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Transmitted via email: [mrp.reissuance@waterboards.ca.gov](mailto:mrp.reissuance@waterboards.ca.gov)

Dear Dr. Mumley:

Thank you for the opportunity to comment on the next phase of the Municipal Regional Permit (MRP). While the City of Union City understands the need to routinely update the MRP and to evaluate or add new provisions that support the protection of our waterways, we have some concerns regarding the proposed Green Infrastructure provisions listed in Section C.3.j.

Section C.3.j, *Green Infrastructure*, of the draft MRP requires preparation and implementation of a Green Infrastructure Plan to facilitate the inclusion of low impact development drainage design into storm drain infrastructure on public and private lands, including streets, roads, storm drains, parking lots, building roofs, and other storm drain infrastructure elements. Union City incorporated in 1959 and is largely built out. Inclusion of low impact development drainage design features into the City's existing infrastructure and buildings is not feasible due to the substantial costs associated with the retrofit of existing facilities necessary to satisfy this requirement. In addition, the amount of staff time related to project management and public outreach would also be significant.

Union City has experience with installing these types of improvements and is well aware of the associated costs and related impact on staff resources. The City is currently in the process of retrofitting portions of three existing streets to install rain gardens, which is one of the primary ways of treating stormwater runoff from roads and satisfying the provisions listed in Section C.3.j. The combined street length of the projects is approximately 1.5 miles with a total estimated construction cost of approximately \$9.5 million. This equates to approximately \$6.5 million per mile to install this type of drainage improvement within an existing street.

The City is currently developed with 237 miles of roadways. At an average cost of \$6.5 million per mile, it would cost the City approximately \$1.5 billion to retrofit its existing streets to install these types of facilities throughout the City. In addition, the City has expended substantial staff time for management of these projects as well as outreach to the public since these types of projects typically result in

temporary disruption to the neighborhood from construction activities as well as permanent impacts such as displacement of parking, removal of trees, and the need for additional right-of-way.

This is just one practical example of the substantial financial burden that the proposed Green Infrastructure requirement places on cities. Without associated funding to support these activities, the requirements under Section C.3.j. results in an unfunded mandate. Union City is supportive of incorporating these types of improvements into new streets and buildings as they are constructed but strongly objects to application of this provision to existing facilities and buildings.

If you have any questions regarding this correspondence, please contact Carmela Campbell, Planning Manager at (510) 675-5316 or via email at [carmelac@unioncity.org](mailto:carmelac@unioncity.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Acosta', written over a horizontal line.

Tony Acosta, City Manager