

March 19, 2012

Mr. John Muller, Chair  
Attn: Mr. Dale Bowyer - dbowyer@waterboards.ca.gov  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Dear Mr. Muller:

Our organization Con10u. Inc. is pleased the San Francisco Bay Regional Water Quality Control Board may soon consider trash load reduction activities for each of the Permittees under its jurisdiction. Trash is a significant problem and we must take strong action to keep our planet green.

While we support the intent of the recommendations submitted for consideration from the Bay Area Stormwater Management Agencies Association (BASMAA), we are concerned those listed as "credits" are based upon unscientific methodology, assumptions by a select few, and the percentages arbitrary and unreliable.

Banning products to achieve a policy goal is a decision that should not be taken lightly. Businesses and consumers would be adversely impacted in a very difficult economic environment. Compounding the product bans with unreliable assumptions about the net result would be in our view irresponsible governance and a great disservice to the public represented. Public policy is sound when those making decisions use objective data to form unbiased conclusions, and in this case the BASMAA committee responsible for formulating the credit recommendations failed.

The documents being considered are a roadmap for how each Permittee must achieve a 40% reduction in trash by 2014. We strongly urge the Board to direct staff to eliminate any "credit" not derived from a scientifically valid methodology and objective process. We are opposed to product bans and believe the impacts to the economy would be too great, and the purported environmental results unclear.

Thank you for considering our concerns.

Sincerely,

James Brady  
VP Con10u.inc.

Cc: Members, San Francisco Bay Regional Water Quality Control Board  
Edwin Lombard