

City of Huntington Beach

# Repeal of the Single-Use Carryout Bag Ordinance

*Administrative Draft*  
**Addendum to the  
Final EIR**  
SCH #2011111053



*April 2015*

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**Huntington Beach  
Repeal of the Single-Use  
Carryout Bag Ordinance**

**Addendum to the  
Final Environmental Impact Report  
SCH #2011111053**

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## Addendum to the Final EIR

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## INTRODUCTION

This document is an addendum to the Single-Use Carryout Bag Ordinance Final Environmental Impact Report (EIR) that was adopted by the Huntington Beach City Council in March 2013 (SCH #2011111053). The Single-Use Carryout Bag Ordinance (“the Bag Ordinance”) went into effect in November 2013. The Bag Ordinance prohibits the distribution of plastic carry-out bags and requires a ten (10) cent charge on the issuance of recyclable paper carry-out bags at specified retail establishments located within the City of Huntington Beach’s corporate limits. All stores affected by the Bag Ordinance are required to provide reusable bags to customers either for sale or at no charge, and each store is encouraged to promote the use of reusable bags through staff education and customer outreach. Prior to adoption of the ordinance, an estimated 102.2 million single-use plastic bags were used in Huntington Beach annually. Using the bag use assumptions from the Final EIR, it is estimated that currently with the Bag Ordinance approximately 5.1 million plastic bags are utilized annually in Huntington Beach.

The City is now proposing to repeal the Bag Ordinance and thus conditions related to carryout bag use at the specified retailers would return to pre-ordinance conditions (prior to November 2013). With the proposed repeal of the Bag Ordinance, all stores in Huntington Beach could distribute plastic carry-out bags and would not be required to charge for recyclable paper carry-out bags or provide reusable bags. The proposed repeal of the Bag Ordinance would result in similar conditions and impacts as analyzed under Alternative 1: The No Project Alternative in Section 6.0, *Alternatives*, of the Final EIR.

According to Section 15164 of the *California Environmental Quality Act (CEQA) Guidelines*, an addendum to a previously adopted Final EIR is the appropriate environmental document in instances when “only minor technical changes or additions are necessary” and when the new information does not involve new significant environmental effects beyond those identified in an adopted Final EIR. The action being contemplated involves repealing the Bag Ordinance and adopting a project similar to the No Project Alternative analyzed in the Final EIR. The City’s proposed repeal of the Bag Ordinance would have no new significant environmental effects. Since the proposed repeal of the Bag Ordinance does not require substantial changes to the No Project Alternative, major revisions of the EIR analysis are not warranted. Further the repeal of the Bag Ordinance would not create any new significant impacts as compared to the project studied in the EIR. As such, a subsequent EIR pursuant to Section 15162 of the *CEQA Guidelines* would not be warranted and an addendum is the appropriate environmental document under CEQA.

This addendum includes a description of the currently proposed repeal of the Bag Ordinance and a comparison of the impacts of the proposed repeal to those identified for the City’s approved Bag Ordinance, which was studied in the Final EIR that the City certified in March 2013.

## PROJECT DESCRIPTION

The proposed repeal of the Single-Use Carryout Bag Ordinance (“Bag Ordinance”) would remove the existing ban on the issuance of plastic carryout bags and a minimum ten (10) cent



charge on the issuance of recyclable paper carryout bags at “stores”, as defined by the Bag Ordinance. It would also remove the requirement that stores provide reusable bags to customers, either for sale or at no charge. Thus, stores would be able to distribute carryout bags how they see fit, similar to the way bags were distributed to customers prior to the Bag Ordinance going into effect in November 2013. Single-use plastic and paper carryout bags would generally be available free-of-charge to customers at most retail stores in Huntington Beach. In addition, reusable carryout bags would be available for purchase at most retailers.

With repeal of the Bag Ordinance, plastic carryout bag use would increase compared to use under current conditions with the Bag Ordinance and total use of plastic carryout bags would be similar to conditions prior to adoption of the Bag Ordinance. Repealing the Bag Ordinance would likely reduce the use of paper carryout bags and reusable bags as it is anticipated that customers would utilize “free” or no cost plastic carryout bags distributed by retailers.

