



March 20, 2012

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

Dear Mr. Muller:

The California Association of Black Pastors is encouraged 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 challenge to our communities and we must take strong action to keep our planet green.

The Bay Area Stormwater Management Agencies Association (BASMAA) has made recommendations with good intent, however the recommendations listed as "credits" raise significant concerns. The foundation of their recommendation on its surface is void of any scientific methodology and the assumptions made are by a select few. The percentages referred to in the recommendation are arbitrary and unreliable.

The proposed banning of products to achieve a policy goal is a decision that should carefully consider the impact on our community. Businesses and consumers would be adversely impacted at a time when we are experiencing an extremely challenging economic environment. Compounding the product bans with unreliable assumptions regarding its impact is irresponsible governance and is a disservice to the constituents we serve.

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 adverse impact to the economy, business owners and consumers would be too great, and the purported environmental results unclear.

Thank you for considering our concerns.

Sincerely,

Rev. Robert L. Jones

Rev. Robert L. Jones
Director of Governmental Affairs

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

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