

City of Palo Alto
Office of the Mayor and City Council

May 21, 2018

The Honorable Dr. Bill Quirk, Ph.D.
State Capitol, Room 2163
P.O. Box 942849
Sacramento, CA 94249-0020

RE: AB 3014 (Quirk): Brake Friction Material Copper Limits Exemption, amended April 12 - Oppose

Dear Dr. Quirk:

The City of Palo Alto respectfully opposes AB 3014. By exempting certain vehicles from a carefully crafted, science-based compromise for vehicle brake copper reduction, this bill could slow the pace of water quality improvements made to protect endangered fish. Further, the heavy traffic in Palo Alto that adds to the pollution in our waterways and the special site-specific copper water quality objective for San Francisco Bay mean we can't afford to have any weakening of the original legislation, meant to improve water quality.

Copper poses threats to aquatic life, including migratory salmonid fish. Peer-reviewed scientific studies established that by far the most significant source of copper in urban watersheds is the fine dust generated from the use of vehicle brake pads. Current law (SB 346 (Kehoe), 2010) was designed to protect California water quality and provide a Clean Water Act compliance pathway for municipalities, while including a very generous brake pad copper phase-out period to meet the practical needs of the vehicle industry.

Specifically, SB 346 provided a generous 11 years for the industry to reduce vehicle brake pads to no more than 5% copper by weight and an additional four years to reach the final standard of no more than 0.5% copper by weight. This law provides California's cities and counties with the tool they need to protect aquatic ecosystems and to comply with water quality protection requirements.

All exemptions in current law were developed collaboratively through the Brake Pad Partnership of industry, government, and environmental groups and were quantified to ensure that they would not undermine the law's environmental goals. In contrast, the exemption in this bill was done without a stakeholder process, circumventing environmental groups and municipalities and undermining the goals of those who would protect water quality. Additionally, by creating a new exemption, 3014 will slow the pace of the already slow water quality improvement plan in current law. For the reasons outlined above, we must oppose AB 3014.

Sincerely,



Liz Kniss,
Mayor

City of Palo Alto

P.O. Box 10250
Palo Alto, CA 94303
650.329.2477
650.328.3631 fax

CC:

Senator Bob Wieckowski, Chair, Senate Environmental Quality Committee

Senator Jerry Hill

Assembly Member Marc Berman

Rachel Machi Wagoner, Chief Consultant, Senate Environmental Quality Committee

Josh Tooker, Chief Consultant, Assembly Environmental Safety & Toxic Materials Committee

Eddie Franco, Legislative Aide, Office of Assembly Member Bill Quirk

Palo Alto City Council

James Keene, Palo Alto City Manager

Townsend Public Affairs