Using the assumptions of bag use from the Final EIR, it is estimated that currently with the Bag Ordinance (as shown in Table 1 below) approximately 5.1 million plastic bags, 45.99 million paper bags and approximately 982,676 reusable bags are utilized per year in Huntington Beach. Table 2 shows the estimated plastic bag use in the City if the Bag Ordinance is repealed. As shown, plastic bag use would increase by approximately 99.39 million bags per year. Plastic bag use in Huntington Beach would be approximately 104.5 million bags per year, similar to the estimated bag use prior to adoption of the Bag Ordinance.

**Table 1  
Existing Bag Use with Bag Ordinance**

<b>Type of Bag</b>	<b>Replacement Assumption [1]</b>	<b>Explanation</b>	<b>Bags Used Post-Ordinance Adoption</b>
Single-Use Plastic	5% remaining	Because the Ordinance does not apply to all retailers, some single-use plastic bags would remain in circulation.	5,109,917
Single Use Paper	45%	Although the volume of a single-use paper carryout bag is generally 150% of the volume of a single-use plastic bag, such that fewer paper bags would be needed to carry the same number of items, it is conservatively assumed that paper would replace plastic at a 1:1 ratio.	45,989,254
Reusable	50%	Although a reusable bag can, by definition, be used 125 times, it is conservatively assumed that a reusable bag would be used by a customer once per week for one year, or 52 times.	982,676
<b>Total Bag Use With Ordinance</b>			<b>52,081,848</b>
<b>Total Single-Use Plastic Bag Use With Ordinance</b>			<b>5,109,917</b>

[1] Rates utilized in the City of Huntington Beach Final EIR, SCH # 2011111053, Certified March 2013.



**Table 2**  
**Estimated Single-Use Plastic Bag Use After Ordinance Repeal**

Area	Population [1]	Number of single-use plastic bags Used per Person [2]	Explanation	Total Bags Used Annually
Huntington Beach	195,999	533.18	While it is acknowledged that as a result of the Ordinance, some peoples' behaviors may have changed and they may solely use reusable bags, it is assumed that 100% of the people who switched from plastic bags with the ban would switch back to using plastic bags after the repeal.	104,502,747
<b>Total Increase in Single-Use Plastic Bags</b>				<b>99,392,830</b>

[1] California Department of Finance, E-5, May 2014

[2] Based on per bag use assumptions in original Huntington Beach Final EIR, Certified March 2013

The City's objectives for the Bag Ordinance, as identified in the Final EIR's Section 2.0, Project Description, included:

- Reducing the number of single-use plastic bags distributed by retailers and used by customers in Huntington Beach
- Deterring the use of paper bags by customers in Huntington Beach
- Promoting a shift toward the use of reusable carryout bags by retail customers in Huntington Beach
- Reducing the environmental impacts related to single-use plastic carryout bags, such as impacts to biological resources (including marine environments) and water quality
- Avoiding litter and the associated adverse impacts to stormwater systems, aesthetics and the marine environment (Pacific Ocean and Bolsa Chica Ecological Reserve)

With repeal of the Bag Ordinance, these objectives of the Bag Ordinance would also be removed.

## **ENVIRONMENTAL IMPACTS**

This section addresses each of the environmental issues studied in the Final EIR, comparing the effects of the proposed repeal of the Bag Ordinance with the effects of the Bag Ordinance that was the subject of the certified Final EIR (March 2013).

### **Air Quality**

#### *Manufacture and Use*

In the Final EIR, it was determined (see Impact AQ-1) that while the Bag Ordinance would potentially alter processing activities related to bag production, which has the potential to increase air pollutant emissions, the Bag Ordinance is expected to substantially reduce the number of single-use plastic carryout bags, thereby reducing the total number of bags manufactured and overall emissions associated with bag manufacture and use. Therefore, air quality impacts related to alteration of processing activities were determined to be Class IV,



beneficial. Table 3 below shows the estimated emissions associated with bag manufacture and use under existing conditions with the Bag Ordinance.

