angeles, Department of Public Works. 2 June 2010. Ordinances to Ban Plastic Carryout Bags in Los Angeles County Draft Environmental Impact Report. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

## ***Response to Comment No. 1***

Comment No. 1 states that the EIR did not discuss and address issues and points contained in STPB's January 4, 2010 comment letter. The County of Los Angeles has considered all comments from STPB's January 4, 2010, letter during preparation of the Draft EIR for the proposed ordinances. The letter included several CEQA-related comments with regard to litter impacts, biological resources, and paper bag usage; these issues are addressed throughout the various subsections of Section 3.0 of the Draft EIR. Section 15151 of the State CEQA Guidelines states, "an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." CEQA requires adequacy, completeness, and a good faith effort at full disclosure. Furthermore, Section 15145 of the State CEQA Guidelines states that "if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." All comments from STPB have been noted for the record and have been considered by the County of Los Angeles for the proposed ordinances.

Below, the County of Los Angeles responds to each issue and point contained in Comment No. 1 of the commenter's letter.

### *Section 1, Page 11, Paragraph B*

In Section 1, page 11, paragraph B, of the comment letter, the commenter requests that the County of Los Angeles describe in detail the method by which the proposed ordinances would achieve a \$4 million expense reduction that is proposed in the Initial Study. As described in Section 2.4.2, the County of Los Angeles has complied with CEQA Guideline §15124 by providing a clearly written statement of the objectives of the proposed ordinances, one of which is to decrease the County of Los Angeles's litter reduction costs by \$4 million. The proposed ordinances would help reduce the amount of litter in the County of Los Angeles attributable to plastic carryout bags, along with the associated costs to government for litter prevention, cleanup, and enforcement efforts. Section 2.2.1 of the EIR also notes that public agencies in California spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>56</sup> In the County of Los Angeles, specifically, the County Flood Control District alone exhausted \$24 million of these public funds in 2008–2009 (the most recent data available), while LACDPW expended additional resources separate from and in addition to state funds to address litter.<sup>57,58</sup> By banning the issuance of plastic carryout bags, a significant number of plastic carryout bags would be removed from the waste stream, along with the associated litter attributable to those plastic carryout bags. An ordinance that could result in a substantial reduction in litter would be reasonably expected to reduce the costs of litter cleanup in the County of Los Angeles. Although CEQA does not require analysis of economic impacts in the EIR, during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR, the County of Los Angeles will consider information related to opportunities for reducing the amount of litter attributable to plastic carryout bags that enters the storm drain system .

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<sup>56</sup> California Department of Transportation. Accessed on: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>57</sup> California Department of Transportation. Accessed on: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>58</sup> County of Los Angeles. October 2009. Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

The commenter states that paper bags also become litter. However, as discussed in Sections 3.1 and 3.17 of the Initial Study and Section 4.0 of the EIR, paper carryout bags are less likely than plastic carryout bags to be littered and to end up in storm water runoff because they are heavier (paper bags have been noted to be anywhere between 6 to 10 times heavier than plastic bags),<sup>59</sup> and therefore are less likely to become airborne and scattered. Unlike regular plastic, paper is biodegradable and compostable.<sup>60</sup> The paper used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally biodegradable and compostable material. Due to the biodegradable properties of paper, paper bags do not persist in the marine environment for as long as plastic bags.<sup>61</sup>

*Section 1, Page 11, Paragraph D*

Section 1, page 11, paragraph D of the STPB's comment letter requests that the County of Los Angeles evaluate alternative ways to achieve the program goals and Countywide objectives without adopting the proposed ordinance. Section 15126.6 of the State CEQA Guidelines stipulates that the EIR must examine in detail only the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project; the County of Los Angeles has complied with this requirement. In Section 4.0 of the EIR, the County of Los Angeles analyzes the impacts of four alternatives to the proposed ordinances that would achieve the program goals and Countywide objectives. These alternatives include banning the issuance of both plastic and paper carryout bags; banning the issuance of plastic carryout bags and imposing a fee on the issuance of paper carryout bags; banning the issuance of plastic carryout bags at all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores; and banning the issuance of plastic carryout bags and paper carryout bags at all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

*Section 3, Page 18, Paragraph B*

The commenter requests that the EIR address the amount of paper carryout bag litter there has been in and near the County of Los Angeles. Many studies have noted the prevalence of plastic carryout bag litter in the marine environment, but these studies have not noted paper carryout bags as a serious litter contributor.<sup>62,63</sup> During the Great Los Angeles River Clean Up, which collected trash

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<sup>59</sup> Cadman, J., S. Evans, M. Holland, and R. Boyd. 2005. *Proposed Plastic Bag Levy – Extended Impact Assessment Final Report*. Prepared for: Scottish Executive.

<sup>60</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

<sup>61</sup> Andrady, Anthony L. and Mike A. Neal. 2009. "Applications and Societal Benefits of Plastics." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

<sup>62</sup> Ocean Conservancy. *A Rising Tide of Ocean Debris and What We Can Do About It. International Coastal Cleanup 2009 Report*. Available at: [http://www.oceanconservancy.org/pdf/A\\_Rising\\_Tide\\_full\\_lowres.pdf](http://www.oceanconservancy.org/pdf/A_Rising_Tide_full_lowres.pdf)



from 30 catch basins in the Los Angeles River, it was observed that 20 percent by weight and 17 percent by volume of the trash collected consisted of paper; however, these results are not limited to paper carryout bags and include all types of paper litter.<sup>64</sup> Out of the litter collected during the City of San Francisco Litter Audit in 2008, retail paper bags were not listed as one of the top 25 litter subcategories.<sup>65</sup> The City of San Francisco reported that paper retail bags constituted 0.4 percent of all large litter items collected in 2007, and 0.35 percent of all litter items collected in 2008.<sup>66</sup> The City of San Francisco Litter Audit concluded that 57.9 percent of all bag litter in 2008 was composed of unbranded plastic bags and 10.9 percent was composed of plastic retail bags, but only 6 percent of bag litter was composed of paper retail bags. As noted in Section 3.2 of the EIR, a study performed in Washington, DC, showed that paper products were not found in the streams except in localized areas, and were not present downstream.<sup>67</sup>

Furthermore, recycling rates of paper carryout bags are known to be higher than the recycling rates of plastic carryout bags. The County of Los Angeles is aware that if more paper carryout bags are used within its boundaries, an increase in litter attributable to paper carryout bags is possible; however, the proposed ordinances would also encourage a transition to the use of reusable bags. In addition, in Section 4.0 of the EIR, the County of Los Angeles has evaluated five alternatives to the proposed ordinances that would either ban or place a fee or charge on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. In addition, the County of Los Angeles has proposed mitigation measure GHG-1 to minimize the potential increase in use of paper carryout bags (see Section 12.2). As part of mitigation measure GHG-1, the County is proposing to implement and/or expand public outreach through a public education program that would aim to increase the percentage of paper carryout bags that are recycled in the County of Los Angeles, thereby reducing the number of paper carryout bags that can be potentially littered. The County of Los Angeles already has a public education program in place that encourages curbside recycling of a number of items, including paper carryout bags.<sup>68,69</sup> Curbside recycling is a convenient, free service for County of Los Angeles residents, and paper carryout bags are universally accepted for recycling throughout the County of Los Angeles.

As discussed in Section 3.17 of the Initial Study and Section 4.0 of the EIR, paper carryout bag litter in waterways does not present the same environmental hazards that are associated with plastic

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<sup>63</sup> Sheavly, S.B. 2007. *National Marine Debris Monitoring Program: Final Program Report, Data Analysis and Summary*. Prepared for US Environmental Protection Agency by Ocean Conservancy, Grant Number X83053401-02. p. 76.

<sup>64</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

<sup>65</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>66</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>67</sup> Anacostia Watershed Society. December 2008. *Anacostia Watershed Trash Reduction Plan*. Prepared for: District of Columbia Department of the Environment.

<sup>68</sup> County of Los Angeles Department of Public Works. Accessed on: 12 October 2010. *Outreach Programs*. Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and

<sup>69</sup> County of Los Angeles, Department of Public Works. Accessed on: 12 October 2010. *Commonly Recycled Materials*. Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/crm.cfm>

carryout bags. Unlike regular plastic, paper is biodegradable and compostable.<sup>70</sup> The paper used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally biodegradable and compostable material. Due to the biodegradable properties of paper, paper bags do not persist in the marine environment for as long as plastic bags.<sup>71</sup> As a result of a review of the available data regarding litter, the County of Los Angeles has reasonably concluded that plastic carryout bags pose a more serious litter problem than do paper carryout bags.

*Section 3, Page 18, Paragraph C*

The commenter conveys that the EIR should identify the exact locations of the highest concentrations of plastic bag and paper bag “hotspots” in and near the County of Los Angeles. Litter “hotspot” areas are estimated based on the frequency with which storm drain catch basins are cleaned. Figure 3.4.2-1, *Northern Portion of the County Storm Drain System*, and Figure 3.4.2-2, *Southern Portion of the County Storm Drain System*, of the EIR show the frequency of catch basin cleanout throughout the County of Los Angeles. The County of Los Angeles has compiled a database listing the locations of the catch basins shown in these figures.<sup>72</sup>

*Section 3, Page 18, Paragraph D*

The commenter conveys that the EIR should address other locations besides “hotspots” that tend to accumulate concentrations of plastic bag litter. During the Great Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, it was observed that 25 percent by weight and 19 percent by volume of the trash collected consisted of plastic bags.<sup>73</sup> The County of Los Angeles storm drain system connects directly to the Pacific Ocean; therefore, it is reasonable to assume that plastic carryout bag litter that enters the storm drain system and is not captured by catch basins could end up in the Pacific Ocean. As described in Section 3.2 of the EIR, plastics are chemically resistant and do not biodegrade, so they persist in the marine environment longer.<sup>74</sup> Plastics degrade into smaller pieces over time, eventually becoming tiny particles of plastics that are often called microplastics.<sup>75</sup> A 2002 study of the coastal ocean near Long Beach, California, showed that the average plastic density during the study was eight pieces per cubic meter. The average mass of plastic was two and a half times greater than that of plankton, and was even greater after a storm.<sup>76</sup> There is substantial evidence to suggest that plastic fragments tend to accumulate in oceans.<sup>77,78,79,80,81</sup>

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<sup>70</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

<sup>71</sup> Andrady, Anthony L. and Mike A. Neal. 2009. “Applications and Societal Benefits of Plastics.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

<sup>72</sup> County of Los Angeles, Department of Public Works. 30 September 2010. Catch Basin Map Database. On file at Sapphos Environmental, Inc., Pasadena, CA.

<sup>73</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

<sup>74</sup> Andrady, Anthony L. and Mike A. Neal. 2009. “Applications and Societal Benefits of Plastics.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

<sup>75</sup> Thompson, R. C. 7 May 2004. “Lost at Sea: Where Is All the Plastic?” In *Science*, 304 (5672): 843.

<sup>76</sup> Moore, C.J., S.L. Moore, S.B. Weisberg, G.L. Lattin, and A.F. Zellers. October 2002. “A Comparison of Neustonic Plastic and Zooplankton Abundance in Southern California’s Coastal Waters.” In *Marine Pollution Bulletin*, 44 (10): 1035–1038.

<sup>77</sup> Moore, Charles James. October 2008. “Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat.” In *Environmental Research*, 108 (2): 131–139.

*Section 3, Page 19, Paragraph E*

The commenter states that the Draft EIR should have addressed the extent to which plastic and paper bag litter is caused by such bags flying out of the back of trucks, including, but not limited to, trucks hauling garbage and materials for recycling. Sections 3.1 and 3.17 of the Initial Study and Section 4.0 of the EIR discuss that the lightweight nature of plastic carryout bags make them more susceptible to becoming airborne. Paper carryout bags, which are heavier than their plastic counterparts, are not as susceptible as plastic bags to becoming airborne. Results of a Caltrans study of catch basins alongside freeways in Los Angeles indicated that plastic film composed 7 percent by mass and 12 percent by volume of the total trash collected.<sup>82</sup> One of the objectives of the proposed ordinances is to reduce the amount of plastic carryout bag litter that blights public spaces, which includes plastic carryout bag litter that has flown out of the back of a truck.

*Section 3, Page 19, Paragraph F*

The commenter states that the EIR should address the extent to which plastic and paper carryout bags are carried by the wind as a result of refuse collection and transportation practices. Sections 3.1 and 3.17 of the Initial Study and Section 4.0 of the EIR state that the lightweight nature of plastic carryout bags makes them more susceptible to becoming airborne. Paper carryout bags, which are heavier than their plastic counterparts, are not as susceptible as plastic carryout bags to being carried by the wind. A Caltrans study of catch basins alongside freeways in Los Angeles also indicated that plastic film composed 7 percent by mass and 12 percent by volume of the total trash collected.<sup>83</sup> One of the objectives of the proposed ordinances is to reduce Countywide disposal of plastic carryout bags in landfills by 50 percent from 2007 annual amounts. A reduction in trash disposal of plastic carryout bags as a result of the proposed ordinances could reasonably be expected to cause a potential reduction the amount of litter in the County of Los Angeles that has been carried by the wind as a result of refuse collection and transportation practices.

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<sup>78</sup> McDermid, K. and McMullen, T. 2004. "Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago." *Marine Pollution Bulletin*, 48: 790–794.

<sup>79</sup> David, K., A. Barnes, Francois Galgani, Richard C. Thompson and Morton Barlaz. 2009. "Accumulation and Fragmentation of Plastic Debris in Global Environments." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1985–1998.

<sup>80</sup> Algalita Marine Research Foundation. 2005. *Density of Plastic Particles Found in Zooplankton Trawls from Coastal Waters of California to the North Pacific Central Gyre*. Available at: <http://alguita.com/pdf/Density-of-Particles.pdf>

<sup>81</sup> Crain, Caitlin M. et al. 2009. "Understanding and Managing Human Threats to the Coastal Marine Environment." In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>82</sup> Combs, Suzanne, John Johnston, Gary Lippner, David Marx, and Kimberly Walter. 2001. *Results of the Caltrans Litter Management Pilot Study*. Sacramento, CA: California Department of Transportation. Available at: <http://www.owp.csus.edu/research/papers/papers/PP020.pdf>

<sup>83</sup> Combs, Suzanne, John Johnston, Gary Lippner, David Marx, and Kimberly Walter. 2001. *Results of the Caltrans Litter Management Pilot Study*. Sacramento, CA: California Department of Transportation. Available at: <http://www.owp.csus.edu/research/papers/papers/PP020.pdf>

*Section 3, Page 19, Paragraph G*

The commenter states that the EIR should address what other sources and causes of plastic and paper carryout bag litter exist in the County of Los Angeles. The County of Los Angeles considered numerous litter audits and studies during preparation of the EIR.<sup>84,85,86,87,88,89</sup>

**Section 3, Page 19, Paragraph H**

The commenter states that the EIR should evaluate the extent to which plastic and paper carryout bags block or enter storm drains in the County of Los Angeles. As discussed in the EIR, including in Section 2.2.1, during the Great Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, it was observed that 25 percent by weight and 19 percent by volume of the trash collected consisted of plastic bags.<sup>90</sup> Figure 3.4.2-1 and Figure 3.4.2-2 of the EIR show the frequency of catch basin cleanout throughout the County of Los Angeles. The Los Angeles County Flood Control District has photographed carryout bags in the catch basins and storm drains.<sup>91</sup> Results of a study conducted by the Caltrans of catch basins alongside freeways in Los Angeles indicated that plastic film composed 7 percent by mass and 12 percent by volume of the total trash collected,<sup>92</sup> and it is important to note that the County of Los Angeles storm drain system drains directly to the Pacific Ocean.

*Section 3, Page 19, Paragraph I*

The commenter states that the EIR should address the regulatory requirements with which the County of Los Angeles must comply regarding plastic and paper carryout bags that are provided to consumers in the County of Los Angeles. A regulatory framework for each environmental issue area is provided throughout the various subsections of Section 3.0 of the EIR. The only adopted regulation that is directly relevant to the issuance and recycling of plastic and paper carryout bags

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<sup>84</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>85</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

<sup>86</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>87</sup> Combs, Suzanne, John Johnston, Gary Lippner, David Marx, and Kimberly Walter. 2001. *Results of the Caltrans Litter Management Pilot Study*. Sacramento, CA: California Department of Transportation. Available at: <http://www.owp.csus.edu/research/papers/papers/PP020.pdf>

<sup>88</sup> Combs, Suzanne, John Johnston, Gary Lippner, David Marx, and Kimberly Walter. 1998–2000. *Caltrans Litter Management Pilot Study*. Sacramento, CA: California Department of Transportation.

<sup>89</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at: [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>90</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

<sup>91</sup> County of Los Angeles. 2010. Photographs of Catch Basins in Los Angeles County provided to Sapphos Environmental, Inc. by the County of Los Angeles Flood Control District. Available for review at Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

<sup>92</sup> Combs, Suzanne, John Johnston, Gary Lippner, David Marx, and Kimberly Walter. 2001. *Results of the Caltrans Litter Management Pilot Study*. Sacramento, CA: California Department of Transportation. Available at: <http://www.owp.csus.edu/research/papers/papers/PP020.pdf>

is AB 2449, codified as California Public Resources Code §42250, *et seq.*, which is discussed in Section 3.5.1 of the EIR.

*Section 3, Page 19, Paragraph J*

The commenter states that the EIR should identify the locations of the “hotspots” for plastic bag litter in and near the County of Los Angeles. As noted in the response to the comment in Section 2, page 18, paragraph C, litter “hotspot” areas are estimated based on the frequency with which storm drain catch basins are cleaned out. Figure 3.4.2-1 and Figure 3.4.2-2 of the EIR show the frequency of catch basin cleanout throughout the County of Los Angeles; the County of Los Angeles has compiled a database listing the locations of the catch basins shown in these figures.<sup>93</sup>

*Section 3, Page 19, Paragraph K*

The commenter states that the EIR should address which alternative solutions to the plastic and paper carryout bag litter issue are available other than the proposed County of Los Angeles ordinance. Section 15126.6 of the State CEQA Guidelines requires only that the EIR examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. In Section 4.0 of the EIR, the County of Los Angeles analyzes the potential impacts of four different alternatives to the proposed ordinances that would achieve the program goals and Countywide objectives. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

*Section 4, Page 20, Paragraph A*

The commenter states that the EIR should address whether there is a concentration or island of plastic debris in the North Pacific Gyre. The purpose of the EIR is to evaluate the environmental impacts of the proposed ordinances rather than to discuss the existence of plastic debris in the North Pacific Gyre. In response to this comment, the County of Los Angeles notes that there is a large amount of available scientific literature that documents the existence of a concentration of plastic within the North Pacific Gyre, which is also commonly referred to as the Great Pacific Garbage Patch.<sup>94,95,96,97,98,99</sup> The USEPA’s regional administrator for the Pacific Southwest (Mr. Jared

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<sup>93</sup> County of Los Angeles, Department of Public Works. September 30, 2010. Catch Basin Map Database. On file at Sapphos Environmental, Inc., Pasadena, CA.

<sup>94</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” In *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>95</sup> Moore, Charles James. October 2008. “Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat.” In *Environmental Research*, 108 (2): 131–139.

<sup>96</sup> Ryan, Peter G. et al. 2009. “Monitoring the Abundance of Plastic Debris in the Marine Environment.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999–2012.

Blumenfeld) recently said that the ban on plastic carryout bags in American Samoa will help “prevent plastic shopping bags from ending up in the Great Pacific Garbage Patch – an enormous area of floating plastic waste.”<sup>100</sup> Although the North Pacific Gyre is not a visible patch or “island” of plastic debris when viewed from the air, it is a location that contains a large concentration of plastic debris, and much of this plastic is present as small plastic fragments.<sup>101</sup> The patch is not visible from satellite photography because it consists primarily of particles that are suspended below the ocean’s surface. The 2008 article by Charles James Moore, which is referenced in Section 3.2.4 of the EIR, contains a photograph of plastic fragments collected during a trawl of the North Pacific Gyre.<sup>102</sup> Accumulation rates of plastics in the oceans “vary widely with many factors such as proximity of urban settlements, shore use, prevailing wind and ocean currents and region.”<sup>103</sup> The EIR for the proposed ordinances does not make misleading claims that the North Pacific Gyre is a visible patch or “island” of plastic debris.

*Section 4, Page 20, Paragraph B*

The commenter states that the EIR should quantify the concentration of plastic “confetti” in the North Pacific Gyre. An analysis of plastic concentration in the North Pacific Gyre is beyond the scope of the analysis required for the EIR. The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed throughout the EIR, including but not limited to, Section 3.2 of the EIR, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean. The USEPA’s regional administrator for the Pacific Southwest (Mr. Jared Blumenfeld) recently said that the ban on plastic carryout bags in American Samoa will help “prevent plastic shopping bags from ending up in the Great Pacific Garbage Patch – an enormous area of floating plastic waste.”<sup>104</sup> The County of Los Angeles notes

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<sup>97</sup> Crain, Caitlin M. et al. 2009. "Understanding and Managing Human Threats to the Coastal Marine Environment." In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>98</sup> McDermid, K. and McMullen, T. 2004. "Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago." *Marine Pollution Bulletin*, 48: 790-794.

<sup>99</sup> Ebbesmeyer C. C., et al. 2007. "Tub toys orbit the Pacific Subarctic gyre." In *EOS, Transactions of the American Geophysical Union*, 88 (1).

<sup>100</sup> U.S. Environmental Protection Agency. 30 September 2010. "U.S. EPA applauds American Samoa’s decision to ban plastic shopping bags." Washington, D.C. Available at: <http://yosemite.epa.gov/opa/admpress.nsf/0/921A87D72D9AAFC1852577AE007394F1>

<sup>101</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." In *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>102</sup> Moore, Charles James. October 2008. "Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat." In *Environmental Research*, 108 (2): 131–139.

<sup>103</sup> David, K., A. Barnes, Francois Galgani, Richard C. Thompson and Morton Barlaz. 2009. "Accumulation and Fragmentation of Plastic Debris in Global Environments." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1985–1998.

<sup>104</sup> U.S. Environmental Protection Agency. 30 September 2010. "U.S. EPA applauds American Samoa’s decision to ban plastic shopping bags." Washington, D.C. Available at: <http://yosemite.epa.gov/opa/admpress.nsf/0/921A87D72D9AAFC1852577AE007394F1>

that additional information can be found in a large amount of available scientific literature that documents the existence of a concentration of plastic, much of which is present as small plastic fragments, within the North Pacific Gyre,<sup>105,106,107,108,109,110,111</sup> Accumulation rates of plastics in the oceans “vary widely with many factors such as proximity of urban settlements, shore use, prevailing wind and ocean currents and region.”<sup>112</sup>

Section 4, Page 20, Paragraph C

The commenter states that the EIR should quantify the sizes of the plastic “confetti” pieces in the North Pacific Gyre. An analysis of sizes of the plastic “confetti” pieces in the North Pacific Gyre is beyond the scope of the analysis required for the EIR. The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed throughout the EIR, including Section 3.2, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean. The County of Los Angeles notes that additional information can be found in a large amount of available scientific literature that documents the existence of a concentration of plastic, much of which exists as small plastic fragments, within the North Pacific Gyre.<sup>113,114,115,116,117,118,119</sup>

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<sup>105</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” In *Marine Pollution Bulletin*, 42: 1297–1300. Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. A comparison of plastic and plankton in the North Pacific central gyre. *Mar. Pollut. Bull.* 42, 1297–1300.

<sup>106</sup> Moore, Charles James. October 2008. “Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat.” In *Environmental Research*, 108 (2): 131–139.

<sup>107</sup> Ryan, Peter G. et al. 2009. “Monitoring the Abundance of Plastic Debris in the Marine Environment.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999–2012.

<sup>108</sup> Crain, Caitlin M. et al. 2009. “Understanding and Managing Human Threats to the Coastal Marine Environment.” In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>109</sup> McDermid, K. and McMullen, T. 2004. “Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago.” In *Marine Pollution Bulletin*, 48: 790–794.

<sup>110</sup> Ebbesmeyer C. C., et al. 2007. “Tub toys orbit the Pacific Subarctic gyre.” In *EOS, Transactions of the American Geophysical Union* 88, No. 1.

<sup>111</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>112</sup> David, K., A. Barnes, Francois Galgani, Richard C. Thompson and Morton Barlaz. 2009. “Accumulation and Fragmentation of Plastic Debris in Global Environments.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1985–1998.

<sup>113</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” In *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>114</sup> Moore, Charles James. October 2008. “Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat.” In *Environmental Research*, 108 (2): 131–139.

<sup>115</sup> Ryan, Peter G. et al. 2009. “Monitoring the Abundance of Plastic Debris in the Marine Environment.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999–2012.

<sup>116</sup> Crain, Caitlin M. et al. 2009. “Understanding and Managing Human Threats to the Coastal Marine Environment.” In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

Section 4, Page 21, Paragraph D

The commenter states that the EIR should note whether there is any substantial evidence that the plastic “confetti” pieces in the North Pacific Gyre consist of plastic bag fragments. The County of Los Angeles notes that additional information can be found in a large amount of available scientific literature that documents the existence of a concentration of plastic, much of which exists as small plastic fragments, within the North Pacific Gyre,<sup>120,121,122</sup> One reference in the EIR that discusses the accumulation of plastic fragments states, “up to 80 per cent or sometimes more of the waste that accumulates on land, shorelines, the ocean surface or seabed is plastic. The most common items are plastic films, such as carrier bags, which are easily wind blown, as well as discarded fishing equipment and food and beverage packaging.”<sup>123</sup> The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed in the EIR, including Section 3.2, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

Section 4, Page 21, Paragraph E

The commenter states that the EIR should note whether plastic debris exists below the water surface in the North Pacific Gyre and in what quantities and concentrations. In response to this comment, the County of Los Angeles notes that there is a large amount of available scientific literature that documents the existence of a concentration of plastic within the North Pacific Gyre, which is commonly referred to as the Great Pacific Garbage Patch.<sup>124,125,126,127,128,129</sup> Although the North Pacific Gyre is not a visible patch or “island” of plastic

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<sup>117</sup> McDermid, K. and McMullen, T. 2004. “Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago.” *Marine Pollution Bulletin*, 48: 790–794.

<sup>118</sup> Ebbesmeyer C. C., et al. 2007. “Tub toys orbit the Pacific Subarctic gyre.” In *EOS, Transactions of the American Geophysical Union*, 88 (1).

<sup>119</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” In *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>120</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” In *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>121</sup> Moore, Charles James. October 2008. “Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat.” In *Environmental Research*, 108 (2): 131–139.

<sup>122</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. “A comparison of plastic and plankton in the North Pacific central gyre.” *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>123</sup> David, K., A. Barnes, Francois Galgani, Richard C. Thompson and Morton Barlaz. 2009. “Accumulation and Fragmentation of Plastic Debris in Global Environments.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1985–1998.

<sup>124</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. A comparison of plastic and plankton in the North Pacific central gyre. *Mar. Pollut. Bull.* 42, 1297–1300.

<sup>125</sup> Moore, Charles James. October 2008. “Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat.” In *Environmental Research*, 108 (2): 131–139.



debris, a bird's-eye view shows that it as a location that contains a large concentration of plastic debris, and much of this plastic is present as small plastic fragments.<sup>130</sup> The 2008 article by Charles James Moore, which is referenced in Section 3.2.4 of the EIR, contains a photograph of plastic fragments collected during a trawl of the North Pacific Gyre.<sup>131</sup> An analysis of the quantities and concentration of plastic in the North Pacific Gyre is beyond the scope of the analysis required by CEQA for the EIR. The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed in the EIR, including Section 3.2, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

#### Section 4, Page 21, Paragraph F

The commenter states that the EIR should quantify the number of intact plastic carryout bags present in the North Pacific Gyre. In response to this comment, the County of Los Angeles notes that there is a large amount of available scientific literature that documents the existence of a concentration of plastic, much of which is present as small plastic fragments, within the North Pacific Gyre,<sup>132,133,134,135,136,137,138</sup> Analysis of the types of plastics present in the North Pacific Gyre is beyond the scope of the analysis required by CEQA for the EIR, but much of the plastic in the

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<sup>126</sup> Ryan, Peter G. et al. 2009. "Monitoring the Abundance of Plastic Debris in the Marine Environment." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999-2012.

<sup>127</sup> Crain, Caitlin M. et al. 2009. "Understanding and Managing Human Threats to the Coastal Marine Environment." In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>128</sup> McDermid, K. and McMullen, T. 2004. "Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago." *Marine Pollution Bulletin*, 48: 790-794.

<sup>129</sup> Ebbesmeyer C. C., et al. 2007. "Tub toys orbit the Pacific Subarctic gyre." In *EOS, Transactions of the American Geophysical Union*, 88 (1).

<sup>130</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297-1300.

<sup>131</sup> Moore, Charles James. October 2008. "Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat." In *Environmental Research*, 108 (2): 131-139.

<sup>132</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." In *Marine Pollution Bulletin*, 42: 1297-1300.

<sup>133</sup> Moore, Charles James. October 2008. "Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat." In *Environmental Research*, 108 (2): 131-139.

<sup>134</sup> Ryan, Peter G. et al. 2009. "Monitoring the Abundance of Plastic Debris in the Marine Environment." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999-2012.

<sup>135</sup> Crain, Caitlin M. et al. 2009. "Understanding and Managing Human Threats to the Coastal Marine Environment." In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>136</sup> McDermid, K. and McMullen, T. 2004. "Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago." *Marine Pollution Bulletin*, 48: 790-794.

<sup>137</sup> Ebbesmeyer C. C., et al. 2007. "Tub toys orbit the Pacific Subarctic gyre." In *EOS, Transactions of the American Geophysical Union*, 88 (1).

<sup>138</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297-1300.

North Pacific Gyre is known to be present as small plastic fragments.<sup>139</sup> The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed throughout the EIR, including Section 3.2, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

*Section 4, Page 21, Paragraph C*

The commenter states that the EIR should quantify the percentages of the different types of debris in the North Pacific Gyre. In response to this comment, the County of Los Angeles notes that there is a large amount of available scientific literature that documents the existence of a concentration of plastic within the North Pacific Gyre,<sup>140,141,142,143,144,145</sup> much of which is present as small plastic fragments.<sup>146</sup> An analysis of the percentages of different types of debris in the North Pacific Gyre is beyond the scope of the analysis required by CEQA for the EIR. The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed throughout the EIR, including in Section 3.2, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

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<sup>139</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>140</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>141</sup> Moore, Charles James. October 2008. "Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat." In *Environmental Research*, 108 (2): 131–139.

<sup>142</sup> Ryan, Peter G. et al. 2009. "Monitoring the Abundance of Plastic Debris in the Marine Environment." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999–2012.

<sup>143</sup> Crain, Caitlin M. et al. 2009. "Understanding and Managing Human Threats to the Coastal Marine Environment." In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>144</sup> McDermid, K. and McMullen, T. 2004. "Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago." *Marine Pollution Bulletin*, 48: 790–794.

<sup>145</sup> Ebbesmeyer C. C., et al. 2007. "Tub toys orbit the Pacific Subarctic gyre." In *EOS, Transactions of the American Geophysical Union* 88, No. 1.

<sup>146</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297–1300.

Section 4, Page 22, Paragraph H

The commenter states that the EIR should discuss whether and how, and how quickly, plastic bags break down in the North Pacific Gyre. As described in the EIR, including in Section 3.2, plastics are chemically resistant and do not biodegrade, so they persist in the marine environment.<sup>147</sup> Plastics degrade into smaller pieces over time, eventually becoming tiny particles of plastics that are often called microplastics.<sup>148</sup> There is a large amount of available scientific literature that documents the existence of a concentration of plastic, much of which is present as small plastic fragments, within the North Pacific Gyre,<sup>149,150,151,152,153,154,155</sup> A full evaluation of the degradation process of plastic bags in the North Pacific Gyre is beyond the scope of the analysis required by CEQA for the EIR.

Section 4, Page 22, Paragraph I

The commenter states that the EIR should provide substantial evidence to document whether any of the plastic debris in the North Pacific Gyre originated from plastic bags from the County of Los Angeles. The EIR makes no claims regarding the origin of the plastic debris in the North Pacific Gyre. The EIR associates the amount of plastic carryout bags issued by stores in the County of Los Angeles with plastic carryout bag litter present in the storm drain system within the County of Los Angeles, which drains out to the Pacific Ocean. The analysis in the EIR focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed in the EIR, including Section 3.2, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

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<sup>147</sup> Andrady, Anthony L. and Mike A. Neal. 2009. "Applications and Societal Benefits of Plastics." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

<sup>148</sup> Thompson, R. C. 7 May 2004. "Lost at Sea: Where Is All the Plastic?" In *Science*, 304 (5672): 843.

<sup>149</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297–1300.

<sup>150</sup> Moore, Charles James. October 2008. "Synthetic Polymers in the Marine Environment: A Rapidly Increasing, Long-term Threat." In *Environmental Research*, 108 (2): 131–139.

<sup>151</sup> Ryan, Peter G. et al. 2009. "Monitoring the Abundance of Plastic Debris in the Marine Environment." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1999–2012.

<sup>152</sup> Crain, Caitlin M. et al. 2009. "Understanding and Managing Human Threats to the Coastal Marine Environment." In *Annals of the New York Academy of Sciences: The Year in Ecology and Conservation Biology*, 1162 (1).

<sup>153</sup> McDermid, K. and McMullen, T. 2004. "Quantitative Analysis of Small-plastic Debris on Beaches in the Hawaiian Archipelago." *Marine Pollution Bulletin*, 48: 790–794.

<sup>154</sup> Ebbesmeyer C. C., et al. 2007. "Tub toys orbit the Pacific Subarctic gyre." In *EOS, Transactions of the American Geophysical Union* 88, No. 1.

<sup>155</sup> Moore, C.J., Moore, S.L., Leecaster, M.K., Weisberg, S.B. 2001. "A comparison of plastic and plankton in the North Pacific central gyre." *Marine Pollution Bulletin*, 42: 1297–1300.

*Section 4, Page 23, Paragraph J*

The commenter states that the EIR should quantify the percentage of any plastic bag debris in the North Pacific Gyre that originates from Asia or other Pacific Rim countries, such as China, Australia and New Zealand. The County of Los Angeles notes that China has banned plastic carryout bags<sup>156</sup> and Australia implements the use of a voluntary "Retailers Code." It is not feasible to determine the origin of all of the plastic fragments in the North Pacific Gyre, and this requested data analysis is beyond the scope of the analysis required by CEQA for the EIR. The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed in Section 3.2 of the EIR, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

*Section 4, Page 23, Paragraph K*

The commenter states that the EIR should quantify the percentage of plastic bag debris in the North Pacific Gyre that can be attributed to inadequate litter cleanup practices in the other Pacific Rim countries. This requested data analysis is beyond the scope of the analysis required by CEQA for the EIR. The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As discussed in Section 3.2 of the EIR, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

*Section 4, Page 23, Paragraph L*

The commenter states that the EIR should quantify the percentage of plastic bag debris in the North Pacific Gyre that originates from ship vessels. This requested data analysis is beyond the scope of the analysis required by CEQA for the EIR. The EIR analysis focuses on the direct, indirect, and cumulative effects on the environment as a result of banning the issuance of plastic carryout bags and the possible conversion to reusable bags and/or paper carryout bags. One of the key objectives of the proposed ordinances is to reduce the Countywide contribution of plastic carryout bags to litter, but the EIR does not set forth an objective to reduce the amount of litter in the North Pacific Gyre by a specific amount. In reducing the amount of plastic carryout bag litter, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. As

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<sup>156</sup> Environmental News Network. 30 June 2010. "China Watch: Plastic Bag Ban Trumps Market and Consumer Efforts." Available at: <http://www.enn.com/pollution/article/37512>

discussed in Section 3.2 of the EIR, a reduction in plastic carryout bag litter in the Pacific Ocean would potentially have beneficial impacts on birds, marine mammals, and fish that feed in the Pacific Ocean.

*Section 4, Page 23, Paragraph M*

The commenter states that the EIR should quantify the number of wildlife deaths caused by plastic bag ingestion or entanglement. As discussed in Section 3.2.4 of the EIR, trash has potentially harmful impacts to species, and plastic bags are one of the most common items of trash observed by RWQCB staff.<sup>157</sup> Seabirds, sea turtles, and marine mammals that feed on or near the ocean surface are especially prone to ingesting plastic debris that floats.<sup>158,159,160</sup> The impacts include fatalities as a result of ingestion, starvation, suffocation, infection, drowning, and entanglement.<sup>161,162</sup> The recovery plan for the endangered leatherback turtle lists ingestion of marine debris, including plastic bags, as one of the factors threatening this species. The recovery plan says that leatherback turtles consume floating plastic, including plastic bags, because they appear to mistake the floating plastic for jellyfish.<sup>163</sup> The recovery plans for the threatened green turtle, loggerhead turtle, and olive ridley turtle also note plastic bag ingestion as a threat to those species.<sup>164,165,166</sup> Ingestion of plastics is also noted as a threat in the recovery plan for the federally endangered short-tailed albatross.<sup>167</sup> Ingestion of plastic debris, of which plastic bags are a subcategory, is known to cause wildlife deaths.<sup>168,169</sup>

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<sup>157</sup> Regional Water Quality Control Board, Los Angeles Region. Revised 27 July 2007. "Trash Total Maximum Daily Loads for the Los Angeles River Watershed." Los Angeles, CA.

<sup>158</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>159</sup> National Research Council. 2008. "Tackling Marine Debris in the 21st Century." Committee on the Effectiveness of National and International Measures to Prevent and Reduce Marine Debris and Its Impacts.

<sup>160</sup> U.S. Environmental Protection Agency. August 2002. *Assessing and Monitoring Floatable Debris*. Washington, DC.

<sup>161</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>162</sup> Gregory, Murray R. 2009. "Environmental Implications of Plastic debris in Marine Settings –Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2013–2025.

<sup>163</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Leatherback Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_leatherback\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_leatherback_pacific.pdf)

<sup>164</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the East Pacific Green Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_green\\_eastpacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_green_eastpacific.pdf)

<sup>165</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Loggerhead Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_loggerhead\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_loggerhead_pacific.pdf)

<sup>166</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Olive Ridley Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_oliveridley.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_oliveridley.pdf)

<sup>167</sup> U.S. Fish and Wildlife Service. September 2008. *Short-tailed Albatross Recovery Plan*. Available at: [http://alaska.fws.gov/fisheries/endangered/pdf/stal\\_recovery\\_plan.pdf](http://alaska.fws.gov/fisheries/endangered/pdf/stal_recovery_plan.pdf)

<sup>168</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

The commenter references a United Nations Environment Programme (UNEP) study that discusses global marine litter.<sup>170</sup> The comment letter states that this study did not survey the North Pacific Gyre and does not indicate where each entanglement occurred. The comment letter notes the following number of entanglements caused by plastic bags globally, as reported in the UNEP study (Table 13-1, *Entanglements Due to Plastic Bags*):

**TABLE 13-1  
ENTANGLEMENTS DUE TO PLASTIC BAGS**

Wildlife	Number of Entanglements
Invertebrates	2
Fishes	3
Reptiles	0
Birds	12
Mammals	15
Amphibians	0

The number of wildlife found entangled in plastic bags as reported in the UNEP study constitutes 9.4 percent of 235 total wildlife entanglements recorded by volunteers in 2007.<sup>171</sup> Fifteen percent of the birds found entangled in marine litter were entangled in plastic carryout bags.<sup>172</sup> Although the UNEP study notes that only 235 global wildlife entanglements in marine litter were recorded in 2007, the study is not exhaustive and does not provide data for the total number of species killed by marine litter throughout the globe, but the UNEP results do provide an example of how wildlife can and do become entangled in plastic bags.

*Section 4, Page 26, Paragraph N*

The commenter states that the EIR should disclose the environmental impacts of plastic bags in the Pacific Ocean. In summary, as discussed in the EIR, seabirds, sea s, and marine mammals that feed on or near the ocean surface are especially prone to ingesting plastic debris that floats.<sup>173,174,175</sup> The impacts include fatalities as a result of ingestion, starvation, suffocation, infection, drowning, and

<sup>169</sup> Gregory, Murray R. 2009. "Environmental Implications of Plastic debris in Marine Settings –Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2013–2025.

<sup>170</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at: [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>171</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at: [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>172</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at: [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>173</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>174</sup> National Research Council. 2008. "Tackling Marine Debris in the 21st Century." Committee on the Effectiveness of National and International Measures to Prevent and Reduce Marine Debris and Its Impacts.

<sup>175</sup> U.S. Environmental Protection Agency. August 2002. *Assessing and Monitoring Floatable Debris*. Washington, DC.

entanglement.<sup>176,177</sup> As described throughout the EIR, including Section 3.2 and Appendix B, plastics are chemically resistant and do not biodegrade, so they persist in the marine environment.<sup>178</sup> Plastics break down into smaller pieces over time, eventually forming tiny particles of plastics called microplastics.<sup>179</sup> Microplastics can spread throughout the marine environment and be ingested by marine wildlife.<sup>180</sup> Ingestion of plastic fragments can lead to internal blockages and toxic poisoning (see also response to comment for Section 4, Page 23, Paragraph M).<sup>181</sup>

#### Section 5, Page 26, Paragraph A

The commenter states that the EIR should quantify the annual cost to the County of Los Angeles of cleaning up plastic bag litter, and what annual cost would be incurred if the County of Los Angeles maximized efforts to clean up plastic bag litter. As discussed in the EIR, including, but not limited to, Section 2.2.1, public agencies in California spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>182</sup> In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million on these activities (\$1.9 million on maintenance of structural and treatment control BMPs, \$9.3 million on municipal street cleaning, \$1.9 million on catch basin cleaning, \$9.6 million on trash collection and recycling, and \$1.3 million on capital costs).<sup>183</sup> Although CEQA does not require analysis of economic impacts in the EIR, during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR, the County of Los Angeles will consider information related to opportunities to substantially reduce the amount of litter attributed to plastic carryout bags from entering the storm drain system.

#### Section 5, Page 26, Paragraph B

The commenter indicates that the County Staff Report referenced in the EIR states that the LACDPW and the County of Los Angeles Flood Control District spend approximately \$18 million per year in litter cleanup. The statement in Section 2.2.1 of the EIR regarding the County of Los Angeles Flood Control District's annual expenditure of more than \$18 million for litter reduction efforts is correct, and is a clarification of the information in the staff report. In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million

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<sup>176</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>177</sup> Gregory, Murray R. 2009. "Environmental Implications of Plastic debris in Marine Settings –Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2013–2025.

<sup>178</sup> Andrady, Anthony L. and Mike A. Neal. 2009. "Applications and Societal Benefits of Plastics." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

<sup>179</sup> Thompson, R. C. 7 May 2004. "Lost at Sea: Where Is All the Plastic?" In *Science*, 304 (5672): 843.

<sup>180</sup> Eriksson, Cecilia and Burton, Harry. 2003. "Origins and Biological Accumulation of Small Plastic Particles in Fur-seal Scats from Macquarie Island." In *Ambio*, 36 (6).

<sup>181</sup> Todd, Peter, A. et al. 2010. "Impacts of Pollution on marine life in Southeast Asia." In *Biodiversity and Conservation*, 19: 1063–1082.

<sup>182</sup> California Department of Transportation. Accessed in: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>183</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

on these activities (\$1.9 million on maintenance of structural and treatment control BMPs, \$9.3 million on municipal street cleaning, \$1.9 million on catch basin cleaning, \$9.6 million on trash collection and recycling, and \$1.3 million on capital costs).<sup>184</sup> The LACDPW expends additional resources addressing litter, separate from these funds. This information, including a more detailed breakdown of the expenditures of the County of Los Angeles Flood Control District, has been included in Section 2.2.1 of the EIR (see Section 12.2).

*Section 5, Page 27, Paragraph C*

The commenter states that the EIR should itemize in detail how the County of Los Angeles Flood Control District allocates the \$18 million to litter reduction efforts. In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million on these activities (\$1.9 million on maintenance of structural and treatment control BMPs, \$9.3 million on municipal street cleaning, \$1.9 million on catch basin cleaning, \$9.6 million on trash collection and recycling, and \$1.3 million on capital costs).<sup>185</sup> The LACDPW expends additional resources addressing litter, separate from these funds. This information, including a more detailed breakdown of the expenditures of the County of Los Angeles Flood Control District, has been included in Section 2.2.1 of the EIR (see Section 12.2). Although CEQA does not require analysis of economic impacts in the EIR, the County of Los Angeles, during the decision-making process for the proposed ordinance, will consider the information related to opportunities to substantially reduce the amount of litter attributed to plastic carryout bags from entering the storm drain system.

*Section 5, Page 27, Paragraph D*

The commenter states that the EIR should quantify the portion of the \$18 million annual expenditure for litter reduction efforts that would be saved as a result of implementation of the proposed ordinances. In the County of Los Angeles, specifically, the County of Los Angeles Flood Control District alone exhausted \$24 million of these public funds in 2008–2009 (the most recent data available), while LACDPW expended additional resources separate from and in addition to state funds to address litter.<sup>186,187</sup> By banning the issuance of plastic carryout bags, a significant number of plastic carryout bags would be removed from the waste stream, along with the associated litter attributable to those plastic carryout bags. Although CEQA does not require the analysis of economic impacts in the EIR, the County of Los Angeles will consider the information related to opportunities to substantially reduce the amount of litter attributed to plastic carryout bags from entering the storm drain system during the decision-making process for the County of Los Angeles ordinance and Final EIR.

The EIR, including Section 2.3.1 and Section 4.0, discusses the fact that litter from plastic carryout bags is prevalent in the urban environment, compromises the efficiency of systems designed to

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<sup>184</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>185</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>186</sup> California Department of Transportation. Accessed in: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>187</sup> County of Los Angeles. October 2009. Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>



channel storm water runoff, is prevalent in the storm water system and coastal waterways, and hampers the ability of, and exacerbates the cost to, local agencies to comply with the National Pollution Discharge Elimination System and total maximum daily loads limits for trash pursuant to the federal Clean Water Act. A reduction in the amount of plastic carryout bags that may enter the litter stream could be reasonably expected to reduce litter reduction costs currently expended by the County of Los Angeles. For example, less plastic carryout bag litter clogging or blocking catch basins would mean that catch basins must be cleaned less frequently, thereby reducing catch-basin cleanup costs.

*Section 5, Page 27, Paragraph E*

The commenter states that the EIR should quantify the annual cost to the County of Los Angeles from the environmental problems caused by plastic bags. As discussed in Section 2.2.1 of the EIR, plastic carryout bags contribute significantly to litter. During the Great Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, plastic bags constituted 25 percent by weight and 19 percent by volume of the trash.<sup>188</sup> The EIR, including in the project description and Section 2.2, notes that the County of Los Angeles Flood Control District alone spends more than \$18 million annually for prevention, cleanup, and enforcement efforts to reduce litter.<sup>189,190,191</sup> In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million on these activities (\$1.9 million on maintenance of structural and treatment control BMPs, \$9.3 million on municipal street cleaning, \$1.9 million on catch basin cleaning, \$9.6 million on trash collection and recycling, and \$1.3 million on capital costs).<sup>192</sup> Public agencies in California also spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>193</sup> Although CEQA does not require analysis of economic impacts in the EIR, the County of Los Angeles, during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR, will consider the information related to opportunities to substantially reduce the amount of litter attributed to plastic carryout bags from entering the storm drain system (also see response to comment in Section 5, Page 27, Paragraph D above).

