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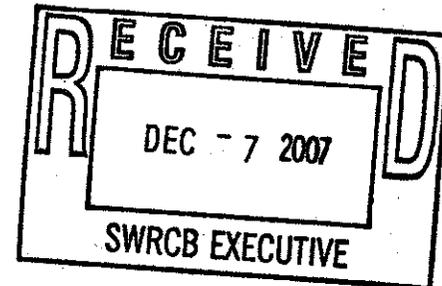
Public Comment
SF Bay – Copper - SSO
Deadline: 12/7/07 by 12 p.m.



*Flex your power!
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December 5, 2007

Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
By e-mail: commentletters@waterboards.ca.gov



Subject: Comment Letter – San Francisco Bay Copper Site-Specific Water Quality Objective

Dear Ms. Townsend:

The California Department of Transportation (Department) appreciates the opportunity to comment on the site-specific objectives (SSOs) for copper for San Francisco Bay. Our comments are as follows:

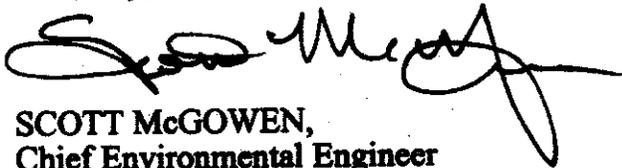
1. ***Appropriateness of SSOs*** – The Department supports the development of SSOs for copper for San Francisco Bay. As described in the Staff Report, a small fraction of the total copper in the water column occurs in the chemical forms that are toxic to marine organisms. It is appropriate to take into account the chemistry of the receiving water and focus on identifying risks to marine organisms.
2. ***Applicability to runoff*** – The proposed Basin Plan amendment includes the adoption of specific translators, a ratio of dissolved to total metal concentrations. However, it is not clear how stormwater runoff will be evaluated for copper discharges causing or contributing to the exceedance.
3. ***Brake Pad Partnership funding*** – The Staff Report notes that the Brake Pad Partnership is funded through Proposition 13 (Costa-Machado Act). It should be noted that the Department is also providing substantial funding.
4. ***Statewide source control for copper*** – The Staff Report identifies brake pads as a source of copper. The report also states that because of ongoing deposits of brake pad debris, “there may need to be additional measures addressing copper-containing wear debris on the part of urban stormwater management agencies.”

additional measures. Since alternatives to copper brake pads exist, the State Water Board could take statewide regulatory action or support legislative action to address this significant source of copper in runoff. The State Water Board previously supported legislative controls on copper with respect to the ban on copper additives to sanitary sewer systems in the Bay Area.

5. *Statewide SSO* – Apparent exceedances of copper standards occurs statewide. In many locations, the dischargers do not have the funding available to complete the necessary studies to support the development of SSOs. The board should look at working with other groups (MS4s) on cost impacts related to setting statewide standards. The Department would like to participate in this effort.

We strongly support the goals of the San Francisco Bay Copper SSO hope these comments are helpful. If you have any questions, please call Paul Lambert at 916-653-2512.

Sincerely,



SCOTT McGOWEN,
Chief Environmental Engineer