**Table 3  
Existing Air Pollution Emissions by Bag Type - with Bag Ordinance**

<b>Carryout Bag Type</b>	<b>Existing # of Bags Used per Year</b>	<b>Ozone Emissions (kg) per 1,000 bags [1,2]</b>	<b>AA Emissions (kg) per 1,000 bags [1,3]</b>	<b>Existing Ozone Emissions per year (kg) [4]</b>	<b>Existing AA Emissions per year (kg) [4]</b>
Single-Use Plastic	5,109,917	0.023	1.084	118	5,539
Recycled Paper	45,989,254	0.03	2.06	1,380	94,738
Reusable	982,676	0.032	3.252	31	3,196
<b>Total Existing Emissions with Ordinance</b>				<b>1,529</b>	<b>103,473</b>
<b>Emissions Pre-Ordinance</b>				<b>2,351</b>	<b>110,783</b>
<b>Net Change (Ordinance minus Pre-Ordinance)</b>				<b>- 822</b>	<b>- 7,310</b>
<b>% Change</b>				<b>- 54%</b>	<b>- 7%</b>

[1] Impact rate per bag as stated in Stephen L. Joseph, 2010; Ecobilan, 2004; FRIDGE, 2002; and Green Cities California MEA, 2010; Santa Monica Single-use Carryout Bag Ordinance Final EIR, January 2011.

[2] Emissions per 1,000 bags from Ecobilan, 2004; Santa Monica Single-use Carryout Bag Ordinance Final EIR, January 2011.

[3] Emissions per 1,000 bags from FRIDGE, 2002 and Green Cities California MEA, 2010; Santa Monica Single-use Carryout Bag Ordinance Final EIR, January 2011.

[4] Emissions per year = (Emissions in kg per 1,000 bags rate x number of bags used per year / 1,000)

With repeal of the Bag Ordinance, air pollutant emissions associated with bag manufacture and use may increase as the overall number of single-use plastic carryout bags would increase by approximately 99.39 million plastic bags per year. Table 4 shows the anticipated emissions if the Bag Ordinance were to be repealed. Ozone emissions and atmospheric acidification emissions associated with single use plastic bag manufacturing and use would increase by approximately 875 kg per year for ozone and 9,808 kg per year for atmospheric acidification compared to existing conditions with the Bag Ordinance. However, these impacts would not be significant because any manufacturing facilities would be required to adhere to existing Air Pollution Control District regulations and permit requirements for operations. Compliance with applicable regulations would ensure that manufacturing facilities would not generate emissions conflicting with or obstructing implementation of the applicable air quality plan, violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant. Compliance with existing regulations would reduce impacts to a less than significant level and the air quality pollutant emissions from manufacturing carryout bags would be similar to the conditions in the City prior to adoption of the Bag Ordinance.



**Table 4  
 Air Pollution Emissions by Bag Type - with Repeal**

Carryout Bag Type	Proposed # of Bags Used per Year	Ozone Emissions (kg) per 1,000 bags [1,2]	AA Emissions (kg) per 1,000 bags [1,3]	Ozone Emissions per year (kg) [4]	AA Emissions per year (kg) [4]
Single-Use Plastic	104,502,747	0.023	1.084	2404	113,281
Recycled Paper	0	0.03	2.06	0	0
Reusable	0	0.032	3.252	0	0
<b>Total Proposed Emissions with Repeal</b>				<b>2,404</b>	<b>113,281</b>
<b>Existing Emissions with Ordinance</b>				<b>1,529</b>	<b>103,473</b>
<b>Net Change (Total minus Existing)</b>				<b>874.9</b>	<b>9,808</b>
<b>% Change</b>				<b>57%</b>	<b>9%</b>

[1] Impact rate per bag as stated in Stephen L. Joseph, 2010; Ecobilan, 2004; FRIDGE, 2002; and Green Cities California MEA, 2010; Santa Monica Single-use Carryout Bag Ordinance Final EIR, January 2011.

[2] Emissions per 1,000 bags from Ecobilan, 2004; Santa Monica Single-use Carryout Bag Ordinance Final EIR, January 2011.

