



February 3, 2025
Delivered via Email
To: Coronado City Council

Re: Support for Item #10D, INTRODUCTION OF AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CORONADO, CALIFORNIA, AMENDING TITLE 36 OF THE CORONADO MUNICIPAL CODE TO ADD CHAPTER 36.28 RELATED TO POLYSTYRENE AND SINGLE-USE PLASTICS REGULATIONS

Honorable Mayor Duncan, Coronado City Councilmembers, and City Staff,

The Surfrider Foundation is a nonprofit grassroots organization dedicated to the protection and enjoyment of our world's ocean, waves, and beaches, for all people, through a powerful activist network. Thank you for your support thus far of potential citywide regulations to prevent single-use plastics from blighting our communities, beaches, and ocean. We offer our strong support for the ordinance now before you, along with some practical suggestions to clarify and strengthen its language.

First, we'd like to commend the comprehensive nature of the draft ordinance and the significant reduction in single-use plastic pollution it will surely engender in Coronado. We support the restrictions on single-use plastic foodware, foodware accessories, carryout bags, helium balloons, and bottled beverages at city facilities and events. We offer the following suggestions to clarify and strengthen the ordinance's intent:

- Strike "biodegradable" from the ordinance as the term is vague, often misused, and without a specified timeline. For this reason, [it is illegal in California to label a product as "biodegradable."](#) A detailed definition of "compostable" is sufficient.
- Add to the definition of "compostable" as follows: "*Compostable*" means material that can be broken down into, or otherwise become part of, usable compost in a safe and timely manner **using the City's available food recycling programs** (suggested language emphasized).
 - This change will help eliminate problematic bioplastics, which EDCO does not accept in their food recycling program. Bioplastics do not readily biodegrade in the ocean. Because they look like traditional plastic, people commonly mix them with their recycling which leads to contamination. In Coronado, they can only be properly disposed of in landfill bins. For these reasons, bioplastics are not considered a better alternative to single-use plastics and are best avoided.
- Strike "reusable carryout bag" from the ordinance (Sec 36.28.050 B and C¹) as it is not adequately defined, and retain only "recyclable paper carryout bag." This will eliminate

¹ Example of our suggestion: "Retail establishments/Food service providers may distribute only **reusable carryout bags** or recyclable paper carryout bags for the purpose of carrying away goods, merchandise, or other items from the point of sale, in accordance with this chapter, and may not use use carryout bags made from polystyrene or single-use plastics." (suggestion emphasized)



plastic carryout bags altogether at point of sale in Coronado, by creating consistency with recent updates to the California bag ban passed by the state legislature (SB 1053). SB 1053 gets rid of the thicker, "reusable" plastic bags that are just as problematic as the flimsy plastic bags they replaced. Starting in 2026, grocery and convenience stores will only offer "recycled paper bags" at point of sale. Revising your carryout bag requirements to be similar will create more consistency across all businesses in Coronado. It will also further reduce single-use plastics by preventing businesses from adopting the thicker reusable plastic bags that SB 1053 rightly targeted. Residents will be encouraged to bring true reusable bags for their shopping needs.

- Expand the prohibition on polystyrene foam to also include non-foodware items such as foam coolers, packing peanuts, and egg cartons. This will further reduce foam pollution, which is among the most unmanageable forms of plastic pollution, and create citywide consistency. Address single-use polystyrene foam as a material, not just one prevalent form of it.
- Ask for/provide clarity on whether Section 36.28.030A² prohibits all single-use plastic foodware and foodware accessories, or just those that are non-recyclable. Our interpretation is that the language prohibits all single-use plastic foodware. However, the language could be misinterpreted the other way. Clarity is important so that the City Council knows what they're voting on, and so that regulated businesses know what to do.

These suggestions are based on our chapter's experience in both the development and passage of similar plastics ordinances around the county, as well as a detailed understanding of statewide plastics laws and how they interact with local laws. We are also on the frontlines of the plastic pollution problem locally, hosting almost 200 community cleanups per year at beaches across the county. We ask volunteers to collect data on what they find, and disposable plastics consistently account for over 80% of what they find each year. Polystyrene foam bits, plastic foodware, plastic foodware accessories like straws and utensils, and bottle caps all consistently rank as top items found.

Thank you for considering our comments and suggestions. Please support the ordinance before you and direct staff to make these recommended modifications, which are relatively straightforward and should not take long to implement. We look forward to Coronado becoming a local leader in the fight against plastic pollution in our communities, beaches, and ocean!

² From the ordinance: *Regulated entities shall not provide prepared food in foodware made, in whole or in part, from polystyrene or **single-use plastic**. Regulated entities shall only use and distribute foodware and foodware accessories upon request, and such requested foodware and foodware accessories must be reusable, **recyclable**, or compostable*



For our Ocean, Waves, and Beaches,

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