

CITY OF LOS ANGELES  
CALIFORNIA



ANTONIO R. VILLARAIGOSA  
MAYOR

BOARD OF  
PUBLIC WORKS

COMMISSIONERS

CYNTHIA M. RUIZ  
PRESIDENT

DAVID SICKLER  
VICE PRESIDENT

PAULA A. DANIELS  
PRESIDENT PRO TEMPORE

YOLANDA FUENTES

VALERIE LYNNE SHAW

DEPARTMENT OF  
PUBLIC WORKS

BUREAU OF SANITATION

RITA L. ROBINSON  
DIRECTOR

JOSEPH E. MUNDINE  
EXECUTIVE OFFICER

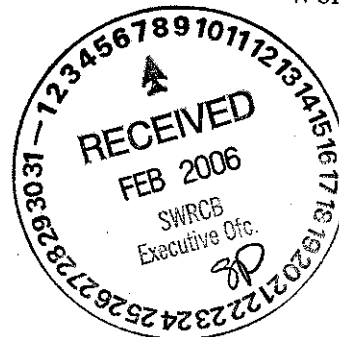
VAROUJ S. ABKIAN  
TRACI J. MINAMIDE  
ENRIQUE C. ZALDIVAR  
ASSISTANT DIRECTORS

1148 SOUTH BROADWAY, 9<sup>TH</sup> FLOOR  
LOS ANGELES, CA 90015  
TEL: (213) 485-2210  
FAX: (213) 485-2979

February 7, 2006

Atmospheric  
Workshop: 2/9/06

Ms. Tam Doduc, Chair  
State Water Resources Control Board  
1001 I Street  
P. O. Box 100  
Sacramento, CA 95812-0100



Attention: Selica Potter, Acting Clerk to the Board

Dear Ms. Doduc:

**COMMENT LETTER - ATMOSPHERIC DEPOSITION AND WATER QUALITY**

The City of Los Angeles Bureau of Sanitation (BOS) appreciates the opportunity to submit comments on this important issue.

The BOS is concerned that efforts to reduce water sources of certain pollutants, while ignoring air sources, may not be sufficient to achieve water quality standards. As the population increases and economy grows, atmospheric deposition of pollutants are expected to increase. One example is the anticipated increase of goods passing through the Port of Los Angeles. Truck transportation associated with these goods is expected to double by the year 2015. With increased business, additional trucks will cause further degradation of our traffic conditions, resulting in even more pollutants in our waterways, such as metals from brake pad and tire wear, and polyaromatic hydrocarbons (PAHs) from combustion of petroleum products. The pollutant contributions would be similar for increased population and associated automobile usage.

The BOS is submitting the following comments regarding gaps in regulatory structure, partnerships, and research needs to assist the SWRCB and CARB address the important issue of atmospheric deposition and impacts to water quality.



Ms. Tam Doduc  
State Water Resources Control Board  
February 7, 2006  
Page 2 of 3

### **Gaps in Regulatory Structure**

Studies have been conducted in the Los Angeles region by the Southern California Coastal Water Research Project and UCLA, which show that air deposition is the major source of metal pollutants in our waters. These pollutants fall directly onto the water surface or are washed off streets, buildings, and other land surfaces into receiving waters during wet weather. Thus, a major gap in the regulatory process is the incorrect assignment of responsibility and costs of remediation of air deposition pollutants to municipal separate stormwater sewer systems (MS4) permittees and co-permittees instead of air pollution sources. BOS requests that SWRCB investigate methods to reduce the burden of the MS4 permittees through regulatory and/or funding infrastructure to mitigate waterbody impairment caused by sources of air deposition.

### **Partnerships Among USEPA, CARB, Public Transit Agencies, non-profit organizations, and Manufacturers**

Partnerships are important and necessary to initiate change in current practices and technology. For example, partnerships between California Air Resources Board and public transit agencies can help with the evaluation of incentive programs for ridesharing, public transit, and telecommuting programs. These changes can help reduce the amount of pollutants generated by vehicles resulting from usage and wear, especially during stop-and-go traffic.

Studies have shown that copper containing brake pads and their wear is considered a large source of copper deposited on urban watersheds. A partnership effort with manufacturers may be the better approach to research braking systems with lower pollutant emissions and encourage their substitution. This would be best done on a national level, with partnership with U.S. EPA while also involving the brake pad industry. The non-profit group, Sustainable Conservation, has a Brake Pad Partnership, which has brought together brake pad manufacturers, environmental groups and U.S. EPA to conduct studies and find solutions to brake pad deposition. However, a statewide program would be helpful, allowing for the investigation of product substitution and incentives for implementation. Research on tire wear, which can release zinc and other toxicants to water, is also needed.

We hope the SWRCB and CARB will take into consideration our above comments as work progresses on addressing air deposition and water quality. Finally, the City of Los Angeles is doing its part in being actively involved with both air and water pollution programs to improve the quality of life for our residents. Examples include ridesharing support, public transportation incentives, alternative powered fleet vehicles, electric powered equipment instead of diesel, and electric power for docked ships.

Reducing the number of vehicle-hours or stop-and-go hours on our highways, as well as product substitution, will result in a better quality of life, a better environment, and savings in health costs by minimizing air-deposited pollutants.

Ms. Tam Doduc  
State Water Resources Control Board  
February 7, 2006  
Page 3 of 3

Please direct any questions to Mr. Clayton Yoshida at (213) 485-3937 or Ms. Donna Chen of Watershed Protection Division at (213) 485-3928.

Sincerely,



RITA L. ROBINSON  
Director, Bureau of Sanitation

cc: Shahram Kharaghani, Division Manager, Watershed Protection Division  
Omar Moghaddam, Division Manager, Regulatory Affairs Division  
Clayton Yoshida, Watershed Protection Division  
Donna Chen, Watershed Protection Division

City of Los Angeles  
Bureau of Sanitation  
Watershed Protection Division

facsimile transmittal

To: Selica Potter Fax: (916) 341-5620

From: Clayton Yoshida Date: February 7, 2006

Re: Comment Letter - Atmospheric Deposition and Water Quality Pages: 4 including cover

CC:



- Urgent
- For Review
- Please Comment
- Please Reply
- Please Recycle

Notes: I have also emailed this letter to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov) and sent a hard copy.

Thank you.

Four horizontal lines for additional notes or comments.

WATERSHED PROTECTION DIVISION

1149 S. BROADWAY, 10<sup>TH</sup> FLOOR  
Los Angeles, CA 90015

(213) 485-3937  
Mail Stop 1149-756  
FAX (213) 485-3939