[3] Emissions per 1,000 bags from FRIDGE, 2002 and Green Cities California MEA, 2010; Santa Monica Single-use Carryout Bag Ordinance Final EIR, January 2011.

[4] Emissions per year = (Emissions in kg per 1,000 bags rate x number of bags used per year / 1,000)

*Emissions Related to Truck Trips*

In the Final EIR (as discussed in Impact AQ-2), the Bag Ordinance was anticipated to generate air pollutant emissions associated with an incremental increase in truck trips to deliver paper and reusable carryout bags to local retailers. However, emissions did not exceed South Coast Air Quality Management District (SCAQMD) operational significance thresholds. Therefore, operational air quality impacts were determined to be Class III, *less than significant*.

With repeal of the Bag Ordinance, truck trips would decrease compared to existing conditions with the Bag Ordinance as plastic bags are lighter in weight and smaller in overall size and volume compared to paper and reusable bags (thus fewer trips would be necessary to deliver bags to retailers). Table 5 summarizes the net change in truck trips as a result of repealing the Bag Ordinance. With a reduction in the number of truck trips (a reduction of approximately 173 truck trips per year), emissions associated with these truck trips would also be incrementally reduced compared to existing conditions. Thus, with repeal of the Bag Ordinance, emissions associated with truck trips would be beneficial compared to existing conditions and the air quality emissions related to carryout bag use would be similar to the conditions in the City prior to adoption of the Bag Ordinance.



**Table 5  
 Estimated Truck Trips per Day With Repeal**

<b>Carryout Bag Type</b>	<b>Proposed # of Bags Used per Year</b>	<b>Number of Bags per Truck Load [1]</b>	<b>Proposed Truck Trips Per Year [2]</b>	<b>Proposed Truck Trips per Day</b>
Single-Use Plastic	104,502,747	2,080,000	50.2	0.138
Recycled Paper	0	217,665	0.0	0.000
Reusable	0	108,862	0.0	0.000
<b>Proposed Truck Trips for Carryout Bags with Repeal</b>			<b>50.2</b>	<b>0.138</b>
<b>Truck Trips for All Carryout Bags with Ordinance</b>			<b>222.8</b>	<b>0.610</b>
<b>Net New Truck Trips with Repeal</b>			<b>- 172.5</b>	<b>- 0.473</b>

[1] City of Santa Monica Single-Use Carryout Bag Ordinance EIR (SCH #2010041004), January 2011.

[2] (Number of Carryout Bags Per Year) / (Number of Carryout Bags per Truck) = Truck Trips per Year

## **Biological Resources**

In the Final EIR (see Impact BIO-1), it was determined that while the Bag Ordinance would incrementally increase the number of paper and reusable bags within Huntington Beach, the reduction in the amount of single-use plastic bags would incrementally reduce the amount of litter entering coastal and marine habitats, thus reducing litter-related impacts to sensitive species, plant communities, and coastal wetland areas. This was considered a Class IV, *beneficial*, effect (Impact BIO-1 in the Final EIR).

The proposed repeal of the Bag Ordinance would incrementally reduce the number of paper and reusable bags within Huntington Beach. However, the increase in the amount of plastic carryout bags could incrementally increase the amount of litter entering coastal and marine habitats, thus increasing litter-related impacts to sensitive species, plant communities, and coastal wetland areas.

All carryout bags, including single-use plastic, paper, and reusable bags, have the potential to affect coastal habitats such as the Pacific Ocean and Bolsa Chica Ecological Preserve when bags are improperly disposed of. These bags can become litter that enters the storm drain system and ultimately enters into coastal and marine environments. As described in the *Setting* of EIR Section 4.2, *Biological Resources*, litter that enters coastal habitats can adversely affect sensitive species that inhabit coastal and marine environments, including sea turtles, seals, whales, otters, or bird species as a result of ingestion or entanglement. Each type of carryout bag's potential to become litter varies and is based on the number of bags disposed of as well as the bag's weight and material.