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<sup>188</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

<sup>189</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>190</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2008. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2008/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20&%20County%20Annual%20Report%20FY07-08.pdf>

<sup>191</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2007. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2007/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Annual%20Rpt%2006-07.pdf>

<sup>192</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>193</sup> California Department of Transportation. Accessed in: September 2009. "Facts at a Glance." Don't Trash California, available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

*Section 5, Page 27, Paragraph F*

The commenter states that the EIR should assess an alternative to the proposed ordinances that would require manufacturers or suppliers to pay money to the County of Los Angeles each year to address the environmental problems caused by plastic bags. Imposing a fee or charge on the manufacturers or suppliers of plastic carryout bags would not effectively or significantly impact the behavior of consumers who use plastic carryout bags. Herrera *et al.*, in the report prepared for Seattle Public Utilities that was reviewed during preparation of the EIR, states, “most research indicates that fees places on suppliers or manufacturers are administratively simpler but less likely to reduce plastic bag consumption since most fees do not affect habits unless passed onto consumers.”<sup>194</sup> The County of Los Angeles has sought to evaluate efforts that prevent plastic carryout bags from becoming litter in the first place; a fee program imposed on suppliers or manufacturers of plastic carryout bags would address the litter problem only after the littering has already occurred, at which time the litter could already have entered the urban environment, storm drain system, and/or coastal waterways. Further, development of an alternative program to impose a fee on manufacturers and suppliers to manage plastic carryout bag litter would not meet most of the basic objectives of the proposed ordinances, because it would not reduce the Countywide consumption of plastic carryout bags, the contribution of plastic carryout bags to litter, or the disposal of plastic carryout bags in landfills. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project.

*Section 5, Page 27, Paragraph G*

The commenter states that the EIR should assess an alternative to the proposed ordinances that would require manufacturers or suppliers to pay money to a Statewide fund each year to address the environmental problems caused by plastic bags. Imposing a fee or charge on the manufacturers or suppliers of plastic carryout bags would not effectively or significantly impact the behavior of consumers who use plastic carryout bags. The report by Herrera *et al.* referenced in the EIR states, “most research indicates that fees placed on suppliers or manufacturers are administratively simpler but less likely to reduce plastic bag consumption since most fees do not affect habits unless passed onto consumers.”<sup>195</sup> The County of Los Angeles has sought to evaluate efforts that prevent plastic carryout bags from becoming litter in the first place; a fee program imposed on suppliers or manufacturers of plastic carryout bags would address the litter problem only after the littering has already occurred, at which time the litter could already have entered the urban environment, storm drain system, and/or coastal waterways. Also, the historical failure of bills to ban plastic bags proposed in the last 3 years, including AB 1998, indicates that a statewide solution may never be realized. Further, Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. Development of an alternative Statewide fee program to manage plastic carryout bag litter would not meet most of the basic objectives of the proposed ordinances, because it would not reduce the Countywide consumption of plastic carryout bags, the contribution of plastic carryout bags to litter, or the disposal of plastic

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<sup>194</sup> Herrera *et al.* January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

<sup>195</sup> Herrera *et al.* January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

carryout bags in landfills. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

*Section 5, Page 27, Paragraph H*

The commenter states that the EIR should quantify the annual amount of money the County of Los Angeles would be expected to save as a result of the proposed ordinances. As discussed in section 2.2.1 of the EIR, public agencies in California spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>196</sup> In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million on these activities.<sup>197</sup> A reduction in the amount of plastic carryout bags that may enter the litter stream could be reasonably expected to reduce litter-reduction costs currently incurred by the County of Los Angeles; one of the objectives of the proposed ordinances is to reduce the County of Los Angeles's, cities', and the County of Los Angeles Flood Control District's costs for prevention, cleanup, and enforcement efforts to reduce litter in the County of Los Angeles by \$4 million. Although CEQA does not require the analysis of economic impacts in the EIR, the County of Los Angeles, during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR, will consider the information related to opportunities to substantially reduce the amount of litter attributed to plastic carryout bags from entering the storm drain system.

*Section 5, Page 28, Paragraph I*

The commenter states that the EIR should discuss the methods by which the County of Los Angeles could implement changes or improvements, including using storm drain screens or "gross pollutant traps" to prevent plastic from blocking or entering storm drains in the County of Los Angeles, and that it should evaluate the costs of such changes or improvements. The Nolan-ITU Pty Ltd., *et al.* report that was reviewed and referenced in the EIR indicates that policies such as implementation by local authorities of enhanced litter control measures may be effective in addressing litter, but are typically more costly than a bag fee and they do not effectively change consumer behavior regarding the use of carryout bags.<sup>198</sup> The changes or improvements suggested by the commenter would address the problem of plastic carryout bag litter only after the littering has already occurred and entered the urban environment, but it would not adequately address the *prevention* of plastic bags litter. Further, Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. An alternative that would solely implement these devices in the storm drain system to manage plastic carryout bag litter would not meet most of the basic objectives of the proposed ordinances because it would not reduce the use of plastic carryout bags Countywide, the disposal of plastic carryout bags in landfills, or the amount of plastic carryout bag litter that blights public spaces. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

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<sup>196</sup> California Department of Transportation. Accessed in: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>197</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>198</sup> Nolan-ITU Pty Ltd., *et al.* December 2002. *Environment Australia: Department of the Environment and Heritage: Plastic Shopping Bags –Analysis of Levies and Environmental Impacts: Final Report*. Sydney, Australia.

Section 5, Page 29, Paragraph J

The commenter states that the EIR should disclose whether the County of Los Angeles is receiving or has requested funding for storm drain improvements. The vast majority of the County of Los Angeles Flood Control District's fund (over 85 percent) comes from an *ad valorem* property tax and a benefit assessment.<sup>199</sup> The majority of the remaining funds originates from sources such as interest/leases, licenses and permits, work for cities, and other miscellaneous sources. The County of Los Angeles Flood Control District may receive some money from the federal and State governments, but the funds are generally related to reimbursement for disasters. The County of Los Angeles Flood Control District sometimes receives federal or State grants, which occasionally could be used for a project related to water quality. The most recent grant received by the County of Los Angeles Flood Control District was from the State of California in the amount of \$147,000 for installation of screens on catch basins,<sup>200</sup> which the County of Los Angeles Flood Control District supplemented with \$360,000 to finish the project. Although CEQA does not require analysis of economic impacts in the EIR, the information related to opportunities to substantially reduce the amount of litter attributed to plastic carryout bags from entering the storm drain system will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinance.

Section 6, Page 29, Paragraph A

The commenter states that the EIR should disclose the annual cost incurred by the County of Los Angeles for cleanup of paper carryout bag litter. As discussed in Section 2.2.1 of the EIR, public agencies in California spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>201</sup> In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million on these activities.<sup>202</sup> Many studies have noted the prevalence of plastic carryout bag litter in the marine environment, but these studies have not noted paper carryout bags as a serious litter contributor.<sup>203,204</sup> During the Great Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, it was observed that 20 percent by weight and 17 percent by volume of the trash collected consisted of paper, but the results do not specify what percentage of the paper litter collected consisted of paper carryout bags.<sup>205</sup> From the litter collected during the City of San Francisco Litter Audit in 2008, retail paper

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<sup>199</sup> Bryden, Russ, Los Angeles County Flood Control District, Los Angeles, CA. 20 October 2010. E-mail correspondence with Los Angeles County Counsel, Los Angeles, CA.

<sup>200</sup> County of Los Angeles, Department of Public Works. 9 January 2007. County of Los Angeles Board of Supervisors Letter Re: Installation of Catch Basin Screens in The City of Santa Monica, Los Angeles County Flood Control District-City of Santa Monica Cooperative Agreement. Los Angeles, CA.

<sup>201</sup> California Department of Transportation. Accessed on: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.donttrashcalifornia.info/pdf/Statistics.pdf>

<sup>202</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>203</sup> Ocean Conservancy. *A Rising Tide of Ocean Debris and What We Can Do About It. International Coastal Cleanup 2009 Report*. Available at: [http://www.oceanconservancy.org/pdf/A\\_Rising\\_Tide\\_full\\_lowres.pdf](http://www.oceanconservancy.org/pdf/A_Rising_Tide_full_lowres.pdf)

<sup>204</sup> Sheavly, S.B. 2007. *National Marine Debris Monitoring Program: Final Program Report, Data Analysis and Summary*, p. 76. Prepared by: Ocean Conservancy. Prepared for: U.S. Environmental Protection Agency, Grant Number X83053401-02.

<sup>205</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

bags were not listed as one of the top 25 litter subcategories.<sup>206</sup> The City of San Francisco reported that paper retail bags composed 0.4 percent of all large litter items collected in 2007 and 0.35 percent of all litter items collected in 2008.<sup>207</sup> The City of San Francisco Litter Audit concluded that 57.9 percent of all bag litter in 2008 was composed of unbranded plastic bags, 10.9 percent was composed of plastic retail bags, and only 6 percent was composed of paper retail bags. As noted in Section 3.2 of the EIR, a study performed in Washington, DC, indicated that paper products were not found in the streams except in localized areas, and were not present downstream.<sup>208</sup> Unlike regular plastic, paper is compostable.<sup>209</sup> Furthermore, the recycling rates of paper carryout bags are known to be higher than the recycling rates of plastic carryout bags. The County of Los Angeles is aware an increase in usage of paper carryout bags would possibly translate to an increase in litter attributable to paper carryout bags; however, the proposed ordinances would also encourage a transition to the use of reusable bags. In addition, the County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

Paper litter in waterways does not present the same environmental hazards that are associated with plastic carryout bags. Unlike regular plastic, paper is biodegradable and compostable.<sup>210</sup> The paper used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally biodegradable and compostable material. Due to the biodegradable properties of paper, paper bags do not persist in the marine environment for as long as plastic bags.<sup>211</sup> As a result of a review of the available data regarding litter, the County of Los Angeles has reasonably concluded that plastic carryout bags pose a more serious litter problem than do paper carryout bags.

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<sup>206</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>207</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>208</sup> Anacostia Watershed Society. December 2008. *Anacostia Watershed Trash Reduction Plan*. Prepared for: District of Columbia Department of the Environment.

<sup>209</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

<sup>210</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

<sup>211</sup> Andrady, Anthony L. and Mike A. Neal. 2009. "Applications and Societal Benefits of Plastics." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

*Section 6, Page 29, Paragraph B*

The commenter states that the EIR should quantify the annual cost incurred by the County of Los Angeles as a result of the environmental problems of paper carryout bags (see response to comment in Section 6, Page 29, Paragraph A above). Although CEQA does not require analysis of economic impacts in the EIR, the information related to opportunities to substantially reduce the amount of litter from entering the storm drain system will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinance. The County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

*Section 6, Page 29, Paragraph C*

The commenter states that the EIR should evaluate an alternative to the proposed ordinances that would require manufacturers or suppliers of paper carryout bags to pay money to the County of Los Angeles each year to address the environmental problems caused by paper carryout bags.

Imposing a fee or charge on the manufacturers or suppliers of plastic carryout bags would not effectively or significantly impact the behavior of consumers who use plastic carryout bags. The County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). Development of an alternative fee program to be paid by manufacturers and suppliers to manage littered paper carryout bags would not meet most of the basic objectives of the proposed ordinances. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project.

*Section 6, Page 29, Paragraph D*

The commenter states that the EIR should evaluate an alternative to the proposed ordinances that would require manufacturers or suppliers of paper carryout bag to pay money to a Statewide fund each year to address the environmental problems caused by paper carryout bags. First, the historical failure of bills to ban plastic bags proposed in the last 3 years, including AB 1998, indicates that a statewide solution may never be realized. Furthermore, imposing a fee or charge on the manufacturers or suppliers of plastic carryout bags would not effectively or significantly impact the behavior of consumers who use plastic carryout bags. The County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. Development of an alternative fee program to be paid by manufacturers and suppliers to manage paper carryout bags would not meet most of the basic objectives of the proposed ordinances. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

*Section 10, Page 37*

The commenter states that the EIR should consider the effect of carbon dioxide (CO<sub>2</sub>) emissions on the oceans as a result of the proposed ordinances. CO<sub>2</sub> emissions are discussed in detail in Section 3.3 and Section 4.0 of the EIR. The four news articles cited in the STPB's January 4, 2010, comment letter do not state that paper carryout bags contribute to global warming, and do not suggest that the use of paper carryout bags would adversely affect the world's oceans. These referenced articles, including two additional articles cited in STPB's July 16, 2010, comment letter, generally discuss global warming effects on the world's oceans and marine wildlife, but do not mention impacts from paper carryout. Section 3.3.1 of the EIR acknowledges that global climate change has the potential for numerous environmental consequences, including snowpack losses, flood hazards, sea-level changes, and fire hazards. Oceanic acidification and impacts to marine wildlife are just two of the many examples of environmental impacts of global climate change. This comment and the referenced articles are noted for the record and will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

It is also important to note that no significance threshold for the analysis of GHG emissions under CEQA has been adopted by the SCAQMD, AVAQMD, or state or federal agencies. As discussed in Section 3.3.5 of the EIR, the GHG emissions calculated due to the life cycle of paper and plastic carryout bags vary greatly depending on which life cycle assessment (LCA) is used. These seemingly conflicting results emphasize the particularity of each study and the importance of

understanding study boundaries, inputs, and methodologies.<sup>212</sup> It is also inaccurate to assume that any increases in GHG emissions would not be regulated. The LCA conducted by Ecobilan states that the majority of GHG emissions originate from processes that occur early in the life cycle of paper and plastic carryout bags, such as the product manufacturing stage. Any indirect increase in GHG emissions from paper carryout bag manufacturing facilities that would be affected by the proposed ordinances would be controlled by the owners of the paper carryout bag manufacturing facilities in compliance with applicable local, regional, and national air quality standards. Coordination with the SCAQMD further indicates that evaluation of indirect impacts from the proposed ordinances due to increases in the manufacturing of paper carryout bags would be speculative.<sup>213</sup> The AVAQMD similarly suggested that using the results from LCAs would be “very difficult” and “nebulous” due to the large number of assumptions and details contained within the calculations.<sup>214</sup> Therefore, it would be speculative to use the LCA results to quantify the impacts of CO<sub>2</sub> emissions on the world’s oceans. Section 15145 of the State CEQA Guidelines stipulates, “if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.”

The County of Los Angeles has also evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee or charge on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

#### *Section 11, Page 37, Paragraph A*

The commenter states that the EIR should discuss the degradability/biodegradability of plastic bags in certain conditions. As discussed in the EIR, including, but not limited to, Sections 3.2 and 4.1, plastics are chemically resistant and do not biodegrade, so they persist in the marine environment.<sup>215</sup> Plastics break down into smaller pieces over time, eventually forming tiny particles of plastics that are often called microplastics.<sup>216</sup> Appendix B to the EIR discusses biodegradable plastics, which can be made from synthetic polymers with an additive that accelerates the degradation of the product.

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<sup>212</sup> Green Cities California. March 2010. *Master Environmental Assessment on Single-Use and Reusable Bags*. Prepared by: ICF International. San Francisco, CA.

<sup>213</sup> Garcia, Daniel, Air Quality Specialist, South Coast Air Quality Management District, Diamond Bar, CA. 21 January 2010. Telephone correspondence with Dr. Laura Watson, Sapphos Environmental, Inc., Pasadena, CA.

<sup>214</sup> Banks, Bret, Operations Manager, Antelope Valley Air Quality Management District, Lancaster, CA. 8 March 2010. Telephone correspondence with Laura Watson, Sapphos Environmental, Inc., Pasadena, CA.

<sup>215</sup> Andrady, Anthony L. and Mike A. Neal. 2009. “Applications and Societal Benefits of Plastics.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

<sup>216</sup> Thompson, R. C. 7 May 2004. “Lost at Sea: Where Is All the Plastic?” In *Science*, 304 (5672): 843.



*Section 11, Page 37, Paragraph B*

The commenter states that the EIR should discuss the effectiveness of certain additives to plastic bags to enhance the degradability or biodegradability of the plastic. As discussed in Appendix B to the EIR and the County of Los Angeles's response to the July 5, 2010, comment letter from Symphony Environmental Technologies Plc, biodegradable plastics can be made from synthetic polymers with an additive that causes the product to degrade faster. As described in Appendix B to the EIR and the County of Los Angeles's response to the July 5, 2010, comment letter from Symphony Environmental Technologies Plc, the span of time needed and extent to which biodegradable plastic fragments will completely degrade are unclear. Oxo-biodegradable products do not degrade in landfills or commercial composting facilities, so they would only degrade fully if left in the natural environment for an extended period of time. The study prepared by Loughborough University concludes that oxo-biodegradable plastics can potentially remain as litter for 2 to 5 years prior to degradation.<sup>217</sup>

*Section 11, Page 37, Paragraph C*

The commenter states that the EIR should discuss the ability of such additives to lessen the negative environmental impacts of plastic bags. As discussed in Appendix B of the EIR and the County of Los Angeles's response to the July 5, 2010 comment letter from Symphony Environmental Technologies, the time needed and extent to which oxo-biodegradable synthetic plastic fragments would degrade is unclear. The study by Loughborough University states that oxo-biodegradable plastics will remain as litter for 2 to 5 years prior to degradation.<sup>218</sup> Although oxo-biodegradable plastic will degrade after an undetermined period of time, the environmental impacts of oxo-biodegradable plastic prior to complete degradation are uncertain.<sup>219</sup> The overall conclusion of the study conducted by Loughborough University, which is referenced in Appendix B of the EIR, is that "incorporation of additives into petroleum-based plastics that cause those plastics to undergo accelerated degradation does not improve their environmental impact and potentially gives rise to certain negative effects."<sup>220</sup> There is substantial evidence to support the conclusion that oxo-biodegradable plastic bags are not beneficial for the environment in comparison to standard plastic bags.<sup>221,222,223,224</sup>

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<sup>217</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>218</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>219</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>220</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>221</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

<sup>222</sup> European Plastic Recyclers. 10 June 2009. "Press Release: Oxo Degradable Additives are Incompatible with Mechanical Recycling." Available at: <http://www.plasticsrecyclers.eu/docs/press%20release/EuPR%20Press%20Release%20-%20OXO%20Degradables%20Incompatibility%20with%20Plastics%20Recycling.pdf>

Section 11, Page 37, Paragraph D

The commenter queries whether certain additives could be required as an alternative to banning plastic carryout bags. The commenter also makes several assertions regarding biodegradable plastic bags and the characterization of the Biodegradable Product Institute in the EIR, which are noted for the record. The commenter instructs the County of Los Angeles to contact ECM Biofilms, Inc. and Symphony Environmental Technologies Plc regarding bag additives. As described in Section 4.1 of the EIR and the County of Los Angeles's response to the July 5, 2010, comment letter from Symphony Environmental Technologies Plc, encouraging a transition to the use of biodegradable bags, including oxo-biodegradable bags, is not a viable alternative to the proposed ordinances. As noted above, the time frame required and the extent to which these synthetic plastic fragments will degrade is unclear.<sup>225</sup> The Loughborough University study referenced in Appendix B of the EIR states that oxo-biodegradable plastics will remain as litter for 2 to 5 years prior to degradation.<sup>226</sup> Although oxo-biodegradable plastic will degrade after an undetermined period of time, encouraging a transition to the use of oxo-biodegradable plastic carryout bags would not assist the County of Los Angeles in reducing the number of plastic carryout bags used or the amount of plastic carryout bags disposed of as litter on a daily basis within its boundaries. While oxo-biodegradable bags are touted as a solution after bags are littered, the County of Los Angeles aims to *prevent* the occurrence of litter. Therefore, requiring stores to issue oxo-biodegradable bags, including those made with additives from the two companies selected by STPB, would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

Section 12, Page 40

The commenter states that the EIR should note whether superfast oxo-biodegradable bags are a viable alternative to the proposed ordinances. The comment letter states that superfast oxo-biodegradable bags "degrade and disappear very quickly" and "vanish in the open air and water." However, the Loughborough University study states, "the fate of oxo-degradable plastic after it has fragmented to a fine powder is not clear."<sup>227</sup> As discussed in Section 4.1 of the EIR and Appendix B, biodegradable plastic carryout bags are not a viable alternative to the proposed ordinances. Although "superfast" oxo-biodegradable bags are claimed to biodegrade more rapidly in the natural environment, they could also pose potential disadvantages to the consumer, as they

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<sup>223</sup> Pearce, Fred. 18 June 2009. "Biodegradable plastic bags carry more ecological harm than good." Available at: <http://www.guardian.co.uk/environment/cif-green/2009/jun/18/greenwash-biodegradeable-plastic-bags>

<sup>224</sup> California Integrated Waste Management Board. June 2007. *Performance Evaluation of Environmentally Degradable Plastic Packaging and Disposable Food Service Ware - Final Report*. Available at: <http://www.calrecycle.ca.gov/Publications/Plastics/43208001.pdf>

<sup>225</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Prepared for: Department for Environment, Food, and Rural Affairs. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)

<sup>226</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Prepared for: Department for Environment, Food, and Rural Affairs. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)

<sup>227</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Prepared for: Department for Environment, Food, and Rural Affairs. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)

would require that the distribution, issuance, and use of the plastic occur prior to degradation. The study prepared by Loughborough University states, “the fact that they are degradable limits the reuse of oxo-degradable bags: they are unsuitable for storing items for an extended length of time.”<sup>228</sup>

In addition, a biodegradable bag that degrades in a shorter time span would still break down into small plastic pieces in the natural environment and would result in adverse impacts similar those of regular plastic fragments prior to full degradation. The degradable bags would also pose litter problems for the County of Los Angeles comparable to the impacts of regular plastic carryout bags until they degrade fully. As stated previously, while oxo-biodegradable bags are touted as a solution after bags are littered, the County of Los Angeles aims to *prevent* the occurrence of litter. Encouraging a transition to the use of oxo-biodegradable bags would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

*Section 13, Page 40*

The commenter states that the EIR should note whether water-soluble bags are a viable alternative to the proposed ordinances. As discussed in Section 4.1 of the EIR, biodegradable and compostable plastic carryout bags are not a viable alternative to the proposed ordinances. If a plastic carryout bag can dissolve in water in 30 seconds as suggested in the STPB comment letter, its function as a carryout bag would be impaired upon contact with moisture, calling into question the practicality of such a bag. Further, it would be impractical to require a store to change the type of bags used depending on weather conditions. In addition, the water-soluble bags would persist as litter in the environment until they come into contact with rain or are littered into the marine environment or local watershed. An alternative that would require stores to issue water-soluble bags would not meet the basic objectives of the proposed ordinances because it would not reduce Countywide consumption of plastic bags, or reduction of plastic carryout bag litter that blights public spaces. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

*Section 14, Page 41, Paragraph A*

The commenter states that the EIR should disclose whether paper carryout bags biodegrade in landfills, in open air, or in water. As discussed in Section 3.2.4 of the EIR, paper is compostable.<sup>229</sup> The paper that is used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally biodegradable and compostable material. The EIR does not claim that paper bags would biodegrade rapidly in landfills or in open air, but it is understood that paper bags break down into smaller pieces upon contact with water and would biodegrade completely in certain conditions, including commercial composting facilities. As noted in Section 2.3.2 of the EIR, paper

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<sup>228</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Prepared for: Department for Environment, Food, and Rural Affairs. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)

<sup>229</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

bags have the potential to biodegrade if they are sufficiently exposed to oxygen, sunlight, moisture, soil, and microorganisms (such as bacteria).

*Section 14, Page 41, Paragraph B*

The commenter states that the EIR should specify the time span of the degradation process of paper carryout bags. As noted in Section 2.3.2 of the EIR, paper bags have the potential to biodegrade if they are sufficiently exposed to oxygen, sunlight, moisture, soil, and microorganisms (such as bacteria). It is known that paper is compostable,<sup>230</sup> but the duration of the degradation process depends on the temperature and the amount of oxygen, moisture, soil, and microorganisms (such as bacteria).<sup>231</sup>

*Section 14, Page 41, Paragraph C*

The commenter states that the EIR should disclose what chemicals, particles, or residues remain after the full biodegradation of paper carryout bags. Paper is made mostly out of cellulose, which is biodegradable, meaning that paper can degrade and eventually be fully digested by microorganisms such as bacteria. After complete biodegradation, no paper particles remain, because the cellulose is chemically broken down into smaller components such as glucose, which are fully digested by microorganisms like fungi or bacteria.<sup>232</sup>

*Section 14, Page 41, Paragraph D*

The commenter states that the EIR should discuss whether particles or residues of paper carryout bags can serve as vehicles for polychlorinated biphenyls (PCB), dichlorodiphenyltrichloroethane (DDT), or other toxic substances in the ocean or elsewhere. The County of Los Angeles has reviewed this issue and has not become aware of substantial evidence that paper particles can serve as vehicles for persistent organic pollutants like PCB and DDT in the marine environment; the commenter did not cite any resources that the County of Los Angeles could review in support of this issue. However, there is substantial evidence to suggest that plastic fragments can serve as vehicles for PCB and DDT.<sup>233,234</sup> These references have been added to Section 3.2 of the EIR (see Section 12.2).

*Section 15, Page 41, Paragraph A*

The commenter states that the EIR should discuss the methods by which the County of Los Angeles will verify that recyclable paper bags actually contain 40 percent post-consumer recycled content. The County of Los Angeles Board of Supervisors will consider enforcement measures for the

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<sup>230</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

<sup>231</sup> Geisel, Pamela M, and Carolyn L. Unruh. *Compost in a Hurry*. Oakland, CA: University of California, Agriculture and Natural Resources. Available at: <http://ucanr.org/freepubs/docs/8037.pdf>

<sup>232</sup> Wang, Nam Sun. Accessed on: 12 October 2010. *Experiment No. 4: Cellulose Degradation*. College Park, MD: University of Maryland, Department of Chemical & Biomolecular Engineering. Available at: <http://www.eng.umd.edu/~nsw/ench485/lab4.htm>

<sup>233</sup> Rios, L. et al. 2007. "Persistent organic pollutants carried by synthetic polymers in the ocean environment." In *Marine Pollution Bulletin*, 54: 1230–1237.

<sup>234</sup> Teuten, E. L. et al. 2009. "Transport and release of chemicals from plastic to the environment and to wildlife." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2027–2045.

proposed ordinances during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

*Section 15, Page 42, Paragraph B*

The commenter states that the EIR should discuss the methods by which the County of Los Angeles will verify that recyclable paper bags do not contain old growth fibers. The measures that would be used to enforce the proposed ordinances are not discussed in the EIR, but will be considered by the County of Los Angeles Board of Supervisors in its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

**Section 15, Page 42, Paragraph C**

The commenter states that the EIR should discuss the extent to which the inclusion of post-industrial scrap can reduce the environmental impacts of paper carryout bags. The inclusion of post-industrial paper scrap in paper carryout bags would provide a use for post-industrial scrap that otherwise may be discarded, thereby reducing the generation of solid waste. In addition, the use of a secondary material displaces the use of virgin materials. The USEPA states, "recycling reduces GHG emissions, conserves natural resources, and saves landfill space."<sup>235</sup> Due to the fact that waste paper scraps generated by the paper manufacturing industry are less expensive than virgin materials, virtually all waste paper scraps generated within a paper mill are recycled and used to make new paper.<sup>236</sup>

*Section 15, Page 42, Paragraph D*

The commenter states that the EIR should discuss to the extent to which the inclusion of post-consumer recycled content can reduce the environmental impacts of paper carryout bags. The USEPA states, "recycling reduces greenhouse gas emissions, conserves natural resources, and saves landfill space."<sup>237</sup> The environmental impacts of post-consumer paper in paper carryout bags have been analyzed in various subsections of Section 3.0 of the EIR. The County of Los Angeles has evaluated impacts of paper carryout bags to air quality emissions (Section 3.1), GHG emissions (Section 3.3), eutrophication (Section 3.4), solid waste (Section 3.5), energy consumption (Section 3.5), water consumption (Section 3.5), and wastewater generation (Section 3.5) using the Ecobilan Study, which analyzes the life cycle impacts of paper carryout bags made from 100 percent post-consumer recycled content. The Ecobilan Study analyzes environmental impacts due to the transport of old paper/paperboard to a recycling facility, as well as the transport of the recycled paper to the paper bag manufacturing facility. The County of Los Angeles also used the Boustead Study to complete analysis in the EIR of impacts from paper carryout bags to air quality emissions, GHG emissions, solid waste, energy consumption, and water consumption. The Boustead Study analyzes the impacts of paper carryout bags that contain 30 percent recycled fiber. In addition to evaluating the life cycle impacts of paper carryout bags, the County of Los Angeles has evaluated

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<sup>235</sup> U.S. Environmental Protection Agency. Accessed on: 6 September 2010. "Wastes - Resource Conservation - Common Wastes & Materials - Paper Recycling." Web site. Available at: <http://www.epa.gov/epawaste/conserves/materials/paper/index.htm>

<sup>236</sup> Conservatree. Accessed on: 12 October 2010. "Part IV: The Paper Manufacturing Process." *Environmentally Sound Paper Overview: Essential Issues*. San Francisco, CA. Available at: <http://www.conservatree.org/learn/Essential%20Issues/EIPaperMaking.shtml>

<sup>237</sup> U.S. Environmental Protection Agency. Accessed on: 6 September 2010. "Wastes - Resource Conservation - Common Wastes & Materials - Paper Recycling." Web site. Available at: <http://www.epa.gov/epawaste/conserves/materials/paper/index.htm>

four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee or charge on the issuance of paper carryout bags, which would reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

*Section 16, Page 49, Paragraph A*

The commenter states that the EIR should discuss the material composition of plastic carryout bags and whether the bags are made of oil. As described in Section 3.3 of the Initial Study, the production of plastic carryout bags is a chemical process that begins with the conversion of crude oil or natural gas into hydrocarbon monomers such as ethylene; further processing leads to the polymerization of ethylene to form polyethylene.<sup>238</sup> The EIR does not assert that oil is imported into the United States to make plastic carryout bags. As noted in Section ES.3 of the EIR, as the proposed ordinances aim to decrease the number of plastic carryout bags used throughout the County of Los Angeles, there would be no expected adverse impacts upon fossil fuel reserves, and no further analysis of this issue is warranted. The commenter also states, “if ethane is not used to make plastic, it will have to be burned off, resulting in greenhouse gas emissions.” This statement is speculative, as ethylene is in high demand globally and is used to manufacture a variety of products, including plastic resins and petrochemical intermediates. Should the proposed ordinances result in a decrease in demand for the production of plastic carryout bags, any surplus ethane would likely be converted into ethylene and used for a variety of other purposes.

*Section 16, Page 50, Paragraph B*

The commenter states that plastic carryout bags do not contain additives such as PCBs, DDT, and nonylphenols. The EIR does not make this claim. However, there is substantial evidence to suggest that plastic fragments can serve as vehicles for PCB and DDT.<sup>239,240</sup> The *Philosophical Transactions of the Royal Society* journal states that polyethylene accumulates more organic contaminants than other plastics (such as polypropylene and polyvinyl chloride), and that organic contaminants are either added during manufacturing or are adsorbed from the surrounding seawater.<sup>241</sup> These references have been added to Section 3.2 of the EIR (see Section 12.2).

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<sup>238</sup> European Environment Agency. 5 December 2007. “Processes in Organic Chemical Industries (Bulk Production) Ethylene.” *EMEP / CORINAIR Emission Inventory Guidebook – 2007*. Copenhagen, Denmark. Available at: <http://www.eea.europa.eu/publications/EMEP/CORINAIR5/B451vs2.3.pdf>

<sup>239</sup> Rios, L. et al. 2007. “Persistent organic pollutants carried by synthetic polymers in the ocean environment.” *Marine Pollution Bulletin*, 54: 1230–1237.

<sup>240</sup> Teuten, E. L. et al. 2009. “Transport and release of chemicals from plastic to the environment and to wildlife.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2027–2045.

<sup>241</sup> Teuten, E. L. et al. 2009. “Transport and release of chemicals from plastic to the environment and to wildlife.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2027–2045.

Section 17, Page 50

The commenter states that the EIR should discuss the environmental impacts of increased cockroach infestation due to an increase in the use and disposal of paper carryout bags. Paper and paper board are the most prevalent type of material in municipal solid waste.<sup>242</sup> The commenter also suggests ways to minimize or eliminate cockroach infestation, as recommended by the USEPA, Orkin, and Terminix. It is speculative to suggest that the proposed ordinances would cause an indirect increase in the number of cockroaches in the County of Los Angeles because households currently can contain large volumes of newspapers, stored paper, and cardboard materials. More importantly, to the extent that cockroach infestation is an issue, the public can be educated on general preventive measures against infestation, including using correct methods of storing paper bags in the home, as suggested by the USEPA, Orkin, and Terminix; using garbage cans with tight lids; and conducting regular household cleaning and vacuuming. The County of Los Angeles has also evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that STPB suggests may promote cockroach infestations. To mitigate the potential increase in the use of paper carryout bags, the County of Los Angeles has proposed mitigation measure GHG-1 (see Section 12.2), which would include implementing and/or expanding public outreach through a public education program that would aim to increase the percentage of paper carryout bags that are recycled in the County of Los Angeles, thereby reducing the number of paper carryout bags stored in homes for an extended period of time. The County of Los Angeles currently has a public education program in place to encourage the curbside recycling of a number of items, including paper carryout bags.<sup>243, 244</sup> Curbside recycling is a convenient, free service for County of Los Angeles residents; paper carryout bags are universally accepted for recycling in the County of Los Angeles.

Section 18, Page 51

The commenter notes that the proposed ordinances would remove the requirement for stores to provide plastic bag recycling bins. It is noted that the proposed ordinances would not require plastic bag recycling bins to be removed, but the reduction in plastic carryout bag consumption in the County of Los Angeles may lead to a reduction in demand for plastic carryout bag recycling and associated bins. As noted in a study by Loughborough University, there are many challenges associated with plastic carryout bag recycling.<sup>245</sup> Comment No. 20 in Heal the Bay's July 16, 2010, comment letter discusses the challenges associated with plastic bag disposal, recycling, and litter management. The same comment also notes the lack of available domestic plastic bag recycling markets, and further notes that over 90 percent of the bags collected in municipalities surveyed in the County of Los Angeles, were transported to a landfill rather than recycled, due to contamination from food or pet waste and their tendency to jam recycling machinery. In addition,

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<sup>242</sup> U.S. Environmental Protection Agency. November 2008. *Municipal Solid Waste in the United States: 2007 Facts and Figures*. Washington, DC. Available at: <http://www.epa.gov/waste/nonhaz/municipal/pubs/msw07-rpt.pdf>

<sup>243</sup> County of Los Angeles, Department of Public Works. Accessed on: 12 October 2010. "Outreach Programs." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm>

<sup>244</sup> County of Los Angeles, Department of Public Works. Accessed on: 12 October 2010. "Commonly Recycled Materials." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/crm.cfm>

<sup>245</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf) Prepared for the Department for Environment, Food, and Rural Affairs. London, UK.

Comment No. 19 in the July 5, 2010, comment letter from Symphony Environmental Technologies Plc discusses the barriers and difficulties of recycling post-consumer plastic waste like plastic carryout bags, and that vegetable-based bioplastics are also problematic for recyclers. The County of Los Angeles is aware that plastic carryout bags are not recycled as much as paper carryout bags are recycled. As noted in Section 2.3.2 of the EIR, the USEPA reported that the recycling rate for high-density polyethylene plastic bags and sacks was 11.9 percent in 2007, compared to 36.8 percent of paper bags and sacks.

*Section 19, Page 52, Paragraph A*

The commenter states that the EIR should discuss whether the proposed ordinances would result in a greater volume and weight of paper carryout bags in landfills. The issue of solid waste related to paper carryout bags is discussed in Sections 3.5.4 and 4.0 of the EIR. The County of Los Angeles is aware that the proposed ordinances would have the potential to increase the amount of paper carryout bags used and disposed of in the County. The County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances.

The commenter also inquires whether additional disposal of paper carryout bags would incur more tipping costs for the County of Los Angeles; the County of Los Angeles does not directly incur tipping fees. In order to mitigate the potential increase in use of paper carryout bags, the County of Los Angeles has proposed mitigation measure GHG-1 (see Section 12.2), which would include implementing and/or expanding public outreach through a public education program that would aim to increase the percentage of paper carryout bags that are recycled in the County, thereby reducing the number of bags going to landfills. The County of Los Angeles currently has a public education program in place that encourages the curbside recycling of a number of items, including paper carryout bags.<sup>246, 247</sup> Curbside recycling is a convenient, free service for County of Los Angeles residents, and paper carryout bags are universally accepted for recycling in the County of Los Angeles. In addition, as noted in Section 2.3.2 of the EIR, the USEPA reported that the recycling rate for paper bags and sacks was 36.8 percent in 2007 as opposed to 11.9 percent of high-density polyethylene plastic bags and sacks. Finally, although CEQA does not require analysis of economic impacts in the EIR, information related to opportunities to substantially reduce litter will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

*Section 19, Page 52, Paragraph B*

The commenter states that the EIR should disclose the environmental impacts of increasing the number of paper carryout bags in landfills and that methane is produced in landfills. This issue is discussed in the EIR, including in Sections 3.5.4, 3.3.5, and 4.0 for the various alternatives. The County of Los Angeles is aware that the proposed ordinances would have the potential to increase the amount of paper carryout bags used and disposed of within the County of Los Angeles. The County of Los Angeles has evaluated five (including Alternative 5) alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper

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<sup>246</sup> County of Los Angeles, Department of Public Works. Accessed on: 12 October 2010. "Outreach Programs." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm>

<sup>247</sup> County of Los Angeles, Department of Public Works. Accessed on: 12 October 2010. "Commonly Recycled Materials." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/crm.cfm>



carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. In order to mitigate the potential increase in use of paper carryout bags, the County of Los Angeles has proposed mitigation measure GHG-1 (see Section 12.2), which would include implementing and/or expanding public outreach through a public education program that would aim to increase the percentage of paper carryout bags that are recycled in the County, thereby reducing the number of bags going to landfills. The County of Los Angeles currently has a public education program in place that encourages the curbside recycling of a number of items, including paper carryout bags.<sup>248,249</sup> Curbside recycling is a convenient, free service for County of Los Angeles residents, and paper carryout bags are universally accepted for recycling in the County of Los Angeles.

*Section 20, Page 53*

The commenter states that the EIR should disclose the environmental impacts of an increased number of reusable bags. The environmental impacts of reusable bags are discussed throughout Section 3.0 of the EIR, including the consumption of nonrenewable energy (Section 3.5.4), emissions of GHGs (Section 3.3.5), consumption of water (Section 3.5.4), generation of acidic atmospheric pollutants (Section 3.1.4), air quality (Section 3.1.4), water pollution (Section 3.4.4), and solid waste (Section 3.5.4).

The Hyder Study, which was used as a reference throughout the EIR, evaluates the life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in environmental impacts that are significantly lower than the impacts resulting from paper and plastic carryout bags (Table 13-2, *Relative Environmental Impacts of Various Types of Bags*).<sup>250</sup> Although the Hyder Study reports that water use due to the life cycle impacts of a calico (cotton) reusable bag would be greater than water use due to the life cycle impacts of other types of bags, the calico reusable bag outperforms carryout bags in all other environmental categories: material consumption, global warming, energy consumption, litter marine biodiversity, and litter aesthetics (Table 13-2). Therefore, overall environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the overall environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

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<sup>248</sup> County of Los Angeles, Department of Public Works. Accessed on: 12 October 2010. "Outreach Programs." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm>

<sup>249</sup> County of Los Angeles, Department of Public Works. Accessed on: 12 October 2010. "Commonly Recycled Materials." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/crm.cfm>

<sup>250</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

**TABLE 13-2  
RELATIVE ENVIRONMENTAL IMPACTS OF VARIOUS TYPES OF BAGS**

Bag Type	Number of Trips	Relative Impacts on a Scale from 1 to 5						
		Material Consumption	Global Warming	Energy Consumption	Water Use	Litter Marine Biodiversity	Litter Aesthetics	
Reusable non-woven plastic (polypropylene) "Green Bag"	104	♣	♣	♣	♣	♣	♣	
Reusable calico (cotton) bag	104	♣	♣	♣	♣♣♣♣	♣	♣	
100-percent recycled content paper carryout bag	2	♣♣♣♣	♣♣♣	♣♣	♣	♣	♣	
Oxo-biodegradable carryout bag	1	♣♣♣	♣♣	♣♣♣	♣	♣♣♣	♣♣	
100-percent recycled content plastic (HDPE) carryout bag	1	♣♣♣	♣	♣	♣♣	♣♣♣♣	♣♣♣♣	
Paper carryout bag	2	♣♣♣♣	♣♣♣♣	♣♣♣	♣	♣	♣	
Compostable (starch-polyester) carryout bag	1	♣♣♣♣	♣	♣	♣♣♣♣	♣	♣♣	
Plastic (HDPE) carryout bag	1	♣♣♣	♣♣	♣♣♣♣	♣	♣♣♣♣	♣♣♣♣	
100-percent recycled content paper carryout bag	1	♣♣♣♣	♣♣♣♣	♣♣♣♣	♣	♣	♣♣	
Paper carryout bag	1	♣♣♣♣	♣♣♣♣	♣♣♣♣	♣♣	♣♣	♣♣	
Plastic (LDPE) "boutique" carryout bag	1	♣♣♣♣	♣♣♣♣	♣♣♣♣	♣	♣♣♣♣	♣♣♣♣	

**SOURCE:** Hyder Consulting. 18 April 2007. Comparison of existing life cycle analyses of plastic bag alternatives. Prepared for: Sustainability Victoria, Victoria, Australia.

**NOTES:**

1. A rating of ♣ to ♣♣♣♣ is used to show the diversity of impacts for each criterion, with ♣ being the lowest impact. In some cases at the high impact end, the impact value of the bag falls outside of the rating scale. Impacts cannot be added together to produce an overall impact rating.
2. HDPE = High density polyethylene  
LDPE = Low density polyethylene

*Section 21, Page 55, Paragraph A*

The commenter states that the EIR should discuss the extent to which lead and heavy metals are present in reusable bags. The presence of lead and heavy metals in reusable bags is not environmental issue area for which CEQA requires analysis in the EIR. The County of Los Angeles has revised its purchasing standards to ensure that any reusable bags purchased by the County of Los Angeles do not contain lead, cadmium, or any other heavy metal in toxic amounts,<sup>251</sup> and the proposed ordinances would make similar requirements. The definition of a reusable bag described in Section 2.2.3 of the EIR has been modified to include this requirement (see Section 12.2).

*Section 21, Page 55, Paragraph B*

The commenter states that the EIR should discuss the environmental impacts of the presence of lead and heavy metals in reusable bags. The amount of lead and heavy metals present in reusable bags is not environmental issue area for which CEQA requires analysis in the EIR. The County of Los Angeles has revised its purchasing standards to ensure that any reusable bags purchased by the County of Los Angeles do not contain lead, cadmium, or any other heavy metal in toxic amounts,<sup>252</sup> and the proposed ordinances would make similar requirements. The definition of a reusable bag described in Section 2.2.3 of the EIR has been modified to include this requirement (see Section 12.2).

*Section 21, Page 55, Paragraph C*

The commenter inquires whether the County of Los Angeles has determined whether any of the reusable bags provided to the public by the County of Los Angeles contain lead or heavy metals. The presence of lead and heavy metals in reusable bags is not environmental issue area for which CEQA requires analysis in the EIR. However, the County of Los Angeles tested the Earthwise brand reusable bags that were distributed during the Brag about Your Bag Campaign, and detected no levels of lead or heavy metals.<sup>253</sup> Furthermore, the County of Los Angeles reviewed the test results provided by the commenter and evaluated the commenter's assertion that the bags distributed during the Brag about Your Bag Campaign contained high levels of lead and mercury. It is important to note that the federal Consumer Product Safety Improvement Act of 2008 stipulates that the lead content of accessible surface coatings must not exceed 90 parts per million (ppm), and the total lead content in substrate materials must not exceed 300 ppm. The test results provided by the commenter demonstrate that the lead content of the reusable bag distributed during the Brag About Your Bag campaign is less than 5 ppm, which is far below the legal limit of 90 ppm. The black board at the bottom of the bag classifies as a substrate material, and was shown by the commenter's test results to have lead content of less than 100 ppm, which is one-third of the legal limit for substrate materials. The test results provided by the commenter would also demonstrate compliance with the legal limit of 300 ppm of lead in products designed or intended primarily for use by children 12 years old and younger.<sup>254</sup> The commenter also presented test results for

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<sup>251</sup> County of Los Angeles, Department of Public Works. Undated. *Specifications for Single Use Bag Reduction and Recycling Program*. Alhambra, CA.

<sup>252</sup> County of Los Angeles, Department of Public Works. Undated. *Specifications for Single Use Bag Reduction and Recycling Program*. Alhambra, CA.

<sup>253</sup> SGS-CSTC Chemical Laboratory. 16 October 2007. Test Report No. SH7120885/CHEM.

<sup>254</sup> U.S. Consumer Product Safety Commission. Consumer Product Safety Improvement Act, Section 1010, Children's Products Containing Lead; Lead Paint Rule. Available at: <http://www.cpsc.gov/about/cpsia/sect101.html>

mercury content in the reusable fabric bag, which indicate that mercury levels were negligible (less than 0.1 ppm) in the bags and the substrate-material board at the bottom of the bag.

The County of Los Angeles has recently revised its purchasing standards to ensure that any reusable bags purchased by the County of Los Angeles do not contain lead, cadmium, or any other heavy metal in toxic amounts; the proposed ordinances would also contain similar requirements.<sup>255</sup> The definition of a reusable bag has been modified to include this requirement in Section 2.2.3 of the EIR (see Section 12.2).

*Section 21, Page 55, Paragraph D*

The commenter states that the EIR should disclose the steps that the County of Los Angeles has taken to ensure that all retailers affected by the proposed ordinances would comply with Health and Safety Code Sections 25214.11 to 25214.26, which regulate the levels of lead, mercury, cadmium, and hexavalent chromium in packaging. However, Section 25214.12 states that a reusable bag, as defined in subdivision (d) of Section 42250 of the Public Resources Code, is not considered to be a package, and therefore would not be subject to the requirements of this code. The Health and Safety Code is enforced and administered by the California Department of Health Services.

*Section 22, Page 55, Paragraph A*

The commenter states that the EIR should discuss whether reusable bags are actual or potential carriers of dangerous or unhealthy bacteria. Although CEQA does not require analysis of health impacts, Section ES.3 addresses potential health concerns related to reusable bags. As discussed in Section ES.3, as is the case for any reusable household item that comes in contact with food items, such as chopping boards, countertops, tableware, or table linens, reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly. Reusable bags made of cloth or fabric can be machine washable, and reusable bags made of durable plastic can be rinsed or wiped clean. Further, to control for any possible public health issues, the County of Los Angeles has clarified the definition for reusable bags established by the proposed ordinance to require that the material used in such bags be machine washable. The definition of a reusable bag has been modified to include this requirement in Section 2.2.3 of the EIR (see Section 12.2).

Health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps to care for the bags, such as washing and disinfecting the bags, using the bags only for groceries, using separate bags for raw meat products, taking care to store the bags in an appropriate place, and allowing bags to dry before folding and storing them.<sup>256</sup> A representative of the County of Los Angeles Department of Public Health, which is charged with protecting and improving the health of residents of the County of Los Angeles, has stated that the public health risks of reusable bags are minimal.<sup>257</sup> Furthermore, as discussed in Section 2.2.4 of the EIR, the City and County of San

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<sup>255</sup> County of Los Angeles, Department of Public Works. Undated. *Specifications for Single Use Bag Reduction and Recycling Program*. Alhambra, CA.

