



Roplast Industries, Inc.
3155 South 5th Avenue
Oroville, CA 95965
1-800-767-5278

Robert Bateman
President

September 11, 2012

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

Re: Agenda Item No. 7 - Implementation of the Municipal Regional Storm Water
Permit Trash Load Reduction Requirements

Dear Chairman Muller:

On behalf of Roplast Industries and our 150 employees in Oroville, I am writing to express concern over proposed storm water trash reduction policies that we believe could negatively impact the local economy. Certainly, my company supports efforts to reduce trash and litter. However, I understand that the regional water board may ultimately approve regional trash reduction policies that would incentivize cities and counties to adopt bans on certain plastic packaging.

As proposed, local governments that adopt bans on the use of polystyrene foam containers and plastic bags, which probably contribute less than 1% of total trash, would receive a "credit" of upwards of 20% toward their trash reduction requirements. Unfortunately, it is not clear to me how a ban on one material type will reduce the overall amount of trash that may find its way into local waterways. In fact, evidence from the City of San Francisco shows that plastic coated paper cup litter increased after that city banned polystyrene foam containers. I fail to see how the arbitrary credit being proposed helps local governments meet their trash load reduction objectives.

Furthermore, forcing local food providers or retailers to use more expensive products can have a negative impact on their operations, their customers, and local companies that may manufacture these products. In my view, the regional board has a responsibility to review policy proposals to ensure they are fair, based on credible evidence, and consider the economic impact on local businesses and manufacturing companies. As proposed, the "credit" proposal falls short of these criteria. I encourage the regional board to reject any suggested proposal that would incentivize local ordinances that "ban" individual packaging materials.

Sincerely,

Robert Bateman
President