Repealing the existing Bag Ordinance would increase plastic bag usage by 99.39 million bags per year compared to existing conditions in 2015 with the Bag Ordinance (from 5.1 million to 104.5 million bags per year). This increase in plastic bags would generally increase litter-related impacts to sensitive species, plant communities, and coastal wetland areas compared to conditions with the Bag Ordinance implemented. Impacts for the proposed repeal of the Bag Ordinance would be similar to the impacts of the No Project Alternative identified in the Final EIR. As stated in EIR Section 6.0, *Alternatives*, the No Project Alternative (which is similar to repealing the Bag Ordinance) would not achieve the Bag Ordinance's beneficial effects relative



to biological resources (sensitive species), nor would it result in the general benefits with respect to litter accumulation that are expected to result from implementation of the Bag Ordinance. However, litter related impacts would be the same or similar to conditions prior to the adoption of the Bag Ordinance. Further, stormwater discharges from the City are regulated under the National Pollutant Discharge Elimination System (NPDES) permit system. Locally, Huntington Beach is a part of the Santa Ana Region Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and The Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Stormwater Runoff Orange County (Order No. R8-2009-0030, NPDES No. CAS618030) (Municipal NPDES Permit). As one of the co-permittees of this Municipal NPDES Permit, the City is responsible for the management of storm drain systems within their jurisdiction and are required to implement management programs, monitoring programs, implementation plans and all best management practices (BMPs) outlined in the Drainage Area Master Plan (DAMP), and take any other actions as may be necessary to meet the Maximum Extent Practicable (MEP) standard. The corresponding City of Huntington Beach Municipal NPDES Permit Local Implementation Plan of 2011 (City of Huntington Beach LIP) includes a wide range of continuing and enhanced BMPs and control techniques. These BMPs and control techniques would reduce litter related storm drain and water quality impacts and thus would also reduce litter impacts on biological resources. In addition, the Citywide Urban Runoff Management Plan (CURMP) provides a broad framework for managing the quantity and quality of all urban runoff that reaches receiving waters from the land surfaces and through the storm drain system within the City.

With adherence to existing regulations, impacts to biological resources related to litter would be less than significant with repeal of the Bag Ordinance. Further, any litter related impacts would be the same or similar to conditions prior to adoption of the Bag Ordinance and thus would not result in any new significant impacts to sensitive species or to coastal and marine ecosystems.

## **Greenhouse Gas Emissions**

The Final EIR (as discussed in Impact GHG-1) determined that implementation of the Bag Ordinance would incrementally increase greenhouse gas (GHG) emissions compared to existing conditions by approximately 2,977 metric tons of carbon dioxide equivalent units (CO<sub>2</sub>E) per year. However, this amount of emissions did not exceed recommended SCAQMD thresholds and did not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Thus impacts were considered to be Class III, *less than significant*.

With repeal of the Bag Ordinance, GHG emissions would incrementally decrease compared to existing conditions with the Bag Ordinance and return to levels similar to those prior to adoption of the Bag Ordinance. The levels of GHG emissions for bag use are directly related to the manufacturing, transport, and disposal of single-use plastic, recycled paper, and reusable carryout bags. The manufacturing process to make all types of carryout bags requires fuel and energy consumption. This generates GHG emissions, including CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O<sub>x</sub>, fluorinated gases, and ozone. In addition, fertilizers that are used on crops for resources such as cotton, which are then utilized in the manufacture of reusable bags, also have the potential to emit N<sub>2</sub>O. The amount of GHG emissions varies depending on the type and quantity of carryout bags produced. Compared to truck trips and disposal, the manufacturing process is the largest



emitter of GHGs due to the high volume of fuel and energy consumption that is used during the process. Delivery trucks that transport carryout bags from manufacturers or distributors to Huntington Beach retailers also create GHG emissions. GHG emissions from truck trips result primarily from the combustion of fossil fuels and include CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O.