<sup>256</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>257</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

Francisco, since enacting their plastic bag ban in 2007, have not reported negative public health issues related to the increased use of reusable bags.<sup>258</sup>

A study provided by Symphony Environmental Technologies Plc in a comment letter dated July 4, 2010, notes that any health risk associated with reusable bags is minimized if proper care is taken with the bags. The study found that washing the reusable bags either by hand or machine reduced bacterial contamination by nearly 100 percent.<sup>259</sup> As with all comments, this comment is noted for the record and will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

*Section 22, Page 55, Paragraph B*

The commenter states that the EIR should address the fact that some reusable bags are manufactured in grossly unhygienic conditions. The commenter provides an example of unhygienic conditions in a manufacturing facility in India. Any reusable bag manufacturing facilities in a country outside of the United States would be required to comply with all applicable regulations in that particular country. The County of Los Angeles does not have jurisdiction to regulate manufacturing facilities outside of the United States. Reusable bags that are made of cloth or fabric can be washed by machine and made of durable plastic can be rinsed or wiped clean. To control for any possible public health issues, the County of Los Angeles has clarified the definition for reusable bags established by the proposed County of Los Angeles ordinance to require that the material used in such bags be machine washable. The definition of a reusable bag has been modified to include this requirement in Section 2.2.3 of the EIR (see Section 12.2).

*Section 22, Page 55, Paragraph C*

The commenter states that the EIR should address extent to which reusable bag manufacturers comply with Federal Drug Administration regulations and standards regarding food contact. The Federal Drug Administration states that a food contact substance is "any substance that is intended for use as a component of materials used in manufacturing, packing, packaging, transporting, or holding food". A reusable bag is not designed for direct contact with food, as the majority of consumer food products are pre-packaged. Further, to control for any possible public health issues, the County of Los Angeles has clarified the definition of reusable bags in the proposed ordinance to require that the material used in such bags not contain toxic amounts of lead, cadmium, or any other heavy metal and that the bags be machine washable. The definition of a reusable bag has been modified to include this requirement in Section 2.2.3 of the EIR (see Section 12.2).

*Section 23, Page 56, Paragraph A*

The commenter opposes referring to plastic carryout bags as "single-use bags." The EIR refers consistently to plastic grocery bags as plastic carryout bags, not as single-use bags. The term "single-use" is used to describe bags, whether plastic or paper, that are intended to be used only one time to carry groceries and other goods from a store. The term "single-use" is not intended to describe other possible uses that a shopper may have for a particular type of bag.

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<sup>258</sup> Galbreath, Rick, County of San Francisco, CA. 10 May 2010. Telephone conversation with Angelica SantaMaría, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>259</sup> Charles P. Gerba, David Williams, and Ryan G. Sinclair. 8 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

*Section 23, Page 56, Paragraph B*

The commenter inquires whether consumers would need to purchase plastic bags for bin liners and other uses as a result of implementation of the proposed ordinances, and asserts that this “would reduce any environmental benefits from banning plastic bags.” The comment also contains a link to an article in the *Irish Examiner* citing circumstantial evidence of a correlation between bans on plastic bags and increased purchases of plastic bags for household use in certain stores in Ireland. However, this article concludes that, despite an increase in sales of bin liners, “the plastic bag levy in general had reduced the amount of plastic going to landfill and has had a ‘hugely positive impact’ in general.” The article quotes a local environmental group’s observation that “you only have to look at our streets to see the difference the bag levy has made. There’s no plastic bags stuck in trees or fences anymore.” Further, there is no evidence that consumers in Ireland and consumers in the County of Los Angeles reuse plastic bags in similar ways or to the same extent. Moreover, consumers would be similarly likely to reuse paper bags for lining trash bins and other uses. While consumers could potentially purchase additional plastic bags after implementation of the proposed ordinances for other uses, they would be expected to use far fewer additional bags than the number of plastic carryout bags currently consumed in the County of Los Angeles. Studies have shown that, while levies upon plastic carryout bags may have the potential to result in an increase in purchases of bin liners, the overall effect is to reduce the total amount of plastic bags consumed.<sup>260</sup> In addition, plastic bags purchased to be used as bin liners are less likely to be littered than plastic carryout bags because they are heavier, are less likely to become airborne, and are used for the general purpose of containing trash to be sent to a landfill. Although CEQA does not require analysis of economic impacts in the EIR, the County of Los Angeles Board of Supervisors will consider this comment during the decision-making process for the proposed County of Los Angeles ordinance.

*Section 24, Page 56, Paragraph A*

The commenter states that the EIR should discuss alternatives to the proposed ordinances that could be used to reduce plastic bag litter in the County of Los Angeles. The County of Los Angeles and the State of California have made various attempts to reduce plastic bag litter by increasing recycling and public awareness. As discussed in Section 3.5.1 of the EIR, the State of California passed AB 2449 in 2006 to encourage recycling of plastic carryout bags. As described in Section 2.3.4 of the EIR, the County of Los Angeles Board of Supervisors approved a motion on January 22, 2008, to implement a voluntary Single Use Bag Reduction and Recycling Program. The program aimed to promote the use of reusable bags, increase at-store recycling of plastic bags, reduce consumption of single-use bags, increase the post-consumer recycled material content of paper bags, and promote public awareness of the effects of litter and consumer responsibility in the County of Los Angeles. The voluntary program established benchmarks for measuring the effectiveness of the program, seeking a 30-percent decrease in the disposal rate of carryout plastic bags from the fiscal year 2007–2008 usage levels by July 1, 2010, and a 65-percent decrease by July 1, 2013.<sup>261</sup> The County of Los Angeles Working Group found that the program did not successfully achieve its goals. Over a 2-year period and despite the mandates of State law, stores in the unincorporated area did not provide data that would enable County of Los Angeles staff to determine if the voluntary program benchmark of 30-percent disposal reduction of plastic bags had

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<sup>260</sup> Cadman, J., S. Evans, M. Holland, and R. Boyd. 2005. *Proposed Plastic Bag Levy – Extended Impact Assessment Final Report*. Prepared for: Scottish Executive.

<sup>261</sup> County of Los Angeles Board of Supervisors. 22 January 2008. *Single Use Bag Reduction and Recycling Program (Resolution and Alternative 5)*. Los Angeles, CA. Available at: <http://dpw.lacounty.gov/epd/PlasticBags/Resources.cfm>

been met. Furthermore, although the public education and outreach aspects of the program, including the successful Brag About Your Bag Campaign, were effective in raising awareness of the environmental impacts of carryout bags and the benefits of reusable bags, the efforts did not change consumer behavior enough to achieve the major objectives of the County of Los Angeles.<sup>262</sup> Therefore, general increases in recycling and public outreach alone would not meet the basic objectives of the proposed ordinances. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project. Therefore, these alternatives were not carried forward for detailed analysis in the EIR. In Section 4.0 of the EIR, the County of Los Angeles analyzes the impacts of four different alternatives to the proposed ordinances that would achieve the program goals and Countywide objectives. The County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4, to maximize to the greatest extent feasible the potential environmental benefit from a fee or charge on the issuance of paper carryout bags and to mitigate impacts related to GHGs from a shift to paper carryout bag use. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

*Section 24, Page 56, Paragraph B*

The commenter states that the EIR should discuss how the County of Los Angeles could improve cleanup of plastic bag litter, as an alternative to the proposed ordinances. The County of Los Angeles has sought to evaluate efforts that *prevent* the occurrence of plastic bag litter and to *prevent* the entrance of this litter into the urban environment, storm water system, and/or coastal waterways, rather than expend resources for cleanup efforts after plastic bags have already become litter. As discussed in Section 2.2.1 of the EIR, public agencies in California spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>263</sup> In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million on these activities.<sup>264</sup> One of the references reviewed during preparation of the EIR states that policies such as enhanced litter control measures by local authorities may be effective in addressing litter but are typically more costly than a bag fee and do not change consumer behavior away from consuming bags.<sup>265</sup> Improving cleanup of plastic bag litter could be cost prohibitive and would not meet the basic objectives of the proposed ordinances, including reducing Countywide consumption of plastic carryout bags; reducing the Countywide contribution of plastic carryout bags to litter; reducing the County of Los Angeles's, cities', and the County of Los Angeles Flood Control District's costs for prevention, cleanup, and enforcement efforts to reduce litter in the County of Los Angeles; and reducing the disposal of plastic carryout bags in landfills. Section

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<sup>262</sup> County of Los Angeles Chief Executive Office. 5 August 2010. *Single Use Bag Reduction and Recycling Program and Expanded Polystyrene Food Containers – Final Quarterly Progress Report*. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls\\_080510\\_bagrpt10.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls_080510_bagrpt10.pdf)

<sup>263</sup> California Department of Transportation. Accessed on: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>264</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>265</sup> Nolan-ITU Pty Ltd., et al. December 2002. *Environment Australia: Department of the Environment and Heritage: Plastic Shopping Bags – Analysis of Levies and Environmental Impacts: Final Report*. Sydney, Australia.

15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

*Section 24, Page 56, Paragraph C*

The commenter states that the EIR should discuss how the County of Los Angeles could improve cleanup of plastic bag litter at litter hotspots, as an alternative to the proposed ordinances. The County of Los Angeles has sought to evaluate efforts that *prevent* the occurrence of plastic bag litter and to *prevent* the entrance of this litter into the urban environment, storm water system, and/or coastal waterways, rather than expend resources for cleanup efforts after plastic bags have already become litter. As discussed in Section 2.2.1 of the EIR, public agencies in California spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>266</sup> In 2008–2009 (the most recent data available) the County of Los Angeles Flood Control District spent over \$24 million on these activities.<sup>267</sup> Increasing the current litter cleanup efforts in the County of Los Angeles could be cost prohibitive, and improving plastic bag litter cleanup would not meet the basic objectives of the proposed ordinances, including reducing Countywide consumption of plastic carryout bags, reducing the Countywide contribution of plastic carryout bags to litter, reducing litter cleanup costs, or reducing the disposal of plastic carryout bags in landfills. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR.

*Section 26, Page 59 to 60*

The commenter states that the EIR should evaluate a legislative alternative to the proposed ordinances that would not ban the issuance of plastic carryout bags, but would make other efforts legally required, as described by the commenter. The comment has been understood to suggest a Statewide legislative solution; however, the State legislature has been unsuccessful in passing a number of bills proposed in the last 3 years addressing plastic carryout bags, including AB 87 and, most recently, AB 1998, which received overwhelming support from many stakeholders. The lack of success of bills proposed in the last 3 years to ban plastic carryout bags, including AB 1998, indicates that a Statewide solution may not be realized in the near future.

Some efforts suggested by the commenter would not be expected to significantly, if at all, reduce the number of plastic carryout bags that are provided to consumers, and therefore do not meet the basic objectives of the proposed ordinances, including reducing Countywide consumption of plastic carryout bags. Further, some of the efforts described by the commenter were part of the educational campaign encompassed in the voluntary Single Use Bag Reduction and Recycling Program, including educating stores not to double bag and to fill carryout bags to maximum capacity. As described in Section 2.3.4 of the EIR, the County of Los Angeles Board of Supervisors approved a motion January 22, 2008, to implement a voluntary Single Use Bag Reduction and Recycling Program. The program aimed to promote the use of reusable bags, increase at-store

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<sup>266</sup> California Department of Transportation. Accessed on: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>267</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>



recycling of plastic bags, reduce consumption of single-use bags, increase the post-consumer recycled material content of paper bags, and promote public awareness of the effects of litter and consumer responsibility in the County of Los Angeles. The voluntary program also established benchmarks for measuring the effectiveness of the program, seeking a 30-percent decrease in the disposal rate of carryout plastic bags from the fiscal year 2007–2008 usage levels by July 1, 2010, and a 65-percent decrease by July 1, 2013.<sup>268</sup> The County of Los Angeles Working Group found that the program did not successfully achieve its goals. Over a 2-year period and despite the mandates of State law, stores in the unincorporated area did not provide data that would enable County of Los Angeles staff to determine if the voluntary program benchmark of 30-percent disposal reduction of plastic bags had been met. Furthermore, although the public education and outreach aspects of the program, including the successful Brag About Your Bag Campaign, were effective in raising awareness of the environmental impacts of carryout bags and the benefits of reusable bags, the efforts did not change consumer behavior enough to achieve the major objectives established by the County of Los Angeles.<sup>269</sup> Therefore, further increases in recycling and public outreach alone are not likely to achieve the degree of reduction in plastic bag litter that the County of Los Angeles has set out to achieve as one of the objectives of the proposed ordinances. The Herrera *et al.* publication reviewed during preparation of the EIR states that “some changes to consumer behavior should be expected by education alone, but the changes in consumption of disposable bags are likely to be modest if not combined with a ban or an advanced recovery fee, and the environmental benefits would be minimal.”<sup>270</sup> Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the proposed project.

*Section 27, Page 60*

The commenter states that the EIR should evaluate the environmental benefits of legislating mandatory percentage reductions in the number of plastic and paper carryout bags provided by stores. The comment has been understood to suggest a Statewide legislative solution; however, the State legislature has been unsuccessful in passing a number of bills proposed in the last 3 years addressing plastic carryout bags, including AB 87 and, most recently, AB 1998, which received overwhelming support from many stakeholders. The lack of success of bills proposed in the last 3 years to ban plastic carryout bags, including AB 1998, indicates that a Statewide solution may not be realized in the near future. Any mandatory percentage reduction other than 100 percent would not achieve the same degree of reductions in plastic carryout bag use and disposal that would be expected to result from implementation of the proposed ordinances. Further, compliance would be with any mandatory reduction level other than 100 percent would be difficult to track, given that the recycling data available under AB 2449 is for plastic film commingled with plastic bags, and CalRecycle does not currently have an accurate ratio by which to estimate the percentage of plastic bags contained in the commingled plastic film.<sup>271</sup>

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<sup>268</sup> County of Los Angeles Board of Supervisors. 22 January 2008. *Single Use Bag Reduction and Recycling Program (Resolution and Alternative 5)*. Los Angeles, CA. Available at: <http://dpw.lacounty.gov/epd/PlasticBags/Resources.cfm>

<sup>269</sup> County of Los Angeles Chief Executive Office. 5 August 2010. *Single Use Bag Reduction and Recycling Program and Expanded Polystyrene Food Containers – Final Quarterly Progress Report*. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls\\_080510\\_bagrpt10.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls_080510_bagrpt10.pdf)

<sup>270</sup> Herrera *et al.* January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities. Seattle, WA.

<sup>271</sup> County of Los Angeles Chief Executive Office. 5 August 2010. *Single Use Bag Reduction and Recycling Program and Expanded Polystyrene Food Containers – Final Quarterly Progress Report*. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls\\_080510\\_bagrpt10.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls_080510_bagrpt10.pdf)

The commenter states that the EIR should cumulatively evaluate impacts of the proposed County of Los Angeles ordinance together with similar ordinances, proposed, adopted, or pending in the City of Berkeley, City of Los Angeles, City of Malibu, City of Manhattan Beach, City of Palo Alto, City and County of San Francisco, City of San Jose, City of Santa Monica, and others (see response to Comment No. 12 from the STPB's July 16, 2010, comment letter on the Draft EIR for information responsive to this comment).

Each of subsection of Section 3.0 of the EIR provides a detailed and extensive discussion regarding likely environmental impacts and feasible mitigation measures, if any. Section 3.1 discusses the potential impacts of the proposed ordinances to air quality by evaluating a number of issues, including indirect emissions based on LCAs. It also addresses criteria pollutant emissions resulting from disposal of paper carryout bags in landfills, and emissions resulting from increased delivery trips. Section 3.2 addresses the potential impacts of the proposed ordinances on biological resources, including evaluating impacts on state-designated sensitive habitats; rare, threatened, and endangered species; sensitive species; locally important species; federally protected wetlands; and migratory corridors and/or nursery sites. Section 3.3 addresses the potential impacts of the proposed ordinances to GHG emissions, including indirect emissions based on LCAs, GHG emissions resulting from disposal of paper carryout bags in landfills, and GHG emissions resulting from increased delivery trips. Section 3.4 addresses potential impacts to water quality and hydrology, and evaluates a number of impacts, including drainage, surface water quality, and groundwater. Section 3.5 addresses potential impacts on utilities and service systems, including impacts to wastewater treatment, the storm drain system, water supply, solid waste, and non-renewable energy consumption. The analysis of environmental impacts in the EIR is adequate and extensive. Section 15151 of the State CEQA Guidelines states, "an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." CEQA requires adequacy, completeness, and a good faith effort at full disclosure. Furthermore, Section 15145 of the State CEQA Guidelines states, "if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." All comments from STPB have been noted for the record and will be considered by the County of Los Angeles during the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

In addition, Section 4.0 of the EIR provides a reasonable range of alternatives that the County of Los Angeles has analyzed. In Section 4.0 of the EIR, the County of Los Angeles analyzes the impacts of five alternatives to the proposed ordinances that would achieve the program goals and Countywide objectives. These alternatives include banning the issuance of both plastic and paper carryout bags; banning the issuance of plastic carryout bags and imposing a fee on the issuance of paper carryout bags; banning the issuance of plastic carryout bags at all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores; and banning the issuance of plastic and paper carryout bags at all supermarkets and other grocery stores, convenience stores, pharmacies, and drug stores. Hybrid Alternative 5, which evaluates the impacts resulting from the imposition of a fee on the issuance of paper carryout bags at broad range of stores, was also evaluated. A number of these alternatives would eliminate or reduce the potential increase in use of paper carryout bags if plastic carryout bags were banned. The analysis of the alternatives also considers impacts from incorporated cities as well.

The commenter also states that the EIR must study "all reasonably feasible alternatives." However, Section 15126.6 of the State CEQA Guidelines specifies that the EIR need only examine alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project, in this case the proposed County of Los Angeles ordinance. The County of Los Angeles has made a good faith effort to ensure that adequate and extensive analysis of alternatives in the EIR. Section 15126.6 of the State CEQA Guidelines further states, "[a]n EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The EIR, including Section ES.3, Section 4.1, Section 13, and Appendix B, details reasons for which certain alternatives were eliminated from consideration. Past court cases have upheld the sufficiency of EIRs that analyzed four alternatives, finding that this number of alternatives represents enough of a variation to allow informed decisions. Other courts have found that one alternative, in addition to the No Project Alternative, was sufficient for an EIR. A "rule of reason" governs the nature and scope of the discussion of alternatives within an EIR (State CEQA Guidelines 15126.6).<sup>272</sup>

### **Response to Comment No. 2**

Comment No. 2 states that the GHG analysis in the EIR is inconsistent with the County of Los Angeles's statistic that 6 billion plastic carryout bags are consumed in the County of Los Angeles on an annual basis.

The 6 billion number was prorated based on the population of the County of Los Angeles using the 19 billion Statewide number provided by the California Integrated Waste Management Board. However, to ascertain a better understanding of the actual number of bags distributed by AB 2449–affected stores in the County of Los Angeles, coordination between the County of Los Angeles Department of Public Works and several large supermarket chains in the County of Los Angeles determined that approximately 10,000 plastic carryout bags are used per store per day on average. Due to confidential and proprietary concerns, and at the request of the large supermarket chains providing this data, the names of these large supermarket chains will remain confidential. Reported data from 12 stores reflected a combined total plastic carryout bag usage of 122,984 bags per day. A daily per-store average was then calculated at 10,249 plastic carryout bags and rounded to approximately 10,000 bags per day. It is important to note that this number is likely very high, as it is more than twice the bag average reported by the California Department of Resources Recycling and Recovery (CalRecycle) in 2008 for stores affected by AB 2449. In 2008, 4,700 stores Statewide affected by AB 2449 reported an average of 4,695 bags used per store per day.<sup>273</sup> The EIR analysis is therefore based on the conservative assumption that 10,000 plastic carryout bags are distributed in each of the stores that would be affected by the proposed County of Los Angeles ordinance. While 10,000 plastic carryout bags per store per day may not accurately reflect the actual number of bags consumed per day on average for stores greater than 10,000 square feet in the unincorporated and incorporated areas of the County of Los Angeles, for the purposes of this EIR, this number was used to conservatively evaluate impacts resulting from a worst-case scenario.

Section 3.0 of the EIR assumes that of the AB 2449–affected stores, there are 67 stores in the unincorporated territory of the County of Los Angeles and 462 stores in the incorporated cities of

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<sup>272</sup> *California Code of Regulations*, Title 14, Division 6, Chapter 3, Section 15126.6.

<sup>273</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

the County of Los Angeles that would be affected by the proposed ordinances.<sup>274,275</sup> Therefore, conservatively the total number of bags assumed to be banned by the proposed ordinances per year would be as follows:

$$\begin{aligned} & 10,000 \text{ bags per day} \times (67 + 462) \times 365 \text{ days} \\ & = 1,930,850,000 \text{ plastic carryout bags per year} \end{aligned}$$

Therefore, the total number of bags analyzed in the EIR is close to 2 billion bags per year, which is a subset of the 6 billion bags per year statistic provided by the County of Los Angeles. The proposed ordinances account only for a subset of the 6 billion plastic carryout bags per year, since the proposed ordinances would only apply to certain retail stores covered by the definition in AB 2449 in the County of Los Angeles. As defined in Section 2.5 of the EIR, the proposed ordinances would apply only to retail establishments that (1) meet the definition of a “supermarket” as stated in the California Public Resources Code, Section 14526.5; or (2) are buildings with over 10,000 square feet of retail space that generates sales or use tax pursuant to the Bradley-Burns Uniform Local Sales and Use Tax Law and have a pharmacy licensed pursuant to Chapter 9 of Division 2 of the Business and Professions Code.

In Sections 4.2.4 and 4.2.5 of the EIR, the County of Los Angeles evaluates Alternative 3 and Alternative 4 that would extend the scope of the proposed ordinances to apply to all supermarkets and other grocery stores, convenience stores, pharmacies and drug stores, regardless of square footage or sales volume. For the analysis of Alternatives 3 and 4, it was assumed that 1,091 stores could be affected in the unincorporated territories of the County of Los Angeles,<sup>276</sup> and 5,084 stores could be affected in the incorporated cities of the County of Los Angeles.<sup>277</sup> It was assumed that each store larger than 10,000 square feet currently uses approximately 10,000 plastic carryout bags per day,<sup>278</sup> and each store smaller than 10,000 square feet currently uses approximately 5,000 plastic carryout bags per day.<sup>279</sup> Therefore, the total number of bags assumed to be banned per year as a result of Alternatives 3 or 4 would be as follows:

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<sup>274</sup> As a result of the voluntary Single Use Bag Reduction and Recycling Program, the County of Los Angeles has determined that 67 stores in unincorporated territories would be affected by the proposed County of Los Angeles ordinance.

<sup>275</sup> Number of stores in the 88 incorporated cities of the County of Los Angeles was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110 and 446110 with a gross annual sales volume of \$2 million or higher and a square footage of 10,000 square feet or higher. Accessed on: 29 April 2010.

<sup>276</sup> Number of stores in the unincorporated territories of the County of Los Angeles was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110, 445120, and 446110 with no filters for gross annual sales volume or square footage. Accessed on: 29 April 2010.

<sup>277</sup> Number of stores in the 88 incorporated cities of the County was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110, 445120, and 446110 with no filters for gross annual sales volume or square footage. Accessed on: 29 April 2010.

<sup>278</sup> Based on coordination between the County of Los Angeles Department of Public Works and several large supermarket chains in the County, it was determined that approximately 10,000 plastic carryout bags are used per store per day. Due to confidential and proprietary concerns, and at the request of the large supermarket chains providing this data, the names of these large supermarket chains will remain confidential. Reported data from only 12 stores reflected a total plastic carryout bag usage of 122,984 bags per day. A daily average per store was then calculated at 10,249 plastic carryout bags and rounded to approximately 10,000 bags per day.

<sup>279</sup> Data from the infoUSA indicates that approximately 40 percent of the stores greater than 10,000 square feet in the unincorporated territories of the County of Los Angeles are larger than 40,000 square feet. Therefore, the average size of the stores to be affected by the proposed County of Los Angeles ordinance would be greater than 20,000 square feet. Accordingly, it would be reasonable to estimate that the stores smaller than 10,000 square feet that would be affected by

$$[(5,000 \text{ bags per day} \times (1,024 + 4,622)) + [10,000 \text{ bags per day} \times (67 + 462)]] \times 365 \text{ days} = 12,234,800,000 \text{ plastic carryout bags per year}$$

Therefore, the total number of plastic carryout bags assumed to be affected by Alternatives 3 and 4 is approximately 12 billion bags a year, which is actually twice as large as the County of Los Angeles's estimate that 6 billion plastic carryout bags are used in the County of Los Angeles every year. This reflects the determination that the estimate of 10,000 plastic bags per store is indeed a very conservative estimate that is much higher than the actual usage in stores, and reflects the County of Los Angeles's good faith in trying to evaluate the environmental impacts using the most conservative approach.

The commenter also states that the 85-percent conversion does not take into account life cycle GHG impacts from reusable bags. However, Section 3.3.5 and Table 3.3.5-4 analyze the estimated daily emissions changes due to reusable bags used three times based on Ecobilan data. These results show that a 100-percent conversion from the use of plastic carryout bags to the use of reusable bags would result in a reduction in GHG emissions, which is a conclusion that is supported by numerous life cycle assessments.<sup>280,281,282</sup> Therefore, in the scenario analyzed in the EIR where 85 percent of consumers are assumed to switch to using paper carryout bags, the GHG emissions due to the 15 percent of consumers who switch to using reusable bags is assumed to be negligible.

### **Response to Comment No. 3**

Comment No. 3 notes a possible error in the GHG emissions calculations in Tables 4.2.4.3-5 and 4.2.4.3-6 of the EIR, by pointing out that 124,720 is not 85 percent of 183,320.

The County of Los Angeles has made a good faith effort to ensure the accuracy of all calculations in the EIR, and has attached Appendix C to the EIR, which shows the spreadsheet that was used for all calculations in the EIR. Any member of the public can review this spreadsheet to understand and verify how the calculations were done. The numbers for an 85-percent conversion from plastic to paper carryout bags do not equal 85 percent of the numbers for a 100-percent conversion from plastic to paper carryout bags because the numbers reported for paper carryout bags are reported as an **increase** from the existing conditions. Under CEQA, impacts are analyzed against existing physical conditions. Below is an explanation of the calculations for an 85-percent conversion to paper carryout bags.

#### *Existing Conditions (100 Percent Plastic Bags)*

CO<sub>2</sub> emissions for the current number of plastic carryout bags used per day in the County of Los Angeles were calculated based on the results of a life cycle assessment.

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Alternative 3 would be at less than half the size of the stores to be affected by the proposed ordinances and would use less than half the number of bags.

<sup>280</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>281</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>282</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

### *Hypothetical Scenario 1 (100 Percent Paper Bags)*

CO<sub>2</sub> emissions were calculated based on a hypothetical situation, assuming every plastic carryout bag that is currently used per day in the County of Los Angeles is replaced by a paper carryout bag, at a ratio of approximately 1.5 plastic carryout bags to 1 paper carryout bag due to the difference in carrying capacity.

### *Hypothetical Scenario 2 (85 Percent Paper Bags)*

CO<sub>2</sub> emissions calculated under scenario 1 were multiplied by 85 percent to evaluate a scenario where 15 percent of consumers switch to using reusable bags, which are assumed to have negligible CO<sub>2</sub> emissions in comparison to plastic carryout bags (as discussed in Section 3.3.5 and Table 3.3.5-4 and supported by numerous LCAs<sup>283,284,285</sup>). These emissions are 85 percent of the emissions calculated under Hypothetical Scenario 1.

### *Emissions Due to a 100-percent Conversion from Plastic to Paper Carryout Bags*

The existing conditions were subtracted from the emissions calculated under Hypothetical Scenario 1 to calculate the emissions due to a 100-percent conversion from plastic to paper carryout bags. This result is a calculation of the increase (or decrease) in emissions compared to the existing conditions.

### *Emissions Due to an 85-percent Conversion from Plastic to Paper Carryout Bags*

The existing conditions were subtracted from the emissions calculated under Hypothetical Scenario 2 to calculate the emissions due to an 85-percent conversion from plastic to paper carryout bags. This result does not equal 85 percent of the emissions calculated under the 100-percent conversion scenario because it is a calculation of the increase (or decrease) in emissions compared to the existing conditions.

The tables below show in further detail how the 183,320 and 124,720 values were calculated in Tables 4.2.4.3-5 and 4.2.4.3-6 of the EIR, as further detailed in Appendix C to the EIR (Table 13-3, *Increase in GHG Emissions Due to 100-percent Conversion from Plastic to Paper Carryout Bags Based on Ecobilan Data*, and Table 13-4, *Increase in GHG Emissions Due to 85-percent Conversion from Plastic to Paper Carryout Bags Based on Ecobilan Data*):

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<sup>283</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>284</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>285</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

**TABLE 13-3  
INCREASE IN GHG EMISSIONS DUE TO 100-PERCENT CONVERSION FROM PLASTIC  
TO PAPER CARRYOUT BAGS BASED ON ECOBILAN DATA**

Ecobilan GHG Emissions	CO <sub>2e</sub> Emissions (Metric Tons)			
	Daily Emissions due to Plastic Carryout Bags <sup>1</sup>	Daily Emissions due to Paper Carryout Bags <sup>2</sup>	Daily Emission Increase Caused by 100 Percent Conversion from Plastic to Paper <sup>3</sup>	Annual Emission Increase <sup>4</sup>
Total Emissions in the County of Los Angeles due to stores larger than 10,000 square feet	89.65	168.92	79.26	28,931
Total Emissions in the County due to stores smaller than 10,000 square feet	478.43	901.41	422.98	154,389
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>1070.33</b>	<b>502.25</b>	<b>183,320</b>

**NOTES:**

1. Exiting conditions based on 10,000 plastic carryout bags per store per day
2. Based on a 100-percent conversion from plastic to paper carryout bags and a carrying capacity ratio of 1 paper carryout bag : 1.46 plastic carryout bags
3. Calculated by subtracting the daily paper carryout bag emissions from the daily plastic carryout bag emissions
4. Daily emissions multiplied by 365. Numbers may vary slightly due to rounding.

**TABLE 13-4  
INCREASE IN GHG EMISSIONS DUE TO 85-PERCENT CONVERSION FROM PLASTIC  
TO PAPER CARRYOUT BAGS BASED ON ECOBILAN DATA**

Ecobilan GHG Emissions	CO <sub>2e</sub> Emissions (Metric Tons)			
	Daily Emissions due to Plastic Carryout Bags <sup>1</sup>	Daily Emissions due to Paper Carryout Bags <sup>2</sup>	Daily Emission Increase Caused by 85 Percent Conversion from Plastic to Paper <sup>3</sup>	Annual Emission Increase <sup>4</sup>
Total emissions in the County of Los Angeles due to stores larger than 10,000 square feet	89.65	143.58	53.93	19,683
Total Emissions in the County due to stores smaller than 10,000 square feet	478.43	766.20	287.77	105,037
<b>Total Emissions in the County</b>	<b>568.08</b>	<b>909.78</b>	<b>341.70</b>	<b>124,720</b>

**NOTES:**

1. Exiting conditions based on 10,000 plastic carryout bags per store per day
2. Based on a 85-percent conversion from plastic to paper carryout bags and a carrying capacity ratio of 1 paper carryout bag : 1.46 plastic carryout bags
3. Calculated by subtracting the daily paper carryout bag emissions from the daily plastic carryout bag emissions
4. Daily emissions multiplied by 365. Numbers may vary slightly due to rounding.

#### **Response to Comment No. 4**

Comment No. 4 objects to the assumption used in the EIR that the proposed ordinances would be expected to result in an increase in the use of reusable bags. Throughout Section 3.0 of the EIR, environmental impacts are analyzed based on a worst-case scenario where all plastic carryout bags currently used in the County of Los Angeles would be replaced by a 100-percent conversion to paper carryout bags and that there would be no increase in use of reusable bags. Therefore, the potential outcome of the proposed ordinances that Comment No. 4 asserts will occur has already been analyzed in the EIR. However, the County of Los Angeles does anticipate that the proposed ordinances would result in an increase in the use of reusable bags, and therefore has also evaluated the proposed ordinances based on an alternative outcome that would result in at least a 15-percent conversion to reusable bags and an 85-percent conversion to paper bags. This 15-percent conversion to reusable bags is based on a survey conducted by Sapphos Environmental, Inc. (Appendix A to the EIR). This survey observed that reusable bags made up approximately 18 percent of the total number of carryout bags used in stores that did not make plastic carryout bags readily available to customers; however, reusable bags made up only approximately 2 percent of the total number of bags used in stores that did make plastic carryout bags readily available (Appendix A to the EIR). Therefore, it is reasonable to estimate that a ban on the issuance of plastic carryout bags would increase the number of reusable bags used by customers by approximately 15 percent.

#### **Response to Comment No. 5**

Comment No. 5 notes the commenter's objection to the use of an 85-percent and 100-percent conversion to paper carryout bags in the analysis that was conducted throughout the EIR. Comment No. 5 notes an objection to the 100-percent conversion scenario because "it assumes that no consumers whatsoever would switch to reusable bags." This objection contradicts Comment No. 4, which states that there is "no basis for 'expecting' that reusable bag usage will increase if plastic bags are banned." The 100-percent conversion to paper carryout bags was analyzed as a worst-case scenario, and the County of Los Angeles recognizes that the proposed ordinances would likely result in an increase in the use of reusable bags.

Comment No. 5 states an objection to analyzing a scenario where there would be a potential 85-percent conversion to paper carryout bags because this scenario does not consider the environmental impacts of reusable bags. Under this scenario, the environmental impacts of reusable bags are considered negligible because, as described throughout the EIR, including in Sections 3.1.4, 3.3.5, 3.4.4, and 3.5.4, although the production, manufacture, distribution, and eventual disposal of reusable bags causes environmental impacts, as is the case with any manufactured product, these impacts are significantly reduced when calculated on a per-use basis. The County of Los Angeles recognizes that the 85-percent conversion scenario analyzed in the EIR assumes that the impacts of switching from the use of plastic carryout bags to the use of reusable bags are negligible, which is a reasonable assumption given that certain types of reusable bags can be used hundreds of times. The EIR concludes that life cycle impacts due to reusable bags are less than impacts due to plastic carryout bags, which is supported by numerous studies referenced in the EIR,<sup>286,287,288,289,290,291,292</sup> therefore, a switch from the use of plastic carryout bags to the use of

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<sup>286</sup> Nolan-Itu Pty. Ltd. 2002. *Plastic Shopping Bags – Analysis of Levies and Environmental Impacts*. Prepared for: Department of the Environment, Water, and Heritage: Canberra, AU.

<sup>287</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.



reusable bags would result in a decrease in environmental impacts compared to existing conditions, or in other words, a beneficial impact.

For example, Section 3.3.5 and Table 3.3.5-4 in the EIR analyze the estimated daily GHG emissions changes due to reusable bags used three times based on Ecobilan data. These results show that a 100-percent conversion from the use of plastic carryout bags to the use of reusable bags would result in a reduction in GHG emissions, which is a conclusion that is supported by the Hyder Study<sup>293</sup> and the ExcelPlas Study,<sup>294</sup> among others. Therefore, in the scenario analyzed in the EIR where 85 percent of consumers are assumed to switch to using paper carryout bags, the GHG emissions increases due to the 15 percent of consumers who switch from using plastic carryout bags to using reusable bags are assumed to be negligible. However, if it were to be assumed, under a worst-case scenario, that the environmental impacts of reusable bags were equivalent to the impacts of paper carryout bags, the environmental impacts would equal those analyzed in the scenarios in the EIR that evaluate a 100-percent conversion from plastic to paper carryout bags.

### **Response to Comment No. 6**

Comment No. 6 asserts that analysis in the Draft EIR assumes that life cycle impacts associated with reusable bags would be zero. Comment No. 6 also asserts that the EIR should provide life cycle analyses of cloth, jute, nonwoven polypropylene, polyethylene terephthalate (PET), or other non-LDPE reusable bags.

Analysis in the EIR did not assume that life cycle impacts associated with reusable bags would be zero; rather, it evaluated the increased use of reusable bags in comparison with existing conditions. For example, page 3.5-15 discusses how conversion from plastic carryout bags to reusable bags would be anticipated to have reduced impacts upon water supply, and page 3.3-27 discusses GHG emissions resulting from 104 uses of a reusable bag compared with emissions from plastic carry out bags.

Many studies that evaluate the environmental impacts of different types of reusable bags were considered during preparation of the EIR. The overall conclusion of these studies is that reusable bags can be expected to have fewer environmental impacts than plastic bags because they can be used multiple times.<sup>295,296,297,298,299,300,301</sup> These studies evaluated reusable bags made from a variety

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<sup>288</sup> Marlet, C., EuroCommerce. September 2004. *The Use of LCAs on Plastic Bags in an IPP Context*. Brussels, Belgium.

<sup>289</sup> The ULS Report. 1 June 2007. *Review of Life Cycle Data Relating to Disposable Compostable Biodegradable, and Reusable Grocery Bags*. Rochester, MI.

<sup>290</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>291</sup> Herrera et al. January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

<sup>292</sup> Marlet, C., EuroCommerce. September 2004. *The Use of LCAs on Plastic Bags in an IPP Context*. Brussels, Belgium.

<sup>293</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>294</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>295</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France. of the Environment, Water, and Heritage: Canberra, Australia.

of materials including low density polyethylene, woven high density polyethylene, cotton, and non-woven polypropylene. The conclusion that the life cycle impacts of reusable bags are less than the life cycle impacts of carryout bags is consistent with the Master Environmental Assessment on Single-Use and Reusable Bags that was prepared to assist counties and cities evaluate environmental impacts of plastic carryout bag bans.<sup>302</sup>

The Hyder Study, which was used as a reference throughout the EIR, evaluated the life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in significantly lower overall environmental impacts than the impacts resulting from paper and plastic carryout bags (Table 13-2).<sup>303</sup> The Hyder Study also evaluated reusable calico (cotton) bags, and determined that although life cycle water use impacts would be greater than for other types of bags, the calico reusable bag outperforms carryout bags in all other environmental categories: material consumption, global warming, energy consumption, litter marine biodiversity, and litter aesthetics (Table 13-2).

Therefore, overall environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the overall environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

The Draft EIR considered and appropriately evaluated information from multiple sources. According to the International Organization for Standardization (ISO) 14044, if data from two or more life cycle assessments are used for comparative assertions, the systems compared must be functionally equivalent, with any differences between systems being identified and reported.<sup>304</sup> If the comparison is intended to be disclosed to the public, ISO 14044 requires that interested parties conduct an additional peer review.<sup>305</sup> Therefore, it was not possible or appropriate to combine the results from the Ecobilan study for plastic and paper carryout bags with results from other life cycle assessments evaluating different types of reusable bags. However, the EIR reasonably concludes that overall life cycle impacts attributable to reusable bags, whether made of plastics such as polypropylene or polyethylene, or other materials such as cotton, are less than overall impacts due to plastic carryout bags, so a switch from the use of plastic carryout bags to the use of reusable bags

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<sup>296</sup> Nolan-Itu Pty. Ltd. 2002. *Plastic Shopping Bags – Analysis of Levies and Environmental Impacts*. Prepared for: Department

<sup>297</sup> Marlet, C., EuroCommerce. September 2004. *The Use of LCAs on Plastic Bags in an IPP Context*. Brussels, Belgium.

<sup>298</sup> The ULS Report. 1 June 2007. *Review of Life Cycle Data Relating to Disposable Compostable Biodegradable, and Reusable Grocery Bags*. Rochester, MI.

<sup>299</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>300</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>301</sup> Herrera et al. January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

<sup>302</sup> Green Cities California. March 2010. *Master Environmental Assessment on Single-Use and Reusable Bags*. Prepared by ICF International. San Francisco, CA.

<sup>303</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>304</sup> Franklin Associates, Ltd., 1990. *Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks*. Prairie Village, KS.

<sup>305</sup> Franklin Associates, Ltd., 1990. *Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks*. Prairie Village, KS.

would generally result in a decrease in environmental impacts compared to existing conditions, or in other words, a beneficial impact.

### **Response to Comment No. 7**

Comment No. 7 objects to the statement in the EIR, “Reusable bag manufacturers are also expected to enforce industry standards and recommendations to avoid adverse environmental impacts, including the use of recycled materials.” This statement refers to reusable bag manufacturers located within the United States, which has been clarified in the Clarifications and Revisions to the EIR (Section 12.2). The statement correctly indicates that reusable bag manufacturing (in the United States) is regulated. For example, air emissions from reusable bag manufacturing are regulated by the federal Clean Air Act, water pollution is regulated by the federal Clean Water Act, and GHG emissions in California are regulated by AB 32. A detailed discussion of applicable regulatory framework is included in each of the various subsections of Section 3.0 of the EIR. It would be incorrect to assume that environmental impacts resulting from the production and manufacture of reusable bags in the United States would be left unchecked and unregulated. The County of Los Angeles recognizes that manufacturing regulations overseas may not be as strict as regulations in the United States, and this point is noted for the record.

Comment No. 7 notes that the environmental impacts from the life cycle of reusable bags, including manufacturing overseas, must be disclosed. The life cycle impacts of reusable bags are discussed throughout Section 3.0 of the EIR, including the consumption of nonrenewable energy (Section 3.5.4), emissions of greenhouse gases (Section 3.3.5), consumption of water (Section 3.5.4), air quality (Section 3.1.4), water pollution (Section 3.4.4), and solid waste (Section 3.5.4). The life cycle analyses include impacts related to transportation.

Comment No. 7 also states that there is no substantial evidence that recycling reduces environmental impacts, except the use of virgin source materials, solid waste disposal, and litter. The USEPA states that “recycling reduces greenhouse gas emissions, conserves natural resources, and saves landfill space.”<sup>306</sup> The environmental impacts of including recycled content in paper carryout bags have been included throughout the various subsections of Section 3.0 of the EIR. The County of Los Angeles has evaluated impacts of paper carryout bags using the Ecoblilan Study, which analyzes the life cycle impacts of paper carryout bags that are made from 100-percent recycled content. The Ecoblilan Study includes environmental impacts due to the transportation of old paper/paperboard to a recycling facility, as well as the transportation of the recycled paper to the paper bag manufacturing facility. The County of Los Angeles also used the Boustead Study to evaluate impacts of paper carryout bags in the EIR that contain 30 percent recycled fiber. In addition, the Hyder Study, which is referenced throughout the EIR, concludes that the environmental impacts, aside from impacts related to littering, of a HDPE plastic carryout bag are substantially reduced when the bag is made from 100-percent recycled content (Table 13-2).<sup>307</sup>

Comment No. 7 also states that recycled materials cannot be used to make cloth, jute, or non-woven polypropylene and PET reusable bags. This statement is incorrect, as there are many reusable bags available in the marketplace that are made from recycled materials. For example,

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<sup>306</sup> U.S. Environmental Protection Agency. Accessed on: 6 September 2010. “Wastes - Resource Conservation - Common Wastes & Materials - Paper Recycling.” Web site. Available at: <http://www.epa.gov/epawaste/conserva/materials/paper/index.htm>

<sup>307</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

plastic bottles that are made of PET can be cleaned, crushed, chopped into flakes, and then spun into threads that can be used to make polyester fabrics,<sup>308</sup> including polyester reusable bags. The County of Los Angeles has purchased such bags as part of its efforts to promote the use of reusable bags and to promote beverage container recycling. Even the statement that the commenter cites from the Web site of “1 Bag at a Time” refutes the commenter's assertion that recycled materials cannot be used to make certain types of reusable bags. The statement cited in this comment also indicates awareness of the existence of 30-percent recycled content bags, and refers to nonwoven polypropylene bags made of 10-percent recycled content.

### **Response to Comment No. 8**

Comment No. 8 states that (1) the Draft EIR should have quantified life cycle GHG and other impacts wherever they occur, such as Canada, not only in the County of Los Angeles or Southern California, and (2) local thresholds of significance are inapplicable and legally unenforceable.

The CEQA Guidelines state that the degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity addressed in the EIR (see State CEQA Guidelines §§ 15146, 15151, and 15204). The Draft EIR acknowledges that the impact analysis is programmatic in nature as the proposed ordinances would encompass 2,649 square miles of the unincorporated portions of the County of Los Angeles, and 1,435 square miles of the incorporated cities (see pages 1-1 and 2-1). The Draft EIR discusses the speculative nature of life cycle analysis starting on pages 3.1-11 through 3.1-25. As discussed in this section, life cycle analysis is largely speculative. Both SCAQMD and AVAQM have reached similar conclusions. This conclusion is further supported by recent revisions in the State CEQA Guidelines:

‘Lifecycle’ The amendment to Appendix F removes the term ‘lifecycle.’ No existing regulatory definition of ‘lifecycle’ exists. In fact, comments received during OPR’s public workshop process indicate a wide variety of interpretations of that term.<sup>309</sup> Thus retention of the term ‘lifecycle’ in Appendix F could create confusion among lead agencies regarding what Appendix F requires.

Moreover, even if a standard definition of the term ‘lifecycle’ existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered ‘indirect effects’ of a project as that term is defined in section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials.<sup>310</sup> CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration. (State CEQA Guidelines § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be ‘caused by’ the project under

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<sup>308</sup> Bright Hub. 21 January 2010. “Polyester Fiber from Recycled Bottles Providing Cost Efficiency in Textile Manufacture.” Available at: <http://www.brighthouse.com/environment/green-living/articles/62032.aspx>

<sup>309</sup> California Natural Resources Agency. December 2009. *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

<sup>310</sup> California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the manufacturing process. Mitigation can only be required for emissions that are actually caused by the project (State CEQA Guidelines, § 15126.4(a)(4)). Conversely, other projects may spur the manufacture of certain materials, and in such cases, consideration of the indirect effects of a project resulting from the manufacture of its components may be appropriate. A lead agency must determine whether certain effects are indirect effects of a project, and where substantial evidence supports a fair argument that such effects are attributable to a project, that evidence must be considered. However, to avoid potential confusion regarding the scope of indirect effects that must be analyzed, the term “lifecycle” has been removed from Appendix F.<sup>311</sup>

As noted in the Draft EIR and acknowledged by the commenter, there is no one specific source for the manufacture and production of paper bags that can be traced to the proposed ordinances. This however, does not necessitate essentially unbounded and potentially global analysis of the project’s impacts. As discussed under CEQA Guidelines Section 15204(a), “reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project...” (italics added). This reasoning is further supported by CEQA case law [see *Rio Vista Farm Bureau Center et al. v. County of Solano* (1992) 5 Cal.App4th 351, 373 (holding that while development may be foreseeable, specific development at a particular location is speculative)].

Furthermore, while site-specific locations for the manufacture of bags were too speculative to analyze, the Draft EIR did provide non-site-specific project emissions analysis of bag manufacturing (see response to STPB Comment No. 27). For the reasons discussed above and in the EIR, analysis of air quality and GHG impacts was appropriate and did not need to address speculative locations, such as Canada.

