



Protecting Alameda County Creeks, Wetlands & the Bay

VIA E-MAIL [REGS@DTSC.CA.GOV]

May 20, 2016

Ms. Jackie Buttle, Regulations Coordinator
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

399 Elmhurst St.
Hayward, CA
94544
p. 510-670-5543

Subject: Hazardous Materials: Motor Vehicle Brake Friction Materials
Proposed Regulations - DTSC Reference Number: R-2014-01

Dear Ms. Buttle:

MEMBER AGENCIES:

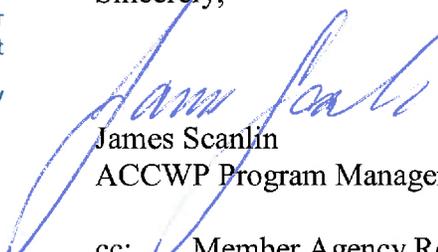
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Alameda County Flood
Control and Water
Conservation District
Zone 7 Water Agency

Thank you for the opportunity to file comments on the proposed regulations to phase out the content of copper and other heavy metals in motor vehicle brake friction materials. The Alameda Countywide Clean Water Program (“Program”) is a stormwater management consortium comprising the County of Alameda, the 14 cities within the County, the Alameda County Flood Control District, and the Zone 7 Water Agency.

The Program firmly supports these regulations that will implement the legislative requirements of SB346, which was passed in 2010 with support from a coalition of industry, government and environmental groups due to widespread impacts of copper from brake friction materials on aquatic life in California streams, lakes and estuaries. The Program contributed to scientific studies that demonstrated the need for these regulations and has supported ongoing efforts by the California Stormwater Quality Association (CASQA) to comment on previous draft regulations.

We thank you again for the opportunity to provide our comments and we ask that DTSC continue working with CASQA to finalize these regulations. If you have any questions, please contact me at (510) 670-6548 or jims@acpwa.org.

Sincerely,


James Scanlin
ACCWP Program Manager

cc: Member Agency Representatives