Using the same emission rates per bag as used in the EIR, the following table estimates GHG emissions related to repealing the Bag Ordinance. As shown in Table 6, GHG emissions would be reduced by approximately 2,915 metric tons CO<sub>2</sub>E per year compared to current conditions with the Bag Ordinance in place. This reduction is primarily related to higher emissions rates for paper and reusable bags compared to single-use plastic bags and additional truck trips needed to carry paper and reusable bags to retailers in Huntington Beach. As the repeal of the Bag Ordinance would reduce GHG emissions compared to current conditions, this would be a beneficial impact related to GHG emissions and climate change. Emissions would be similar to conditions prior to implementation of the Bag Ordinance and impacts would not be significant.

**Table 6**  
**Proposed GHG Emissions by Bag Type with Repeal**

Carryout Bag Type	Proposed # of Bags Used per Year	GHG Impact Rate (metric tons CO <sub>2</sub> E)	CO <sub>2</sub> E per year (metric tons)	CO <sub>2</sub> E per Person (metric tons) [4]
Single-Use Plastic	104,502,747	0.04 per 1,500 bags [1]	2787	0.0142
Recycled Paper	0	0.1188 per 1,000 bags [2]	0	0.0000
Reusable	0	5.24 per 1,000 bags [3]	0	0.0000
<b>Total GHG Emissions with Repeal</b>			<b>2,787</b>	0.0142
<b>Existing GHG Emissions with Ordinance</b>			<b>5,702</b>	<b>0.0297</b>
<b>Net Change (Total minus Existing)</b>			<b>- 2,915</b>	<b>- 0.0155</b>

CO<sub>2</sub>E = Carbon Dioxide Equivalent units

[1] Based on Boustead Report, 2007; Santa Monica Single use Carryout Bag Ordinance Final EIR, January 2011.

[2] 10% reduction (from a rate of 3.3 to 2.97) based on the Scottish Report (AEA Technology, 2005) and the Santa Clara County Negative Declaration, October 2010 based on Environmental Defense Fund's Paper Calculator.

[3] Based on Environment Agency – United Kingdom government report, 2011.

[4] Emissions per person are divided by the 2014 population in Huntington Beach

## Hydrology and Water Quality

### *Water Quality from Litter*

The Final EIR (as discussed in Impact HWQ-1) determined that while the Bag Ordinance would incrementally increase the number of single-use paper and reusable bags used in Huntington Beach, the overall reduction in the total amount of carryout bags would incrementally reduce the amount of litter and waste entering storm drains, water ways and receiving waters such as the Pacific Ocean, improving water quality. This was determined to be a Class IV, beneficial, effect.

Repeal of the Bag Ordinance would incrementally increase the number of plastic bags used in Huntington Beach and thus would incrementally increase the amount of litter and waste entering storm drains, water ways and receiving waters such as the Pacific Ocean, degrading water quality compared to existing conditions.



Each type of carryout bag's potential to become litter is based on the bag's weight, material and quantity of bags used within Huntington Beach. Single-use plastic bags that become litter may enter storm drains from surface water runoff or may be blown directly into local waterways by the wind. Single-use plastic bag litter that enters the storm drain system can block or clog drains resulting in contamination (Green Cities California MEA, 2010).

With repeal of the Bag Ordinance, the overall amount of single-use carryout bags used in Huntington Beach per year would increase by approximately 99.39 million bags. Therefore, repeal of the Bag Ordinance could increase the amount of litter associated with single-use plastic carryout bags compared to existing conditions. Consequently, water quality may degrade from repeal of the Bag Ordinance compared to existing conditions with the Bag Ordinance implemented, as the amount of litter may increase in the City that could enter storm drains and local waterways as well as the receiving waters such as the Pacific Ocean, thus degrading water quality and increasing the potential for storm drain blockage.

Although plastic litter may increase with repeal of the Bag Ordinance compared to existing conditions with the Ordinance in place, as stated in the EIR Section 4.4, *Hydrology and Water Quality*, page 4.4-4.5, and as described above in the discussion of Biological Resources, stormwater discharges from the City are regulated under the NPDES permit system and locally, Huntington Beach is a part of the regional Municipal NPDES Permit (Order No. R8-2009-0030, NPDES No. CAS618030)). As one of the co-permittees of this Municipal NPDES Permit, the City is responsible for the management of storm drain systems within their jurisdiction and are required to implement management programs, monitoring programs, implementation plans and all BMPs outlined in the DAMP. The corresponding City of Huntington Beach LIP includes a wide range of continuing and enhanced BMPs and control techniques that would reduce litter related storm drain and water quality impacts. In addition, the CURMP provides a broad framework for managing the quantity and quality of all urban runoff that reaches receiving waters from the land surfaces and through the storm drain system within the City.