Similarly, the significance thresholds used in the Draft EIR were appropriate and provide for a conservative analysis. As described in Section 2.0 of the EIR, the proposed “project” being evaluated under CEQA is the proposed ordinances to ban the issuance of plastic carryout bags within the County of Los Angeles. Therefore, the EIR evaluates the proposed ordinances in accordance with applicable regulations and thresholds for the County of Los Angeles. As discussed in Draft EIR Section 3.1, the project falls into the SCAQMD portion of the South Coast Air Basin (SCAB) and the AVAQMD portion of the Mojave Desert Air Basin (MDAB). As further discussed on page 3.1-3, these areas are in severe-17 non-attainment and non-attainment for several criteria pollutants. These levels of non-attainment have resulted in more stringent air quality regulations and significance thresholds. Therefore, the use of the SCAQMD thresholds is considered to result in a conservative analysis in comparison to other locations (or Canada as suggested in the comment).

Furthermore, the County of Los Angeles is the lead agency, and has used its discretion, consistent with CEQA, in selecting its significance thresholds. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An iron clad definition of significant effect is not always possible [CEQA Guidelines § 15064(b)]. Therefore, a lead agency

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<sup>311</sup> California Natural Resources Agency. December 2009. *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

has the discretion to determine whether to classify an impact described in an EIR as “significant.” [Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 477, relying upon National Parks & Conservation Ass’n v. County of Riverside (1999) 71 Cal.App.4th 1341, 1357].

Furthermore, the use of the GHG thresholds of significance in Section 3.3.4 was appropriate, as the impacts are assumed to contribute to global GHGs regardless of where they are generated. There are no worldwide adopted thresholds for GHG emissions.

In terms of GHG emissions, as described in Section 3.3.4 of the EIR, the State has not determined significance thresholds for evaluating potential impacts on GHG emissions under CEQA, beyond the general, qualitative questions contained in Appendix G of the State CEQA Guidelines. The County of Los Angeles and the cities within the County of Los Angeles fall within one of two air districts: the SCAQMD and AVAQMD. Neither the SCAQMD nor the AVAQMD has adopted GHG significance thresholds under CEQA. Therefore, the County of Los Angeles has analyzed the potential of the proposed ordinances to result in significant impacts related to GHG emissions based on the review of regulatory and professional publications, the guidance on analyzing GHG emissions under CEQA provided by the California Office of the Attorney General,<sup>312</sup> OPR,<sup>313</sup> and CARB,<sup>314</sup> and Appendix G of the State CEQA Guidelines. Based on this review, the County of Los Angeles evaluated the significance of GHG emission impacts related to whether the proposed ordinances would be consistent with laws and regulations managing GHG emissions, and specifically whether the proposed ordinances would be consistent with the Countywide and Statewide GHG emission goals.

As discussed in Section 3.1.3 of the EIR, the County of Los Angeles relied on significance thresholds recommended by the SCAQMD in the *CEQA Air Quality Handbook*, as revised in November 1993 and approved by the SCAQMD Board of Directors, to determine whether the proposed ordinances would have significant impacts to air quality due to mobile source emissions.<sup>315</sup> The SCAQMD’s emission thresholds apply to all federally regulated air pollutants except lead, which is not exceeded in the SCAB. The County of Los Angeles also relied on significance thresholds provided by the AVAQMD to evaluate the significance of mobile source emissions that may be expected to occur in the portion of the County of Los Angeles that lies within the jurisdiction of the AVAQMD.<sup>316</sup> As noted in Section 3.1.4 of the EIR, and discussed above, life cycle assessment results for air quality cannot be reasonably evaluated in relation to the operational thresholds of significance set by the SCAQMD for the SCAB or by AVAQMD for the MDAB because the operational thresholds are intended for specific projects located in the SCAB and MDAB, whereas LCA data cover all stages of production, distribution, and end-of-life procedures related to a particular product. The manufacture and production of paper carryout bags does not appear to occur in the SCAB or the MDAB, with manufacturing facilities located in other

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<sup>312</sup> California Department of Justice Office of the Attorney General. 21 May 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

<sup>313</sup> California Governor’s Office of Planning and Research. 19 June 2008. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. Technical Advisory. Sacramento, CA.

<sup>314</sup> California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act*. Available at: [http://www.opr.ca.gov/ceqa/pdfs/Prelim\\_Draft\\_Staff\\_Proposal\\_10-24-08.pdf](http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf)

<sup>315</sup> South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

<sup>316</sup> Antelope Valley Air Quality Management District. May 2005. *Antelope Valley AQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Available at: <http://www.mdaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=916>

air basins in the United States and in other countries that may have different emission thresholds and regulations. Indeed, it would be speculative to determine exactly how much plastic and paper carryout bag manufacturing would be indirectly affected by the proposed ordinances in each different region or country in order to prepare an environmental analysis using distinct thresholds of significance for each region or country.

### **Response to Comment No. 9**

Comment No. 9 objects to using global and Statewide GHG emissions as thresholds for evaluating the significance of GHGs from the proposed ordinances. Because GHGs are considered to be a global issue, it is reasonable for the County of Los Angeles to look at cumulative emissions. As noted in Section 3.3 of the EIR, significance thresholds for GHG emissions have not yet been adopted by the SCAQMD or AVAQMD, nor any federal or State agency responsible for managing GHG emissions in the County of Los Angeles or the South Coast Air Basin. On the local level, the County of Los Angeles has not adopted a GHG emission significance threshold. Neither CEQA Statutes nor CEQA Guidelines establish thresholds of significance. A lead agency has the discretion to determine whether to classify an impact described in an EIR as “significant” [*Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, relying upon *National Parks & Conservation Ass’n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1357].

As set forth in Section 3.3.5, the quantitative analysis of GHG impacts was viewed (1) in context with GHG emission reduction goals of both California and the County of Los Angeles, and (2) in a cumulative context. California's GHG emissions target for 2020 is 427 million metric tons per year (Table 3.3.2-1 and Table 3.3.5-9) and the County of Los Angeles’s GHG emissions target for 2020 is 108 million metric tons per year (Table 3.3.3-1 and Table 3.3.5-9). The LCA data was analyzed and applied to these target 2020 emission levels. In addition, the County of Los Angeles acknowledged that the proposed ordinances could affect the entire County of Los Angeles, and that the resultant indirect GHG emissions would not occur at any one particular facility. Assuming this, it was reasonable to also consider the indirect GHG emissions on a per-person, or per-capita basis. The commenter also objects to the County of Los Angeles disclosing that paper bags are not one of the top 10 contributors to GHG emissions. It is reasonable for the County of Los Angeles to put into context GHG impacts from paper carryout bags against the major sources of GHG emissions in California, as discussed in Section 3.3.1 and as shown in Figures 3.3.1-1 and 3.3.1-2, to highlight that paper carryout bags are not the main driving force behind GHG emissions.

The commenter states that the thresholds are inapplicable and inadequate. The thresholds utilized in the chapter to analyze the cumulative impacts are legally adequate and consistent with CEQA Guidelines Section 15064.7 and Appendix G. Section 3.3.4 provides thresholds upon which the cumulative significance conclusions are based, namely, “would the proposed ordinance have any of the following effects:

- Generate greenhouse gas emissions, either directly or indirectly that may have a significant effect on the environment
- Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases”

The second threshold is further explained by two additional significance criteria:

- Inconsistency with laws and regulations in managing GHG emissions

- Inconsistency with the goal to reduce GHG emissions to 1990 levels (approximately 427 metric tons or 9.6 metric tons of CO<sub>2e</sub> per capita) as required by AB 32”

Section 3.3 analyzes life cycle impacts of conversion from the use of plastic to the use of paper carryout bags (Table 3.3.5-9), end of life emissions (Table 3.3.5-10), increased vehicle trips (Table 3.3.5-13), and cumulative impacts (pages 3.3-36 to 3.3-37). The significance conclusions are based on the thresholds identified in Section 3.3.4.

The per capita analysis was utilized to evaluate consistency of the project with the goals of AB 32 and its implementation document, the CARB’s *Climate Change Scoping Plan*, and no significant impacts were found.

Applying the threshold “Generate greenhouse gas emissions, either directly or indirectly that may have a significant effect on the environment,” Section 3.3.5 conservatively concluded that the end of life impacts resulting from an 85- and 100-percent conversion from plastic to paper carryout bags, would be significant. This impact conclusion is also provided in Section 3.3.7. As discussed in the chapter, the GHG impacts of the proposed project were analyzed on a cumulative basis. The threshold “Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases” was applied for conversion from plastic to paper carryout bags and truck trip analyses and the summary of projections approach was used to determine cumulative impact. This is consistent with CEQA Guidelines §15130(b)(1)(B) which provides that cumulative analysis may be based on a “summary of projections in an adopted local, regional or Statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or *plans for the reduction of greenhouse gas emissions*” (emphasis added). The GHG cumulative analysis was based on consistency with the GHG projections in California’s plan to implement AB 32: California Air Resources Board’s *Climate Change Scoping Plan* and the County of Los Angeles’s Energy and Environmental Policy No. 3-045. Based on this analysis, no significant cumulative impacts were found.

The threshold “Generate greenhouse gas emissions, either directly or indirectly that may have a significant effect on the environment” was applied to the end of life emissions. The overall conclusion from this analysis, based on a conservative worst-case scenario, is that there would be the potential for a cumulatively considerable impact.

The commenter also states that the baselines are “inapplicable and inadequate.” The baseline for analysis was 2009, which was the date of the Notice of Preparation. This is consistent with CEQA Guidelines §15125(a), which provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project as they exist at the time of the notice of preparation is published . . . .”

### **Response to Comment No. 10**

Comment No. 10 states that the County of Los Angeles proposes to reach at least 50,000 residents with a message that their choice of bag *significantly* impacts the environment. Section 2.4.2 of the EIR notes that one of the objectives of the proposed ordinances is to substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags; however, this statement does not imply that each consumer’s bag choice would constitute a significant impact under CEQA. Comment No. 10 asserts that “Significance in the context of this



project is determined by the comparative environmental impacts of different bag choices: which is better for the environment—plastic, paper or reusable.” Impacts were determined by evaluating scenarios where consumers would switch from using plastic carryout bags to using paper carryout bags and reusable bags as a result of the proposed ordinances. Several scenarios and five alternatives were evaluated in order to provide a thorough exploration of potential environmental impacts due to adoption of the ordinances. For each environmental issue area, significance was determined in the context of the significance thresholds established under CEQA. The EIR does not claim that the bag choice of each individual consumer is significant in the context of CEQA.

### ***Response to Comment No. 11***

Comment No. 11 objects to the fact that the EIR analysis did not evaluate the GHG emission impacts of the proposed ordinances using the USEPA’s GHG equivalency calculator. Use of the USEPA’s GHG equivalency calculator is not a requirement for GHG analysis under CEQA. The County of Los Angeles has calculated GHG emissions for the proposed ordinances in Section 3.3 of the EIR. The County of Los Angeles has also evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use and potential indirect cumulative increase in GHG emissions that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

The commenter did attempt to extrapolate the County of Los Angeles’s emissions by using the USEPA’s GHG equivalency calculator as set forth in its comment letter, and those equivalency numbers, like all comments, are part of the record and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

The commenter also notes that the “equivalency figures must be based on the cumulative impacts analysis, taking into account all other past projects, current projects, and probable future projects.” As noted before, use of the USEPA’s GHG equivalency calculator is not a requirement for GHG analysis under CEQA. However, the commenter did attempt to extrapolate the County of Los Angeles’s total emissions using the 6 billion plastic carryout bag figure, by using the USEPA’s GHG equivalency calculator as set forth in its comment letter, and those claimed equivalency numbers, like all comments, are part of the record and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

The commenter also asserts that “none of the tables in the DEIR are based on such cumulative impacts.” Please see response to Comment No. 12.

## **Response to Comment No. 12**

Comment No. 12 states that the EIR should evaluate cumulative impacts of the proposed County of Los Angeles ordinances, together with similar ordinances, proposed, adopted, or pending in the City of Berkeley, the City of Los Angeles, the City of Malibu, the City of Manhattan Beach, the City of Palo Alto, the City and County of San Francisco, the City of San Jose, the City of Santa Monica and others. Throughout each subsection in Section 3.0 of the EIR, each environmental issue has been evaluated by implementation of the proposed County of Los Angeles ordinance in the unincorporated territories of the County of Los Angeles, and implementation of similar proposed ordinances in the 88 cities of the County of Los Angeles. Therefore, the analysis of project impacts already includes the cumulative impacts resulting from all 88 cities in the incorporated areas of the County of Los Angeles if they were to all adopt similar proposed ordinances, including the Cities of Los Angeles, Malibu, Manhattan Beach, and Santa Monica. While it is possible that not all 88 cities would adopt similar proposed ordinances, in the interest of being conservative, the County of Los Angeles assumed that all 88 cities would do so. The County of Los Angeles, again in the interest of being conservative, thereafter assumed that 10,000 plastic carryout bags are distributed in each of the stores that would be affected by similar proposed ordinances, even though this number is more than twice the bag average reported by the California Department of Resources Recycling and Recovery (CalRecycle) in 2008 for stores affected by AB 2449. In 2008, 4,700 stores Statewide affected by AB 2449 reported an average of 4,695 bags used per store per day.<sup>317</sup> In addition, similar cumulative impact calculations were done in Section 4.0 with the various alternatives, where appropriate.

The County of Los Angeles was not required to include the Cities of Berkeley, Palo Alto, San Francisco, San Jose, and “all other plastic bag ban ordinances and reduction projects that are being considered or may be or have been implemented in California and outside California.” The County of Los Angeles undertook a cumulative analysis for all of the past, current, and reasonably foreseeable related ordinances within the physical area that would be affected by the proposed ordinances. Other potential related ordinances outside of the County of Los Angeles that were noted in Comment No. 12 would not share the same physical environment, the same air basin, or the same watershed as the proposed ordinances. Lead agencies under CEQA have discretion to select the appropriate geographic context for environmental impact analysis [*Ebbetts Pass Forest Watch v. Dept. of Forestry and Fire Protection* (2004) 123 Cal. App. 4th 1331, 1351]. It would be speculative to attempt to quantify all potential related activities throughout California and beyond, and Section 15151 of the State CEQA Guidelines states, “an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.” Further, the discussion of cumulative impacts in an EIR “should be guided by the standards of practicability and reasonableness” [State CEQA Guidelines §15130(b)]. Ordinances outside of the County of Los Angeles would also be subject to different regulations and thresholds of significance. GHG emissions were evaluated in the EIR on a per-capita basis in accordance with the GHG emission reduction goals established by the County of Los Angeles. Per-capita GHG emissions resulting from ordinances in other counties or states would not affect the per-capita emission targets for residents in the County of Los Angeles. Therefore, the EIR provides an adequate analysis of cumulative impacts.

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<sup>317</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

### **Response to Comment No. 13**

Comment No. 13 indicates that there is little substantial evidence that plastic bags kill marine mammals, marine animals, or seabirds. The County of Los Angeles has reviewed and considered numerous studies during preparation of the EIR, and describes the biological impacts of plastic carryout bags in Section 3.2 of the EIR. As discussed in Section 3.2.4 of the EIR, trash has potentially harmful impacts to species, and plastic bags are one of the most common items of trash observed by Regional Water Quality Control Board staff.<sup>318</sup> Seabirds, sea turtles, and marine mammals that feed on or near the ocean surface are especially prone to ingesting plastic debris that floats.<sup>319,320,321</sup> The impacts include fatalities as a result of ingestion, starvation, suffocation, infection, drowning, and entanglement.<sup>322,323</sup> The recovery plan for the endangered leatherback turtle (*Dermochelys coriacea*) lists ingestion of marine debris, specifically including plastic bags, as one of the factors threatening this species. The recovery plan says that leatherback turtles consume floating plastic, including plastic bags, because they appear to mistake the floating plastic for jellyfish.<sup>324</sup> The recovery plans for the threatened green turtle, loggerhead turtle, and olive ridley turtle also note plastic bag ingestion as a threat to those species.<sup>325,326,327</sup> Ingestion of plastics is also noted as a threat in the recovery plan for the federally endangered short-tailed albatross.<sup>328</sup> Ingestion of plastic debris by wildlife is known to cause wildlife deaths, and plastic carryout bags are a subcategory of plastic debris.<sup>329,330,331</sup> Since preparation of the EIR, the County of Los Angeles

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<sup>318</sup> Regional Water Quality Control Board, Los Angeles Region. Revised 27 July 2007. "Trash Total Maximum Daily Loads for the Los Angeles River Watershed." Los Angeles, CA.

<sup>319</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>320</sup> National Research Council. 2008. "Tackling Marine Debris in the 21st Century." Committee on the Effectiveness of National and International Measures to Prevent and Reduce Marine Debris and Its Impacts.

<sup>321</sup> U.S. Environmental Protection Agency. August 2002. *Assessing and Monitoring Floatable Debris*. Washington, DC.

<sup>322</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

<sup>323</sup> Gregory, Murray R. 2009. "Environmental Implications of Plastic debris in Marine Settings –Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2013–2025.

<sup>324</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Leatherback Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_leatherback\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_leatherback_pacific.pdf)

<sup>325</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the East Pacific Green Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_green\\_eastpacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_green_eastpacific.pdf)

<sup>326</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Loggerhead Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_loggerhead\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_loggerhead_pacific.pdf)

<sup>327</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Olive Ridley Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_oliveridley.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_oliveridley.pdf)

<sup>328</sup> U.S. Fish and Wildlife Service. September 2008. *Short-tailed Albatross Recovery Plan*. Available at: [http://alaska.fws.gov/fisheries/endangered/pdf/stal\\_recovery\\_plan.pdf](http://alaska.fws.gov/fisheries/endangered/pdf/stal_recovery_plan.pdf)

<sup>329</sup> California Ocean Protection Council. 20 November 2008. *An Implementation Strategy for the California Ocean Protection Council Resolution to Reduce and Prevent Ocean Litter*. Available at: [http://www.opc.ca.gov/webmaster/ftp/pdf/opc\\_ocean\\_litter\\_final\\_strategy.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/opc_ocean_litter_final_strategy.pdf)

has been made aware of an article published in the European Journal of Wildlife Research that attributes the death of a beaked whale to the ingestion of four plastic bags, two of which were plastic shopping bags.<sup>332</sup> This reference has been added to the clarification and revisions to Section 3.2 of the EIR (see Section 12.2).

Comment No. 13 does not object to the number of plastic bag wildlife entanglements reported in the UNEP study, which is referenced in the EIR.<sup>333</sup> The number of wildlife found entangled in plastic bags (32), as reported in the UNEP study, composes 9.4 percent of the total number (235) of wildlife entanglements recorded by volunteers in 2007.<sup>334</sup> Fifteen percent of the birds found entangled in marine litter were tangled in plastic carryout bags.<sup>335</sup> Although the UNEP study notes that only 235 global wildlife entanglements in marine litter were recorded in 2007, the study is not exhaustive, and the total number of species killed by marine litter throughout the globe is unknown. Comment No. 13 suggests that the EIR should discuss, disclose, or address the number (if any) of plastic bags from the County of Los Angeles that reach the Pacific Ocean and the number of marine animals and seabirds that are killed by plastic bags. Although the UNEP study results were not obtained specifically off the coast of the County of Los Angeles, they do provide an example of how wildlife can become entangled in plastic bags. In aiming to reduce the amount of plastic carryout bag litter that blights public spaces, the proposed ordinances have the potential to reduce the amount of plastic carryout bag litter that enters the County of Los Angeles storm drain system, which drains to the Pacific Ocean. Section 15151 of the State CEQA Guidelines states, “an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.” The County of Los Angeles has made reasonable efforts to evaluate the biological impacts of the proposed ordinances.

Comment No. 13 indicates that there is no evidence suggesting the plastic bags or plastic bag debris cause fatalities in turtles. There is evidence that shows that turtles ingest plastic bag debris, and an article in the *Marine Pollution Bulletin* concludes that small amounts of marine debris can kill a turtle.<sup>336</sup> This *Marine Pollution Bulletin* study notes that a given piece of debris could be oriented in such a way as to block the gut and cause the death of the animal.<sup>337</sup> In a study conducted in the 1980s of the ingestion of debris by marine animals, 14 sea turtles were noted to

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<sup>330</sup> Gregory, Murray R. 2009. “Environmental Implications of Plastic debris in Marine Settings –Entanglement, Ingestion, Smothering, Hangers-on, Hitch-hiking and Alien Invasions.” In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 2013–2025.

<sup>331</sup> Azzarello, M. and Van Vleet, E. 1987. “Marine Birds and Plastic Pollution.” In *Marine Ecology – Progress Series*, 37: 295–303.

<sup>332</sup> Gomerčić, H. et al. 2006. “Biological aspects of Cuvier’s beaked whale (*Ziphius cavirostris*) recorded in the Croation part of the Adriatic Sea.” In *European Journal of Wildlife Research*. DOI 10.1007/s10344-006-0032-8.

<sup>333</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at: [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>334</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at: [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>335</sup> United Nations Environment Programme. April 2009. *Marine Litter: A Global Challenge*. Nairobi, Kenya. Available at: [http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine\\_Litter\\_A\\_Global\\_Challenge.pdf](http://www.unep.org/regionalseas/marinelitter/publications/docs/Marine_Litter_A_Global_Challenge.pdf)

<sup>336</sup> Bjorndal, K. et al. 1994. “Ingestion of marine debris by juvenile sea turtles in coastal Florida habitats.” *Marine Pollution Bulletin*, 28 (3). Available at: [http://accstr.ufl.edu/publications/BjorndalEtAl\\_1994\\_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf](http://accstr.ufl.edu/publications/BjorndalEtAl_1994_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf)

<sup>337</sup> Bjorndal, K. et al. 1994. “Ingestion of marine debris by juvenile sea turtles in coastal Florida habitats.” In *Marine Pollution Bulletin*, 28 (3). Available at: [http://accstr.ufl.edu/publications/BjorndalEtAl\\_1994\\_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf](http://accstr.ufl.edu/publications/BjorndalEtAl_1994_IngestionOfMarineDebrisByJuvenileSeaTurtlesInCostalFlorida.pdf)

have ingested synthetic debris.<sup>338</sup> Of these animals, the death of five leatherback turtles was specifically linked to the presences of a large bolus of plastic occluding their digestive tracts, and one such bolus was made up of 15 quart-sized plastic bags that were blocking the pyloric opening.<sup>339</sup> As noted previously, and as discussed in Section 3.2 of the EIR, the recovery plans for the endangered leatherback turtle, the threatened green turtle, loggerhead turtle, and olive ridley turtle, list ingestion of plastic bags as a threat to the survival of those species.<sup>340,341, 342,343</sup>

#### **Response to Comment No. 14**

Comment No. 14 objects to the use of “outdated” recycling data for plastic bags from the CIWMB. The County of Los Angeles has confirmed that as of the date of preparation of the EIR, the numbers reported from CIWMB have not changed. CIWMB still reports on its Web site, which was last updated on February 3, 2010, that “Recycling rates for plastic film are very low. Currently, the CIWMB estimates that less than 5 percent of plastic film in California is recycled.”<sup>344</sup> Section 2.3.2 of the EIR states that the USEPA reported that the recycling rate for high-density polyethylene plastic bags and sacks was 11.9 percent in 2007, compared to a recycling rate of 36.8 percent of paper bags and sacks.<sup>345</sup> However, the USEPA statistics include all types of bags and sacks. Section 3.0 of the EIR uses the most recent recycling data to conservatively evaluate the impacts due to plastic carryout bags, even though the County of Los Angeles conservatively estimates that the percentage of plastic carryout bags that are recycled in the County of Los Angeles is less than 5 percent.

#### **Response to Comment No. 15**

Comment No. 15 objects to the fact that the EIR does not state the commenter’s assertion that plastic bags do not degrade in landfills is an environmental benefit. Section 3.3.5 of the EIR does analyze life-cycle GHG emission impacts, and concludes from several life cycle assessments, that GHG emissions due to the life cycle of paper carryout bags are greater than life cycle of plastic

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<sup>338</sup> Okeanos Ocean Research Foundation. 1989. *Marine Mammal and Sea Turtle Encounters with Marine Debris in the New York Bight and the Northeast Atlantic*. Available at: [http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154\\_P562.PDF](http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154_P562.PDF)

<sup>339</sup> Okeanos Ocean Research Foundation. 1989. *Marine Mammal and Sea Turtle Encounters with Marine Debris in the New York Bight and the Northeast Atlantic*. Available at: [http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154\\_P562.PDF](http://swfsc.noaa.gov/publications/TM/SWFSC/NOAA-TM-NMFS-SWFSC-154_P562.PDF)

<sup>340</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Leatherback Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_leatherback\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_leatherback_pacific.pdf)

<sup>341</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the East Pacific Green Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_green\\_eastpacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_green_eastpacific.pdf)

<sup>342</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Loggerhead Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_loggerhead\\_pacific.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_loggerhead_pacific.pdf)

<sup>343</sup> National Marine Fisheries Service and U.S. Fish and Wildlife Service. 1998. *Recovery Plan for U.S. Pacific Populations of the Olive Ridley Turtle*. Available at: [http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle\\_oliveridley.pdf](http://www.nmfs.noaa.gov/pr/pdfs/recovery/turtle_oliveridley.pdf)

<sup>344</sup> California Integrated Waste Management District. Update 3 February 2010. *Plastics Recycling: Plastic Film Cooperative Recycling Initiative*. Web site. Available at: <http://www.calrecycle.ca.gov/Plastics/Film/#Problem>

<sup>345</sup> U.S. Environmental Protection Agency. November 2008. “Table 21: Recovery of Products in Municipal Solid Waste, 1960 to 2007.” *Municipal Solid Waste in the United States: 2007 Facts and Figures*. Washington, DC. Available at: <http://www.epa.gov/waste/nonhaz/municipal/pubs/msw07-rpt.pdf>.

carryout bags. These analyses account for the degradation of paper carryout bags in landfills. However, the fact that plastic carryout bags do not degrade in landfills can also be considered an environmental disadvantage, as it means that the disposal of plastic carryout bags contribute to the generation of municipal solid waste. This comment, like all comments, is part of the record and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

The County of Los Angeles has obtained survey data from employees at solid waste facilities within the County of Los Angeles that conclusively indicate that plastic carryout bags pose serious operational problems for landfills.<sup>346</sup> All six survey respondents stated that plastic bags cause serious litter issues due to their lightweight nature and propensity to become airborne.<sup>347</sup> Each survey respondent indicated that it was costly and time consuming to provide cleanup crews to address the plastic bag litter problem in neighborhoods adjacent to the landfills.<sup>348</sup> The results of this survey have been added to Sections 2.2.1 and 3.5.4 of the EIR (see Section 12.2).

### **Response to Comment No. 16**

Comment No. 16 states that the EIR should address landfill impacts due to reusable bags. The issue of solid waste is addressed in Section 3.5.4 of the EIR. As discussed in that section, the proposed ordinances would be anticipated to increase consumer use and eventual disposal of reusable bags, which are heavier and take up more volume than plastic carryout bags. The manufacturing process of reusable bags would also be expected to generate solid waste. However, due to the fact that reusable bags are designed to be used multiple times, a conversion from plastic carryout bags to reusable bags would decrease the total number of bags that are disposed of in landfills, resulting in a decrease in solid waste disposal in the County of Los Angeles. For example, the Ecobilan Study evaluated the solid waste impacts of a LDPE reusable bag and concluded that this particular reusable bag has a smaller impact on solid waste than a plastic carryout bag, as long as the reusable bag is used a minimum of three times.<sup>349</sup> The impacts of the reusable bag are reduced further when the bag is used additional times. The Hyder Study, which was used as a reference throughout the EIR, evaluated the life cycle impacts of several different types of bags and concluded that polypropylene and calico reusable bags that are used 104 times by consumers require significantly less material consumption than paper and plastic carryout bags (Table 13-2).<sup>350</sup> Therefore, impacts related to solid waste as a result of converting from plastic carryout bags to reusable bags in the County of Los Angeles would be expected to be below the level of significance.

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<sup>346</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

<sup>347</sup> County of Los Angeles Department of Public Works. 2007. Survey: “All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.”

<sup>348</sup> County of Los Angeles Department of Public Works. 2007. Survey: “All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.”

<sup>349</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>350</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

### **Response to Comment No. 17**

Comment No. 17 states that the EIR should discuss the hygiene impacts of reusable bags that have not been cleaned. Although CEQA does not require analysis of health impacts, Section ES.3 of the EIR addresses potential health concerns related to reusable bags. As discussed in Section ES.3 and as is the case for any reusable household item that comes in contact with food items, such as chopping boards, countertops, tableware, or table linens, reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly. If reusable bags are made of cloth or fabric, they can be machine washable. If reusable bags are made of durable plastic, they can be rinsed or wiped clean. Further, to control for any possible public health issues, the County of Los Angeles is proposing that the proposed ordinances require that the material used in such bags be machine washable. The definition of a reusable bag has been modified to include this requirement in Section 2.2.3 of the EIR (see Section 12.2).

Health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps, such as washing and disinfecting the bags, using them only for groceries and using separate bags for raw meat products, being careful with where they are stored, and allowing bags to dry before folding and storing.<sup>351</sup> A representative of the County of Los Angeles Department of Public Health, which is charged with protecting and improving the health of County of Los Angeles residents, has stated that the public health risks of reusable bags are minimal.<sup>352</sup> Further, as discussed in Section 2.2.4 of the EIR, the City and County of San Francisco, since enacting their plastic bag ban in 2007, have not reported negative public health issues related to the increased use of reusable bags.<sup>353</sup>

Comment No. 17 further states that a recent 2010 University of Arizona study indicates that 97 percent of people surveyed for the study did not wash their reusable bags. What this study shows, which is consistent with the County of Los Angeles's discussion in Section ES.3 of the EIR, is that any risk is minimized if proper care is taken. Indeed, the study found that washing the reusable bags, either by hand or machine, cut bacterial contamination by nearly 100 percent.<sup>354</sup>

Comment No. 17 also states, "if people become concerned about the hygiene issues associated with reusable bags, many or most people will stop using them and will use paper bags instead if plastic bags are banned," which is a speculative assertion. If consumers become concerned about the hygiene associated with reusable bags, it is also possible that consumers will clean the bags more frequently. The comment suggests that a comprehensive education campaign is necessary to ensure that bag users properly and frequently wash their bags, which like all comments, will be considered by the County of Los Angeles Board of Supervisors in the decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

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<sup>351</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>352</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>353</sup> Galbreath, Rick, County of San Francisco, CA. 10 May 2010. Telephone conversation with Angelica SantaMaría, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>354</sup> Charles P. Gerba, David Williams, and Ryan G. Sinclair. 8 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

### **Response to Comment No. 18**

Comment No. 18 objects to any data presented in the EIR that assumes that a paper carryout bag is a reusable bag. None of the EIR analysis assumes that a paper carryout bag can qualify as a reusable bag.

### **Response to Comment No. 19**

Comment No. 19 objects to the discussion of the City of San Francisco ordinance on page 2-5 of the EIR. The EIR states that, as a result of the City of San Francisco ordinance, the City of San Francisco has not noted an increase in the number of waste discharge permits or air quality permits required for paper bag manufacturing in the district, nor has any increase been noted in the eutrophication in waterways due to increased use of paper bags. Comment No. 19 states that these negative environmental impacts have not been noted by the City of San Francisco because paper carryout bags are not manufactured in San Francisco. The County of Los Angeles recognizes this fact, and also recognizes that paper bag manufacturing does not occur in the County of Los Angeles. Therefore, it can be concluded that the environmental impacts of paper bag manufacturing, as a possible indirect result of the proposed ordinances, will not result in negative environmental impacts in the County of Los Angeles due to the fact that paper bag manufacturing does not occur in this region. This point is noted, as CEQA is a California law and should only be applied to projects located in California. As described in Section 2.0 of the EIR, the proposed project being evaluated under CEQA is the proposed ordinances to ban the issuance of plastic carryout bags within the County of Los Angeles.

For clarification, a statement has been added to Section 2.2.4 of the EIR that paper bags are not manufactured in the City of San Francisco (see Section 12.2).

Comment No. 19 also states that the use of paper carryout bags has increased in the City of San Francisco since implementation of a ban on plastic carryout bags. Comment No. 19 sites the ULS Report as the substantial evidence to support this claim.<sup>355</sup> The ULS report is qualitative in nature and does not provide comprehensive statistics that could be used to determine the percentage increase in the use of paper carryout bags and reusable bags since implementation of the ordinance. The report fails to establish baseline conditions prior to implementation of the ordinance and surveys stores that may have primarily provided paper carryout bags to consumers in the past, and therefore may not have changed their bagging habits since implementation of the ordinance. The City of San Francisco reported that paper retail bags composed 0.4 percent of all large litter items collected in 2007 and 0.35 percent of all large litter items collected in 2008, which does not show an increase in paper carryout bag littering from 2007 to 2008.<sup>356</sup> However, the County of Los Angeles does recognize that the proposed ordinances may result in an increase in the use of paper carryout bags and has analyzed environmental impacts accordingly in the EIR based on conservative scenarios where 85 percent or 100 percent of consumers switch from using plastic carryout bags to using paper carryout bags. It is important to note that San Francisco's ordinance did not place any limitation on the issuance of paper carryout bags and did not aim to decrease paper carryout bag consumption. In Section 4.0 of the EIR, the County of Los Angeles has

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<sup>355</sup> The ULS Report. 2008. *A Qualitative Study of Grocery Bag Use in San Francisco*. Available at: <http://www.use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>

<sup>356</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)



evaluated four alternatives to the proposed ordinances that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

### **Response to Comment No. 20**

Comment No. 20 states that the EIR should evaluate an alternative to the proposed ordinances that would require all plastic carryout bags to be made of oxo-biodegradable plastic. Please see the County of Los Angeles's responses to Comment Nos. 4 through 20 from the July 5, 2010, letter from Symphony Environmental Technologies. As described in Section 4.1 of the EIR and Appendix B, encouraging a transition to the use of biodegradable bags is not a viable alternative to the proposed ordinances. As discussed in Appendix B of the EIR, the necessary time span and extent to which oxo-biodegradable synthetic plastic fragments will degrade is unclear. The study by Loughborough University concluded that oxo-biodegradable plastics will remain as litter for two to five years prior to degradation.<sup>357</sup> Although oxo-biodegradable plastic will degrade after an undetermined period of time, the environmental impacts of oxo-biodegradable plastic prior to complete degradation are uncertain.<sup>358</sup> The Loughborough University study referenced in Appendix B of the EIR concludes, "incorporation of additives into petroleum-based plastics that cause those plastics to undergo accelerated degradation does not improve their environmental impact and potentially gives rise to certain negative effects."<sup>359</sup>

Although oxo-biodegradable plastic will degrade after an undetermined period of time, encouraging a transition to the use of oxo-biodegradable plastic carryout bags would not assist the County of Los Angeles in reducing the number of plastic carryout bags used or the amount of plastic carryout bags disposed of as litter on a daily basis. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project. Requiring stores to issue oxo-biodegradable bags would not assist the County of Los Angeles in attaining the objectives of the proposed ordinances; therefore, this suggested alternative was not carried forward for detailed analysis in the EIR. While oxo-biodegradable bags are touted as a solution after bags are littered, the County of Los Angeles objective is to prevent the litter from occurring in the first place.

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<sup>357</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Prepared for the Department for Environment, Food, and Rural Affairs. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)

<sup>358</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Prepared for the Department for Environment, Food, and Rural Affairs. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)

<sup>359</sup> Loughborough University. January 2010. *Assessing the Environmental Impacts of Oxo-degradable Plastics Across Their Life Cycle*. Prepared for the Department for Environment, Food, and Rural Affairs. London, UK. Available at: [http://randd.defra.gov.uk/Document.aspx?Document=EV0422\\_8858\\_FRP.pdf](http://randd.defra.gov.uk/Document.aspx?Document=EV0422_8858_FRP.pdf)

The commenter also asserts that County of Los Angeles staff did not meet with a representative from Symphony Environmental Technologies when he was in town in May 2010. County of Los Angeles staff were unavailable to meet with the representative, but did initiate correspondence by inviting Symphony Environmental Technologies to provide information about its product.<sup>360</sup>

### ***Response to Comment No. 21***

Comment No. 21 objects to the assertion that the Biodegradable Product Institute is a trade association rather than a recognized entity for verification of compostable plastic carryout bags. This comment does not affect the environmental analysis in the EIR, which assumes that the issuance of compostable carryout bags will be banned in the County of Los Angeles. The definition of compostable bags, including the reference to the Biodegradable Product Institute, has been removed from Section 2.2.3 of the EIR, because the proposed ordinances would ban all types of plastic carryout bags, regardless of whether they are verified to be compostable or not (see Section 12.2).

### ***Response to Comment No. 22***

Comment No. 22 objects to the use of the City of Los Angeles survey as a reference in the EIR. The County of Los Angeles recognizes that the City of Los Angeles survey is specific to a particular incorporated part of the County of Los Angeles. The County of Los Angeles is also aware that this study does not differentiate between the types of plastic bags encountered in storm drains. However, this study is a useful example of how serious the plastic litter problem can be in parts of the County of Los Angeles. In addition, results of a California Department of Transportation (Caltrans) study of catch basins alongside freeways in Los Angeles indicated that plastic film composed 7 percent by mass and 12 percent by volume of the total trash collected.<sup>361</sup>

Comment No. 22 states that the EIR should have used the Watershed Quality Compliance Master Plan for Urban Runoff as a reference to explain how the City of Los Angeles survey is not typical of all conditions in the County of Los Angeles. The commenter's comments about this Master Plan are noted for the record. The Watershed Quality Compliance Master Plan includes a figure (Figure 4.1) depicting the areas of high trash generation in the City of Los Angeles.<sup>362</sup> The areas depicted in that figure that generate the most trash are not limited only to the 1-mile stretch of North Figueroa Street between Cypress Avenue and Avenue 43 that was analyzed in the City of Los Angeles survey, but extend throughout the south central portion of the City of Los Angeles. Figure 3.4.2-1 and Figure 3.4.2-2 of the EIR show the frequency of catch basin cleanout throughout the County of Los Angeles. Litter "hotspot" areas, which are estimated based on the frequency of storm drain catch basin cleanout, are located throughout the County of Los Angeles. It is reasonable to assume that these hotspot areas may experience higher levels of plastic carryout bag litter than other areas, and may experience similar levels of plastic carryout bag litter to those documented in the City of Los Angeles survey.

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<sup>360</sup> Skye, Coby, County of Los Angeles Department of Public Works. 28 April 2010. E-mail to Michael Stephen, Symphony Environmental Technologies.

<sup>361</sup> Combs, Suzanne, John Johnston, Gary Lippner, David Marx, and Kimberly Walter. 2001. *Results of the Caltrans Litter Management Pilot Study*. Sacramento, CA: California Department of Transportation. Available at: <http://www.owp.csus.edu/research/papers/papers/PP020.pdf>

<sup>362</sup> City of Los Angeles Department of Public Works. May 2009. *Water Quality Compliance Master Plan for Urban Runoff*. Available at: [http://www.lacitysan.org/wpd/Siteorg/download/pdfs/tech\\_docs/WQCMPURChapters.pdf](http://www.lacitysan.org/wpd/Siteorg/download/pdfs/tech_docs/WQCMPURChapters.pdf)

### **Response to Comment No. 23**

Comment No. 23 states that the EIR should have noted that the purpose of catch basins is to prevent litter, such as plastic carryout bags, from entering waterways. This statement is correct, but catch basins do not prevent 100 percent of litter from entering waterways, and not all storm drains have catch basins. Plastic carryout bags may also clog or block catch basins from working correctly. Clogged catch basins can cause unnecessary flooding during storms.<sup>363</sup> County of Los Angeles Flood Control District staff have photographed carryout bags in the catch basins and storm drains (Figure 13-1, *Catch Basin Photographs*).<sup>364</sup> The County of Los Angeles storm drain system connects directly to the Pacific Ocean; therefore, it is reasonable to assume that any plastic carryout bag litter that enters the storm drain system and is not captured by catch basins could end up in the Pacific Ocean.

### **Response to Comment No. 24**

Comment No. 24 objects to the lack of disclosure in EIR of how and to what extent the proposed ordinances would reduce the litter cleanup costs incurred by the County of Los Angeles. The \$4 million reduction in litter and cleanup costs is a goal of the County of Los Angeles, and is appropriately stated as an objective for the proposed ordinances. For 2008–2009, the most recent year available, the County of Los Angeles Flood Control District spent over \$24 million on these activities (\$1.9 million on maintenance of structural and treatment control BMPs, \$9.3 million on municipal street cleaning, \$1.9 million on catch basin cleaning, \$9.6 million on trash collection and recycling, and \$1.3 million on capital costs).<sup>365</sup> Section 2.2.1 of the Draft EIR also notes that public agencies in California spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>366</sup> An ordinance that could result in a substantial reduction in litter would be reasonably expected to reduce the costs of litter cleanup in the County of Los Angeles. For example, if there is less plastic carryout bag litter clogging or blocking catch basins, it can be reasonably assumed that the frequency with which catch basins have to be cleaned out can be reduced, resulting in savings in catch-basin cleanup costs. Although CEQA does not require analysis of economic impacts, the information related to opportunities to substantially reduce the amount of litter attributable to plastic carryout bags from entering the storm drain system will be considered during the decision-making process for the County of Los Angeles ordinances and Final EIR.

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<sup>363</sup> County of Los Angeles Department of Public Works. 24 December 2008. "Public Works: Protecting the Public During Storm Season." Web site. Available at: <http://dpw.lacounty.gov/prg/pressroom/printview.aspx?ID=206&newstype=PRESS>.

<sup>364</sup> County of Los Angeles. 2010. Photographs of Catch Basins in the County of Los Angeles provided to Sapphos Environmental, Inc. by the County of Los Angeles Flood Control District. Available for review at Sapphos Environmental, Inc. headquarters, 430 North Halstead Street, Pasadena, CA.

<sup>365</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>366</sup> California Department of Transportation. Accessed on: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>





PHOTO 1



PHOTO 2



**FIGURE 13-1**  
Catch Basin Photographs



PHOTO 3



PHOTO 4



**FIGURE 13-1**  
Catch Basin Photographs

The County of Los Angeles has obtained survey data from employees at solid waste facilities within the County of Los Angeles that conclusively indicate that plastic carryout bags pose serious operational problems for landfills.<sup>367</sup> All six survey respondents stated that plastic bags cause serious litter issues due to their lightweight nature and propensity to become airborne.<sup>368</sup> Each survey respondent indicated that it was costly and time consuming to provide cleanup crews to address the plastic bag litter problem in neighborhoods adjacent to the landfills.<sup>369</sup> The results of this survey have been added to Sections 2.2.1 and 3.5.4 of the EIR (see Section 12.2).

The commenter asserts that there would also be more paper bag litter, and more bags going into landfills affecting tipping fees. With respect to the former, paper carryout bags, which are heavier than their plastic counterparts, are not as susceptible to being carried by the wind and becoming litter. During the Great Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, it was observed that 20 percent by weight and 17 percent by volume of the trash collected consisted of paper; however, these results are not limited to paper carryout bags and include all types of paper litter.<sup>370</sup> Out of the litter collected during the City of San Francisco Litter Audit in 2008, retail paper bags were not listed as one of the top 25 litter subcategories.<sup>371</sup> The City of San Francisco reported that paper retail bags constituted 0.4 percent of all large litter items collected in 2007, and 0.35 percent of all litter items collected in 2008.<sup>372</sup> The City of San Francisco Litter Audit concluded that 57.9 percent of all bag litter in 2008 was composed of unbranded plastic bags and 10.9 percent was composed of plastic retail bags, but only 6 percent of bag litter was composed of paper retail bags. As noted in Section 3.2 of the EIR, a study performed in Washington, DC, showed that paper products were not found in the streams except in localized areas, and were not present downstream.<sup>373</sup>

With respect to the comment that more paper bags are going into landfills, the County of Los Angeles has studied the impacts resulting from greater use of paper carryout bags as a result of the proposed ordinances and a number of reasonable alternatives, in Section 3.5.4 of the EIR, and Section 4.0. These alternatives include banning or placing a fee or charge on paper carryout bags. In addition, the County of Los Angeles is proposing Mitigation Measure GHG-1 (see Section 12.2), which includes implementing and/or expanding public outreach through a public education program that would aim to increase the percentage of paper carryout bags that are recycled in the County of Los Angeles, therefore reducing the amount potentially going to the landfills. The County of Los Angeles already has a public education program in place that encourages the

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<sup>367</sup> County of Los Angeles Department of Public Works. 2007. Survey: "All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles."

<sup>368</sup> County of Los Angeles Department of Public Works. 2007. Survey: "All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles."

<sup>369</sup> County of Los Angeles Department of Public Works. 2007. Survey: "All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles."

<sup>370</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

<sup>371</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>372</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>373</sup> Anacostia Watershed Society. December 2008. *Anacostia Watershed Trash Reduction Plan*. Prepared for: District of Columbia Department of the Environment.

curbside recycling of a number of items, including paper carryout bags.<sup>374</sup> Curbside recycling is a convenient free service to County of Los Angeles residents, and paper carryout bags are universally accepted for recycling in the County of Los Angeles. As noted in Section 2.3.2 of the EIR, the USEPA reported that the recycling rate for paper bags and sacks was 36.8 percent.

### ***Response to Comment No. 25***

Comment No. 25 objects to the use of the CIT Ekologik Study as a reference in the EIR. The EIR did not rely upon this study for the environmental analysis nor was the study used to guide the conclusions of the document. This study was referenced in the EIR to emphasize the widely varying results of LCAs and other studies that depend on the study boundaries, inputs, and methodologies used. As the CIT Ekologik study is not of key importance in the analysis in the EIR, the reference has been removed by way of the Clarifications and Revisions to the EIR.

### ***Response to Comment No. 26***

Comment No. 26 objects to the EIR indicating potentially significant environmental impacts from the No Project Alternative, since this alternative is the existing condition. The No Project Alternative was evaluated in comparison with the proposed ordinances rather than in comparison to the existing conditions. Section 15126.6 of the State CEQA Guidelines states that “The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” In the case of this EIR, the No Project Alternative is the current situation in the County of Los Angeles where plastic carryout bags are readily distributed to customers at the point of sale. As Section 4.2.1 of the EIR correctly analyzes, the manufacture, transportation, use, and disposal of these plastic carryout bags results in environmental impacts, which would be reduced or eliminated upon implementation of the proposed ordinances. The analysis of the No Project Alternative also takes into account the fact that the No Project Alternative would avoid any potential environmental impacts (both beneficial and adverse) resulting from the increase in use of paper carryout bags and reusable bags that would be anticipated as a result of the proposed ordinances. The sentence quoted in Comment No. 26 has been amended in the EIR to clarify that the No Project Alternative was evaluated in comparison to the proposed ordinances (see Section 12.2).

### ***Response to Comment No. 27***

Comment No. 27 indicates that the proposed ordinances would not achieve the objectives set forth by the County of Los Angeles for the sustainability and reduction of disposal at landfills. The County of Los Angeles acknowledges that goals listed in Section 2.4.2 of the EIR are listed in order of importance. However, the County of Los Angeles intends the proposed ordinances to increase consumer use of reusable bags, which would be expected to increase public awareness of environmental issues and promote source reduction and reuse in general by promoting the use of reusable bags, thereby enhancing sustainability. In addition, banning plastic carryout bags, coupled with the increase in environmental awareness of using reusable bags, would be expected to reduce disposal of plastic carryout bags at landfills. The County of Los Angeles has obtained survey data from employees at solid waste facilities within the County of Los Angeles that indicate

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<sup>374</sup> County of Los Angeles Department of Public Works. Accessed 12 October 2010. “Outreach Programs.” Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and <http://dpw.lacounty.gov/epd/recycling/crm.cfm>



that plastic carryout bags pose serious operational problems for landfills.<sup>375</sup> All six survey respondents stated that plastic bags cause serious litter issues due to their lightweight nature and propensity to become airborne.<sup>376</sup> Each survey respondent indicated that it was costly and time-consuming to provide cleanup crews to address the plastic bag litter problem in neighborhoods in County of Los Angeles unincorporated and incorporated areas adjacent to the landfills.<sup>377</sup> The landfill survey information has been added to Section 3.5 of the EIR (see Section 12.2).

