



May 31, 2018

The Honorable Dr. Bill Quirk, Ph.D.  
State Capitol, Room 2163  
Sacramento, CA 94249-0020  
Via FAX: (916) 319-2120

**RE: AB 3014 (Quirk) – Brake Friction Material Copper Limits Exemption  
Notice of Opposition**

The Los Angeles County Division of the League of California Cities® (Division), representing 86 cities in the County respectfully opposes your AB 3014 which would exempt high performance road and track capable vehicles and brake friction materials from SB 346 (Kehoe, 2010) requirements that copper, a significant aquatic pollutant, be reduced to 5% by weight in vehicle brake pads sold in California by 2021 and to a de minimis 0.5% by weight by 2025. **AB 3014 jeopardizes compliance efforts by cities in Los Angeles County to meet State and federally required copper reductions (Total Maximum Daily Loads or TMDL's) in stormwater and urban runoff.**

SB 346 (Kehoe) was strongly supported by the Los Angeles County Division after years of discussions with stakeholders. All exemptions in SB 346 were developed collaboratively through the Brake Pad Partnership, a collaboration with industry, government, and environmental groups, and were quantified to ensure that they would not undermine the environmental goals of the program. Peer-reviewed scientific studies have established that by far the most significant source of copper in urban watersheds is the fine dust generated from the use of brake pads.

Under the 2012 Municipal Separate Storm Sewer Systems Permit (MS-4) adopted by the Los Angeles Regional Water Quality Control Board, cities in Los Angeles County must meet the strongest water quality guidelines in the country; including requirements to remove metals like copper from stormwater and urban runoff. The Los Angeles County Department of Public Works estimates the total capital costs to comply with the permit exceed \$20 billion to upgrade infrastructure and implement stormwater capture technology to remove most pollutants. In the case for copper TMDLs, the only technically and economically feasible way for municipalities to comply with looming deadlines is to eliminate copper pollution at its primary source – vehicle brake pads. Without a reduction of copper in brake pads cities face infeasible costs to eliminate copper pollution. Cities and their taxpayers simply can't afford to allow exemptions for measurable amounts of copper into watersheds.

For these reasons, the Los Angeles County Division opposes AB 3014.

Sincerely,

Miguel Canales  
President, Los Angeles County Division  
League of California Cities®

cc: Los Angeles County Senate Delegation  
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