



# Ventura Countywide Stormwater Quality Management Program

Participating Agencies June 4, 2010

Camarillo

County of Ventura

Fillmore

Moorpark

Ojai

Oxnard

Port Hueneme

San Buenaventura

Santa Paula

Simi Valley

Thousand Oaks

Ventura County  
Watershed Protection  
District

The Honorable Pedro Nava  
Chair, Assembly Committee on Environmental Safety & Toxic Materials  
State Capitol, Room 2148  
Sacramento, CA 95814

**Subject: SB 346 (KEHOE) – SOURCE CONTROL OF COPPER WATER POLLUTION – SUPPORT AS PROPOSED TO BE AMENDED**

Dear Assemblyman Nava:

The Ventura Countywide Stormwater Quality Management Program supports SB 346 (Kehoe), which will provide California's cities and counties with the tool they need to comply with stringent federal and state water quality mandates and avoid billions of dollars in costs and penalties. SB 346 requires that copper, an extremely significant aquatic pollutant, be reduced to a *de minimis* 0.5% by weight in vehicle brake pads sold in California by 2025. 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.

Pursuant to the requirements of the federal Clean Water Act, the Regional Water Quality Control Boards in Los Angeles and San Diego have already imposed severe copper Total Maximum Daily Loads (TMDLs). Similar TMDLs are expected to be imposed on other urban watersheds across the state in the near future. The only technically and economically feasible way for municipalities to comply with these looming deadlines is to eliminate copper pollution at its source – vehicle brake pads – no later than 2025. Any attempt to try and remove copper already dissolved in stormwater in highly urbanized areas would most likely require condemnation of large tracts of land and construction of elaborate infrastructure. This could easily cost already fiscally strapped local governments billions of dollars statewide with no guarantee that these methods would actually succeed.

SB 346 provides industry with a generous timeline within which to develop and distribute safe and effective copper-free brake friction materials while also giving cities and counties the ability to demonstrate that they will meet their copper TMDLs in a timely manner, without having to spend billions of dollars to do so. The Ventura County Stormwater Quality Management Program is pleased to support SB 346.

Sincerely,

Gerhardt Hubner  
On Behalf of the Entire  
Ventura Countywide  
Stormwater Management Program

cc: Senator Christine Kehoe