In addition, in Section 4.0 of the EIR, the County of Los Angeles evaluated four alternatives to the proposed ordinances that would ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). The alternatives analyzed that would place a limitation on the issuance of paper carryout bags would further assist the County of Los Angeles in achieving the objectives that relate to sustainability and reduction of trash disposal at landfills.

### ***Response to Comment No. 28***

Comment No. 28 states that the EIR did not evaluate the environmental impacts of a ban or a fee on the issuance of paper carryout bags. The County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. To maximize to the greatest extent feasible the potential environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper carryout bag use, the County of Los Angeles has also developed Alternative 5, which combines Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores in the County of Los Angeles, with no limits on square footage or sales volumes. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee or charge on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

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<sup>375</sup> County of Los Angeles Department of Public Works. 2007. Survey: "All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles."

<sup>376</sup> County of Los Angeles Department of Public Works. 2007. Survey: "All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles."

<sup>377</sup> County of Los Angeles Department of Public Works. 2007. Survey: "All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles."

### ***Response to Comment No. 29***

Comment No. 29 states that there are no separate and discrete findings in the EIR that address each of the points required to be considered in the EIR. Consistent with State of California and County of Los Angeles CEQA procedures, the County of Los Angeles prepared an Initial Study, a scoping process, and an EIR. This process considered each checklist question listed in Appendix G, Environmental Checklist Form, of the State CEQA Guidelines, and is documented throughout the Initial Study, scoping process, and in the EIR. In accordance with CEQA, written Findings of Fact will be prepared by the County of Los Angeles in conjunction with the Final EIR.

### ***Response to Comment No. 30***

Comment No. 30 objects to the fact that the EIR states that the State of California Superior Court dismissed the CEQA petition in *Save The Plastic Bag v. County of Los Angeles, Los Angeles Superior Court*. The Court dismissed the petition on May 3, 2010, after the Petitioner submitted its Request for Dismissal on that same date. The stipulation confirms that the County of Los Angeles Board of Supervisors directed an ordinance banning plastic bags be drafted subject to certain contingencies, including completion of any necessary environmental review under CEQA. Had Petitioner not reached out to the County of Los Angeles to settle the CEQA petition, the Court's May 3, 2010, ruling indicates that it would have lost on its CEQA challenge. The levels of participation and whether the goals of the voluntary Single Use Bag Reduction and Recycling Program were met are factors that will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.



July 16, 2010

Mr. Coby Skye  
County of Los Angeles Department of Public Works  
Environmental Programs Division  
900 South Fremont Avenue, 3<sup>rd</sup> Floor  
Alhambra, California 91803

Via email: [CSkye@dpw.lacounty.gov](mailto:CSkye@dpw.lacounty.gov)

Re: Comments of the Progressive Bag Affiliates of the American Chemistry Council on Draft Environmental Impact Review on Ordinances to Ban Plastic Carryout Bags in Los Angeles County

Dear Mr. Skye:

I write on behalf of the American Chemistry Council ("ACC")'s Progressive Bag Affiliates (PBA) to provide the attached comments on the Draft Environmental Impact Report ("DEIR") of Ordinances to Ban Plastic Carryout Bags in Los Angeles County prepared by Sapphos Environmental and dated June 2, 2010.

Our comments demonstrate that the DEIR, like the Initial Study, is inadequate and incomplete because it continues to miscalculate and misrepresent the adverse environmental impacts that would result from a shift from plastic to paper bags. A shift from plastic bags to paper bags would have the effect of significantly increasing the use of natural resources, fossil fuels, and water; and will have other significant adverse impacts, including increased greenhouse gas ("GHG") emissions and further burdening the County's landfills. The DEIR also fails to propose adequate mitigation measures.

California is fighting a serious and concerted battle with respect to GHGs, and the proposed ordinances are headed in the wrong direction. The citizens and policymakers of Los Angeles deserve a thorough and well-documented EIR so they can fully understand the environmental consequences of forcing a shift from plastic to paper, and the potential public health consequences of a shift from plastic to reusable bags. The California Environmental Quality Act requires nothing less.

Please feel free to contact me if I can assist you further with respect to these comments.

Very truly yours,

A handwritten signature in black ink that reads "Shari Jackson".

Shari M. Jackson  
Director, Progressive Bag Affiliates, American Chemistry Council

Attachments:

- ACC Comments on DEIR 7/16/2010
- ACC Comments on Initial Study 1/4/2010
- Gerber, et al., 6/9/2010

COMMENTS OF  
THE PROGRESSIVE BAG AFFILIATES OF THE AMERICAN CHEMISTRY COUNCIL  
ON DRAFT ENVIRONMENTAL IMPACT REPORT -- ORDINANCES TO BAN PLASTIC CARRYOUT  
BAGS  
IN LOS ANGELES COUNTY

**Introduction**

Sound public policy and the California Environmental Quality Act (CEQA) require that Los Angeles carefully, and thoroughly, understand and evaluate the public the environmental consequences of the various proposals to ban or tax plastic bags. Indeed, this is a key purpose of this important environmental statute: to identify, evaluate, and understand environmental impacts, both salutary and adverse, before a government action is taken, in order to help the public and policymakers evaluate and weigh the consequences of an action. This exercise requires a well-prepared, carefully researched, accurate and sufficient Environmental Impact Report (EIR).

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The Draft Environmental Impact Report (DEIR) fails to meet statutory requirements. It is not sufficiently complete or accurate on several counts to support completion as an EIR, as our comments will note.

Our comments on the DEIR incorporate by reference our previously submitted comments with respect to the Initial Study and are attached for the record.

**Comments**

**1. The DEIR Fails to Adequately Determine the Significance of Impacts from Greenhouse Gas Emissions from a Shift to Paper Bags.**

The DEIR fails to complete an adequate and comprehensive analysis of whether there would be a significant added volume of greenhouse gas (GHG) emissions from increased use of paper bags. A number of key contributions to GHGs were either omitted from consideration or inadequately considered. In addition to GHGs created by the manufacture of the paper bags themselves, the total life cycle contribution of GHGs must be calculated. This includes the energy and resources needed to harvest trees; to ship trees to a pulp mill; trucking paper bags to their use destination; trucking used paper bags to landfill; and generation of GHGs in the landfill as the bags degrade. Simple displacement calculations of moving away from 6 billion plastic bags used in the County annually to a fractional number of paper bags yields a significant increase in the number of paper bags used.

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The California Environmental Quality Act (“CEQA”) Guidelines §15064.4(a) requires the lead agency to make “a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project.” The guidelines set out that the lead agency will decide whether to use either (1) a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use (and the lead agency should explain the limitations of the particular model or methodology selected for use); and/or (2) rely on a qualitative analysis or performance based standards.<sup>1</sup> Even if only qualitative analysis is used, and the selection of this method does not constitute an abuse of discretion by the lead agency, the analysis must still be “based to the extent possible on scientific and factual data” and must describe, calculate, or estimate the total amount of GHG emissions resulting from the project.<sup>2</sup> Here, the County has conducted at best a partial estimate, and has failed to estimate all emissions from all sources.

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<sup>1</sup> California Code of Regulations, Title 14, Section 15064.4(a).

<sup>2</sup> *Id.*

Another critical shortcoming of the DEIR, relevant with respect to calculation of GHG emissions but also generally, is its reliance on the Ekologik study with respect to evaluating paper versus plastic bags.<sup>3</sup> This study, however, does not evaluate carryout plastic bags, which are a very specific product. Carryout plastic bags have been specifically designed and engineered for tremendous efficiency, using a minimal amount of plastic and resources to create a strong but lightweight product. This design feature yields many of the environmental benefits easily visible in a well-conducted LCA. The Ekologik study, however, acknowledges that it does not evaluate check out carrier bags at all; the plastic bags it evaluates are “fundamentally different products” and “bigger bags” than carryout bags.<sup>4</sup> Use of this study, therefore, cannot be made unless the study results are further adjusted to address the fact that they evaluate the wrong plastic products.

3 cont.

## 2. The DEIR Fails to Propose Mitigation Measures for Greenhouse Gas Emissions.

Notwithstanding its insufficient and incomplete conclusions with respect to GHG emissions from the project, the DEIR nevertheless concludes that the environmental impact from a shift to paper bags may be cumulatively significant.<sup>5</sup> Specifically, life cycle and end of life analysis reports included in the EIR demonstrate that the proposed ban on plastic bags may be cumulatively significant, representing 0.0095-0.144 percent of County target emissions for the year 2020.<sup>6</sup>

CEQA therefore requires that the final EIR include detailed findings on the feasibility of mitigation measures upon finding cumulatively considerable significant effects.<sup>7</sup> These findings, and proposed mitigation measures, should be presented in the DEIR for public comment. They are not.

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The DEIR attempts to rationalize the omission of mitigation measures with the claim that all paper bag manufacturing facilities are located outside its regulatory reach. That approach is wrong on two counts. First, this is a narrow view of the meaning of reduction or mitigation, apparently tied to the concept of mitigation at a particular geographical site. CEQA analysis, however, does not limit a project to a physical site location. If “site” mitigation is not feasible due to the nature of the project, then “off-site” mitigation measures must be considered. As the Attorney General’s GHG guidance for CEQA notes, “[i]f, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing GHG-related impacts, the lead agency determines that additional mitigation is required, the agency may consider additional off-site mitigation.”<sup>8</sup> Second, the GHG concerns themselves are not limited to paper bag manufacturing. As we noted above, and in our earlier comments to the initial study, significant GHG impacts occur from transportation (trucking) of raw materials to make paper bags, from trucking the bags to their use destination and to landfill, and also from degradation of paper bags in landfills, which emits methane gas.<sup>9</sup> All these lifecycle “locations” present mitigation opportunities.

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<sup>3</sup> County of Los Angeles Department of Public Works, “Ordinances to Ban Plastic Carryout Bags in Los Angeles County Draft Environmental Impact Report”, SCH# 2009111104, p. 3.1-14.

<sup>4</sup> CIT Ekologik, “Distribution in Paper Sacks”, Chalmers Industriteknik, 2000.

<sup>5</sup> County of Los Angeles Department of Public Works, “Ordinances to Ban Plastic Carryout Bags in Los Angeles County Draft Environmental Impact Report”, SCH# 2009111104, p. 3.3-38.

<sup>6</sup> *Id.* at 3.3-28, 3.3-32.

<sup>7</sup> California Code of Regulations, Title 14, Section 15126.4(a)(1).

<sup>8</sup> California Attorney General’s Office, “AGO, Project Level Mitigation Measures”, Rev. 1/6/2010, p. 17. [http://ag.ca.gov/globalwarming/pdf/GW\\_mitigation\\_measures.pdf](http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf)

<sup>9</sup> American Chemistry Council, “Comments of the Progressive Bag Affiliates of the American Chemistry Council on Initial Study on Ordinances to Ban Plastic Carryout Bags in Los Angeles County”, p. 2. *Vide infra.*

To the extent that the environmental damage to be addressed stems from a consumer shift to paper bags, obvious mitigation measures could include imposition of a full ban on paper bags to avoid the shift altogether, or a consumer fee to discourage the shift outright. The Attorney General’s Guidance also notes the propriety of imposing mitigation fees: “[a]s appropriate, the measures can be included as design features of a project, required as changes to the project, or imposed as mitigation (whether undertaken directly by the project proponent or funded by mitigation fees).”<sup>10</sup> To the extent that the damage to be addressed stems from a consumer shift to reusable bags, two tracks must be considered. The first track is that some reusable bags may not be adequately laundered, and could present a health risk with respect to providing a growth medium for bacteria that may come into contact with foods. An obvious mitigation measure would be to adopt a public health campaign to educate consumers about the health risk and the need to wash bags regularly. The second track is that some reusable bags may be adequately laundered to address the health risk, but this introduces an additional environmental burden due to the increased environmental costs associated with washing bags, including water use, energy use, and detergent use. An obvious mitigation measure would be to impose a fee upon reusable bags to address these increased environmental costs.

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Other appropriate mitigation methods are available that are well within the County’s jurisdiction. For example, carbon offsets have been utilized in a number of projects in an effort to reduce the impact of industrially generated GHGs, and a similar approach may be applicable here. Additionally, the EIR reports paper bag GHG emissions from landfills from are under the control of local landfill ordinances and are outside the County’s control. Again, there are methods to offset increased GHGs emanating from landfills that do not involve regulation of entities outside the County’s jurisdiction.

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The failure to define mitigation measures for GHG emissions was recently addressed in Communities for a Better Environment v City of Richmond.<sup>11</sup> The Court held that the mitigation plan for GHGs presented was legally deficient because “[t]he final EIR merely proposes a generalized goal of no net increase in GHG emissions, and then sets out a handful of cursorily described mitigation measures for future consideration that might serve to mitigate the 898,000 tons of emissions resulting from the project.”<sup>12</sup> The City was also chastised by the court for making no effort “to calculate what, if any, reductions in the Project’s anticipated GHG emissions would result from each of these vaguely described future mitigation measures.”<sup>13</sup> Here, the DEIR is making the same mistakes. The County should revise the DEIR to include detailed findings on mitigation proposals for the following:

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- Greenhouse gas impacts of increased paper bag production
- Greenhouse gas impacts of additional transportation impacts from paper bags
- Greenhouse gas impacts of paper bag decomposition in landfill

**3. The DEIR’s Conclusion of No Significant Risk from Reusable Bags for Public Health Concerns is Unsupported and Inadequate.**

In our comments on the Initial Study, we cited two studies indicating that bacterial contamination is a potential downside to widespread use of reusable bags.<sup>14,15</sup> In the DEIR, the County acknowledges the potential for

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<sup>10</sup> California Attorney General’s Office, “AGO, Project Level Mitigation Measures”, Rev. 1/6/2010, p. 1.

<sup>11</sup> Super Ct. No. MSN08-1429 (Ca. App. 4th, April 26, 2010).

<sup>12</sup> *Id.* at 23.

<sup>13</sup> *Id.*

<sup>14</sup> Health Canada, "Food Safety Tips for Reusable Grocery Bags and Bins", 6/14/2010, <http://www.hc-sc.gc.ca/fn-an/securit/kitchen-cuisine/reusable-bags-sacs-reutilisables-eng.php>

<sup>15</sup> Environment and Plastics Industry Council, “Grocery Bag Sanitation, A Microbiological Study of Reusable Bags and ‘First or single-use’ Plastic Bags”, 5/20/2009.

bacterial contamination from reusable bags, but dismisses the possibility of public health risk two ways. First, it claims that this is a risk inherent to any item in contact with food, and a risk easily mitigated by proper care and washing. Second, it introduces as “evidence” that health concerns have not actually materialized from reusable bags by citing a telephone conversation with a member of the San Francisco County Board of Health who noted an absence of health reports stemming from increased reusable bag use following the city’s ban on plastic grocery bags.<sup>16</sup>

11 cont.

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We note that as matter of behavior and actual risk, whether consumers can mitigate a risk (e.g., by washing bags) has little bearing on whether they in fact are mitigating a risk (e.g., by in fact, washing their bags). The behavioral data that does exist is shocking: a new study by researchers at the University of Arizona and Loma Linda University indicates that some 97% of study participants reported having never washed or bleached their reusable bags.<sup>17</sup> The available data supports the conclusion that these bags are not being washed, and this could present, as the Arizona study concluded, a serious risk to public health.<sup>18</sup> This risk must be properly and thoroughly evaluated, and mitigation measures presented, in the EIR.

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The notion that it is somehow sufficient to respond to data showing presence and growth of bacteria in potential contact with foods by relying on such a conversation is disturbing. It is well documented that foodborne illnesses often go unreported, and likewise, that victims often fail to identify the source of the exposure. This is even more likely to be the case when very few consumers can be expected to know that reusable bags can present a health risk in the first place – consumers cannot report a potential association of which they are unaware. And of course, the fact that a serious foodborne illness has not occurred does not obviate the fact that a serious risk may nonetheless be presented. No food safety health official would seriously accept that argument, for example, that a contaminated food contact surface is somehow acceptable simply because no one has reported getting sick yet, and yet this train of flawed logic is presented as the basis for the conclusion that no significant risk is presented.

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Similarly, the common sense approach to food safety stores use to keep shelves, carts, and conveyor belts clean may not be applicable to consumers who are apt to store reusable bags in vehicles or in closets and avoid proper cleaning procedures. A bag contaminated by food contents and then placed in a vehicle can experience temperatures warm enough to foster bacterial growth. The propensity for reusable bags to sustain bacteria could increase the potential for health risks, especially if the food is contaminated with salmonella, E. coli, or other food borne pathogens. Cloth bags have a tendency to soak in moisture contaminated by bacteria and can then cross contaminate other food items during subsequent uses. Carryout plastic bags do not absorb moisture and their ability to transfer bacteria is correspondingly diminished.

At a minimum, a reasoned response to these concerns that satisfies statutory requirements should involve some examples, data, or studies and not simply self-proclaimed common sense rationale, an email, or phone call to a public official. We also note that because the County itself is proposing the ban, it may not rely on an unsubstantiated statement by a County employee as proof of support for a finding of no significant health risks.

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#### **4. The DEIR fails to adequately study the potential impacts from increased use of reusable bags.**

To mitigate the health risks associated with reusable bags, consumers will have to wash and dry the bags regularly. Washing and drying reusable bags would raise their environmental impact due to increased energy, cleaning agent, and water use. The additive effects of increased washing may be significant when added to the projected increases in GHG emissions. Despite these potential impacts, no study has adequately assessed the

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<sup>16</sup> County of Los Angeles Department of Public Works, “Ordinances to Ban Plastic Carryout Bags in Los Angeles County Draft Environmental Impact Report”, SCH# 2009111104, p. 2-5.

<sup>17</sup> Occupational Health & Safety, “No Paper, No Plastic? Potential Problem”, 6/27/2010, citing Gerba, C,P; Williams, D; Sinclair, R.G., “Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags”, [http://uanews.org/pdfs/GerbaWilliamsSinclair\\_BagContamination.pdf](http://uanews.org/pdfs/GerbaWilliamsSinclair_BagContamination.pdf)

<sup>18</sup> *Id.*

consequences of expanding the use of reusable bags, and the DEIR does not include projected increases in reusable bag use. The report has provided anecdotal evidence from nontraditional grocery stores that reusable bags will become more prevalent, although what correlations one can draw between traditional and nontraditional grocers is not apparent. Therefore, it cannot be determined if an expansion of reusable bag use will be beneficial or detrimental to the environment, and subsequently an informed decision cannot be made as is required under CEQA. An accurate LCA must include an analysis of increased machine washing, detergents, and drying before a conclusion of no significant impact can be determined.

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**5. The DEIR improperly relies on inaccurate calculations for energy demand for paper bag manufacturing.**

The air emissions data from the Ecobilan study were generated based on estimated electricity required to make the required number of plastic bags. These data are based not on the electrical infrastructure in Los Angeles County, or even in the United States, but on the electrical infrastructure located in France, where electricity generation is dominated by nuclear power (the French grid is approximately 80% derived from nuclear power and only 10% from fossil fuels).<sup>19</sup> In comparison, the generation of electricity in the United States is primarily derived by burning fossil fuels (about 72% from fossil fuels, with 50% derived from coal alone). Subsequently, the air emissions emanating from the production of plastic bags in each will have different impacts on the air quality in the respective country. It is reasonable to believe burning fossil fuels will have a more significant impact on air quality than using nuclear reactors to produce energy. This difference may explain the variation of criteria pollutants between the Ecobilan and Boustead LCA reports. Pollutants emitted during energy production need to be accounted for in the LCA analyses to provide an accurate forecast of the environmental effects of the proposed bag ban.

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**6. The DEIR does not address studies showing psychological, sociological, or behavioral effects on litter.**

As presented in ACC's comments on the Initial Study, behavioral research from Keep Los Angeles Beautiful suggests litter may become more prevalent when it is thought to be biodegradable or organic.<sup>20</sup> Banning plastic bags may therefore have the effect of increasing the amount of paper bag trash within the County. Furthermore, additional studies have shown that removing a source of litter will not diminish littering behavior.<sup>21</sup> The DEIR does not provide specific reasons explaining why these comments were not taken into consideration as CEQA requires.

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Although the proposed ban on plastic grocery bags is predicted to reduce litter, several studies cast doubt on this conclusion, including a study mentioned within the DEIR. A survey of catch basins within the County revealed that plastic film debris was only seven percent by mass (7th overall), and only twelve percent by volume (4th overall) of the total trash present.<sup>22</sup> Paper composed a larger portion of the trash collected in both volume and mass than plastic film. Yet another study from San Francisco found retail plastic bags composed only 0.6 percent of large litter items collected, representing an increase in plastic bag litter after the ban had become law.<sup>23</sup>

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<sup>19</sup> Spero News, "France: Energy Profile", 6/8/2007, <http://www.speroforum.com/site/article.asp?idarticle=9839&t=France:+Energy+profile>

<sup>20</sup> Keep Los Angeles Beautiful, "Littering and the iGeneration", 2009.

<sup>21</sup> Keep America Beautiful, "Literature Review – Litter: A Review of Litter Studies, Attitude Surveys and Other Litter-related Literature", 2007.

<sup>22</sup> County of Los Angeles Department of Public Works, "Ordinances to Ban Plastic Carryout Bags in Los Angeles County Draft Environmental Impact Report", SCH# 2009111104, p. 3.5-11.

<sup>23</sup> The City of San Francisco, San Francisco Environment Department, "Streets Litter Re-Audit" 2008 and , "Streets Litter Audit", 2007.



Banning plastic fails to address consumer behavior towards littering. The psychological behaviors that lead to littering have been well studied. A number of influences have been noted, such as:

- An already clean environment. One study from California State University, Sacramento, concludes that littering is less likely to occur in an environmental area that is already clean or maintained clean. This principle is sometimes called the “litter begets litter” principle. See, Reiter, S.M., and Samuel, W., Littering as a Function of Prior Litter and the Presence or Absence of Prohibitive Signs, *Journal of Applied Social Psychology*, 1980 (concluding that the littering rate was lowest in an already clean environment); Curnow, R.; Strecker, P.; Williams, E.; *Understanding Littering Behaviour; a Review of the Literature*. Beverage Industry Environmental Council, Pymont, Australia, 1997 (p. 31). 22
- The ready availability, design and convenience of trash receptacles. Curnow, R.; Strecker, P.; Williams, E.; *Understanding Littering Behaviour; a Review of the Literature*. Beverage Industry Environmental Council, Pymont, Australia, 1997. 23
- Effective communication and education. Stern, P.C.; Oskamp, S.; *Managing Scarce Environmental Resources*, In: Stokols, D.; Altman, I. *Handbook of Environmental Psychology*, Vol. 2. Krieger Publishing Company, Malabar, Florida, 1991 (pp. 1055-1057); see also Hansmann, R.; Scholz, R.W. *Environment and Behavior*, 2003, Vol. 35 No. 6, 752-762 (literature review of research concerning the effective design of explicit anti-littering messages noting evidence that prompts phrased as requests are more effective than those phrased as orders; and prompts are more effective if they contain a more specific description of the desired behavior). 24

#### 7. The DEIR Fails to Adequately Address Potential Impacts on Forest Use and Depletion.

The DEIR summarily makes a determination not to pursue further review of the potential impacts of a shift to increased paper bag use on forest resources. The basis for this decision is apparently an earlier conclusion made in the Initial Study; nevertheless, the records present clear evidence of potential significant impacts that should be fully examined in the final EIR. 25

Paper bags require the use of wood fiber that comes from a variety of sources including forests. An increase in paper bag use in California will put a significant additional demand on the natural resources needed to manufacture paper bags, even if a significant proportion of paper bags are recycled. Currently, only about 25% of the private-owned forests (these represent 91% of wood harvested in the US) are certified as sustainable, which would at minimum provide some protection for the resource base needed to produce fiber for paper.

The Technical Association of the Pulp and Paper Industry (TAPPI) provided a discussion in their “Earth Answers: How Much Paper Can Be Made From a Tree.”<sup>24</sup> TAPPI estimates about 17 trees are needed to manufacture a ton of paper.<sup>25</sup> Assuming, then, that about 6 billion plastic bags in LA county are converted annually to the use of paper bags, and assuming the use of 100% virgin wood pulp, about 4 million more trees will be cut each year to support this shift in use. Although some recycled paper content would reduce the total number of trees cut and consumed, the volume of trees needed to support a plastic to paper transition is nevertheless a large number. The review fails to address what that number – and impact – would be. 26

A well-constructed presentation in the final EIR will explore the origin of the fiber resources used in paper bags purchased and used in California; the increase in demand on these fiber resources; and potential impacts to the ecology from increased demand for paper bags.

<sup>24</sup> TAPPI, “How Much Paper Can Be Made From a Tree”, 2001, [http://www.tappi.org/paperu/all\\_about\\_paper/earth\\_answers/Howmuch1.htm](http://www.tappi.org/paperu/all_about_paper/earth_answers/Howmuch1.htm)

<sup>25</sup> *Id.*

## 8. The DEIR Fails to Adequately Compare Local Environmental Impacts with Global Impacts.

The DEIR declines to compare local environmental impacts with global impacts, claiming that LCA data cannot be used in connection with local air quality evaluation criteria. The DEIR's justification is:

These results cannot reasonably be evaluated in relation to the operational thresholds of significance set by SCAQMD for the SCAB or by AVAQMD for the MDAB because the operational thresholds are intended for specific projects located in the SCAB and MDAB, whereas LCA data cover all stages of production, distribution, and end-of-life procedures related to a particular product. The manufacture and production of paper carryout bags appears not to occur in the SCAB or the MDAB, with manufacturing facilities located in other air basins in the United States and in other countries that may have different emission thresholds and regulations.<sup>26</sup>

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While we agree that using aggregated data from an LCA would incorrectly represent the nature of local emissions compliance, LCA data can and should be used to evaluate regional and global impacts. NO<sub>x</sub>, SO<sub>x</sub>, CO<sub>2</sub>, N<sub>2</sub>O, methane, and other gases all have impacts that reach beyond the point of origin and affect either larger regional areas or cause global impacts. Therefore, the emissions that result in regional and global impacts can be compared. This comparison would not be reliant on operational thresholds of significance set by local regulatory authorities because regional and global impacts need not be evaluated based on local regulatory criteria.

## 9. The DEIR's Failure to Use a Consistent Approach to Calculate Current and Anticipated Bag Consumption Rates Yields Inaccurate Conclusions

The DEIR must use consistent methodology with respect to how it calculates both current plastic and paper bag consumption and anticipated plastic and paper bag consumption under various scenarios. The use of inconsistent approaches can have the effect of over representing or under representing environmental impacts. A key illustration of this problem in the DEIR is that the draft uses an estimate of current county-wide consumption of 6 billion plastic bags annually for purposes of drawing conclusions about adverse environmental impacts with respect to plastic bag consumption and litter, but with respect to calculating GHG emissions, the DEIR changes approach and uses estimated consumption figures of plastic bags of 1.3 – 2.9 billion bags per year.<sup>27</sup> The County can't have it both ways: either the DEIR is significantly overestimating plastic bag consumption and litter impacts, or it is significantly underestimating the GHG impacts that would result from the proposed ordinance(s). The DEIR must be redrafted throughout to correct this fundamental methodological flaw.

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<sup>26</sup> County of Los Angeles Department of Public Works, "Ordinances to Ban Plastic Carryout Bags in Los Angeles County Draft Environmental Impact Report", SCH# 2009111104, p. 3.1-17.

<sup>27</sup> *Id.* at 3.3-20, 2-2.

## ATTACHMENTS

Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags  
Charles P. Gerba, David Williams and Ryan G. Sinclair, Department of Soil, Water and Environmental Science,  
University of Arizona, Tucson, AZ School of Public Health, Loma Linda University, Loma Linda, CA (June 9,  
2010), [http://uanews.org/pdfs/GerbaWilliamsSinclair\\_BagContamination.pdf](http://uanews.org/pdfs/GerbaWilliamsSinclair_BagContamination.pdf)

Comments of the Progressive Bag Affiliates of the American Chemistry Council on Initial Study on Ordinances  
to Ban Plastic Carryout Bags in Los Angeles County (January 4, 2010)



January 4, 2010

Mr. Coby Skye  
County of Los Angeles Department of Public Works  
Environmental Programs Division  
900 South Fremont Avenue, 3<sup>rd</sup> Floor  
Alhambra, California 91803

Via email: [CSkye@dpw.lacounty.gov](mailto:CSkye@dpw.lacounty.gov)

Re: Comments of the Progressive Bag Affiliates of the American Chemistry Council on Initial Study on Ordinances to Ban Plastic Carryout Bags in Los Angeles County

Dear Mr. Skye:

I write on behalf of the American Chemistry Council ("ACC")'s Progressive Bag Affiliates (PBA) to provide the attached comments on the Initial Study on Ordinances to Ban Plastic Carryout Bags in Los Angeles County prepared by Sapphos Environmental and dated December 1, 2009 (referred to as "Initial Study").

We are pleased to have the opportunity to submit comments, as we recognize that the correct and complete definition of all reasonably foreseeable elements of a proposed project is the single most important element of the California Environmental Quality Act (CEQA) compliance process. Our comments focus on the adequacy and accuracy of the information contained in the Initial Study under CEQA. While we recognize that the initial study does not need to include the level of detail included in the Environmental Impact Report (EIR) it should nevertheless be supported by "facts, technical studies or other substantial evidence to document its findings," CEQA Guidelines § 15063, and we have conducted our review and submit these comments accordingly. Given that the Initial Study also defines the scope of the EIR to be conducted, we provide further comments on the scope and content of the EIR.

While we are encouraged to see that the study recommends preparation of an EIR, it grossly over-represents the adverse environmental impact of plastic bags and grossly under-represents those of paper bags. This review is at the very heart of the EIR and must be conducted thoroughly and comprehensively. Importantly, the study makes a number of assumptions about consumer behavior that are not substantiated. Contrary to the conclusions set out in the report, there is no data to suggest that a consumer switch from plastic to paper would be temporary. To the contrary, data suggests that most consumers will continue to select free carryout bags at checkout. Selection of paper bags instead of plastic bags would have the effect of significantly increasing the use of natural resources, fossil fuels, and water; and will have other significant adverse impacts, particularly on the emission of more greenhouse gases and further burdening the County's landfills.

We support the preparation of a complete EIR that addresses the broadest range of potential impacts. This is particularly the case given the controversial nature of the proposed ordinances. We also encourage the lead agency to exercise its authority to request the County to collect and submit additional information needed for environmental evaluation of the proposed ordinances.

Please feel free to contact me if I can assist you further with respect to these comments.

Very truly yours,

A handwritten signature in black ink that reads "Shari M. Jackson".

Shari M. Jackson  
Director, Progressive Bag Affiliates

COMMENTS OF  
THE PROGRESSIVE BAG AFFILIATES OF THE AMERICAN CHEMISTRY COUNCIL  
ON INITIAL STUDY -- ORDINANCES TO BAN PLASTIC CARRYOUT BAGS  
IN LOS ANGELES COUNTY

**Introduction**

Various localities in California have explored the viability of imposing product bans as a mechanism to prevent particular products from being littered. The theory is seemingly elegant, and on first glance, attractive: if there is a perceived litter problem with a product and there appear to be viable alternatives to that product, then just ban it and force consumers to switch to the substitute.

This theory, however, is flawed. Littering behavior has been extensively studied, and much littering is deliberate (intentional). Simply removing one potential source of litter does not solve the underlying behavior; the litterer simply litters with another product.

Litter aside, the forced substitution of one product with another can create significant unintended consequences, and is not necessarily a net advantage for the environment or human health. In the case of plastic bags, data show that widespread adoption of paper – the most likely substitute – would have adverse impacts on the environment, while doing little or nothing to prevent litter.

This is why it is so important that the County accurately and fully characterize the environmental benefits and impacts of plastic bags, and in exploring the environmental consequences of a plastic bag ban, accurately and fully characterize the environmental benefits and impacts of the replacement product, paper bags. It is also important to understand that a policy that results in a slight shift to reusable bags but a significant shift to paper bags will nevertheless have significant adverse environmental consequences.

We continue to believe that a comprehensive approach based on the three pillars of sustainable consumption (reduce, reuse and recycle) is the best method to reduce bag waste and promote litter prevention. And, our experience has been that working cooperatively in partnership with other organizations is an effective way to leverage scarce resources and achieve results more quickly. We have supported a number of programs using this approach and promoting bag recycling including Keep California Beautiful’s new “Got Your Bags” program. This initiative encourages consumers to bring their bags back to the grocery store whether they are reusable bags or recyclable plastic bags. Recycling and reusing plastic bags is one of the simplest things consumers can do to contribute to a better environment. Surveys show that 92 percent of consumers already reuse their plastic shopping bags (*Source: National Plastic Shopping Bag Recycling Signage Testing March 2007, see attached*).

**GENERAL COMMENTS**

**General Comment #1: The Key Findings of the Initial Study Fail to Thoroughly and Properly Evaluate the Potential Environmental Impacts of the Proposed Ordinances.**

The statutory responsibility of the lead agency in preparing the Initial Study includes evaluating the significance of the environmental effect of the ordinances. The CEQA Guidelines 15064 require consideration of both “direct physical changes in the environment which may be caused by the project” and (2) “reasonably foreseeable indirect physical changes in the environment which may be caused by the project.” An indirect physical change in the environment is “a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project.” The stated example in the Guidelines is an increase in air pollution caused by increased population growth resulting from the construction of a new sewage plant.

The key findings are deficient on their face, because while the Initial Study devotes significant effort to examining the purported environmental “benefits” of the ordinances, it devotes virtually no effort to evaluating indirect effects. Without adequately examining the indirect effects of the ordinances, the review severely under-represents the significance of adverse environmental effects from the ordinances (e.g., a consumer switch to paper bags).

There are two areas of local concern that are particularly glaring in their deficiencies. The first is the anticipated additional burden to already overtaxed landfills in the County as consumers shift from plastic bags to paper bags. This shift will result in additional greenhouse gas generation from trucks moving solid waste, and additional greenhouse gas generation as methane is generated in the landfill by paper bags. The shift will also accelerate landfill capacity and closure. The second area is again related to greenhouse gas generation, as additional trucks carrying additional paper bags generates additional greenhouse gases over those needed to transport plastic bags.

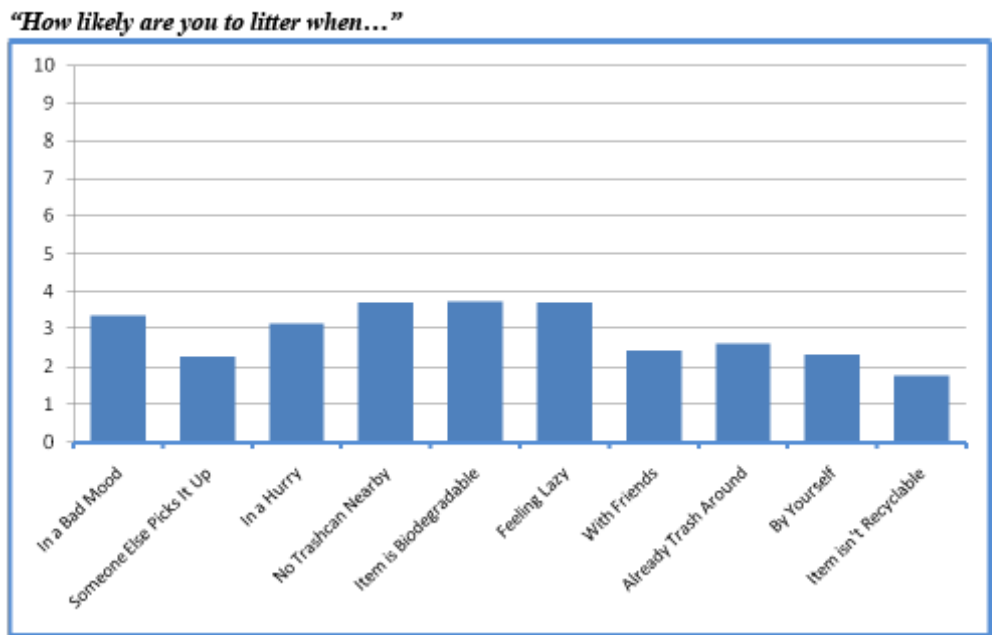
Recommendation: The County should devote at least equivalent time and focus to examining the adverse environmental impacts of switching from plastic bags to one or more substitute products. Evaluation of the environmental benefits/adverse impacts of various products should use reliable Life Cycle Analysis (LCA) (see Appendix A, Life Cycle Assessments of Paper and Plastic Bags). It should explore the various scenarios that motivate consumer behavior so the consumer shift to substitute products can be reasonably projected and the associated environmental impacts calculated. The evaluation should not be based on speculation about what consumer behavior might be, but should be based on empirical data of consumer behavior following plastic bag bans in other jurisdictions such as San Francisco where an overwhelming switch to paper bags has been observed. *A Qualitative Study of Grocery Bag Use in San Francisco*, <http://use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>.

1 cont.

**General Comment #2: The Initial Study Fails To Adequately Address the Additional Litter and Human Health Impacts that May be Introduced by the Use of Biodegradable Bags or Reusable Bags.**

While a key finding of the Initial Study is that biodegradable carryout bags are not a practical solution to “this issue” in Los Angeles County, and while we agree with this conclusion, we believe that the Initial Study fails to adequately address the many evidentiary reasons that support this conclusion. First, as noted above, litter behavioral studies suggest that people may litter more if they believe the products they are using are organic or can biodegrade (*Source: Littering in the I-Generation, Keep Los Angeles Beautiful, 2009, see attached*). For example, a study of littering conducted by Keep Los Angeles Beautiful reported that perception of biodegradability is one of the strongest contributors to littering (figure #3 below).

**Figure 3. Mean Scores for Barriers and Motivators to Proper Disposal**



2

If a prohibition of plastic carryout bags leads to the use of more “biodegradable” bags including paper the potential impact on a net increase in litter must be considered. Additionally, many such bags in fact are not biodegradable within the layman’s understanding at all; rather, the bags degrade very slowly in the natural environment.

To the extent that the proposed ordinances may result in a shift from plastic carryout bags to bags that are used repeatedly without regular washings, the substitute bags may present new health risks that should be evaluated. The Initial Study fails to adequately address this public health risk. The first North American microbiological study on reusable bags, issued earlier this year, found high levels of bacterial, yeast, mold and coliform counts in many reusable bags. Sixty-four (64) percent of the bags tested were contaminated with some level of bacteria.

Dr. Richard Summerbell, research director at Toronto-based Sporometrics and former chief of medical mycology for the Ontario Ministry of Health, reviewed the study and stated that “the main risk is food poisoning ... but other significant risks include skin infections such as bacterial boils, allergic reactions, triggering of asthma attacks, and ear infections.” The study conclusions included the observation that there is a potential for cross-contamination of food if the same reusable bags are used on successive trips; that check-out staff in stores may be transferring these microbes from reusable bag to reusable bag as the contaminants get on their hands; and that in cases of food poisoning, experts will have to test reusable bags in addition to food products as the possible sources of contamination.

2 cont.

[http://www.cpia.ca/files/files/A\\_Microbiological\\_Study\\_of\\_Reusable\\_Grocery\\_Bags\\_May20\\_09.pdf](http://www.cpia.ca/files/files/A_Microbiological_Study_of_Reusable_Grocery_Bags_May20_09.pdf). Health Canada issued guidance as a result of this study. See, Health Canada guidance, at <http://www.hc-sc.gc.ca/fn-an/securit/kitchen-cuisine/reusable-bags-sacs-reutilisable-eng.php>.

Recommendation: The County should study the potential environmental impacts and public health impacts of reusable bags and include these calculations in the EIR.

**General Comment #3: The Initial Study Fails to Adequately Address Potential Adverse Impacts From Reduced Recycling of Plastic Film and Impacts on the Recycling Infrastructure.**

Over 830 million pounds of plastic bags and film are recycled every year in the U.S., predominantly through the nationwide grocery and retail system where they are consolidated with stores’ stretch film (pallet wrap) and recycled through a well established recycling infrastructure.

A prohibition of plastic carryout bags may result in an overall decrease in the recycling of plastics, or damage the recycling infrastructure for polyethylene bags, wraps, and film. Currently, stores that accept plastic bags for recycling, as mandated by California law, also accept other polyethylene wraps and films, including dry cleaning bags, toilet paper wraps, paper towel wraps, and other wraps and bags. But if commercial retailers and grocers may no longer offer plastic bags under the proposed ordinance, it is reasonable to assume that a significant majority of such businesses will also stop offering to accept plastic bags for recycling at their stores, since they will no longer be required to do so. In fact, empirical evidence bearing this out has already emerged in a study conducted by *Use Less Stuff* following the San Francisco plastic bag ban. See, <http://www.use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>. The study, following the City’s plastic bag ban, reported that several stores had already removed, or had moved to obscured areas, plastic bag recycling bins from their stores within a fairly short period following the ban.

3

The clear impact is that the proposed ordinances are likely to significantly reduce recycling of other plastic bags, films, and wraps, and perhaps completely eliminate the ability for County residents to recycle any of these items. If recycling facilities are no longer readily available to accept these products, very few if any of these products will be recycled. Existing behavioral evidence is clear that if readily available recycling centers are not available, people will stop recycling. See, e.g., <http://www.articlesbase.com/home-improvement-articles/why-is-recycling-important-697194.html>. (readily available recycling centers are essential to promote recycling behavior); Sidique et al., *The Effects of Behavior and Attitudes on Drop-off Recycling Activities (2009)*, available at [www.sciencedirect.com](http://www.sciencedirect.com) (recyclers use the drop-off sites more when they feel that recycling is a convenient

activity and when they are more familiar with the sites). This outcome is a potentially serious environmental consequence, and one that could result in a net increase in litter or landfill impacts.

It should also be noted that the reduced availability of plastic grocery bags could have other detrimental effects on recycling programs in the Los Angeles Basin, further reducing recycling and imposing additional burdens on landfills.

3 cont.

Recommendation: The County should determine the current recycling rate and volume for non-plastic bag films and the intake origin for such material (e.g., grocery stores currently offering bag and film recycling). The study should examine existing alternate avenues, if any, for collection of plastic films for recycling. The net adverse environmental impact should be calculated, including landfill burden, as this additional avenue for film, bag, and wrap recycling of polyethylene is lost.

**General Comment #4: The Initial Study Does Not Present Sufficient Evidence to Support its Key Finding that “accelerating the use of reusable bags will diminish plastic bag litter.”**

The study here makes several flawed assumptions. The first is that a ban on plastic bags will drive consumers to use reusable bags. Available data suggest that this is not the case; where paper bags are freely available at checkout, consumers will select paper bags. This has been documented by a recent study conducted by *Use Less Stuff* (ULS), which surveyed the effect of the plastic bag ban in San Francisco on paper bag usage. ULS found that paper bag use increased significantly.

<http://www.use-less-stuff.com/Field-Report-on-San-Francisco-Plastic-Bag-Ban.pdf>.

The second flawed assumption is that removing a source of litter will diminish littering behavior. Substituting one packaging material, or carryout bag for another, does not address littering behavior. The Initial Study assumes that reducing the total number of plastic carryout bags used in the jurisdiction will necessarily reduce the number of plastic bags that are littered. There is, however, no substantiated basis for such an assumption, and significant evidence that without actions that directly address the behavioral issue, litter will continue unabated, or worsen. See generally, A Review of Litter Studies, Attitude Surveys and Other Litter-Related Literature, Keep America Beautiful, July 2007 ([http://www.kab.org/site/DocServer/Litter\\_Literature\\_Review.pdf?docID=481](http://www.kab.org/site/DocServer/Litter_Literature_Review.pdf?docID=481) (referred to as “KAB Report”).

4

The psychological behaviors that lead to littering have been well studied. A number of influences have been noted, such as:

- An already clean environment. One study from California State University, Sacramento, concludes that littering is less likely to occur in an environmental area that is already clean or maintained clean. This principle is sometimes called the “litter begets litter” principle. See, Reiter, S.M., and Samuel, W., Littering as a Function of Prior Litter and the Presence or Absence of Prohibitive Signs, *Journal of Applied Social Psychology*, 1980 (concluding that the littering rate was lowest in an already clean environment); Curnow, R.; Strecker, P.; Williams, E.; *Understanding Littering Behaviour; a Review of the Literature*. Beverage Industry Environmental Council, Pyrmont, Australia, 1997 (p. 31).
- The ready availability, design and convenience of trash receptacles. Curnow, R.; Strecker, P.; Williams, E.; *Understanding Littering Behaviour; a Review of the Literature*. Beverage Industry Environmental Council, Pyrmont, Australia, 1997.
- Effective communication and education. Stern, P.C.; Oskamp, S.; *Managing Scarce Environmental Resources*, In: Stokols, D.; Altman, I. *Handbook of Environmental Psychology, Vol. 2*. Krieger Publishing Company, Malabar, Florida, 1991 (pp. 1055-1057); see also Hansmann, R.; Scholz, R.W. *Environment and Behavior*, 2003, Vol. 35 No. 6, 752-762 (literature review of research concerning the effective design of explicit anti-littering messages noting evidence that prompts phrased as requests are more effective than those phrased as orders; and prompts are more effective if they contain a more specific description of the desired behavior).



One of the more significant findings in the literature reviews is that there are certain littering behaviors that may continue, or worsen, if the litterer believes that the litter will biodegrade. See, e.g., KAB Report at 6-3 (an acceptable reason provided for littering is the belief that the waste is organic). In fact, Keep Los Angeles Beautiful has conducted a study of factors that contribute to littering and concluded that the perception of biodegradability is one of the major contributors. (Source: *Littering in the I-Generation, Keep Los Angeles Beautiful, 2009, see attached*). This is particularly relevant here because the Initial Study fails to take into consideration that a shift from plastic carryout bags to paper or fabric may result in a net increase in litter since certain litterers believe the bags will degrade in the environment.

4 cont.

The third flawed assumption is that if there is reduced access to plastic bags, plastic bag litter will necessarily diminish. This assumption is unfounded. To reach such a conclusion, it would be necessary for the County to conduct a targeted litter audit focused on plastic bags, and then to restrict access to the specific plastic bags that are actually in the litter stream.

Recommendation: To inform the EIR, the County should conduct a detailed litter audit focused on sourcing plastic bag litter. The study should also contain an observational behavioral component that seeks to better understand the impact that demographic factors such as age have on littering behavior.

**General Comment #5: The Initial Study Fails to Identify Significant Irreversible Environmental Effects of the Proposed Ordinances.**

Under CEQA, an EIR must analyze the extent to which a plan's primary and secondary effects would commit resources to uses that future generations will probably be unable to reverse. CEQA Guidelines Section 15126(f). Implementation of the proposed ordinances would result in the irreversible commitment of certain natural resources. The most notable significant irreversible impacts are expenditure of energy resources in the form of natural gas, electricity, and gasoline; increased generation of pollutants; and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources such as lumber and other forest products, landfill capacity, and water resources.