With adherence to existing regulations, impacts to water quality related to litter would be less than significant with the repeal of the Bag Ordinance. Further, any litter related impacts would be the same or similar to conditions prior to adoption of the Bag Ordinance and thus would not result in any new significant impacts to water quality.

#### *Water Quality Associated with Manufacturing Bags*

The Final EIR (as discussed in Impact HWQ-2) determined that an increase in the number of paper and reusable bags used in the City could potentially alter processing activities related to bag production, which could potentially degrade water quality in some instances and locations. However, it was determined that bag manufacturers would be required to adhere to existing regulations including NPDES Permit requirements, AB 258 and the California Health and Safety Code. Therefore, impacts to water quality from altering bag processing activities were considered Class III, *less than significant*.

The manufacturing process for single-use plastic, single-use paper, and reusable carryout bags utilize various chemicals and materials. Conventional single-use plastic bags are a product of the petrochemical industry and are typically produced by independent manufacturers who purchase virgin resin from petrochemical companies or obtain non-virgin resin from recyclers



or other sources. Single-use plastic bags begin the manufacturing process with the conversion of crude oil or natural gas into hydrocarbon monomers, which are then further processed into polymers. These polymers are heated to form plastic resins, which are then blown through tubes to create the air pocket of the bag. Once cooled, the plastic film is stretched to the desired size of the bag and cut into individual bags (Green Cities California MEA, 2010). The plastic resin pellets are a concern when accidentally released (from spilling into storm drains during use or transport) into aquatic environments. AB 258 was enacted to address these concerns by implementing program control measures that require plastic manufacturing, handling, and transportation facilities to implement best management practices to control discharges (accidental release from spilling) of preproduction plastics. This includes containment systems, careful storage of pre-production plastics, and the use of capture devices to collect any spills.

Products used in the process to manufacture single-use plastic bags, such as petroleum and natural gas, also have the potential to be released as result of an accident during transport or use. However, regulatory agencies such as the EPA set forth Preliminary Remediation Goals (PRGs) for various pollutants in soil, air, and tap water (EPA Region IX, Preliminary Remediation Goals Tables, 2004). PRG concentrations can be used to screen pollutants in environmental media, trigger further investigation, and provide initial cleanup goals resulting from an accident or spill of petroleum or natural gas at a single-use plastic bag manufacturing facility.

Although repealing the Bag Ordinance would incrementally increase the manufacturing of single-use plastic bags for use in Huntington Beach, it would also eliminate the need to manufacture as much paper and reusable bags as currently exist in the City with the Bag Ordinance. Furthermore, any existing or potential manufacturing facilities (whether plastic, paper or reusable bag manufacturers) would be required to adhere to existing federal, state and local regulations which are intended to protect water quality. Therefore, impacts to water quality related to the potential change of processing activities as a result of repealing the Bag Ordinance would not be significant.

## **Conclusion**

As discussed above, impacts associated with repeal of the Bag Ordinance related to air quality, biological resources, greenhouse gases, and hydrology and water quality were determined to have similar impacts as the Final EIR as no impacts would be considered significant. All of these issues were determined to result in either less than significant impacts or beneficial impacts. The City's proposed repeal of the Bag Ordinance would have no new significant environmental effects. Since the proposed repeal of the Bag Ordinance does not require substantial changes to the No Project Alternative, major revisions of the EIR analysis are not warranted. Further the repeal of the Bag Ordinance would not create any new significant impacts as compared to the project studied in the EIR. As such, a subsequent EIR pursuant to Section 15162 of the *CEQA Guidelines* would not be warranted and an addendum is the appropriate environmental document under CEQA.



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