



COALITION FOR PRACTICAL REGULATION

"It's about saving jobs"

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WEST COVINA
WHITTIER

February 28, 2006

Sylvia Ocy
Air Quality and Transportation Planning Branch
California Air Resources Board
1001 I Street
Sacramento, CA 94814

**Re: Emission Reduction Plan for Ports and International Goods
Movement in California**

Dear Ms. Ocy:

I am writing on behalf of the Coalition for Practical Regulation (CPR), an *ad hoc* group of 43 cities within Los Angeles County that have come together to address water quality issues. We would like to provide comments regarding the Air Resources Board's Emission Reduction Plan for Ports and International Goods Movement in California.

CPR has reviewed the *February 17, 2006 Draft Action Plan Phase II Progress Report: Draft Framework for Action*, prepared by the Business, Transportation and Housing Agency and the California Environmental Protection Agency, as well as the *December 1, 2005 Draft Emission Reduction Plan for Ports and International Goods Movement in California* prepared by the Air Resources Board that will become a "key component of the Phase II plan." Our comments today focus on the Emission Reduction Plan.

The CPR cities are disappointed that the Emission Reduction Plan does not address the impacts of atmospheric deposition on water quality. We recognize that the current draft was prepared before the historic joint workshop between the Air Resources Board and the State Water Board that was held on February 9, 2006 to discuss atmospheric deposition and water quality. However, we are still extremely discouraged that the impacts of international goods movement on water quality are ignored in the Emission Reduction Plan and barely mentioned in the Goods Movement Action Plan.

We urge the Air Resources Board to involve the State Water Board in preparation of the Revised Draft Emission Reduction Plan. We realize that

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much work has already gone into development of the plan and that the Revised Plan is to be prepared quickly. However, we believe that the following changes could be easily incorporated into the Emission Reduction Plan:

- **Almost everywhere that air pollution is cited as an environmental and public health problem, water pollution should also be cited.**
- **The Public Health Assessment in Chapter I and the Executive Summary should briefly discuss the adverse impacts of particulate matter on water quality and the bioaccumulation in fish of toxics from atmospheric deposition.**
- **A new section on "Particulate Matter and Water Quality" should be added to Chapter I. Water quality end points associated with atmospheric pollutants should be discussed in the section.**
- **A new section on "Water Quality-Related Costs" should be added to Chapter I. This section should recognize that the costs associated with water quality impacts are also high.**
- **The "Emission by Region" section in Chapter II should recognize the impacts to water quality from emissions released over water, from port facilities, and from transportation corridors and railyards.**
- **The "Drivers for Action" discussion in the "Background" section of Chapter III should include a commitment to reduce the adverse impacts on water quality from atmospheric deposition associated with goods movement by 50 percent by 2015.**
- **The Pollutants discussion in the "Scope of Plan" section of Chapter III should specify that strategies are designed to reduce pollutants that cause water quality impairments.**
- **The "Emission Reduction Goals" section of Chapter III should include specific statewide and South Coast goals for reducing the adverse impacts on water quality from port-related activities and import and export of cargo.**
- **Chapter IV should include a section addressing "Water Quality Impacts Avoided Due to Reduced Emissions."**
- **Chapter V should include a discussion of funding needed to address the water quality impacts of atmospheric pollution associated with goods movement as well as the water quality impacts of direct discharges to water, to parking and storage facilities, and to transportation corridors.**
- **Chapter IV should recognize that the federal government has a role to play in financing**

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water quality clean up as well as air quality clean up.

These recommended changes should be able to be incorporated into the Revised Draft Emission Reduction Plan expeditiously with the assistance of State Water Board staff. Such a cooperative effort would be a valuable contribution toward the Air and Water Boards working cooperatively to address the Air-Water Interface. The material presented at the February 9, 2006 joint workshop on Atmospheric Deposition and Water Quality should aid staff in making the recommended changes to the Draft Plan.

Sincerely,



Larry Forester
Steering Committee
Coalition for Practical Regulation

cc: Alan C. Lloyd, Ph.D., Secretary, CalEPA
Robert Sawyer, Ph.D., Chairman, Air Resources Board
Tam M. Doduc, Chair, State Water Resources Control Board
Jerry Secundy, Vice Chair, State Water Resources Control Board
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