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A shift from plastic bags to paper bags will result in substantial additional depletion of natural resources. Fossil fuels will be needed to support lumbering operations. During manufacture, fossil fuels and electricity would be consumed. During transportation – bags to store and also bags from the store to consumers' homes - fossil fuels would be consumed.

**General Comment #6: The Initial Study Fails to Identify Cumulative Effects, Including Air Quality, Greenhouse Gas and Global Warming Impacts, of the Proposed Ordinance.**

Implementation of the proposed ordinances would result in cumulative impacts related to air quality and greenhouse gases from increased landfill emissions (methane), truck traffic (CO, VOCs, NOx, PM10, and PM2.5), and air pollution impacts from paper bag manufacture and lumbering. Methane gases from landfills are a serious greenhouse gas and global warming concern.

See, e.g., <http://cdm.unfccc.int/UserManagement/FileStorage/WT2UQTYRGORYSPUBWL923QLJX31KFQ>. At the federal level (under NEPA), greenhouse gas emissions resulting from a proposed project “are either direct or indirect effects, and therefore the resulting global climate change impacts are classic examples of cumulative effects.” 40 C.F.R. § 1502.16. Climate change impacts are, by definition, inherently cumulative and significant. See 40 C.F.R. § 1508.27[b] [7], and at the federal level, the U.S. Supreme Court has ruled that such impacts are reasonably foreseeable. *Massachusetts et al. v. Environmental Protection Agency*, 549 U.S. 497 (2007). The EIR must address these issues fully in its review with respect to the impacts of a consumer shift from plastic to paper bags.

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**General Comment #7: The Initial Study Fails to Identify Significant Environmental Impacts Outside Los Angeles County that Will Occur If the Proposed Ordinances are Implemented.**

7

The California Supreme Court has held that consideration of environmental impacts extends outside the jurisdiction in which the statutory project is located:

[N]o statute (in CEQA or elsewhere) imposes any per se geographical limit on otherwise appropriate CEQA evaluation of a project's environmental impacts. To the contrary, CEQA broadly defines the relevant geographical environment as "the area which will be affected by a proposed project." (Pub. Resources Code, § 21060.5.) Consequently, "the project area does not define the relevant environment for purposes of CEQA when a project's environmental effects will be felt outside the project area." (*County Sanitation Dist. No. 2 of Los Angeles County v. County of Kern* (2005) 127 Cal.App.4<sup>th</sup> 1544, 1582-1583.) Indeed, "the purpose of CEQA would be undermined if the appropriate governmental agencies went forward without an awareness of the effects a project will have on areas outside of the boundaries of the project area." (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001). 7 cont.

*Muzzy Ranch Co. v. Solano County Airport Land Use Com'n*, 41 Cal.4th 372, 384-385, 389, 60 Cal.Rptr.3d 247, 160 P.3d 116 (2007).

Given the nature of the proposed ordinances, many of the environmental impacts that will occur from a shift from paper to plastic bags will occur within the County, but many others will occur outside the County. The County is therefore obliged under CEQA to consider geographically distant environmental impacts of their activities. This includes environmental impacts of lumbering (fossil fuel use; land degradation, habitat impacts); paper bag manufacturing (water use, fossil fuel use, air and water pollution); landfill burden outside the county; transportation of paper bags into and out of the County. The EIR should address all these issues fully.

### Specific Comments

Page 1-3 Study: The study estimates that litter from plastic carryout bags that are designed for single use account for as much as 25 percent of the litter stream. As support for this estimate, the study cites a 2004 study and a more recent 2008 study by the County of Los Angeles Department of Public Works.

Comment: The estimate presented is speculative and does not meet criteria for inclusion in the Initial Study or EIR. The estimate is also inconsistent with hard data drawn from litter audits. Data from the most recent, comprehensive national litter literature study indicates that litter composition from 9 states using IAR methodology for the category "napkins, bags, and tissues" was on average 6.3%. See A Review of Litter Studies, Attitude Surveys and Other Litter Related Literature, R.W. Beck (July, 2007), available at [http://www.kab.org/site/DocServer/Litter\\_Literature\\_Review.pdf?docID=481](http://www.kab.org/site/DocServer/Litter_Literature_Review.pdf?docID=481); Table 3.4, Composition of Litter, IAR-Based Surveys (1993-2006) (p.3-7). Notably, the category does not distinguish among the three constituents (napkins, bags, and tissues) nor does it distinguish between paper and plastics, so the actual composition of plastic bags in the litter stream would be expected to be significantly lower. The average is also inflated by a higher number from older data (1993) from the State of Hawaii; notably, the most recent data collected from Tennessee and Georgia from 2006 for this entire category indicates litter stream concentrations at 1.8% and 4.6%, respectively. Again, the plastic bag component of this category would be a subset, and perhaps significantly smaller. 8

The report's estimate is also inconsistent with the City of San Francisco's recent litter audit data. San Francisco's Department of Environment Litter Survey Report (July 2008) (Table 5, p. 30), shows that non-retail plastic bags composed only 3.4% of the large litter portion of the litter stream from 2008 data. [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf).

Actual litter stream audit data therefore suggests that plastic bags in fact represent a very small percentage of the litter stream, and the “estimates” presented in the Initial Study grossly over-represent plastic bags. 8 cont.

Page 1-3 Study: The study presents data on the number of plastic bags consumed annually in the County as 6 million.

Comment: No evidence is presented to connect the amount of plastic bag litter with the number of bags consumed annually. No evidence is presented on the number of paper bags annually consumed within the County. No evidence is presented with respect to the equivalent number of paper bags that this figure represents, so that the environmental impacts of product substitution can be adequately evaluated. 9

Page 1-3 Study: The study claims that the County of Los Angeles Flood Control District spent more than \$18 million annually for prevention, clean up, and enforcement efforts to reduce litter, of which “plastic bags are a component.”

Comment: The reported figure is for a variety of programs, including litter prevention and education efforts. The study does not report which fraction of monies are spent on which activity, so there is no documentation presented regarding how much money is actually expended annually on cleanup versus outreach and education. In addition, the study does not quantify how much is spent on plastic bag litter, nor the size of the component of the waste stream that plastic bag litter constitutes. 10

Page 1-5 Study: The study claims a key finding that “Plastic carryout bags have been found to significantly contribute to litter and have other negative impacts on marine wildlife and the environment.”

Comment: This “key finding” is actually three “findings”: one with respect to litter, and one with respect to impacts on marine wildlife, and one with respect to impacts on the environment. All three “findings” are anecdotal and speculative in nature, and are not supported by “facts, technical studies or other substantial evidence,” CEQA Guidelines § 15063.

Litter: It is anecdotally true, and documented through litter audits, that plastic bag litter is a part of the litter stream. Mere presence of a material or product as litter, however, does not mean that its contribution to the litter stream is significant. A proper and complete evaluation of the potential environmental benefits, as well as adverse environmental impacts, of the proposed project (ordinance) demand a careful, up to date, and accurate analysis of the contribution of plastic bags to the litter stream. If this discussion is not based on accurate data and it overstates or overestimates the presence of plastic bags in the litter stream, subsequent environmental study will fail to accurately characterize the environmental benefits of the project, and this will undermine the ability of decision makers and the public to compare anticipated environmental benefits with anticipated adverse environmental impacts. See also, supra, specific comments on page 1-3 with respect to the low contribution of plastic bags to measured litter streams in multi-state litter audits. 11

Marine wildlife: The study does not present credible or properly developed evidence that plastic bags “have other negative impacts on marine wildlife.” CEQA considers impacts to be significant if they occur at the population level. This is well understood in the context of wind farms, where it is accepted that some bird mortality may occur without necessarily constituting a significant impact that would trigger EIR preparation. See also CEQA Guidelines § 15065 (mandatory findings of significance include whether the project “has the potential to ...substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten

to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species...”). Speculative evidence has no place in either an Initial Study or an EIR and should be deleted. The presented anecdotal evidence that certain marine mammals have chewed on a plastic bag, however unfortunate, does not provide adequate substantiation of the scope and degree of environmental impact needed to support appropriate analysis under CEQA. It is also important to note that bans have not been demonstrated to reduce litter and thus impacts on animals. In fact, San Francisco’s litter audit does not show a significant impact on bag litter despite the ban.

Environment: Like any other consumer product, plastic bags consume resources and have potential environmental impacts. The relevant exercise for the Initial Study is to identify the significant environmental impacts of the project: “If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall [prepare an EIR].” CEQA Guidelines §15063. That said, we are concerned that the claimed environmental impacts from plastic bags are overstated, and that the finding is not based on adequate “facts, technical studies or other substantial evidence,” CEQA Guidelines § 15063; likewise, we are concerned that the study lacks an adequate exploration of the many adverse environmental impacts of paper bags.

11 cont.

Page 1-5 Study: The study claims a key finding that “Biodegradable carryout bags are not a practical solution to this issue in Los Angeles because there are no local commercial composting facilities able to process the biodegradable carryout bags at this time.”

Comment: While we agree that “biodegradable” carryout bags are not a solution, it is for different reasons than those stated in the study. This finding is completely disconnected with and unsupported by the claimed environmental finding that plastic carryout bags result in litter. Litter is a behavioral problem, and no amount of landfills nor of commercial composting facilities will address a litter behavioral problem.

12

Page 1-5 Study: The study claims a key finding that “Reusable bags contribute toward environmental sustainability over plastic and paper carryout bags.”

Comment: We are puzzled by the use of the term “sustainability” in this context, as it has multiple and potentially complex meanings. However, if the term is meant to mean environmental impacts across all categories that can be measured using appropriate life cycle analysis, this finding is not adequately supported. The report over- represents the alleged environmental detriment of plastic bags, and fails to adequately gauge the adverse environmental impacts of substitute products, including reusable bags and paper bags.

13

Page 1-5 Study: The study claims a key finding that “Accelerating the widespread use of reusable bags will diminish plastic bag litter and redirect environmental preservation efforts and resources towards “greener” practices.”

Comment: This finding is actually several separate compounded findings related to (1) a claim of diminished plastic bag litter, and (2) redirected environmental preservation efforts and resources towards (3) “greener” practices.

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Litter: We question whether “accelerating the widespread use of reusable bags” will in fact diminish plastic bag litter. This appears to be an entirely unsupported assumption, rather than a documented finding. Both behavioral and litter audit data suggest that such an action will not itself decrease the overall amount of litter, since such an action does

not address littering behavior. Current literature does not suggest that persons toting their weekly groceries from the grocery store – the targets of the proposed ordinances – are those most likely to litter their grocery bags, or even likely to litter at all; rather, those aged 19 and under are more likely to litter. See generally, Littering Behavior in America, Results of a National Study (2009) (p. 5)

[http://www.kab.org/site/DocServer/KAB\\_Report\\_Final\\_2.pdf?docID=4581](http://www.kab.org/site/DocServer/KAB_Report_Final_2.pdf?docID=4581) (principal investigator, Wesley Schultz, Professor of Psychology, California State University).

In addition, we note that the proposed ordinances would not require the use of reusable bags; rather, paper carryout bags would continue to be available at checkout. This key “finding” is actually an assumption that banning plastic bags will, by itself, lead consumers to select and consistently use reusable bags over free paper bags at checkout. No data has been presented nor do we believe exists to support this assumption. Available observations suggest that consumers at checkout will select the most convenient, highest performing, and least expensive checkout bags, and thus if consumers are denied the choice of a free plastic bag at checkout, they will default next to selecting a free paper bag as they appear to have done in San Francisco.

14cont.

“Redirected environmental preservation efforts and resources”: This finding is not sufficiently developed to be articulated in the report. We are unclear as to what this finding is supposed to mean. If it is intended to mean that the County of Los Angeles will be able to redirect litter clean up costs, there is no evidence to suggest such an outcome. Indeed, available behavioral and litter audit data suggest that the proposed ordinances will either have no net effect on the total amount of litter – or will actually increase the total amount of litter. Behavioral data suggests that some of the motivating factors to littering include the belief that the product is biodegradable or not recyclable. See, supra, Littering Behavior in America (2009) at page 4: “Littering was reported more frequently in instances when the person was in a hurry, no trash can was nearby, the item was biodegradable, there was a sense that someone else would pick it up, and when the item was not recyclable.”

Page 1-6

Study: The study states that “Plastic carryout bags have been found to contribute substantially to the litter stream and to have other adverse effects on marine wildlife.”

Comment: Available litter audit data in fact do not suggest that plastic bags contribute substantially to the litter stream; to the contrary, available data shows their contribution to be in the low single digits. The specific contribution of plastic carryout bags from grocery stores, the subject of the proposed ordinance, is likely to be significantly lower still, since it is a smaller subset of plastic carryout bags. Each of the documents used to support this statement fail to provide sufficient factual basis to support the stated finding. The first document, a 2009 UNEP report on marine debris, does not make any findings nor reach any conclusions about plastic bags having adverse effects on marine wildlife; the executive summary actually concludes at page 9 that “Further research and documentation on the impacts of marine litter is needed to assess this issue effectively.” The second cited document is a resolution from a board meeting of the California Integrated Waste Management Board, which is itself not a finding of fact but a political resolution from an agenda. The third document, a staff report to the Los Angeles County Board of Supervisors, cites a number of sources for its claims of harm to marine mammals. Further review of the underlying sources reveals that the sources do not provide evidentiary support for the claimed finding. For example, among the citations is a NOAA report on marine debris. The report is very careful to debunk widespread claims about the severity of environmental impact on marine life from plastic bags:

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Origin of plastic bag statement: We were able to find no information to support this statement [claims that plastic bags are injuring marine animals]. An erroneous statement attributing these figures to plastic bags was published in a 2002 report published by the Australian Government; it was corrected in 2006. See the 2002 report published by Environment Australia entitled, “Plastic Shopping Bags – Analysis of Levies and Environmental Impacts” or [click here](#).

In 2006, Environment Canada recanted the statement “A figure of 100,000 marine animals killed annually has been widely quoted by environmental groups; this was from a study in Newfoundland which estimated the number of animals entrapped by plastic bags in that area from a four-year period from 1981-1984” and replaced it with “A figure of 100,000 marine animals killed annually has been widely quoted by environmental groups; this was from a study in Newfoundland which estimated the number of animals entrapped by plastic debris in that area from a four-year period from 1981-1984.”

15cont.

See NOAA’s Marine Debris webpage, <http://marinedebris.noaa.gov/info/plastic.html#2>. Another source cited as support is a Seaworld website, which does little more than repackage concern that a sea turtle could eat a plastic bag – merely a speculative exercise and quite a reach from presenting actual evidence that they do (“Pollution, such as plastic bags resembling jellyfish, can also cause sea turtle deaths.”).

Page 1-6

Study: The study states that “The prevalence of litter from plastic bags in the urban environment also compromises the efficiency of systems designed to channel storm water runoff.”

Comment: No citation or support is provided for this claim. No data is presented to quantify the specific inefficiency claimed to be introduced by plastic bags. No data is presented to review the potential impacts of paper bag litter on storm water systems.

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Page 1-7

Study: “Furthermore, plastic bag litter leads to increased clean-up costs for the County, the California Department of Transportation (Caltrans), and other public agencies.”

Comment: Clearly, litter cleanup has an inherent cost to the County, and to the extent that plastic bags are a small component of the litter stream, they have an impact on cleanup costs. We have presented data in these comments, however, to show that the Project (plastic bag ban) may result in a net increase to the County in the amount of litter. Increased litter, or a shift in the composition of the litter stream to more paper, may actually increase litter cleanup costs to the County if wet paper litter is more difficult to remove.

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Page 1-7

Study: “In particular, the prevalence of plastic bag litter in the storm water system and coastal waterways hampers the ability of and exacerbates the cost to local agencies to comply with the National Pollutant Discharge Elimination System, and total maximum daily loads (TMDL) limits for trash as specified pursuant to the federal Clean Water Act.”

Comment: The only cited source for this claim is the Department of Public Works’ Report on Plastic Carryout Bags. The cited document provides no support for the specific claim that plastic bag litter hampers compliance or raises costs to local agencies. And to the contrary, a fair argument can be made that replacing plastic bag litter with paper bag litter may in fact increase costs, if the wet paper is more difficult to remove and more likely to clog systems, screens, grinders, or intakes. For that matter, a fair argument can also be made that an increase of paper bag waste in waterways may adversely affect water quality (as the organic matter degrades, it will impact the availability of dissolved oxygen in the water), which itself could impact compliance with TMDLs for water quality. See, e.g., [http://web.cecs.pdx.edu/~fishw/FT\\_L13-BOD25.pdf](http://web.cecs.pdx.edu/~fishw/FT_L13-BOD25.pdf)

18

(impact of degrading organic matter on dissolved oxygen levels of water and discussion of depletion levels at which fish suffocate). 18cont.

Page 1-7

Study: The study claims that “Plastic bag litter is also a major economic operational issue for landfills and other solid waste processing facilities.”

Comment: We suspect that this statement was made in error, and that the authors intended to refer to plastic bags in the solid waste stream rather than the litter stream. That said, the County’s own reports note that 12 million tons of trash were disposed of in 2006, with about 80% being landfilled in the County. It is further reported that “...approximately 45,000 tons of plastic carryout bags are disposed by residents countywide each year, comprising approximately 0.4 percent of the 12 million tons of solid waste disposed each year.” See <http://ladpw.org/epd/pdf/PlasticBagReport.pdf>.

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We find it curious that the study would claim that less than one half of one percent of the solid waste stream presents a “major” economic operational issue for “landfills” and “other solid waste processing facilities.” We fail to find any support for this claim in the supporting documentation.

It is well known that landfill operators need to implement best practices to prevent trash from leaving the landfill site and becoming litter. These practices are already in place, not just to address plastic bags, but other film, paper, fibers, and lighter weight wastes of all kinds. There is no basis for the implied claim here that these best management practices are used only due to the presence of plastic bags in solid municipal waste, nor that these best management costs would be reduced or go away with a corresponding reduction in landfilled plastic bag waste. Without such data, the claim is merely speculative.

Page 1-9

Study: The study claims that, “based on the available evidence, paper carryout bags are less likely to become litter than are plastic carryout bags.”

Comment: No such evidence has been presented to support such a claim. In these comments, we have presented behavioral evidence that suggests the opposite is likely: that people predisposed to intentionally litter will be more likely to litter paper bags than plastic. This likelihood is borne out by existing litter audit data, which shows a significant amount of the existing litter stream to be paper, including paper bags, paper fast food bags, and napkins. See, [http://www.kab.org/site/DocServer/Litter\\_Literature\\_Review.pdf?docID=481](http://www.kab.org/site/DocServer/Litter_Literature_Review.pdf?docID=481) and Keep Los Angeles Beautiful “Littering in the I-generation” 2009.

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Page 1-9

Study: The study claims that, “...life-cycle studies have also indicted that reusable bags are the preferable option to both paper and plastic bags.”

Comment: The Project is predicated on the notion that consumers will, when faced with a ban of plastic carryout bags, switch to free paper carryout bags and reusable bags. A careful analysis therefore must occur of the potential adverse environmental impacts of such a switch. This analysis is wholly lacking from the study, and should be conducted. In addition to accurately anticipating product switches so that informed calculations about environmental consequences can be made, additional review of the potential adverse environmental consequences of reusable bags (including potential human health impacts) needs to be conducted.

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Page 1-13

Study: The study claims that, “The County anticipates that a measurable percentage of affected consumers would subsequently use reusable bags (this percentage includes consumers currently using reusable bags) once the proposed ordinances take effect.”

Comment: Testing this assumption with behavioral and other available information is absolutely essential to this exercise. First, we note that the anticipated environmental benefits, and adverse

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	environmental consequences, cannot “count” the existing use of reusable bags, since the ordinances would not impact this pre-existing behavior. Second, given that paper bags will be readily available as free substitutes to plastic bags, it can be fairly argued that a large majority of consumers will continue to request free bags at checkout, and will therefore switch to paper similar to results in San Francisco.	22cont.
Page 2-2	<p>Study: The study concludes, on the basis of the initial evaluation, that the proposed project may have a significant effect on the environment, and that an Environmental Impact Report is required.</p> <p>Comment: We agree with this conclusion and support the preparation of an Environmental Impact Report. We urge the preparation of a complete report with the broadest scope possible.</p>	23
Page 2-4	<p>Study: For section 2.3, Air Quality, items (b) and (c) are checked as “potentially significant unless mitigation incorporated.”</p>	24
Page 2-7	<p>Study: For section 2.7, Greenhouse Gas Emissions, (a) and (b) are checked as “potentially significant unless mitigation incorporated.”</p> <p>Comment: Both of these items, in both sections, should be redesignated as “potentially significant impact.” As we have noted, reduced availability of plastic carryout bags will increase use of paper carryout bags. This substitution will carry with it significant adverse environmental impacts because the environmental footprint of paper bags, over their lifecycle, is more damaging than plastic.</p> <p>The proposed CEQA Guidelines, Section 15064.4 (Determining the Significance of Impacts from Greenhouse Gas Emissions) call for “a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” The lead agency should use either a model or methodology to quantify greenhouse gas emissions resulting from a project or a qualitative analysis or performance based standards. Importantly, the lead agency has authority “to consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.”</p> <p>Energy consumption during manufacture: Plastic grocery bags require 70 percent less energy to manufacture than paper bags. Boustead Consulting &amp; Associates Ltd. <i>Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper</i> (2007) at <a href="http://www.americanchemistry.com/s_plastics/doc.asp?CID=1106&amp;DID=7212">http://www.americanchemistry.com/s_plastics/doc.asp?CID=1106&amp;DID=7212</a> The more efficient manufacturing process for plastic bags translates into fewer greenhouse gas emissions.</p> <p>Transportation (greenhouse gas emissions from trucking): Plastic bags are much lighter than paper bags: 2,000 plastic bags weigh 30 lbs; 2,000 paper bags weigh 280 lbs. This weight differential is extremely important when calculating transportation costs, and in particular, truck emissions for trucks delivering plastic bags. At end of life, these same plastic bags are lighter to transport than paper to the recycling facility, or lighter to transport to landfill. Each time an equivalent number of plastic bags is trucked versus paper bags, it takes only one truck for the plastic and seven trucks for the paper. U.S. Environmental Protection Agency. <i>Questions about Your Community Shopping Bags: Paper or Plastic</i> at <a href="http://web.archive.org/web/20060426235724/http://www.epa.gov/region1/communities/shopbags.html">http://web.archive.org/web/20060426235724/http://www.epa.gov/region1/communities/shopbags.html</a></p>	25



In terms of actual figures, 2 million plastic bags can be carried on one truck, so all 6 million plastic bags the study estimates are used annually in Los Angeles can arrive on only 3 trucks. On the other hand, it takes 7 times as many trucks to haul an equivalent number of paper bags – 21 trucks. This multiplier applies every time the products are transported, whether to be transported to recycling or to landfill.

25cont.

Energy consumption during recycling: It takes 91% less energy to recycle a pound of plastic than it takes to recycle a pound of paper. U.S. Environmental Protection Agency. *Questions about Your Community Shopping Bags: Paper or Plastic* at <http://web.archive.org/web/20060426235724/http://www.epa.gov/region1/communities/shopbags.html>

Page 2-8

Study: The study indicates that the impact of the proposed ordinances would be “potentially significant unless mitigation incorporated” for subsection (a) of Section 2.9, Hydrology and Water Quality. For subsection (f), “no impact” is noted.

Comment: Subsections (a) and (f) should be recategorized to “potentially significant impact.” As noted in these comments, a shift to additional paper litter entering waterways could significantly impact dissolved oxygen in waters, which could have a detrimental impact on fish or other water organisms.

In addition, we note a significant omission from the checklist. Although Section 2.9 does address the potential to adversely impact groundwater supplies, it does not include a category for water usage, or depletion of water resources, and it should, as this is highly relevant to a complete analysis of environmental impacts under CEQA. The production of plastic bags consumes less than 6 percent of the water needed to make paper bags, so any shift from utilization of plastic bags to paper bags will necessitate a significant additional burden on water use. Boustead Consulting & Associates Ltd. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper* (2007), [http://www.americanchemistry.com/s\\_plastics/doc.asp?CID=1106&DID=7212](http://www.americanchemistry.com/s_plastics/doc.asp?CID=1106&DID=7212) Likewise, any shift from plastic bags to reusable bags will need to include calculated water use (washings) and detergent use for the needed care and maintenance of reusable bags.

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Page 2-14

Study: The study categories the potential impact for 2.17(f), which relates to landfill capacity impacts, as “potentially significant unless mitigation incorporated.”

Comment: The County’s own reviews, and indeed this study, insist that landfill capacity is a significant environmental issue for the county. Paper bags are much bulkier and heavier than plastic bags, and substitution of plastic bags with paper bags will generate five times as much waste. U.S. Environmental Protection Agency. *Questions about Your Community Shopping Bags: Paper or Plastic*. See: <http://web.archive.org/web/20060426235724/http://www.epa.gov/region1/communities/shopbags.html>.

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The consequences of this additional waste burden on the County’s landfills must be evaluated. In addition, as the County is forced to close landfills and truck waste out of the county for landfilling, heavier paper bags in the waste stream will have a significant environmental impact due to the greenhouse gas emissions generated during the transportation process. See, e.g., memo from Carrier Bag Consortium reporting on failure of plastic bag taxes:

In fact one retailer in one country where a plastic bag tax was introduced now has to transport four 40 foot containers of paper sacks (protected from moisture by plastic) where previously it shipped only 3 pallets of plastic carriers to do the same the job. This unpredicted result of a misguided tax is doing far more environmental damage because it results in increased exhaust

emissions, more congestion on the roads and much more waste going to landfill. [www.carrierbagtax.com/downloads/7035FactorFiction.doc](http://www.carrierbagtax.com/downloads/7035FactorFiction.doc).

Another item completely unaddressed in the study is the substitution dilemma facing consumers who currently reuse the free plastic bags obtained at the grocery store. Nationwide, a large majority of consumers report reusing these bags for trash bags, lunch bags, pet pick up, extra containment of items that might leak in the refrigerator, wet bathing suits or gym clothes, and toting or disposing items that could leak or spill. If free plastic bags are no longer available at checkout, consumers will need to buy plastic bags for these functions. Very few, if any, commercially available plastic bags are designed and made to be as thin as grocery bags, which means that substitution will likely occur with a thicker plastic product, using more energy to manufacture and transport, and more space in a landfill for disposal. The Ireland experiment with a plastic bag tax bears this out. The Ireland tax in fact resulted in more plastic bags being used in Ireland after the tax than before it – the total amount of bags used in Ireland actually rose by 10%. Why? The sales of substitute plastic bags, such as garbage bags, increased by 400%. PIFA, 2004 (also validated by the Scottish Parliament ERDC Committee – Economic and Rural Development Committee) PIFA/Mike Kidwell Associates 2006.

27cont.

### Section 2.18, Mandatory Findings of Significance

Study: The study concludes “no impact” for subsection (a), which addresses “potential to degrade the quality of the environment” and affect habitat. Comment: The categorization should be changed to “potentially significant impact.” As discussed in these comments, the proposed ordinances present numerous significant environmental impacts as a result of substituted product usage for plastic bags.

One key area overlooked by the analysis is water consumption. Water conservation is one of the most significant environmental concerns of our time. Almost uniformly, life cycle studies by independent and government groups have shown that paper grocery bags made at least in part from recycled material have far greater impacts in terms of global warming and use of valuable water resources. See Appendix A. Water conservation and consumption are going to become increasingly more important.

The paper industry is the largest single water consumer of any sector in the national economy. American Forest & Paper Association, Biennial Report, December, 2006. About one gallon of water is used to make each paper grocery bag – significantly more water than is needed to make a plastic bag (it takes less than 6% of the water needed to make a plastic bag than a paper bag). Therefore, if 6 billion plastic bags (as estimated by the County) are converted to the use of paper bags, 6 billion gallons of water are consumed.

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Pulp and papermaking processes also contribute additional environmental contaminants to waterways and the air. These impacts need to be carefully studied and understood before the ordinances are prepared.

Study: The study concludes “less than significant impact” for cumulative impacts.

Comment: The categorization should be changed to “potentially significant impact.” Data has been presented that indicates that the greenhouse gas consequences of moving from plastic bags to paper bags are significant. Greenhouse gas impacts must be analyzed for cumulative impacts, and must be analyzed to understand impacts on other requirements of state law.

### Section 3.3, Air Quality

Study: The study concludes that further analysis is not required.

Comment: The study makes a number of unsupported and flawed assumptions that require correction. First, the study correctly notes that the impacts of the ordinances on air quality as a result of decreased

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vehicle emissions related to the distribution of bags, transport of bag waste, and litter collection, should be considered. These impacts, however, need to be evaluated with respect to both plastic bags and the anticipated substitute product, paper bags.

The study incorrectly assumes that “any increases would be offset to some extent due to the fact that paper bags can contain a larger volume of groceries than plastic.” This statement is not only untrue and unsubstantiated but ignores the fact that most paper and plastic bags are “double bagged” at checkout, and that very few consumers ask for a fully packed paper bag, which is then too heavy for many people to comfortably handle.

29cont.

### Section 3.7, Greenhouse Gas Emissions

Study: The study assumes consumers will select reusable bags and there will be minimal greenhouse gas impacts.

Comment: This entire section is severely flawed. The entire discussion is premised on the notion that consumers will switch from plastic bags to reusable bags, but as we have noted in these comments, there is no data to suggest that this behavioral change will occur as long as free paper bags are offered, and data from a 2008 San Francisco litter audit suggests the opposite – that consumers will in fact select free paper bags. This assumption is absolutely critical, since a shift to paper bags will have significant greenhouse gas impacts.

It is widely noted the single biggest environmental issues of our time is “global warming”. A careful discussion of greenhouse gas impacts and global warming is essential for consistency with California’s environmental goals. The very purposes of CEQA are undermined if these significant environmental impacts are not assessed and presented to the public. As we noted in our general comments, these important cumulative impacts must be properly identified and fully evaluated. The public deserves to know the consequences of the ordinances under consideration.

Recommendation: Given the importance of this issue, the lead agency should request clarification with respect to the order of importance of program goals, and that the results of the order be understood before ordinances are prepared. There are many scientific techniques available to deal with trade-offs related to environmental goals, therefore the appropriate studies should be conducted first.

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Almost uniformly, life-cycle studies by independent and government groups have shown that paper grocery bags made at least in part from recycled material have far greater impacts than plastic bags in terms of global warming. See Appendix A. More than 60% of paper grocery bags end up in landfills. American Forest & Paper Association Biennial Report, December 2006. Paper grocery bags in landfill decompose and release methane gas, which contributes significantly to global warming (23 times more than carbon dioxide over a 100 year horizon). Methane emissions from landfills were estimated at 8.0 million metric tons in 2001. In addition, 2.5 million tons were recovered for energy use and 2.4 million tons were recovered and flared. Therefore, more than 60% of the methane is not recovered. Plastic bags in landfills, on the other hand, contribute insignificantly to the global warming problem.

To further appreciate the significance of the impact of a conversion to paper bags, an examination is needed of how many trees would potentially be cut down each year if plastic bags are replaced by paper bags. The Technical Association of the Pulp and Paper Industry (TAPPI) provided a discussion in its “Earth Answers: How Much Paper Can Be Made From a Tree.” Although somewhat simplified, some experts suggests 17 trees per ton of paper.” The Technical Association of the Pulp and Paper Industry (TAPPI), www.TAPPI.org. Therefore, if 6 million plastic bags (as estimated by the County) are converted to the use of paper bags, ***about 4 million more trees will be cut down each year.***

Paper bags are made from a renewable resource and plastic bags are currently made from fossil fuels (i.e., natural gas). However, the fossil fuel energy required to manufacture and transport paper bags is greater than that required for plastic bags. Even paper bags made from 100% recycled fiber use more fossil fuels than plastic bags. Since global warming has become a worldwide concern and global warming emissions are significantly greater with the use of paper bags and compostable plastic bags than using plastic bags, a closer examination of some consequences of global warming is warranted. 30cont.

For more extensive reviews, one EPA website lists a multitude of climate news releases. The website is: [www.epa.gov/climatechange/newsroom.html](http://www.epa.gov/climatechange/newsroom.html).

## **Appendix A: Life Cycle Assessments of Paper and Plastic Bags**

### **What is Life Cycle Assessment?**

LCA is a method that provides a systems approach to examining environmental factors. The system is cradle to grave. Which means taking things from the environment such as fuels, water and raw materials; processing them; using them; and then disposing of them. At each of these levels the activities required to complete these steps lead to potential environmental impacts from emissions to the air, water and ground as emissions and solid waste. The purpose of the system studied is the way for consumers to carry their purchases using either paper, plastic or compostable plastic bags.

The concept of LCA has been practiced since the early 1970s, and in the 1990s standardized through several organizations including SETAC (Society of Environmental Toxicology and Chemistry) and ISO (International Standards Organization). Using LCA, one examines all aspects of the system used to produce a product from cradle (the extraction of raw materials necessary for producing a product) all the way through to the grave (final disposal of the product). LCA studies provide results on resource and energy use, and emissions to air, water (effluents), and land (solid wastes) for local, regional, and global effects.

All products are produced using a system, and as such, have environmental characteristics that are multifaceted and result in global, regional, and local environmental impacts. This is important to recognize as it is at the core of understanding how to make choices that actually provide for an overall benefit to the environment rather than simply trade off one environmental consequence for another or simply push environmental impacts to other jurisdictions. All materials, products, and packaging use resources, require energy for manufacturing and transport, and produce wastes either in the form of air emissions, water effluents, or solid wastes. Choosing an environmentally preferable product system requires that one or more environmental characteristics of the product are better than the product it is replacing – where better is defined as reducing impacts across the entire system which does not include decreases in some areas while allowing increases in other areas.

Based on this basic introduction of why LCAs are critical to our environmental understanding, one can see that it is necessary fully understand how one system compares to another system when trying to make a determination between the use of different products such as grocery bags (paper bags, compostable plastic bags and plastic bags). As a result, it is instructive to determine if previous LCAs have been conducted on the products in question, and if so, if the results from previous studies are similar or different, and if different what is the cause of the underlying differences.

### **Life Cycle Assessments of Paper and Plastic Bags**

The following is a brief review of four selected Life Cycle studies conducted in the past twenty years; starting with the most recent study.

1. “Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper” was prepared for the Progressive Bag Alliance by Boustead Consulting & Associates Ltd., Sep 2007.

To ensure that the results of this study are reliable, repeatable, and robust, the findings of this study were peer reviewed by an independent third party - Professor Michael Overcash of North Carolina State University - with significant experience in life cycle assessments. The following are quotes from the review of Professor Overcash.

“This report provides both a sound technical descriptions of the grocery bag products and the processes of life cycle use.”

“The conclusions regarding the relative environmental impact when using a life cycle view are consistent with previous studies and need to be reinforced in the policy arena. The policies to discourage plastic bags may have more to do with litter than the overall environment. Whatever the goals of the policy makers, these need to be far more explicit than general environmental improvement, since the life cycle story is consistent in favor of recyclable plastic bags. It is possible that the emphasis of another report might be that the full benefit of plastic bags is even higher when large recycling is in place.”

The LCA study conducted by BCAL shows that when compared to 30% recycled fiber paper bags, polyethylene grocery bags use less energy in terms of fuels for manufacturing, less oil, and less potable water. In addition, polyethylene plastic grocery bags emit fewer global warming gases, less acid rain emissions, and less solid wastes.

The same trend exists when comparing the typical polyethylene grocery bag to grocery bags made with compostable plastic resins - traditional plastic grocery bags use less energy in terms of fuels for manufacturing, less oil, and less potable water and emit fewer global warming gases, less acid rain emissions, and less solid wastes.

The results support the conclusion that any decision to ban traditional polyethylene plastic grocery bags in favor of bags made from alternative materials (compostable plastic or recycled paper) will result in an increase in environmental impacts across a number of categories from global warming effects to the use of precious potable water resources. So no matter what benefits consumers and legislators believe may come from banning traditional plastic grocery bags, such as a reduction in litter, the unintended consequences are real and long lasting. The significance of the increased impacts will depend largely on the level of and type of replacement that may be invoked as a result of any specifically imposed industrial or legislative requirements (this is addressed later in this document).

2. “Evaluation des impacts environnementaux des sacs de caisse Carrefours...Analyse du cycle de vie de sacs de caisse en plastique, papier et materiau biodegradable” prepared for CARREFOUR by Ecobilan a division of PriceWaterhouseCooper, France, 2004.

Carrefour is a very large French retailer that has an extensive presence in many parts of Europe and indeed the world. Carrefours also conducted a life cycle analysis of the carry out sacks utilized by its chain, and the following table summarizes the results of the study.

Consumption of nonrenewable energy	Paper 10% more than plastic
Consumption of water	Paper 4 times as much as plastic
Emissions of greenhouse gases	Paper 3.3 times as much as plastic
Emission of acid rain gases	Paper 1.9 times as much as plastic
Eutrophication*	Paper 14 times as much as plastic

\* Eutrophication is the process of introducing excess nutrients such as phosphorous and nitrogen into water bodies thereby promoting the growth of plants and algae which lower the available dissolved oxygen.

The report, conducted by Ecobilan for Carrefours, concludes that plastic bags are more environmentally friendly than paper bags.

3. “Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks” prepared for The Council for Solid Waste Solutions by Franklin Associates, Ltd., 1990.

The following are key quotes from the Franklin Associates report:

Even paper bags made from 100% recycled fiber use more fossil fuels than plastic bags.

The manufacture of paper bags impacts significantly more than plastic bags on the global warming issue and on the acid rain issue.

For all environmental impacts related to air emissions, water emissions and solid waste ---paper bags are significantly greater than plastic bags.

The solid waste from paper bags disposed of in landfills, as compared to plastic bags, is more significant in both weight and volume.

The Franklin Associates report, like the other reports noted above, illustrates that plastic bags in many environmental reporting categories have fewer impacts than paper bags made from either virgin or recycled fibers.

4. “Life Cycle Inventory of Packaging Options For Shipment of Retail Mail-order Soft Goods”, Prepared For Oregon Dept. of Environmental Quality (DEQ) and U.S. EPA Environmentally Preferable Purchasing Program, by Franklin Associates, Ltd., 2004.

Although this study is not a grocery bag LCA, this LCA is instructional as it does compare plastic bag packaging with kraft paper bag packaging of packaging configurations that are of similar size to grocery bags. The following are key quotes from the Franklin Associates report:

The most critical factor influencing environmental burdens is the weight of packaging---more weight; more environmental burdens or impacts.

Compared to all types of packaging the unpadded LLDPE plastic bag had the lowest environments impacts---lowest energy used; lowest greenhouse gases; lowest solid waste.

Compared to the unpadded kraft bag, the unpadded LLDPE plastic bag had the lower environments impacts---lower energy used; lower greenhouse gases; lower solid waste.

Again, the study conducted by Franklin Associates illustrates that that plastic bag packaging has fewer environmental impacts across a number of environmental reporting categories than paper bag packaging.

It is clear that if plastic bags are replaced with either plastic bags made from compostable materials or paper bags made from various amounts of recycled fibers, there will be significant increases in environmental impacts on a per bag basis. The use of plastic and paper in the packaging industry has been studied for more than 20 years – and the results are consistent. The scientific data regarding the environmental impacts of paper bags show that paper has significant adverse environmental consequences in a number of impact categories when compared to plastic bags. The following are a few examples of environmental impacts that are worse when using paper instead of plastic in retail bags.

Global warming: Paper bags result in significantly higher greenhouse gas emissions than plastic bags, even though they are recyclable and often contain as much as 40% recycled materials. Compostable plastic bags result in significantly higher greenhouse gas emissions than plastic bags.

Use of fossil fuels: Although paper bags are made from a renewable resource and currently, plastic bags are made from fossil fuels (primarily natural gas), the amount of energy required to manufacture and transport paper bags is great enough to offset the differences based on resource use and cause an overall increase in fossil fuel use associated with paper bags. The energy required to manufacture and transport compostable plastic bags is also greater than that required for single-use recyclable plastic bags.

It should also be noted that the raw feedstock needed to make polyethylene is ethylene, a simple hydrocarbon molecule made up of carbon and hydrogen. Ethylene can be readily obtained by cracking hydrocarbons, but it can also be synthesized, or even obtained from biomass (plant matter). Because ethylene occurs naturally in plants, fruits and vegetables, work is currently underway to develop a commercially viable source for ethylene from plant

products such as sugar cane. See, e.g., <http://www.chalmers.se/chem/EN/centres/plus/research6483/ethylene-from-renewable>; <http://www.dow.com/commitments/studies/sugar.htm>; [http://www.ethanolproducer.com/article.jsp?article\\_id=4535](http://www.ethanolproducer.com/article.jsp?article_id=4535).

**Use of potable water:** The manufacturing of paper uses significant amounts of water, a critical resource which is fast becoming limited by a number of factors including climate change and population increases. The paper bag and compostable plastic bag consumption of water are significantly greater than that required for plastic bags. **Water pollution** Paper bag manufacturing releases far more water pollutants than plastic bags and are known to have significant local and regional impacts to waterways. **Solid waste** Paper bags and compostable plastic bags require more materials than do plastic bags and therefore will increase solid wastes.

**Acid rain:** The production of acid rain is recognized as a regional problem. It can affect streams, lakes, soils and the growth of trees. Paper bags and compostable bags generate more acid rain emissions than plastic bags. The level of impact associated with these emissions will vary depending on the location of manufacture.

**Use of natural resources:** Paper bags require the use of wood fiber that comes from a variety of sources including forests. Given the uncertainty of the effects from poor forest management and maintenance practices in different regions of the world, making more paper bags is counter to an objective of reducing the use of natural resources.

This review of a number of life cycle studies have examined the environmental impacts of paper and plastic grocery bags, and these studies all show that paper bags have considerably more environmental impacts than plastic bags. Global warming and water conservation are two of the most significant environmental concerns of our time. Life cycle studies by independent and government groups have shown that paper grocery bags and compostable plastic grocery bags have far greater impacts in terms of global warming and use of valuable water resources than plastic grocery bags.



**American Chemistry Council**  
**Shari M. Jackson, Director, Progressive Bag Affiliates**

***Response to Comment No.1***

The County of Los Angeles appreciates that the Progressive Bag Affiliates of the American Chemistry Council (ACC) took the time to review and provide comments on the Draft EIR in its July 16, 2010, letter. Comment No. 1 states that the EIR miscalculates and misrepresents the environmental impacts of a transition from plastic to paper carryout bags. Although it is the intention of the proposed ordinances to increase the use of reusable bags, the County of Los Angeles has made a good faith effort to thoroughly analyze and disclose the environmental impacts of the proposed ordinances under a worst-case scenario, both an 85-percent and 100-percent transition from plastic to paper carryout bags, throughout Section 3.0 of the EIR. A complete Initial Study was prepared evaluating all 17 environmental issues in the CEQA checklist. As a result of the Initial Study, as well as public input during the Initial Study and Notice of Preparation review period (scoping period), an EIR was prepared. The detailed and thorough EIR analysis did include evaluation of a number of environmental impacts, including water quality, GHG emissions, solid waste disposal, air quality, biological resources, electricity consumption, wastewater generation, and water consumption. The introductory comment also notes that mitigation measures are not included in the EIR. Potential indirect environmental impacts that may be caused by the proposed ordinances as a result of paper bag manufacturing cannot be mitigated due to the fact that the County of Los Angeles does not have jurisdiction over paper bag manufacturing facilities in other states or countries. Any cumulative GHG emission impacts as a result of an increased decomposition of paper carryout bags in landfills located in the County are controlled in accordance with applicable regional, State, and federal regulations.

In addition, the County is proposing Mitigation Measure GHG-1 (see Section 12.2), which includes implementing or expanding public outreach through a public education program that would aim to increase the percentage of paper carryout bags that are recycled in the County of Los Angeles, therefore reducing the amount of paper carryout bags that can be potentially littered. The County already has a public education program in place that encourages the curbside recycling of a number of items, including paper carryout bags.<sup>378</sup> Curbside recycling is a convenient free service to residents in the unincorporated areas of the County of Los Angeles, and paper carryout bags are universally accepted for recycling in the County of Los Angeles.

Additionally, the County of Los Angeles has analyzed four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper bag usage to the greatest extent feasible, the County of Los Angeles developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

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<sup>378</sup> County of Los Angeles Department of Public Works. Accessed 12 October 2010. "Outreach Programs." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and <http://dpw.lacounty.gov/epd/recycling/crm.cfm>

### **Response to Comment No. 2**

Comment No. 2 states that the EIR is not in compliance with the statutory requirements of CEQA. The County of Los Angeles has made a good faith effort to evaluate the environmental impacts of proposed ordinances in accordance with CEQA in light of available data and public input. Section 15151 of the State CEQA Guidelines states that “an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.” Comment No. 2 on the Draft EIR also asserts that its comment letter for the Draft EIR is incorporated by reference. However, ACC’s January 4, 2010, letter (“NOP letter”) was written before the Draft EIR was prepared, and in many respects is not relevant to the Draft EIR. All comments provided by the ACC during scoping were taken into consideration by the County of Los Angeles for preparation of the Draft EIR. At the end of these responses to comments received from the ACC on the Draft EIR, the County of Los Angeles has included a list of where each of the scoping comments provided by the ACC during the public review period for the Notice of Preparation and Initial Study were addressed in the Draft EIR.

### **Response to Comment No. 3**

Comment No. 3 states that the EIR fails to analyze the GHG emission impacts due to the life cycle of paper carryout bags. The County of Los Angeles has made a good faith effort to evaluate the potential GHG emission impacts due to the life cycle impacts of paper carryout bags, despite the limits of available comprehensive life cycle assessment data that quantifies a broad range of environmental impacts caused by all of the possible types of carryout bags and reusable bags that are used in the County of Los Angeles. Section 3.3.5 of the EIR analyzes in detail the GHG emission impacts based on a review of several life cycle assessments (LCA), including the Boustead Study,<sup>379</sup> the ExcelPlas Study,<sup>380</sup> and the Ecobilan Study.<sup>381</sup> An LCA assesses environmental impacts by analyzing the entire life cycle of a product, process, or activity, including extraction and processing of raw materials, manufacturing, transportation and distribution, use/reuse/maintenance, recycling, and final disposal. Each of these studies, in conducting the life cycle assessments for the bags at issue, do consider emissions due to production, manufacturing, transport, and disposal of paper carryout bags. Please see response to STPB’s Comment No. 6 for additional discussion regarding LCA studies.

The quantitative numbers from these LCA studies were then used to evaluate the impacts to GHG emissions resulting from the proposed ordinances. As disclosed in the EIR, for the purposes of this EIR and in the interest of being conservative in evaluating impacts resulting from a worst-case scenario, the County of Los Angeles assumed a larger number of plastic carryout bags used by affected stores in its impact analysis than were actually used in reality. It was assumed that each store currently uses approximately 10,000 plastic carryout bags per day. This number is likely very high, as it is more than twice the bag average reported by CalRecycle in 2008 for store affected by AB 2449.<sup>382</sup> In 2008, 4,700 stores statewide affected by AB 2449 reported an average of 4,695

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<sup>379</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

<sup>380</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>381</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>382</sup> Sturgess, Dona, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

bags used per store per day. While 10,000 plastic carryout bags per store per day may not accurately reflect the actual number of bags consumed per day on average per store in the County unincorporated and incorporated areas, for the purposes of this EIR, this number was used to conservatively evaluate GHG impacts resulting from a worst-case scenario. The County thereafter used this conservative number and evaluated the impacts that would result in Section 3.3.5 of the EIR, assuming yet again, from a conservative worst case scenario of 85- and 100-percent conversion from plastic to paper carryout bags. As explained in Section 3.3.5 of the EIR, it was conservatively determined that the life cycle impacts resulting from an 85- and 100-percent conversion from plastic to paper carryout bags may be cumulatively significant when considered in conjunction with all other related past, present, or reasonably foreseeable, probable future projects or activities.

The County of Los Angeles has made a good faith effort to ensure the accuracy of all calculations in the EIR, including for GHG impacts, and have attached Appendix C to the EIR, which shows the spreadsheet that was used for all calculations in the EIR. Any member of the public can review this spreadsheet to understand and verify how the calculations were done. Analysis in the Draft EIR utilized up-to-date and approved models to evaluate GHG emissions, including EMFAC 2007 and URBEMIS 2007.

Comment No. 3 also claims that the County of Los Angeles, “has conducted at best a partial estimate, and has failed to estimate all emissions from all sources.” The County of Los Angeles has made a good faith effort to thoroughly analyze and disclose the environmental impacts to GHG emission from the proposed ordinances. Section 15151 of the State CEQA Guidelines states that “an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.” The County of Los Angeles has complied with this requirement by taking the various LCA studies, including the Boustead Study,<sup>383</sup> the ExcelPlas Study,<sup>384</sup> and the Ecobilan Study<sup>385</sup> to calculate GHG emissions. These studies were provided to the County and a number of other local jurisdictions in California by members of the plastic bag industry. The County of Los Angeles, in good faith used these studies to conduct its analysis, including the Boustead Study that was actually funded and paid for by the commenter. As noted in the EIR, Boustead Consulting & Associates (Boustead) prepared an LCA on behalf of the Progressive Bag Affiliates in 2007. The Progressive Bag Alliance was founded in 2005 and is a group of American plastic carryout bag manufacturers who advocate recycling plastic shopping bags as an alternative to banning the bags. In 2007, they became the Progressive Bag Affiliates of the American Chemistry Council. Please also see response to STPB Comment No. 8 for additional discussion.

Comment No. 3 also objects to the EIR referencing the CIT Ekologik Study. This study was not relied upon for the environmental analysis in the EIR and was not used to guide the conclusions of the document. This study was referenced in the EIR to emphasize the wide variation of results of life cycle assessments and other studies depending on the study boundaries, inputs, and methodologies used. As the CIT Ekologik Study is not of key importance in the analysis in the EIR, it has been removed from the EIR by way of the Section 12.2.

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<sup>383</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

<sup>384</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>385</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

#### **Response to Comment No. 4**

Comment No. 4 states that the EIR should have evaluated the feasibility of mitigation measures that would be expected to reduce or avoid the cumulative GHG emission impacts due to the life cycle of paper carryout bags. Section 3.3.5 of the EIR analyzes the impacts of GHGs based on (1) potential indirect GHG emissions resulting from the life cycle assessments of carryout bags, (2) GHG emissions resulting from disposal of paper carryout bags in landfills, and (3) GHG emissions resulting from increased delivery trips. As discussed in Section 3.3.5, the County of Los Angeles, with respect to (1) and (2), in the interest of being conservative, and specific to this project only, conservatively determined that the life cycle impacts resulting from an 85- and 100-percent conversion from plastic to paper carryout bags may be cumulatively significant. However, with respect to GHG emissions resulting from increased vehicle trips, the County of Los Angeles found a less than significant cumulative impact.

As described in Section 3.3.6 of the EIR, the indirect cumulative impacts to GHG emissions from the proposed ordinances that may result from a potential increase in paper carryout bag manufacturing are subject to the regulatory oversight authority in the location where manufacturing occurs, if any. With respect to paper carryout bag manufacturing, it appears that there are no paper carryout bag manufacturing facilities located within the County of Los Angeles unincorporated and incorporated areas, and the County of Los Angeles does not have the ability to control or regulate GHG emissions from bag manufacturing facilities outside of its jurisdiction. The majority of paper carryout bags supplied to the greater Los Angeles metropolitan area are produced in and delivered from states outside of California,<sup>386</sup> or from countries outside of the United States, such as Canada.<sup>387</sup> GHG emissions from any paper carryout bag manufacturing facilities affected by the proposed ordinances will be controlled by the owners of the facilities in accordance with any applicable regional, State, and federal regulations pertaining to GHG emissions, if any. CEQA confers no independent grant of authority to impose mitigation measures on a project. When imposing measures to mitigate a project's significant environmental effects, a public agency may exercise only powers provided by legal authority independent of CEQA. Under Public Resources Code §21004 and 14 California Code of Regulations §15040, mitigation measures that are beyond the powers conferred by law on lead and responsible agencies are legally infeasible. The County of Los Angeles is not required to propose or analyze a mitigation measure that cannot legally be imposed.

Similarly, indirect cumulative impacts to GHG emissions from the proposed ordinances may result from carryout bag degradation in Los Angeles area landfills, but emissions from landfills would be subject to local air district permits and other regulations. GHG emissions from landfills located in the County are already heavily controlled in accordance with applicable regional, State, and federal regulations pertaining to GHG emissions. The County does not have the ability to control or regulate GHG emissions from landfills. Any potential increases in GHG emissions due to decomposition of paper carryout bags in landfills in the County will be controlled by AVAQMD Rule 1150.1 or SCAQMD Rule 1150.1, as well as the new state requirements that regulate methane emissions from landfills in accordance with the goals of Assembly Bill 32.<sup>388</sup> Again,

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<sup>386</sup> Watt, Stephanie, Sapphos Environmental, Inc., Santa Monica, CA. 15 July 2009. Telephone communication with Ms. Carol Trout, Customer Service Department, Duro Bag Manufacturing Company, Florence, KY.

<sup>387</sup> National Council for Air and Stream Improvement. 5 February 2010. *Life Cycle Assessment of Unbleached Paper Grocery Bags*. Prepared for: American Forest and Paper Association and Forest Product Association of Canada.

<sup>388</sup> California Environmental Protection Agency Air Resources Board. 17 June 2010. "Methane Emissions from Municipal Solid Waste Landfills." Available at: <http://www.arb.ca.gov/regact/2009/landfills09/landfillfinalfro.pdf>

CEQA confers no independent grant of authority to impose mitigation measures on a project. When imposing measures to mitigate a project's significant environmental effects, a public agency may exercise only powers provided by legal authority independent of CEQA. Under Public Resources Code §21004 and 14 California Code of Regulations §15040, mitigation measures that are beyond the powers conferred by law on lead and responsible agencies are legally infeasible. The County of Los Angeles is not required to propose or analyze a mitigation measure that cannot legally be imposed. The County of Los Angeles does acknowledge however, that it already has a public education program in place that encourages the curbside recycling of a number of items, including paper carryout bags.<sup>389</sup> This current public education program could assist with increasing the percentage of paper carryout bags that are recycled within the County. There is nearly universal access to curbside recycling throughout the County of Los Angeles, where paper bags can be recycled by homeowners conveniently. Continued public education and outreach would increase the number of bags recycled and consequently reduce the number of carryout bags being disposed of in landfills.

The cumulative contribution resulting from conversion from plastic to paper carryout bags has been established as a reasonable worst-case scenario for the purposes of the analysis in the EIR. The County of Los Angeles has consulted with the responsible agencies for air quality and circulated the Draft EIR to them, including SCAQMD, AVAQMD, and the CARB, and has not yet received any recommendations to mitigate the cumulative impacts to GHG emissions from manufacturing or disposal of paper carryout bags. It is also important to note that recent revisions to CEQA and the CEQA Guidelines discuss the speculative nature of life cycle analysis, especially for GHGs, and note generally that

No existing regulatory definition of "lifecycle" exists....Moreover, even if a standard definition of the term "lifecycle" existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered "indirect effects" of a project as that term is defined in section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials.<sup>390</sup> CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be "caused by" the project under consideration.<sup>391</sup>

The County of Los Angeles did however, evaluate four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related

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<sup>389</sup> County of Los Angeles Department of Public Works. Accessed 12 October 2010. "Outreach Programs." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and <http://dpw.lacounty.gov/epd/recycling/crm.cfm>

<sup>390</sup> California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

<sup>391</sup> California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

impacts from a shift to paper bag usage to the greatest extent feasible, the County developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see the Clarifications and Revisions to the Draft EIR, Section 12.2). The Alternatives include provisions consistent with mitigation suggested by this commenter.

In addition, wherever the EIR identifies a potential significant impact from life cycle emissions, including “end of life” GHG emissions, the Final EIR recommends the adoption of mitigation measure GHG-1 (see Section 12.2). Although the measures contained within mitigation measure GHG-1 will help offset GHG emissions, they may not mitigate them to below the level of significance.

**Mitigation Measure MM-GHG-1**

Implement and/or expand public outreach and educational programs to increase the percentage of paper carryout bags that are recycled curbside.

If the adopted ordinance includes a fee or charge on the issuance of paper carryout bags of at least \$0.05, consider increases to the fee or charge to further reduce consumption of paper carryout bags.

Distribute reusable grocery bags, free of charge within the project area to encourage further transitions to reusable bags. Consider public/private partnerships to offset costs of distribution.

Implement an outreach program for affected stores to encourage consumer transition to reusable bags, to reduce double bagging, and to encourage reuse and in-store recycling of paper carryout bags.

Encourage grocery stores to implement energy efficiency technology particularly in relation to storage of cold and frozen foods (assuming a reduction of 0.65 metric ton carbon dioxide equivalent for each megawatt hour saved<sup>392</sup>).

Consider converting public vehicles to low-emitting fuels (assuming a reduction of 0.45 metric ton carbon dioxide equivalent for each 1,000 vehicle miles traveled<sup>393</sup>). Consider funding conversion of vehicles through participation in South Coast Air Quality Management District’s Carl Moyer Program.

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<sup>392</sup> Emission factors taken from <http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results>

<sup>393</sup> Emission factors taken from <http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results>

With respect to GHG emissions resulting from increased vehicle trips, the County of Los Angeles found a less than significant cumulative impact. CEQA does not require mitigation measures for less than significant impacts.

### **Response to Comment No. 5**

Comment No. 5 states that the EIR should include recommended mitigation measures to avoid or reduce GHG emission impacts due to the transportation of raw materials to make paper bags, trucking the bags to their use destination and landfill, and decomposition of paper bags in landfills. Please see response to Comment No. 4. With respect to GHG emission impacts due to transportation of raw materials to make paper bags, it is important to note that recent revisions to CEQA and the CEQA Guidelines discuss the speculative nature of life cycle analysis, especially for GHGs, and note generally that

No existing regulatory definition of "lifecycle" exists....Moreover, even if a standard definition of the term "lifecycle" existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered "indirect effects" of a project as that term is defined in section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials.<sup>394</sup> CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be "caused by" the project under consideration.<sup>395</sup>

Section 3.3.5 of the EIR does evaluate GHG emission impacts due to increased transportation of paper carryout bags to stores, and concludes that these impacts are not significant and therefore do not require mitigation. Section 3.3.5 of the EIR also uses life cycle analyses analysis to evaluate GHG emissions due to end-of-life, which includes transportation of paper carryout bags to landfills, and decomposition of paper carryout bags in landfills. Any emissions resulting from truck trips transporting paper carryout bag waste to landfills in the County are currently controlled by regional and State regulations. For example, CARB's Solid Waste Collection Vehicle Rule also requires owners of refuse collection vehicles to use best available control technology that has been verified by CARB to reduce vehicle emissions. In addition, SCAQMD Rule 1193, Clean On-road Residential and Commercial Refuse Collection Vehicles, requires all public and private solid-waste collection fleets within the jurisdiction of the SCAQMD to acquire alternative-fuel refuse collection vehicles when procuring or leasing these vehicles. SCAQMD Rule 1193 applies to governmental agencies and private entities that operate solid-waste collection fleets with 15 or more solid-waste collection vehicles. Finally, the County is also controlling for emissions by requiring in its new refuse agreements that alternative-fuel refuse vehicles be used.<sup>396,397,398,399</sup> GHG emissions from

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<sup>394</sup> California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

<sup>395</sup> California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

<sup>396</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award of Contract for Walnut Park Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54560.pdf>

landfills located in the County of Los Angeles are already controlled in accordance with applicable regional, State, and federal regulations pertaining to GHG emissions. The County of Los Angeles does not have the ability to control or regulate GHG emissions from landfills that are outside of the County of Los Angeles's jurisdiction. Any potential increases in GHG emissions due to decomposition of paper carryout bags in landfills in the County of Los Angeles will be controlled by AVAQMD Rule 1150.1 or SCAQMD Rule 1150.1. Therefore, the impacts to GHG emissions resulting from decomposition of paper carryout bags in landfills could not be feasibly mitigated and may have the potential to remain cumulatively considerable. The County of Los Angeles has also evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper bag usage to the greatest extent feasible, the County of Los Angeles developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

In addition, the County of Los Angeles is proposing Mitigation Measure GHG-1 (see Section 12.2 and response to Comment No. 4 above). Part of mitigation measure GHG-1 includes implementing and/or expanding a public education program that could assist with increasing the percentage of paper carryout bags that are recycled within the County of Los Angeles. The County of Los Angeles acknowledges that it already has a public education program in place that encourages the curbside recycling of a number of items, including paper carryout bags.<sup>400</sup> There is nearly universal access to curbside recycling throughout the County of Los Angeles, where paper bags can be recycled by homeowners conveniently. Continued public education and outreach would increase the number of bags recycled and consequently reduce the number of carryout bags being manufactured, transported, and disposed of in landfills.

### **Response to Comment No. 6**

Comment No. 6 states that mitigation measures that could be used to reduce the potential impacts of the proposed ordinances could include banning or placing a fee on the issuance of paper carryout bags. Rather than evaluating these options as mitigation measures, the County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected

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<sup>397</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award of Contract for Athens/Woodcrest/Olivita Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54567.pdf>

<sup>398</sup> County of Los Angeles, Department of Public Works. 11 May 2010. *Award the Contract for Firestone Garbage Disposal District*. Available at: <http://file.lacounty.gov/bos/supdocs/54559.pdf>

<sup>399</sup> County of Los Angeles, Department of Public Works. 19 January 2010. *Award of Contract for an Exclusive Franchise Agreement to Valley Vista Services, Inc. for the Unincorporated Area of Hacienda Heights*. Available at: <http://file.lacounty.gov/bos/supdocs/52931.pdf>

<sup>400</sup> County of Los Angeles Department of Public Works. Accessed 12 October 2010. "Outreach Programs." Web site. Available at: <http://dpw.lacounty.gov/epd/recycling/outreach.cfm> and <http://dpw.lacounty.gov/epd/recycling/crm.cfm>



to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper bag usage to the greatest extent feasible, the County developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). In addition, the County is proposing Mitigation Measure GHG-1 (see Section 12.2 and response to Comment No. 4).

### **Response to Comment No. 7**

Comment No. 7 notes that reusable bags may pose a health risk if not adequately laundered. Although CEQA does not require analysis of health impacts, the EIR addresses potential health concerns related to reusable bags. As discussed in Section ES.3 and as is the case for any reusable household item that comes in contact with food items, such as chopping boards, countertops, tableware, or table linens, reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly. If reusable bags are made of cloth or fabric, they can be machine washable. If reusable bags are made of durable plastic, they can be rinsed or wiped clean. Further, to control for any possible public health issues, the County of Los Angeles is proposing that the proposed ordinances will require that the material used in such bags be machine washable.

Health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps, such as washing and disinfecting the bags, using them only for groceries and using separate bags for raw meat products, being careful with where they are stored, and allowing bags to dry before folding and storing.<sup>401</sup> A representative of the County of Los Angeles Department of Public Health, the County department charged with protecting and improving the health of Los Angeles County residents, has stated that the public health risks of reusable bags are minimal.<sup>402</sup> Further, as discussed in Section 2.2.4 of the EIR, the City and County of San Francisco, since enacting a plastic bag ban in 2007, have not reported negative public health issues related to the increased use of reusable bags.<sup>403</sup> A recent 2010 University of Arizona study indicates, which is consistent with the County's discussion in Section ES.3 of the EIR, that any risk is minimized if proper care is taken. Indeed, the study found that washing the reusable bags, either by hand or machine, cut bacterial contamination by more than 99.9 percent.<sup>404</sup>

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<sup>401</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>402</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>403</sup> Galbreath, Rick, County of San Francisco, California. 10 May 2010. Telephone conversation with Angelica SantaMaría, County of Los Angeles, Department of Public Works, Alhambra, California.

<sup>404</sup> Gerba, Charles P., David Williams, and Ryan G. Sinclair. 8 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

Comment No. 7 suggests that a mitigation measure for this potential impact could include a comprehensive education campaign to make sure people properly and frequently wash their reusable bags. Although health impacts from reusable bags were not determined to constitute a significant impact under CEQA, this comment, like all comments, is noted for the record and the County of Los Angeles will consider the suggestion to include a public education program to encourage consumers to wash their reusable bags in the decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

### **Response to Comment No. 8**

Comment No. 8 notes that an increase in laundering of reusable bags would result in environmental impacts due to water use, energy use, and detergent use. There is no substantial evidence to suggest that this impact would constitute a significant environmental impact that would require the consideration of mitigation measures. It is likely that consumers will wash their reusable bags along with the rest of their laundry, and it is unlikely that the need to wash reusable bags will cause the average consumer to have to do additional loads of laundry. Additionally, all wastewater that enters the sewer pipeline in Los Angeles County is treated to a secondary treatment at a minimum, thus reducing any potentially adverse impacts on the natural environment.<sup>405</sup>

Comment No. 8 also suggests that the County of Los Angeles impose a fee on reusable bags as a mitigation measure to reduce environmental impacts of reusable bags. The environmental impacts of reusable bags were determined to be below the level of significance as studied throughout the EIR, and therefore would not require mitigation. The EIR concludes that life cycle impacts due to reusable bags are less than impacts due to plastic carryout bags, which is supported by numerous studies referenced in the EIR;<sup>406,407,408,409,410,411,412</sup> therefore, a switch from the use of plastic carryout bags to the use of reusable bags would result in a decrease in environmental impacts compared to existing conditions, or in other words, a beneficial impact.

### **Response to Comment No. 9**

Comment No. 9 states that the County of Los Angeles could purchase GHG emission offsets like carbon credits "in an effort to reduce the impact of industrially generated GHGs, and a similar approach may be applicable here." Carbon offsets are considered at this time to be infeasible for this particular proposed project. Payment of an infinite number of carbon offsets for a potentially unlimited amount of time lacks a sufficient legal nexus (i.e., results from a highly attenuated GHG

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<sup>405</sup> Sanitation Districts of Los Angeles County. Accessed 15 October 2010. "Wastewater Treatment and Water Reclamation." Available at: [http://www.lacsd.org/about/wastewater\\_facilities/moresanj/default.asp](http://www.lacsd.org/about/wastewater_facilities/moresanj/default.asp)

<sup>406</sup> Nolan-Itu Pty. Ltd. 2002. *Plastic Shopping Bags – Analysis of Levies and Environmental Impacts*. Prepared for: Department of the Environment, Water, and Heritage: Canberra, AU.

<sup>407</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>408</sup> Marlet, C., EuroCommerce. September 2004. *The Use of LCAs on Plastic Bags in an IPP Context*. Brussels, Belgium.

<sup>409</sup> The ULS Report. 1 June 2007. *Review of Life Cycle Data Relating to Disposable Compostable Biodegradable, and Reusable Grocery Bags*. Rochester, MI.

<sup>410</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>411</sup> Herrera et al. January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

<sup>412</sup> Marlet, C., EuroCommerce. September 2004. *The Use of LCAs on Plastic Bags in an IPP Context*. Brussels, Belgium.

source not directly attributable to the County and the cities), and is more appropriately considered when specific project-level details are known for the manufacturing facilities and disposal facilities. As noted in response to Comment No. 8 to the July 16, 2010, comment letter from STPB, and provided in the Natural Resource Agency's Statement of Reasons for revisions to the CEQA Guidelines,<sup>413</sup> "In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be 'caused by' the project under consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the manufacturing process. Mitigation can only be required for emissions that are actually caused by the project (State CEQA Guidelines, § 15126.4(a)(4))."<sup>414</sup>

Furthermore, the County of Los Angeles believes that imposition of carbon offset fees would be infeasible for policy considerations, economic reasons, and would fail to meet the project objectives. There are still outstanding policy concerns regarding carbon offsets and their approach and effectiveness.<sup>415,416,417,418,419,420,421</sup> As for economic reasons, imposition of carbon offset fees could deter future adoption of the recommended ordinances or alternatives by the incorporated cities within the County of Los Angeles, especially given the tough economic circumstances many cities and the County of Los Angeles are currently facing,<sup>422,423,424,425,426,427</sup> and would therefore not

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<sup>413</sup> California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

<sup>414</sup> California Natural Resources Agency. December 2009. Final Statement of Reasons for Regulatory Action. Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. Available at: [http://ceres.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)

<sup>415</sup> Mitchell, Dan. Article in The New York Times. May 5, 2007. How Clean Is Your Carbon Credit? Available at: <http://www.nytimes.com/2007/05/05/business/05online.html>

<sup>416</sup> Revkin, Andrew. Article in The New York Times. April 29, 2007. Carbon-neutral Is Hip, but Is It Green? Available at: <http://www.nytimes.com/2007/04/29/weekinreview/29revkin.html?ex=1335499200&en=d9e2407e4f1a20f0&ei=5124>

<sup>417</sup> Davies, Nick. Article in The Guardian. June 16, 2007. The Inconvenient Truth about the Carbon Offset Industry. Available at: <http://www.guardian.co.uk/environment/2007/jun/16/climatechange.climatechange>

<sup>418</sup> Kaste, Martin. National Public Radio. November 28, 2006. 'Carbon Offset' Business Takes Root. Available at: <http://www.npr.org/templates/story/story.php?storyId=6548098>

<sup>419</sup> Monbiot, George. Published in the Guardian. October 18, 2006. Selling Indulgences. Available at: <http://www.monbiot.com/archives/2006/10/19/selling-indulgences/>

<sup>420</sup> David Suzuki Foundation. Accessed October 25, 2010. The problems with carbon offsets from tree-planting. Available at: <http://www.davidsuzuki.org/issues/climate-change/science/the-problems-with-carbon-offsets-from-tree-planting/>

<sup>421</sup> Granda, Patricia. Acción Ecológica. 2005. Carbon Sink Plantations in the Ecuadorian Andes. Available at: <http://www.wrm.org.uy/countries/Ecuador/face.pdf>

<sup>422</sup> CBS Evening News. March 26, 2010. City, State Budgets Crippled Nationwide. Available at: <http://www.cbsnews.com/stories/2010/03/26/eveningnews/main6336699.shtml>

<sup>423</sup> Luhby, Tami. CNN Money. October 6, 2010. City budgets slammed by falling property taxes. Available at: [http://money.cnn.com/2010/10/06/news/economy/cities\\_property\\_taxes/index.htm](http://money.cnn.com/2010/10/06/news/economy/cities_property_taxes/index.htm)

<sup>424</sup> Dougherty, Conor. The Wall Street Journal. Cities, May 25, 2010. States, Still Grappling with Budget Woes. Available at: <http://online.wsj.com/article/SB10001424052748704792104575264772303847934.html>

<sup>425</sup> Riccardi, Nicholas. Los Angeles Times. October 7, 2010. Cities' budgets squeezed by housing crunch. Available at: <http://articles.latimes.com/2010/oct/07/nation/la-na-league-20101007>

<sup>426</sup> Semuels, Alana. Los Angeles Times. October 18, 2010. California Cities are Lowering Standards to Raise Revenue. Available at: <http://www.latimes.com/business/la-fi-desperate-cities-20101018,0,7536692.story>

<sup>427</sup> County of Los Angeles Chief Executive Office. August 5, 2010. Sacramento Update. Available at: [http://file.lacounty.gov/bc/q3\\_2010/cms1\\_150053.pdf#search="shortfall](http://file.lacounty.gov/bc/q3_2010/cms1_150053.pdf#search=)

meet the project objectives of: (1) conducting outreach to all 88 incorporated cities of the County to encourage adoption of comparable ordinances, (2) reduce the Countywide consumption of plastic carryout bags from the estimated 1,600 plastic carryout bags per household in 2007, to fewer than 800 plastic bags per household in 2013, (3) reduce the Countywide contribution of plastic carryout bags to litter that blights public spaces Countywide by 50 percent by 2013, (4) reduce the County's, Cities', and Flood Control District's costs for prevention, clean-up, and enforcement efforts to reduce litter in the County by \$4 million, (5) substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and reach at least 50,000 residents (5 percent of the population) with an environmental awareness message, (6) reduce Countywide disposal of plastic carryout bags in landfills by 50 percent from 2007 annual amounts.

There is currently no adopted federal GHG emissions trading scheme that would require the County of Los Angeles to purchase carbon credits to offset their emissions. However, the County of Los Angeles will consider this suggestion during the decision-making process for the proposed County of Los Angeles ordinance. As noted previously, the County of Los Angeles has evaluated five alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. In addition, the County is proposing mitigation measure GHG-1 (see Section 12.2, and response to Comment No. 4).

### **Response to Comment No. 10**

Comment No. 10 states that the EIR should consider mitigation measures for GHG emissions in light of the CEQA court case, *Communities for a Better Environment vs. City of Richmond*, 184 Cal. App. 4th 70 (April 26, 2010). This case is completely distinguishable factually from the proposed ordinances and EIR currently being considered by the County of Los Angeles. The proposed project being considered in *Communities for a Better Environment vs. City of Richmond* is distinctly different from the proposed ordinances as it involves expansion of an oil refinery, which would have the potential to result in significant direct impacts to GHG emissions. The proposed ordinances would not result in any direct impacts to GHG emissions, as they would not directly result in any construction activities or the expansion of existing facilities. Even in the case of indirect GHG emissions, in the interest of being conservative, and specific to this project only, the County of Los Angeles conservatively determined that the life cycle impacts resulting from an 85- and 100-percent conversion from plastic to paper carryout bags may be cumulatively significant. The County of Los Angeles has also evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper bag usage to the greatest extent feasible, the County also developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). Provisions in these alternatives are consistent with mitigation suggested by this commenter, including the use of bag fees to reduce life

cycle impacts. In addition, the County of Los Angeles is proposing mitigation measure GHG-1 (see the Section 12.2, and response to Comment No. 4).

### **Response to Comment No. 11**

Comment No. 11 objects to the statement in Section ES.3 of the EIR that reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly. Studies that have documented bacteria in reusable bags, including two of the references provided by this comment letter, have noted that laundering the bags minimizes the risk of cross-contamination of foods.<sup>428,429</sup> As discussed in Section ES.3 and as is the case for any reusable household item that comes in contact with food items, such as chopping boards, countertops, tableware, or table linens, reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly. If reusable bags are made of cloth or fabric, they can be machine washable. If reusable bags are made of durable plastic, they can be rinsed or wiped clean. Further, to control for any possible public health issues, the County of Los Angeles is proposing that the proposed ordinances require that the material used in such bags be machine washable.

Health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps, such as washing and disinfecting the bags, using them only for groceries and using separate bags for raw meat products, being careful with where they are stored, and allowing bags to dry before folding and storing.<sup>430</sup> A representative of the County of Los Angeles Department of Public Health, which is charged with protecting and improving the health of Los Angeles County residents, has stated that the public health risks of reusable bags are minimal.<sup>431</sup> Further, as discussed in Section 2.2.4 of the EIR, the City and County of San Francisco, since enacting a plastic bag ban in 2007, have not reported negative public health issues related to the increased use of reusable bags.<sup>432</sup> A recent 2010 University of Arizona study indicates, which is consistent with the County's discussion in Section ES.3 of the EIR, that any risk is minimized if proper care is taken. Indeed, the study found that washing the reusable bags, either by hand or machine, cut bacterial contamination by more than 99.9 percent.<sup>433</sup>

Although CEQA does not require analysis of public health impacts, these references have been added to Section ES.3 of the EIR (see Section 12.2).

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<sup>428</sup> Health Canada. Food Safety Tips for Reusable Grocery Bags and Bins. Accessed September 7, 2010. Available at: <http://www.hc-sc.gc.ca/fn-an/securit/kitchen-cuisine/reusable-bags-sacs-reutilisables-eng.php>

<sup>429</sup> Charles P. Gerba, David Williams, and Ryan G. Sinclair. 8 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

<sup>430</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>431</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>432</sup> Galbreath, Rick, County of San Francisco, California. 10 May 2010. Telephone conversation with Angelica SantaMaría, County of Los Angeles, Department of Public Works, Alhambra, California.

<sup>433</sup> Charles P. Gerba, David Williams, and Ryan G. Sinclair. 8 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

### **Response to Comment No. 12**

Comment No. 12 objects to the fact that the EIR used a telephone conversation with the San Francisco County Board of Health as evidence that reusable bags do not pose a significant health risk. Section 15086 of the State CEQA Guidelines states that during preparation of a Draft EIR, a lead agency may consult directly with “any person who has special expertise with respect to any environmental impact involved.”

### **Response to Comment No. 13**

Comment No. 13 asserts that the EIR should discuss the hygiene impacts of reusable bags that have not been cleaned. Although CEQA does not require analysis of health impacts, Section ES.3 of the EIR notes that a representative of the County of Los Angeles Department of Public Health has stated that the public health risks of reusable bags are minimal.<sup>434</sup> The EIR addresses potential health concerns related to reusable bags. As discussed in Section ES.3 and as is the case for any reusable household item that comes in contact with food items, such as chopping boards, countertops, tableware, or table linens, reusable bags do not pose a serious public health risk if consumers care for the bags accordingly and/or clean the bags regularly. If reusable bags are made of cloth or fabric, they can be machine washable. If reusable bags are made of durable plastic, they can be rinsed or wiped clean. Further, to control for any possible public health issues, the County of Los Angeles is proposing that the proposed ordinances require that the material used in such bags be machine washable.

Health risks, if any, from reusable bags can be minimized if the consumer takes appropriate steps, such as washing and disinfecting the bags, using them only for groceries and using separate bags for raw meat products, being careful with where they are stored, and allowing bags to dry before folding and storing.<sup>435</sup> A representative of the County of Los Angeles Department of Public Health, which is charged with protecting and improving the health of Los Angeles County residents, has stated that the public health risks of reusable bags are minimal.<sup>436</sup> Further, as discussed in Section 2.2.4 of the EIR, the City and County of San Francisco, since enacting a plastic bag ban in 2007, have not reported negative public health issues related to the increased use of reusable bags.<sup>437</sup> The same study that commenter cites, the 2010 University of Arizona study, is indeed consistent with the County’s discussion in Section ES.3 of the EIR that any risk is minimized if proper care is taken. Indeed, the study found that washing the reusable bags, either by hand or machine, cut bacterial contamination by more than 99.9 percent.<sup>438</sup> The claim in Comment No. 13 that a majority of consumers do not wash their reusable bags is noted for the record, and the County of

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<sup>434</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>435</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>436</sup> Dragan, James, County of Los Angeles, Department of Public Health, Los Angeles, CA. 17 March 2010 to 9 April 2010. E-mail correspondence with Nilda Gemeniano, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>437</sup> Galbreath, Rick, County of San Francisco, California. 10 May 2010. Telephone conversation with Angelica SantaMaría, County of Los Angeles, Department of Public Works, Alhambra, California

<sup>438</sup> Charles P. Gerba, David Williams, and Ryan G. Sinclair. 8 June 2010. *Assessment of the Potential for Cross Contamination of Food Products by Reusable Shopping Bags*.

Los Angeles Board of Supervisors will consider food cross-contamination risks during the decision-making process for the proposed ordinances.

#### **Response to Comment No. 14**

Comment No. 14 states that the propensity for reusable bags to sustain bacteria could increase the potential for health risks, especially if the food is contaminated with salmonella, *E. coli*, or other food borne pathogens. However, the reference provided under Comment No. 11 (the 2010 University of Arizona study), which documents the presence of bacteria in reusable bags, also notes that salmonella and *E. coli* were not found to be present in any of the reusable bags tested.<sup>439</sup> Although CEQA does not require analysis of health risks or impacts, the County of Los Angeles Board of Supervisors will consider risks for cross-contamination of foods during the decision-making process for the proposed ordinances. Please also see response to Comment No. 11 and response to Comment No. 13.

#### **Response to Comment No. 15**

Comment No. 14 states that a phone call to a County of Los Angeles employee is not a sufficient reference to document that health risks posed by reusable bags are not a significant concern. Section 15086 of the State CEQA Guidelines states that during preparation of a Draft EIR, a lead agency may consult directly with “any person who has special expertise with respect to any environmental impact involved.” Although CEQA does not require analysis of health risks, the County of Los Angeles Board of Supervisors will consider food cross-contamination risks during its decision-making process for the proposed ordinances. Please also see response to Comment No. 11 and response to Comment No. 13.

#### **Response to Comment No. 16**

Comment No. 16 states that the EIR fails to analyze that an increase in laundering of reusable bags would result in environmental impacts due to water use, energy use, and detergent use. As Comment No. 16 notes, there is no study available that assesses these suggested possible impacts of increased use of reusable bags. There is no substantial evidence to suggest that this impact would constitute a significant environmental impact that would require the consideration of mitigation measures. It is likely that consumers will wash their reusable bags along with the rest of their laundry, and it is unlikely that the need to wash reusable bags will cause the average consumer to have to do additional loads of laundry. Additionally, wastewater that enters the sewer pipeline in Los Angeles County is treated to a secondary treatment at a minimum, thus reducing any potentially adverse impacts on the natural environment.<sup>440</sup>

The commenter also claims that the Draft EIR does not include projected increases in reusable bag use. Throughout Section 3.0 of the EIR, environmental impacts are analyzed based on a worst-case scenario where all plastic carryout bags currently used in the County of Los Angeles would be replaced by a 100-percent conversion to paper carryout bags and that there would be no increase in use of reusable bags. The County of Los Angeles does anticipate, however, that the proposed ordinances would result in an increase in the use of reusable bags, and therefore has also evaluated

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<sup>439</sup> The Carrier Bag Consortium. 21 April 2009. *Grocery Carry Bag Sanitation. A Microbiological Study of Reusable Bags and “First or Single-use” Plastic Bags.*

<sup>440</sup> Sanitation Districts of Los Angeles County. Accessed October 15, 2010. Wastewater Treatment and Water Reclamation. Available at: [http://www.lacsd.org/about/wastewater\\_facilities/moresanj/default.asp](http://www.lacsd.org/about/wastewater_facilities/moresanj/default.asp)

the proposed ordinances based on an alternative outcome that would result in at least a 15-percent use in reusable bags, for an 85 percent conversion to paper bags. This 15-percent conversion to reusable bags is based on a survey conducted by Sapphos Environmental, Inc. (Appendix A to the EIR). This survey observed that reusable bags made up approximately 18 percent of the total number of carryout bags used in stores that did not make plastic carryout bags readily available to customers (referred to as nontraditional stores for the purposes of the study); however, reusable bags made up only approximately 2 percent of the total number of bags used in stores that did make plastic carryout bags readily available (referred to as traditional stores) (Appendix A to the EIR). The 18 percent of reusable bags used by nontraditional store customers could be indicative of the approximate percentage of consumers that might be expected to shift to the use of reusable bags should the proposed ordinances be implemented in the County, as the proposed ordinances would ban the issuance of plastic carryout bags and would include an environmental awareness campaign to encourage the use of reusable bags. After implementation of the proposed ordinances, all of the affected stores would be in a similar situation to the nontraditional stores evaluated in the study, as they would not be permitted to distribute plastic carryout bags to customers. Therefore, it is reasonable to estimate that a ban on the issuance of plastic carryout bags would increase the number of reusable bags used by customers by approximately 15 percent.

### **Response to Comment No. 17**

Comment No. 17 states that the EIR does not allow for a determination of whether the expansion of reusable bag use will be beneficial or detrimental to the environment. Many studies that evaluate the environmental impacts of different types of reusable bags were taken into consideration during preparation of the EIR. The overall conclusion of these studies is that reusable bags can be expected to have lower environmental impacts than plastic bags because they can be used multiple times.<sup>441,442,443,444,445,446,447</sup> This conclusion is consistent with the Master Environmental Assessment on single-use and reusable bags that was prepared to assist counties and cities evaluate environmental impacts of plastic carryout bag bans.<sup>448</sup> The County of Los Angeles also notes that the environmental impacts of reusable bags are discussed throughout Section 3.0 of the EIR, including the consumption of nonrenewable energy (Section 3.5.4), emissions of greenhouse gases (Section 3.3.5), consumption of water (Section 3.5.4), generation of acidic atmospheric pollutants (Section 3.1.4), air quality (Section 3.1.4), water pollution (Section 3.4.4), and solid waste (Section 3.5.4).

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<sup>441</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France. of the Environment, Water, and Heritage: Canberra, Australia.

<sup>442</sup> Nolan-Itu Pty. Ltd. 2002. *Plastic Shopping Bags – Analysis of Levies and Environmental Impacts*. Prepared for: Department

<sup>443</sup> Marlet, C., EuroCommerce. September 2004. *The Use of LCAs on Plastic Bags in an IPP Context*. Brussels, Belgium.

<sup>444</sup> The ULS Report. 1 June 2007. *Review of Life Cycle Data Relating to Disposable Compostable Biodegradable, and Reusable Grocery Bags*. Rochester, MI.

<sup>445</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

<sup>446</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>447</sup> Herrera et al. January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

<sup>448</sup> Green Cities California. March 2010. *Master Environmental Assessment on Single-Use and Reusable Bags*. Prepared by ICF International. San Francisco, CA.



The Hyder Study, which was used as a reference throughout the EIR, evaluated the life cycle impacts of several different types of bags and concludes that a polypropylene reusable bag that is used 104 times results in significantly lower overall environmental impacts than the impacts resulting from paper and plastic carryout bags (Table 13-2).<sup>449</sup> The Hyder Study also evaluated reusable calico (cotton) bags, and determined that although life cycle water use impacts would be greater than for other types of bags, the calico reusable bag outperforms carryout bags in all other environmental categories: material consumption, global warming, energy consumption, litter marine biodiversity, and litter aesthetics (Table 13-2).

Therefore, overall environmental impacts due to the life cycle of a reusable bag would be expected to be significantly lower than the overall environmental impacts of a plastic or paper carryout bag when considered on a per-use basis, and any conversion from the use of plastic carryout bags to reusable bags would be reasonably expected to result in an environmental benefit.

Further, if it were to be assumed, under a worst-case scenario, that the environmental impacts of reusable bags were equivalent to the impacts of paper carryout bags, the environmental impacts would equal those analyzed in the scenarios that evaluate a 100-percent conversion from plastic to paper carryout bags throughout the EIR.

#### **Response to Comment No. 18**

Comment No. 18 states that the air quality impacts of the proposed ordinances were based on the Ecobilan Study, which includes energy assumptions that are particular to France. The County of Los Angeles is aware of this, and acknowledged the limitations of the Ecobilan Study, as well as the limitations of the other life cycle assessments that were analyzed during preparation of the EIR, as discussed in Section 3.1.4 of the EIR. There is no comprehensive available life cycle assessment available that quantifies a broad range of environmental impacts caused by carryout bags and reusable bags that is specific to conditions in California. The County of Los Angeles has made a good faith effort to analyze available data and studies, and noted the limitations of the studies used. The County of Los Angeles, in an effort to be thorough and reflect the studies available, also used the Boustead Study<sup>450</sup> and the Franklin Study<sup>451</sup> to evaluate air quality impacts, which are studies that are not based on energy consumption assumptions particular to France.

#### **Response to Comment No. 19**

Comment No. 19 states that banning the issuance of plastic carryout bags may have the effect of increasing the amount of paper carryout bag litter within the County of Los Angeles. Many studies have noted the prevalence of plastic carryout bag litter in the marine environment, but these studies have not noted paper carryout bags as a serious litter contributor.<sup>452,453</sup> During the Great

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<sup>449</sup> Hyder Consulting. 18 April 2007. *Comparison of existing life cycle analyses of plastic bag alternatives*. Prepared for: Sustainability Victoria, Victoria, Australia.

<sup>450</sup> Boustead Consulting and Associates Ltd. 2007. *Life Cycle Assessment for Three Types of Grocery Bags – Recyclable Plastic; Compostable, Biodegradable Plastic; and Recycled, Recyclable Paper*. Prepared for: Progressive Bag Affiliates.

<sup>451</sup> Franklin Associates, Ltd. 1990. *Resource and Environmental Profile Analysis of Polyethylene and Unbleached Paper Grocery Sacks*. Prairie Village, KS.

<sup>452</sup> Ocean Conservancy. *A Rising Tide of Ocean Debris and What We Can Do About It. International Coastal Cleanup 2009 Report*. Available at: [http://www.oceanconservancy.org/pdf/A\\_Rising\\_Tide\\_full\\_lowres.pdf](http://www.oceanconservancy.org/pdf/A_Rising_Tide_full_lowres.pdf)

<sup>453</sup> Sheavly, S.B. 2007. *National Marine Debris Monitoring Program: Final Program Report, Data Analysis and Summary*. Prepared for: US Environmental Protection Agency by Ocean Conservancy, Grant Number X83053401-02. p. 76.

Los Angeles River Clean Up, which collected trash from 30 catch basins in the Los Angeles River, it was observed that 20 percent by weight and 17 percent by volume of the trash collected consisted of paper; however, these results are not limited to paper carryout bags and include all types of paper litter such as paper napkins and paper towels.<sup>454</sup> The County of Los Angeles understands from the review of numerous studies undertaken in multiple areas that paper carryout bags normally account for less than one percent of litter collected from waterways. Out of the litter collected during the City of San Francisco Litter Audit in 2008, retail paper bags were not listed as one of the top 25 litter subcategories.<sup>455</sup> The City of San Francisco reported paper retail bags composed 0.4 percent of all large litter items collected in 2007 and 0.35 percent of all litter items collected in 2008.<sup>456</sup> The City of San Francisco Litter Audit concluded that 57.9 percent of all bag litter in 2008 was composed of unbranded plastic bags and 10.9 percent was composed of plastic retail bags, but only 6 percent of bag litter was composed of paper retail bags. As noted in Section 3.2 of the EIR, a study performed in Washington, DC, showed that paper products were not found in the streams except in localized areas, and were not present downstream.<sup>457</sup> It is also known that the recycling rates of paper carryout bags are higher than the recycling rates of plastic carryout bags. The County of Los Angeles is aware that if more paper carryout bags are used within its boundaries, an increase in litter attributed to paper carryout bags is plausible; however, the proposed ordinances would also encourage a transition to the use of reusable bags. In addition, the County of Los Angeles has evaluated four alternatives to the proposed ordinances in Section 4.0 of the EIR that would either ban or place a fee on the issuance of paper carryout bags, which would be expected to reduce or avoid the potential increase in paper carryout bag use that may be caused by the proposed ordinances. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper bag usage to the greatest extent feasible, the County of Los Angeles developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. Alternative 5 would also achieve the program goals and Countywide objectives. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2).

Paper litter in waterways does not present the same environmental hazards associated with plastic carryout bags. Unlike regular plastic, paper is biodegradable and compostable.<sup>458</sup> The paper used to make standard paper carryout bags is originally derived from wood pulp, which is a naturally biodegradable material. Due to the biodegradable properties of paper, paper bags do not persist in

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<sup>454</sup> City of Los Angeles. 18 June 2004. *Characterization of Urban Litter*. Prepared by: Ad Hoc Committee on Los Angeles River and Watershed Protection Division. Los Angeles, CA.

<sup>455</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>456</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>457</sup> Anacostia Watershed Society. December 2008. *Anacostia Watershed Trash Reduction Plan*. Prepared for: District of Columbia Department of the Environment.

<sup>458</sup> County of Los Angeles, Department of Public Works. Accessed on: 28 April 2010. *Backyard Composting*. Web site. Available at: <http://dpw.lacounty.gov/epd/sg/bc.cfm>

the marine environment for as long as plastic bags.<sup>459</sup> As a result of a review of the available data regarding litter, the County of Los Angeles has concluded that plastic carryout bags pose a more serious litter problem than do paper carryout bags.

Comment No. 19 also states that removing a source of litter will not diminish littering behavior. One of the key objectives of the proposed ordinances is to reduce the amount of litter that is attributable to plastic carryout bags. A ban on the issuance of plastic carryout bags will undoubtedly result in a decrease in the amount of litter that can be attributed to plastic carryout bags, even if it does not diminish littering behavior. In order to reduce litter and encourage the use of reusable bags, another objective of the proposed ordinances is to substantially increase awareness of the negative impacts of plastic carryout bags and the benefits of reusable bags, and reach at least 50,000 residents (5 percent of the population) with an environmental awareness message.

### **Response to Comment No. 20**

Comment No. 20 states that the Caltrans catch basin survey referenced in the EIR noted that paper composed a larger portion of trash collected than plastic film. This statement is correct, as the Caltrans study of catch basins alongside freeways in Los Angeles indicated that paper was 9 percent by mass and 14 percent by volume of the total trash collected, whereas plastic film composed 7 percent by mass and 12 percent by volume of the total trash collected.<sup>460</sup> However, it is important to note that the category of paper trash includes items besides paper carryout bags. The County of Los Angeles understands from the review of numerous studies undertaken in multiple areas that paper carryout bags normally account for less than one percent of litter collected. For example, out of the litter collected during the City of San Francisco Litter Audit in 2008, paper napkins and paper towels were the most prevalent forms of paper litter surveyed, but retail paper bags were not listed as one of the top 25 litter subcategories.<sup>461</sup> The City of San Francisco reported paper retail bags as 0.4 percent of all large litter items collected in 2007 and 0.35 percent of all litter items collected in 2008.<sup>462</sup> The City of San Francisco Litter Audit concluded that 57.9 percent of all bag litter in 2008 was composed of unbranded plastic bags, 10.9 percent was composed of plastic retail bags, but only 6 percent was composed of paper retail bags.

### **Response to Comment No. 21**

Comment No. 21 indicates that the City of San Francisco litter audit noted an increase in the amount of retail plastic carryout bag litter after implementation of the plastic carryout bag ban. The City of San Francisco reported plastic retail bags as 0.6 percent of all large litter items collected

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<sup>459</sup> Andrady, Anthony L. and Mike A. Neal. 2009. "Applications and Societal Benefits of Plastics." In *Philosophical Transactions of the Royal Society B: Biological Sciences*, 364: 1977–1984.

<sup>460</sup> Combs, Suzanne, John Johnston, Gary Lippner, David Marx, and Kimberly Walter. 2001. *Results of the Caltrans Litter Management Pilot Study*. Sacramento, CA: California Department of Transportation. Available at: <http://www.owp.csus.edu/research/papers/papers/PP020.pdf>

<sup>461</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>462</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

in 2007<sup>463</sup> and 0.64 percent of all large litter items collected in 2008.<sup>464</sup> This does not indicate a significant increase in plastic carryout bag litter from 2007 to 2008. The City of San Francisco reported paper retail bags as 0.4 percent of all large litter items collected in 2007 and 0.35 percent of all large litter items collected in 2008, which does not show an increase in paper carryout bag littering from 2007 to 2008.<sup>465</sup>

### **Response to Comment No. 22**

Comment No. 22 notes a reference that indicates that littering is less likely to occur in an environmental area that is already clean or maintained clean. This reference is noted for the record. However, the County of Los Angeles is interested in evaluating efforts that prevent plastic bag litter from occurring in the first place, instead of spending more money to improve cleanup of plastic bag litter after the littering has already occurred and entered the urban environment, storm water system, and coastal waterways. As discussed in Section 2.2.1 of the EIR, public agencies in California already spend more than \$375 million each year for litter prevention, cleanup, and disposal.<sup>466</sup> For 2008–2009, the most recent year available, the County of Los Angeles Flood Control District spent over \$24 million on these activities.<sup>467</sup> One of the references reviewed during preparation of the EIR states that policies such as enhanced litter control measures by local authorities may be effective in addressing litter but are typically more costly than a bag fee and do not change consumer behavior away from consuming bags.<sup>468</sup> Increasing the current litter cleanup efforts in the County of Los Angeles could be cost prohibitive and would not meet the basic objectives of the proposed ordinances, including reducing Countywide consumption of plastic carryout bags, reducing the Countywide contribution of plastic carryout bags to litter, and reducing the disposal of plastic carryout bags in landfills. Therefore, an alternative to increase litter cleanup was not carried forward for detailed analysis in the EIR. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project.

### **Response to Comment No. 23**

Comment No. 23 notes a reference that indicates that the ready availability, design, and convenience of trash receptacles affects consumer behavior towards littering. This comment is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances

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<sup>463</sup> City of San Francisco, San Francisco Environment Department. 2007. *The City of San Francisco Streets Litter Audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA.

<sup>464</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>465</sup> City of San Francisco, San Francisco Environment Department. 2008. *The City of San Francisco Streets Litter Re-audit*. Prepared by: HDR; Brown, Vence & Associates, Inc.; and MGM Management Environmental and Management Service. San Francisco, CA. Available at: [http://www.sfenvironment.org/downloads/library/2008\\_litter\\_audit.pdf](http://www.sfenvironment.org/downloads/library/2008_litter_audit.pdf)

<sup>466</sup> California Department of Transportation. Accessed on: September 2009. "Facts at a Glance." *Don't Trash California*. Available at: <http://www.dontrashcalifornia.info/pdf/Statistics.pdf>

<sup>467</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

<sup>468</sup> Nolan-ITU Pty Ltd., et al. December 2002. *Environment Australia: Department of the Environment and Heritage: Plastic Shopping Bags –Analysis of Levies and Environmental Impacts: Final Report*. Sydney, Australia.

and Final EIR. As discussed in Section 3.5.1 of the EIR, the State of California passed AB 2449 in 2006 to increase recycling of plastic carryout bags and reduce litter. AB 2449 states that affected stores must supply at least one plastic bag collection bin in a publicly accessible spot to collect used bags for recycling. An alternative to provide additional trash receptacles or improve existing trash receptacles in the County of Los Angeles would not meet the basic objectives of the proposed ordinances, including reducing Countywide consumption of plastic carryout bags and reducing the disposal of plastic carryout bags in landfills. Therefore, this suggested alternative was not carried forward for detailed analysis in the EIR. Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project.

### **Response to Comment No. 24**

Comment No. 24 notes a reference that discusses how effective communication and education can be used to reduce littering behavior.

As described in Section 2.3.4 of the EIR, the County of Los Angeles Board of Supervisors approved a motion to implement a voluntary Single Use Bag Reduction and Recycling Program on January 22, 2008. The program aimed to promote the use of reusable bags, increase at-store recycling of plastic bags, reduce consumption of single-use bags, increase the post-consumer recycled material content of paper bags, and promote public awareness of the effects of litter and consumer responsibility in the County of Los Angeles. The voluntary program established benchmarks for measuring the effectiveness of the program, seeking a 30-percent decrease in the disposal rate of carryout plastic bags from the fiscal year 2007–2008 usage levels by July 1, 2010, and a 65-percent decrease by July 1, 2013.<sup>469</sup> The Working Group found that the program was not successful in achieving its goals. Over a two-year period and despite State law, stores in the unincorporated area did not provide data that would enable County staff to determine if the voluntary Single Use Bag Reduction and Recycling Program benchmark of 30-percent disposal reduction of plastic bags had been met. Furthermore, although the public education and outreach aspects of the Program, including the successful *Brag About Your Bag Campaign*<sup>®</sup>, were effective in raising awareness of the environmental impacts of carryout bags and the benefits of reusable bags, this awareness did not translate into a shift in consumer behavior that was significant enough to address the major did not achieve the program objectives of the County.<sup>470</sup> Therefore, general increases in recycling and public outreach alone, are not likely to achieve the degree of reduction in plastic bag litter that the County of Los Angeles has set out to achieve as one of the objectives of the proposed ordinances. One of the references reviewed during preparation of the EIR states that “some changes to consumer behavior should be expected by education alone, but the changes in consumption of disposable bags are likely to be modest if not combined with a ban or an advanced recovery fee, and the environmental benefits would be minimal.”<sup>471</sup> Section 15126.6 of the State CEQA Guidelines states that the EIR need only examine in detail the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project.

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<sup>469</sup> County of Los Angeles Board of Supervisors. 22 January 2008. *Single Use Bag Reduction and Recycling Program (Resolution and Alternative 5)*. Los Angeles, CA. Available at: <http://dpw.lacounty.gov/epd/PlasticBags/Resources.cfm>

<sup>470</sup> County of Los Angeles Chief Executive Office. 5 August 2010. *Single Use Bag Reduction and Recycling Program and Expanded Polystyrene Food Containers – Final Quarterly Progress Report*. Available at: [http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls\\_080510\\_bagrpt10.pdf](http://dpw.lacounty.gov/epd/PlasticBags/PDF/BoardLetters/bdls_080510_bagrpt10.pdf)

<sup>471</sup> Herrera et al. January 2008. *Alternatives to Disposable Shopping Bags and Food Service Items Volume I and II*. Prepared for: Seattle Public Utilities.

## **Response to Comment No. 25**

Comment No. 25 calls into question the determination in the Initial Study that the project would not have potentially significant impacts on forest resources and the decision to not carry forest resources forward for further analysis in the EIR. The NOP and Initial Study were circulated for public review on December 1, 2009, prior to incorporation of the following questions into Appendix G of CEQA Guidelines in the amendments to the guidelines adopted on March 2010:

- Would the proposed project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- Would the proposed project result in the loss of forest land or conversion of forest land to non-forest use?
- Would the proposed project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

However, the County of Los Angeles considered impacts to forest resources in the analysis undertaken before preparation of the EIR and determined there was no potential for significant effects on such resources. Section ES.4 of the EIR states that forest resources are not expected to be significantly impacted by the proposed project based on “the analysis undertaken in support of this EIR.” This analysis includes the personal communications cited in Section 3.1 of the Draft EIR (page 3.1-17), which indicated that “the majority of paper carryout bags supplied to the greater Los Angeles metropolitan area are produced in and delivered from states outside of California, or from countries outside of the United States, such as Canada.” Based on this, the County determined that analysis of impacts on forest resources is too speculative. Specifically, the location and type of forest (certified sustainable, plantations, reforested, etc.) and the amount of wood fiber procured from trees that could be attributed to the project is unknown. The County of Los Angeles’s conclusion is therefore consistent with Section 15151 of the State CEQA Guidelines, which states that “an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible,” and Section 15145, which provides, “If, after a thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.”

The proposed ordinances would not conflict with existing zoning or cause rezoning of forest land, and would not result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, the proposed project would not be considered to have a significant impact upon forest resources under CEQA.

The analysis of potential indirect impacts of paper bag usage would be speculative, as there may be many locations for paper bag manufacturing and suppliers can change over time. However, State and federal laws exist requiring forest management plans and required best management practices, including regulations governing replanting/reforestation to reduce impacts and allow for re-growth. Major logging projects would be subject to CEQA and/or NEPA (depending upon project location), and any significant impacts would require the consideration of project changes, mitigation measures, and alternatives.

Additionally, Section 4.0 of the EIR, the County of Los Angeles analyzes the impacts of several alternatives to the proposed ordinances that would limit the issuance of paper carryout bags through a ban or a fee. Alternative 1 would ban paper carryout bags in Los Angeles County. Alternative 4 would ban paper carryout bags in all supermarkets, grocery stores, convenience stores, pharmacies, and drug stores in Los Angeles County. Alternative 2 would impose a fee on the issuance of paper carryout bags. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags, Alternative 5, which is a hybrid of Alternatives 2, 3, and 4, was added. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). In addition, the proposed ordinances would require that any paper carryout bags issued by stores would contain a minimum of 40 percent recycled content, and the County of Los Angeles will encourage customers to transition from paper carryout bag usage to reusable bag usage.

### **Response to Comment No. 26**

Comment No. 26 states that an increase in paper bag use in California would put a significant additional demand on the natural resources needed to manufacture paper bags and that this demand should have been analyzed in the EIR. As discussed above, the County determined that the project would not have a potentially significant effect on forest resources, and no evidence has been submitted demonstrating otherwise. Although Comment No. 26 expresses the opinion that impacts to forest resources would be significant and should be analyzed in the EIR, the comment contains no evidence in support thereof. Further analysis of this impact in the EIR is therefore not required. (Section ES.4 and CEQA Guidelines §§15128, 15143.) The EIR analyzed alternatives that would reduce the number of paper carryout bags used, which would reduce any potential impact on forest resources, as further discussed below.

Comment No. 26 states that 4 million trees would be cut each year as a result of the project. The assumptions used to arrive at this number are incorrect. First, the comment assumes 6 billion plastic carryout bags per year would be converted to paper carryout bags. The maximum number of paper bags that would be used in the County of Los Angeles as a result of the proposed ordinances would be approximately 1.3 billion paper carryout bags per year, not 6 billion per year. There are 67 stores in the unincorporated territory of the County of Los Angeles and 462 stores in the incorporated cities of the County of Los Angeles that would be affected by the proposed ordinance.<sup>472,473</sup> Assuming 100 percent of plastic carryout bags currently used in the County of Los Angeles are replaced by paper carryout bags at a ratio of approximately 1.5 plastic carryout bags to 1 paper carryout bag (due to the difference in carrying capacity), each store affected by the proposed ordinances would issue a maximum of 6,836 paper carryout bags per day. This is equal to approximately 1.3 billion paper bags annually. Second, the Comment assumes that all of the paper bags would be made from 100 percent virgin wood pulp. This is not a reasonable

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<sup>472</sup> As a result of the voluntary Single Use Bag Reduction and Recycling Program, the County has determined that 67 stores in unincorporated territories would be affected by the proposed *County of Los Angeles* ordinance.

<sup>473</sup> Number of stores in the 88 incorporated cities of the *County of Los Angeles* was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110 and 446110 with a gross annual sales volume of \$2 million or higher and a square footage of 10,000 square feet or higher. Accessed on: 29 April 2010.

assumption, and the proposed ordinances would require all paper carryout bags issued by stores to contain a minimum of 40 percent recycled content.

Moreover, even though estimates of the number of paper carryout bags that would be used as a result of the project can be made, an accurate prediction of how many trees would be felled as a result of the project cannot be made. As stated above, the location and type of forest as well as the amount of wood fiber that can be attributed to the project is unknown. Given that these variables are unknown, the number of trees that could potentially be cut down as a result of the project is speculative and need not be evaluated under CEQA (CEQA Guidelines, § 15145).

The EIR analyzes several alternatives to the proposed ordinances that would either ban or place a fee on the issuance of paper carryout bags, which would reduce or avoid potential increases in use of paper carryout bags. Alternative 1 would ban paper carryout bags in Los Angeles County. Alternative 4 would ban paper carryout bags in all supermarkets, grocery stores, convenience stores, pharmacies, and drug stores in Los Angeles County. Alternative 2 would impose a fee on the issuance of paper carryout bags. Alternative 5, which is a hybrid of Alternatives 2, 3, and 4, was added to the Final EIR to maximize the environmental benefit realized from reducing paper bag use through imposition of fees. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). In addition, all alternatives would require all paper carryout bags issued by stores to contain a minimum of 40 percent recycled content.

For the reasons described above, the EIR is not required to include an analysis of the project's potential effects on fiber or forest resources.

### ***Response to Comment No. 27***

Comment No. 27 agrees with the discussion in the EIR of how LCA data cannot reasonably be evaluated in relation to local thresholds of significance. Comment No. 27 states that the LCA data should have been evaluated on a regional or global scale. CEQA is a law that is specific to California and does not require evaluation of impacts in states outside of California; therefore, the County of Los Angeles has conducted the EIR analysis accordingly. As described in Section 2.0 of the EIR, the proposed "project" being evaluated under CEQA is the proposed ordinances to ban the issuance of plastic carryout bags within the County of Los Angeles. Therefore, the EIR evaluates the proposed ordinances in accordance with applicable regulations and thresholds for the County of Los Angeles. This in no way compromises the results of the GHG analysis, as the impacts are assumed to contribute to global GHGs regardless of where they are generated. There are no worldwide adopted thresholds for GHG emissions.

Comment No. 27 states that the EIR should evaluate regional and global impacts of criteria pollutant emissions associated with the project. The EIR included this analysis in the Air Quality Chapter, Section 3.1.4. Tables 3.1.4-2 and 3.1.4-3 show the air emissions of VOCs, NO<sub>x</sub>, CO, SO<sub>x</sub>, and PM from plastic carryout bags versus paper carryout bags. These numbers represent the amount of criteria pollutant emissions resulting from the manufacture of plastic and paper carryout bags that can be attributed to the stores affected by the proposed ordinances. Manufacturing of paper carryout bags does not occur within Los Angeles County or the surrounding region. The numbers and analysis represent the project's global contribution to emissions of the above listed



pollutants, not merely the local contribution. (See also response to Comment No. 8 to the July 16, 2010, comment letter from Save the Plastic Bag Coalition.)

As discussed in Section 3.1.3, Air Quality, of the EIR, the County of Los Angeles relied on significance thresholds recommended by the SCAQMD in the *CEQA Air Quality Handbook*, as revised in November 1993 and approved by the SCAQMD Board of Directors, to determine whether the proposed ordinances would have significant impacts to air quality due to mobile source emissions.<sup>474</sup> The SCAQMD's emission thresholds apply to all federally regulated air pollutants except lead, which is not exceeded in the South Coast Air Basin (SCAB). The County of Los Angeles also relied on significance thresholds provided by the AVAQMD to evaluate the significance of mobile source emissions that may be expected to occur in the portion of the County of Los Angeles that lies within the jurisdiction of the AVAQMD.<sup>475</sup> As noted in Section 3.1.4 of the EIR, life cycle assessment results for air quality cannot be reasonably evaluated in relation to the operational thresholds of significance set by the SCAQMD for the SCAB or by AVAQMD for the MDAB because the operational thresholds are intended for specific projects located in the SCAB and MDAB, whereas LCA data cover all stages of production, distribution, and end-of-life procedures related to a particular product. The manufacture and production of paper carryout bags does not appear to occur in the SCAB or the MDAB, with manufacturing facilities located in other air basins in the United States and in other countries that may have different emission thresholds and regulations. Indeed, it would be speculative to determine exactly how much plastic and paper carryout bag manufacturing would be indirectly affected by the proposed ordinances in each different region or country in order to prepare an environmental analysis using distinct thresholds of significance for each region or country.

**Response to Comment No. 28:**

Comment No. 28 states that the greenhouse gas analysis in the EIR is inconsistent with the County of Los Angeles's statistic that 6 billion plastic carryout bags are consumed in the County of Los Angeles on an annual basis.

The 6 billion number was prorated based on the population of Los Angeles County using the 19 billion statewide number provided by the California Integrated Waste Management Board. However, to ascertain a better understanding of the actual number of bags distributed by AB 2449-affected stores in Los Angeles County, coordination between the County of Los Angeles Department of Public Works and several large supermarket chains in the County of Los Angeles determined that approximately 10,000 plastic carryout bags are used per store per day on average. Due to confidential and proprietary concerns, and at the request of the large supermarket chains providing this data, the names of these large supermarket chains will remain confidential. Reported data from 12 stores reflected a combined total plastic carryout bag usage of 122,984 bags per day. A daily per-store average was then calculated at 10,249 plastic carryout bags and rounded to approximately 10,000 bags per day. It is important to note that this number is likely very high, as it is more than twice the bag average reported by the CalRecycle in 2008 for stores affected by AB 2449. In 2008, 4,700 stores statewide affected by AB 2449 reported an average of 4,695 bags

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<sup>474</sup> South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

<sup>475</sup> Antelope Valley Air Quality Management District. May 2005. *Antelope Valley AQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Available at: <http://www.mdaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=916>

used per store per day.<sup>476</sup> The EIR analysis is therefore based on the conservative assumption that 10,000 plastic carryout bags are distributed in each of the stores that would be affected by the proposed County of Los Angeles ordinances. While 10,000 plastic carryout bags per store per day may not accurately reflect the actual number of bags consumed per day on average for stores greater than 10,000 square feet in the unincorporated and incorporated areas of the County of Los Angeles, for the purposes of this EIR, this number was used to conservatively evaluate impacts resulting from a worst-case scenario.

Section 3.0 of the EIR assumes that of the AB 2449-affected stores, there are 67 stores in the unincorporated territory of the County of Los Angeles and 462 stores in the incorporated cities of the County of Los Angeles that would be affected by the proposed ordinances.<sup>477,478</sup> Therefore, conservatively the total number of bags assumed to be banned by the proposed ordinances per year would be as follows:

$$\begin{aligned} & 10,000 \text{ bags per day} \times (67 + 462) \times 365 \text{ days} \\ & = 1,930,850,000 \text{ plastic carryout bags per year} \end{aligned}$$

Therefore, the total number of bags analyzed in the EIR is close to 2 billion bags per year, which is a subset of the 6 billion bags per year statistic provided by the County of Los Angeles. The proposed ordinances account only for a subset of the 6 billion plastic carryout bags per year, since the proposed ordinances would only apply to certain retail stores covered by the definition in AB 2449 in the County of Los Angeles. As defined in Section 2.5 of the EIR, the proposed ordinances would apply only to retail establishments that (1) meet the definition of a “supermarket” as stated in the California Public Resources Code, Section 14526.5; or (2) are buildings with over 10,000 square feet of retail space that generates sales or use tax pursuant to the Bradley-Burns Uniform Local Sales and Use Tax Law and have a pharmacy licensed pursuant to Chapter 9 of Division 2 of the Business and Professions Code.

In Sections 4.2.4 and 4.2.5 of the EIR, the County of Los Angeles evaluates Alternative 3 and Alternative 4 that would extend the scope of the proposed ordinances to apply to all supermarkets and other grocery stores, convenience stores, pharmacies and drug stores, regardless of square footage or sales volume. For the analysis of Alternatives 3 and 4, it was assumed that 1,091 stores could be affected in the unincorporated territories of the County of Los Angeles,<sup>479</sup> and 5,084 stores could be affected in the incorporated cities of the County of Los Angeles.<sup>480</sup> It was assumed that each store larger than 10,000 square feet currently uses approximately 10,000 plastic carryout bags

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<sup>476</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, County of Los Angeles, Department of Public Works, Alhambra, CA.

<sup>477</sup> As a result of the voluntary Single Use Bag Reduction and Recycling Program, the *County of Los Angeles* has determined that 67 stores in unincorporated territories would be affected by the proposed *County of Los Angeles* ordinance.

<sup>478</sup> Number of stores in the 88 incorporated cities of the *County of Los Angeles* was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110 and 446110 with a gross annual sales volume of \$2 million or higher and a square footage of 10,000 square feet or higher. Accessed on: 29 April 2010.

<sup>479</sup> Number of stores in the unincorporated territories of the *County of Los Angeles* was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110, 445120, and 446110 with no filters for gross annual sales volume or square footage. Accessed on: 29 April 2010.

<sup>480</sup> Number of stores in the 88 incorporated cities of the *County of Los Angeles* was determined from the infoUSA database for businesses with North American Industry Classification System codes 445110, 445120, and 446110 with no filters for gross annual sales volume or square footage. Accessed on: 29 April 2010.

per day,<sup>481</sup> and each store smaller than 10,000 square feet currently uses approximately 5,000 plastic carryout bags per day.<sup>482</sup> Therefore, the total number of bags assumed to be banned per year as a result of Alternatives 3 or 4 would be as follows:

$$((5,000 \text{ bags per day} \times (1,024 + 4,622)) + [10,000 \text{ bags per day} \times (67 + 462)]) \times 365 \text{ days} = 12,234,800,000 \text{ plastic carryout bags per year}$$

Therefore, the total number of plastic carryout bags assumed to be affected by Alternatives 3 and 4 is approximately 12 billion bags a year, which is actually twice as large as the County of Los Angeles's estimate that 6 billion plastic carryout bags are used in the County of Los Angeles every year. This reflects the determination that the estimate of 10,000 plastic bags per store is indeed a very conservative estimate that is much higher than the actual usage in stores, and reflects the County's good faith in trying to evaluate the environmental impacts using the most conservative approach.

The commenter also states that the 85-percent conversion does not take into account life cycle GHG impacts from reusable bags. However, Section 3.3.5 and Table 3.3.5-4 analyze the estimated daily emissions changes due to reusable bags used three times based on Ecobilan data. These results show that a 100-percent conversion from the use of plastic carryout bags to the use of reusable bags would result in a reduction in GHG emissions, which is a conclusion that is supported by numerous life cycle assessments.<sup>483,484,485</sup> Therefore, in the scenario analyzed in the EIR where 85 percent of consumers are assumed to switch to using paper carryout bags, the GHG emissions increase due to the 15 percent of consumers who switch to using reusable bags is assumed to be negligible.

The following lists where each of the scoping comments provided by the American Chemistry Council during the public review period for the Notice of Preparation and Initial Study were addressed in the Draft EIR:

### ***Response to Scoping Comment No. 1***

Indirect impacts of the proposed ordinances (e.g., a consumer switch to paper bags) were addressed using LCAs throughout the various subsections of Section 3.0 of the EIR. Section 3.1

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<sup>481</sup> Based on coordination between the *County of Los Angeles* Department of Public Works and several large supermarket chains in the *County of Los Angeles*, it was determined that approximately 10,000 plastic carryout bags are used per store per day. Due to confidential and proprietary concerns, and at the request of the large supermarket chains providing this data, the names of these large supermarket chains will remain confidential. Reported data from only 12 stores reflected a total plastic carryout bag usage of 122,984 bags per day. A daily average per store was then calculated at 10,249 plastic carryout bags and rounded to approximately 10,000 bags per day.

<sup>482</sup> Data from the infoUSA indicates that approximately 40 percent of the stores greater than 10,000 square feet in the unincorporated territories of the *County of Los Angeles* are larger than 40,000 square feet. Therefore, the average size of the stores to be affected by the proposed *County of Los Angeles* ordinance would be greater than 20,000 square feet. Accordingly, it would be reasonable to estimate that the stores smaller than 10,000 square feet that would be affected by Alternative 3 would be at less than half the size of the stores to be affected by the proposed ordinances and would use less than half the number of bags.

<sup>483</sup> Ecobilan. February 2004. *Environmental Impact Assessment of Carrefour Bags: An Analysis of the Life Cycle of Shopping Bags of Plastic, Paper, and Biodegradable Material*. Prepared for: Carrefour Group. Neuilly-sur-Seine, France.

<sup>484</sup> Hyder Consulting. 18 April 2007. *Comparison of Existing Life Cycle Analyses of Plastic Bag Alternatives*. Prepared for: Sustainability Victoria.

<sup>485</sup> ExcelPlas Australia, Centre for Design at RMIT, and NOLAN-ITU. 2004. *The Impacts of Degradable Plastic Bags in Australia*. Moorabbin VIC, AU.

discusses the potential impacts of the proposed ordinances on air quality by evaluating a number of issues, including indirect emissions based on life cycle assessments. It also addresses criteria pollutant emissions resulting from disposal of paper carryout bags in landfills, and emissions resulting from increased delivery trips. Section 3.2 addresses the potential impacts of the proposed ordinances on biological resources, including evaluating impacts on state-designated sensitive habitats; rare, threatened, and endangered species; sensitive species; locally important species; federally protected wetlands; and migratory corridors and/or nursery sites. Section 3.3 addresses the potential impacts of the proposed ordinances on GHG emissions, including an evaluation of indirect emissions based on life cycle assessments, GHG emissions resulting from disposal of paper carryout bags in landfills, and GHG emissions resulting from increased delivery trips. Section 3.4 addresses potential impacts on water quality and hydrology, and evaluates a number of impacts, including drainage, surface water quality, and groundwater. Section 3.5 evaluates potential impacts on utilities and service systems, including impacts on wastewater treatment, the storm drain system, water supply, solid waste generation, and non-renewable energy consumption. The analysis of environmental impacts in the EIR is adequate and extensive and the EIR evaluates two potential worst-case scenarios where 85 percent and 100 percent of consumers switch from using plastic carryout bags to using paper carryout bags.

#### ***Response to Scoping Comment No. 2***

Potential environmental impacts of reusable bags are discussed throughout Section 3.0 of the EIR, including the consumption of nonrenewable energy (Section 3.5.4), emissions of greenhouse gases (Section 3.3.5), consumption of water (Section 3.5.4), generation of acidic atmospheric pollutants (Section 3.1.4), air quality (Section 3.1.4), water pollution (Section 3.4.4), and solid waste (Section 3.5.4). Although CEQA does not require analysis of health impacts, Section ES.3 of the EIR addresses potential health concerns related to reusable bags.

#### ***Response to Scoping Comment No. 3***

The proposed ordinances, as described in Section 2.5 of the EIR, would not encourage a reduction in the current recycling rates of plastic carryout bags. Previous efforts by the County of Los Angeles to encourage plastic carryout bag recycling are described in Section 2.3.4 of the EIR.

#### ***Response to Scoping Comment No. 4***

Litter issues associated with plastic carryout bags are described in Section 2.2.1 of the EIR.

#### ***Response to Scoping Comment No. 5***

The EIR addresses consumption of non-renewable energy in Section 3.5.4.

#### ***Response to Scoping Comment No. 6***

Throughout Section 3.0 of the EIR, each environmental issue has been evaluated under two scenarios: 1) implementation of the proposed County ordinances in isolation, which would only affect stores in the unincorporated territories of the County of Los Angeles, and 2) implementation of similar proposed ordinances in all of the 88 cities of the County of Los Angeles. Please also see response to Comment No. 12 to the July 16, 2010, comment letter from the Save the Plastic Bag Coalition for further information.

### ***Response to Scoping Comment No. 7***

Indirect life cycle impacts (including impacts due to bag manufacturing) that may occur outside of the County of Los Angeles were addressed throughout the various subsections of Section 3.0 of the EIR.

### ***Response to Scoping Comment No. 8***

Litter issues associated with plastic carryout bags are described in Section 2.2.1 of the EIR. Impacts due to litter are evaluated in each of the various subsections of Section 3.0 of the EIR.

### ***Response to Scoping Comment No.9***

For the purposes of analyzing a worst-case scenario, environmental impacts were evaluated throughout the various subsections of 3.0 of the EIR assuming that each store currently uses approximately 10,000 plastic carryout bags per day.<sup>486</sup> It is important to note that this number is likely very high, as it is more than twice the bag average reported by the California Department of Resources Recycling and Recovery (CalRecycle) in 2008 for AB 2449–affected stores. In 2008, 4,700 stores statewide affected by AB 2449 reported an average of 4,695 bags used per store per day.<sup>487</sup>

### ***Response to Scoping Comment No. 10***

Costs of litter prevention, cleanup, and disposal are addressed in Section 2.2.1 of the EIR. For 2008–2009, the most recent year available, the County of Los Angeles Flood Control District spent over \$24 million on these activities (\$1.9 million on maintenance of structural and treatment control BMPs, \$9.3 million on municipal street cleaning, \$1.9 million on catch basin cleaning, \$9.6 million on trash collection and recycling, and \$1.3 million on capital costs).<sup>488</sup>

### ***Response to Scoping Comment No. 11***

Impacts of plastic carryout bag litter upon marine wildlife are addressed in detail in Section 3.2 of the EIR.

### ***Response to Scoping Comment No. 12***

A discussion of biodegradable bags can be found in Section 4.1 and Appendix B of the EIR.

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<sup>486</sup> Based on coordination between the County Department of Public Works and several large supermarket chains in the County, it was determined that approximately 10,000 plastic carryout bags are used per store per day. Due to confidential and proprietary concerns, and at the request of the large supermarket chains providing this data, the names of these large supermarket chains will remain confidential. Reported data from only 12 stores reflected a total plastic carryout bag usage of 122,984 bags per day. A daily average per store was then calculated at 10,249 plastic carryout bags and rounded to approximately 10,000 bags per day.

<sup>487</sup> Dona Sturgess, California Department of Resources Recycling and Recovery, Sacramento, CA. 29 April 2010. E-mail to Luke Mitchell, California Department of Public Works, Alhambra, CA.

<sup>488</sup> Los Angeles County Municipal Storm Water Permit (Order 01-182) Individual Annual Report Form. October 2009. Available at: <http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/2009/Appendix%20D%20-%20Principal%20Permittee%20Annual%20Report/Principal%20Permittee%20Annual%20Report.pdf>

***Response to Scoping Comment No. 13***

Potential environmental impacts of reusable bags are discussed throughout Section 3.0 of the EIR, including the consumption of nonrenewable energy (Section 3.5.4), emissions of GHGs (Section 3.3.5), consumption of water (Section 3.5.4), generation of acidic atmospheric pollutants (Section 3.1.4), air quality (Section 3.1.4), water pollution (Section 3.4.4), and solid waste (Section 3.5.4).

***Response to Scoping Comment No. 14***

Potential environmental impacts of reusable bags are discussed throughout Section 3.0 of the EIR, including the consumption of nonrenewable energy (Section 3.5.4), emissions of GHGs (Section 3.3.5), consumption of water (Section 3.5.4), generation of acidic atmospheric pollutants (Section 3.1.4), air quality (Section 3.1.4), water pollution (Section 3.4.4), and solid waste (Section 3.5.4).

***Response to Scoping Comment No. 15***

Impacts of plastic carryout bag litter upon marine wildlife are addressed in detail in Section 3.2 of the EIR.

***Response to Scoping Comment No. 16***

Impacts of plastic carryout bags upon the storm drain system are discussed in Section 3.5.4 of the EIR.

***Response to Scoping Comment No. 17***

Costs of litter prevention, cleanup, and disposal are addressed in Section 2.2.1 of the EIR.

***Response to Scoping Comment No. 18***

Water quality impacts of carryout bag litter are addressed in Section 3.4.5 of the EIR.

***Response to Scoping Comment No. 19***

Solid waste impacts of plastic carryout bags are addressed in Section 3.5 of the EIR.

The County of Los Angeles has obtained survey data from employees at solid waste facilities within the County of Los Angeles that conclusively indicate that plastic carryout bags pose serious operational problems for landfills.<sup>489</sup> All six survey respondents stated that plastic bags cause serious litter issues due to their lightweight nature and propensity to become airborne.<sup>490</sup> Each survey respondent indicated that it was costly and time consuming to provide clean-up crews to address the plastic bag litter problem in neighborhoods adjacent to the landfills.<sup>491</sup> The results of this survey have been added to Sections 2.2.1 and 3.5.4 of the EIR (see Section 12.2).

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<sup>489</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

<sup>490</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

<sup>491</sup> County of Los Angeles Department of Public Works. 2007. Survey – All Solid Waste Facilities: Plastic Bag Analysis for the County of Los Angeles.

***Response to Scoping Comment No. 20***

The contribution of paper carryout bags to litter is addressed in Section 2.3.2 of the EIR.

***Response to Scoping Comment No. 21***

The analysis of environmental impacts throughout the various subsections of Section 3.0 of the EIR is adequate and extensive and the EIR evaluates worst-case scenarios where 85 percent and 100 percent of consumers switch from using plastic carryout bags to using paper carryout bags. Potential life cycle impacts of reusable bags are discussed throughout Section 3.0 of the EIR, including the consumption of nonrenewable energy (Section 3.5.4), emissions of greenhouse gases (Section 3.3.5), consumption of water (Section 3.5.4), generation of acidic atmospheric pollutants (Section 3.1.4), air quality (Section 3.1.4), water pollution (Section 3.4.4), and solid waste (Section 3.5.4).

***Response to Scoping Comment No. 22***

Appendix A contains a survey conducted by Sapphos Environmental, Inc. to evaluate consumer use of plastic, paper, and reusable bags in the County of Los Angeles. This survey observed that reusable bags made up approximately 18 percent of the total number of carryout bags used in stores that did not make plastic carryout bags readily available to customers; however, reusable bags made up only approximately 2 percent of the total number of bags used in stores that did make plastic carryout bags readily available (Appendix A of the Draft EIR). Therefore, it is reasonable to estimate that a ban on the issuance of plastic carryout bags would increase the number of reusable bags used by customers by approximately 15 percent. Nevertheless, the analysis of environmental impacts throughout the various subsections of Section 3.0 of the EIR also evaluates a worst-case scenario where 100 percent of consumers switch from using plastic carryout bags to using paper carryout bags.

***Response to Scoping Comment No. 23***

An EIR was prepared for the proposed ordinances in accordance with CEQA.

***Response to Scoping Comment No. 24***

Environmental impacts related to air quality emissions are evaluated in detail in Section 3.1.4 of the EIR.

***Response to Scoping Comment No. 25***

Environmental impacts related to GHG emissions are evaluated in detail in Section 3.3.5 of the EIR.

***Response to Scoping Comment No. 26***

Environmental impacts related to hydrology and water quality are evaluated in detail in Section 3.4.4 of the EIR, while impacts related to water supply are evaluated in Section 3.5.4 of the EIR.

***Response to Scoping Comment No. 27***

Solid waste impacts are addressed in detail in Section 3.5.4 of the EIR.

***Response to Scoping Comment No. 28***

Impacts related to water supply are evaluated in Section 3.5.4 of the EIR. Cumulative environmental impacts related to GHG emissions are evaluated in detail in Section 3.3.5 of the EIR.

***Response to Scoping Comment No. 29***

Environmental impacts related to air quality emissions are evaluated in detail in Section 3.1.4 of the EIR.

***Response to Scoping Comment No. 30***

Environmental impacts related to GHG emissions are evaluated in detail in Section 3.3.5 of the EIR.



### **13.2.7 Public Meetings**

Yvonne B. Burke Senior and Community Center  
4750 West 62nd Street (Baldwin Hills / Ladera Heights Area)  
Los Angeles, California 90056

East Los Angeles College  
1700 Avenida Cesar Chavez  
Monterey Park, California 91754

Jackie Robinson Park  
8773 East Avenue R  
Little Rock, California 93543

Los Angeles County Arboretum and Botanic Garden  
301 North Baldwin Avenue  
Arcadia, California 91007

Agoura Hills / Calabasas Community Center  
27040 Malibu Hills Road  
Calabasas, California 91301

City of Long Beach Employee Development Center  
2929 East Willow Street  
Long Beach, California 90806

**Yvonne B. Burke Senior and Community Center**  
**4750 West 62nd Street (Baldwin Hills / Ladera Heights Area)**  
**Los Angeles, California 90056**

The County of Los Angeles appreciates that a community member took the time to attend the public meeting and provide comments regarding the proposed ordinances.

***Response to Comment No. 1:***

Comment No. 1 indicates that, upon implementation of the proposed ordinances, pet owners may be concerned about what types of bags to use for collecting pet waste. The proposed ordinance would ban the issuance of plastic carryout bags from certain stores throughout the County of Los Angeles, but would not ban stores from selling other types of plastic bags, such as pet waste bags. The availability of free plastic carryout bags for collecting pet waste is an issue that is outside the scope of CEQA; however, socioeconomic impacts of the proposed ordinances will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 2:***

Comment No. 2 suggests that the County of Los Angeles ensure that biodegradable bags for collecting pet waste are available for sale in stores. As described in Section ES.3 of the EIR, the proposed ordinances would ban the issuance of compostable and biodegradable carryout bags due to the lack of commercial composting facilities in the County of Los Angeles that would be needed to process compostable or biodegradable plastic carryout bags. However, the proposed ordinances would not ban the sale of biodegradable bags in stores. The suggestion that the County of Los Angeles enforce the availability of biodegradable bags in stores is acknowledged for the record, and will be considered by the Board of Supervisors during its decision-making process for the County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 3:***

Comment No. 3 recommends that the County of Los Angeles expand the scope of the proposed ordinances to include a performance standard for reusable bags. The definition of reusable bags has been modified in Section 2.2.3 of the EIR to include a requirement for reusable bags to be designed for a minimum of 125 uses to ensure that potential environmental impacts due to reusable bags are minimized (see the Clarifications and Revisions to the Draft EIR, Section 12.2). Comment No. 3 also recommends that the proposed ordinances should require that reusable bags be made of biodegradable material and not be imported into the United States from overseas. The commenter's recommendation is acknowledged for the record, and will be considered by the Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 4:***

Comment No. 4 expresses concern about the impact of the proposed ordinances upon low-income neighborhoods. Socioeconomic impacts of the proposed ordinances will be considered by the Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 5:***

Comment No. 5 suggests that the scope of the proposed ordinances include government-funded public institutions that distribute food or pharmaceutical products in carryout bags to low-income residents. The commenter's recommendation is acknowledged for the record, and will be considered by the Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinance and Final EIR.

***Response to Comment No. 6:***

Comment No. 6 inquires about the nature of relationship between the proposed ordinances and the State legislation (AB 1998). The proposed County of Los Angeles ordinance and Final EIR is a separate effort by the County of Los Angeles; whereas, AB 1998 was a proposed statewide bill. Had AB 1998 been approved by the State legislature and signed by the Governor, it would have superseded the proposed ordinances because it carried an express preemption clause of a local jurisdiction's ability to regulate certain types of bags. A discussion of AB 1998 has been added to Section 2.2.4 of the EIR (see the Clarifications and Revisions to the Draft EIR, Section 12.2).

***Response to Comment No. 7:***

Comment No. 7 recommends that the proposed ordinances require stores to make reusable bags clearly visible to customers (*i.e.*, by requiring that reusable bags be placed at a standard location in each store). This comment is out of the scope of CEQA regarding to the EIR; however, the recommendation is acknowledged for the record, and will be considered by the Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 8:***

Comment No. 8 recommends that the proposed ordinances require stores to offer both paper bags and reusable bags to the public at the point of sale, rather than offer paper bags only. The recommendation is acknowledged for the record, and will be considered by the Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

**East Los Angeles College  
1700 Avenida Cesar Chavez  
Monterey Park, California 91754**

***Response to Comment No. 1:***

Comment No. 1 expressed support for the proposed ordinances. The County of Los Angeles appreciates the fact that a member of the public took the time to attend the public meeting, and acknowledges the comment for the record. All comments will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 2:***

Comment No. 2 recommends that the County of Los Angeles ban both plastic and paper carryout bags. As described in Section 4.2.2 of the EIR, Alternative No. 1 to the proposed ordinances proposes to ban the issuance of plastic and paper carryout bags for the same stores affected by the proposed ordinances. Alternative No. 4 proposes to ban the issuance of plastic and paper carryout bags at a larger number of stores, including other grocery stores, convenience stores, pharmacies and drug stores. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper bag usage to the greatest extent feasible, the County of Los Angeles also developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see Section 12.2). The commenter's preference for implementation of a ban on the issuance of both paper and plastic carryout bags is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

**Jackie Robinson Park  
8773 East Avenue R  
Little Rock, California 93543**

***Response to Comment No. 1:***

Comment No. 1 expresses support for the proposed ordinances. The County of Los Angeles appreciates that a member of the public took the time to attend the public meeting, and acknowledges the comment for the record. All comments will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 2:***

Comment No. 2 recommends the County of Los Angeles advertise public meetings in the *Antelope Valley Press* and the local television stations. That suggestion is acknowledged for the record, and will be considered when performing additional public outreach for the proposed ordinances.

***Response to Comment No. 3:***

Comment No. 3 expresses the commenter's preference for a regulation to incentivize recycling [such as a redemption value like what currently exists with glass bottles (*i.e.*, California Refund Value)]. The commenter's recommendation is acknowledged for the record, and will be considered by the Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 4:***

Comment No. 4 states that, currently, plastic bags are often discarded or are allowed to blow away in the wind. As described in Section 2.4.2 of the EIR, reducing the litter impacts of plastic carryout bags is one of the chief objectives of the proposed ordinances.

**Los Angeles County Arboretum and Botanic Garden**  
**301 North Baldwin Avenue**  
**Arcadia, California 91007**

No comments were received at the public meeting held on June 24, 2010, at the Los Angeles County Arboretum and Botanic Garden.

**Agoura Hills / Calabasas Community Center**  
**27040 Malibu Hills Road**  
**Calabasas, California 91301**

***Response to Comment No. 1:***

Comment No. 1 expressed support for the proposed ordinances and for AB 1998. The County of Los Angeles appreciates that a representative from the City of Los Angeles took the time to attend the public meeting and acknowledges the comment for the record. The City of Los Angeles's comments will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

**City of Long Beach Employee Development Center  
2929 East Willow Street  
Long Beach, California 90806**

The County of Los Angeles appreciates that a representative from the City of Long Beach, a representative from the Sierra Club, and a resident from the City of Downey took the time to attend the public meeting and provide comments about the proposed ordinances.

***Response to Comment No. 1:***

Comment No. 1 recommends that the County of Los Angeles ban both plastic and paper carryout bags. As described in Section 4.2.2 of the EIR, Alternative No. 1 proposes to ban the issuance of plastic and paper carryout bags for the same stores affected by the proposed ordinances. Alternative 4 proposes to ban the issuance of plastic and paper carryout bags at a larger number of stores, including other grocery stores, convenience stores, pharmacies, and drug stores. So that there may be a maximum environmental benefit realized from a fee on the issuance of paper carryout bags and to mitigate GHG-related impacts from a shift to paper bag usage to the greatest extent feasible, the County of Los Angeles developed Alternative 5, which is a hybrid of Alternatives 2, 3, and 4. Like Alternatives 3 and 4, Alternative 5 would affect all supermarkets and other grocery stores, pharmacies, drug stores, and convenience stores, with no limits on square footage or sales volumes in the County of Los Angeles. Like Alternative 2, Alternative 5 would ban the issuance of plastic carryout bags and place a fee on the issuance of paper carryout bags at such stores. The analysis of Alternative 5 has been added to Section 4.0 of the EIR (see the Clarifications and Revisions to the Draft EIR, Section 12.2). The commenter's preference for implementation of a ban on both paper and plastic and paper carryout bags is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 2:***

Comment No. 2 questioned when the County of Los Angeles is going to ban Styrofoam. The comment is out of the scope of CEQA regarding the EIR but is noted for the record.

***Response to Comment No. 3:***

Comment No. 3 recommends that the County of Los Angeles take a leadership role in banning plastic carryout bags to encourage other municipalities to follow. One of the objectives of the proposed ordinances is to conduct outreach to all 88 incorporated cities of the County to encourage adoption of comparable ordinances.

***Response to Comment No. 4:***

Comment No. 4 expresses support for a performance standard for reusable bags. The definition of reusable bags has been modified in Section 2.2.3 of the EIR to include a requirement for reusable bags to be designed for a minimum of 125 uses to ensure that potential environmental impacts due to reusable bags are minimized (see the Clarifications and Revisions to the Draft EIR, Section 12.2).



***Response to Comment No. 5:***

Comment No. 5 questions the County of Los Angeles motive for not considering placing a fee on plastic carryout bags. As described in Section 3.5.1 of the EIR, AB 2449 as set forth in California Public Resources Code Sections 42250, et seq. restricts the ability of a local jurisdiction like the County of Los Angeles from placing a fee on plastic carryout bags. AB 2449 expires under its own terms on January 1, 2013, unless it is extended. The County of Los Angeles does not wish to delay the implementation of an ordinance to restrict the use of plastic carryout bags. The comment regarding the possibility of placing a fee on plastic carryout bags is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during the decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 6:***

Comment No. 6 questions whether the cities in Los Angeles County could use this EIR to implement their own ordinances. The EIR analyzes the environmental impacts of the proposed ordinances under the assumption that all 88 incorporated cities would adopt similar ordinances, and was prepared with the goal of allowing the 88 incorporated cities to be able to use or refer to this EIR, as support for implementation of similar ordinances in their own jurisdictions.

***Response to Comment No. 7:***

Comment No. 7 questions whether the cities of Los Angeles would be able to place a fee on plastic bags. As described in Section 3.5.1 of the EIR, AB 2449 restricts the ability of cities to place a fee on plastic carryout bags. AB 2449 expires under its own terms on January 1, 2013, unless it is extended. The cities of Los Angeles would only be able to implement a fee on plastic bags after expiration of AB 2449. This EIR does not analyze the potential environmental impacts of a fee on plastic carryout bags. Therefore, the cities would need to perform additional analyses and determine whether placement of a fee on plastic carryout bags would require environmental documentation in order to comply with CEQA.

***Response to Comment No. 8:***

In Comment No. 8, a representative from the City of Long Beach asked if municipalities could require stores to provide an incentive (such as 5 cents cash back) for customers to use reusable bags. This comment is acknowledged for the record, and will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 9:***

Comment No. 9 inquires how the County of Los Angeles will regulate the quality of reusable bags. In response to comments received from the public, including Comment No. 9, the definition of reusable bags has been modified in Section 2.2.3 of the EIR to include a requirement for reusable bags to be designed for a minimum of 125 uses (see Section 12.2). The measures that will be used to enforce the proposed ordinances will be considered by the County of Los Angeles Board of Supervisors in its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 10:***

Comment No. 10 inquires whether the performance standard is described in the EIR. The definition of reusable bags has been modified in Section 2.2.3 of the EIR to include a requirement for reusable bags to be designed for a minimum of 125 uses to ensure that potential environmental impacts due to reusable bags are minimized (see Section 12.2).

***Response to Comment No. 11:***

Comment No. 11 inquires whether the County of Los Angeles has a plan for enforcement of the performance standard for reusable bags. The analysis in the EIR assumed that the proposed ordinance would be enforced, as with all ordinances adopted by the County of Los Angeles Board of Supervisors. The methods for enforcing the proposed ordinances will be considered by the County of Los Angeles Board of Supervisors during its decision-making process for the proposed County of Los Angeles ordinances and Final EIR.

***Response to Comment No. 12:***

Comment No. 12 states that the nearest commercial composting facility to the City of Long Beach is 100 miles away. As described in Section ES.3 of the EIR, due to the lack of commercial composting facilities in the County of Los Angeles that would be needed to process compostable plastic carryout bags, the proposed ordinances are recommended to include a ban on the issuance of compostable bags.

***Response to Comment No. 13:***

Comment No. 13 inquires whether a city in the County of Los Angeles could pass an ordinance to require that stores use compostable bags instead of plastic or paper carryout bags. As described in Section ES.3 of the EIR, the proposed ordinances include a recommended ban on the issuance of plastic bags, including compostable and biodegradable plastic bags, in the County of Los Angeles. The EIR also evaluated the potential environmental impacts of the adoption of a similar ban in the unincorporated cities within the County of Los Angeles. However the proposed ordinances encourage, but do not require that a ban include compostable bags in the cities within the County of Los Angeles. However, as discussed in Section ES.3 and Appendix B of the EIR, there are a number of problematic issues related to the use of compostable bags that do not make them ideal for use in Los Angeles County. If a city in the County of Los Angeles intends to pass an ordinance to require stores to use compostable bags, the city would need to perform additional analysis and determine whether requiring stores to use compostable bags would require environmental documentation in order to comply with CEQA.