



Councilmember: Susan Garner
Councilmember: Lana Malloy
Councilmember: Don Perry
Councilmember: A. Curtis Wright
Councilmember: Vacant

City Manager: Brian Loventhal
City Clerk: Andrea Chelemengos
Finance Officer: Sue L'Heureux
Building Official: Howard T. Bell

City of Monte Sereno

Mr. Bruce Wolfe, Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

March 30, 2009

Subject: Comments on the Municipal Regional Permit Revised Tentative Order,
dated February 11, 2009

Dear Mr. Wolfe:

The City of Monte Sereno, as a member of the Santa Clara Valley Urban Runoff Program, has participated in local and regional activities for improving the quality of urban runoff for nearly 20 years. And, while we remain committed to the improvement of water quality through management of urban runoff and stormwater pollution, we must also consider the economic cost to do so. In order to continue maximizing our efforts, we cannot stress enough the need for prioritization and focus on cost-effective stormwater management measures in the draft Municipal Regional Permit (MRP), dated February 11, 2009.

Our agency remains concerned about the proposed MRP's lack of priorities and lack of phasing-in of requirements over several permit cycles. At present the many individual measures, which may well be aimed to improve water quality, cause an aggregate burden that would place a considerable strain on public agency resources without likely, significant improvement to water quality (i.e., stringent and prescriptive controls on conditionally exempted discharges). In addition, the proposed permit lacks priority among high-cost resource allocation and capital costs requirements (i.e., multiples of special studies, pilot projects, new monitoring requirements, and structural controls). We request the following modifications to the proposed MRP:

- Prioritization of requirements and proposed improvements or enhancements of existing municipal stormwater programs;
- Implementation requirements, particularly those already in place, consistent with current (already approved) performance standards, which have been developed for nearly every element of our current permit and have effectively served as guiding principles for MEP
- Scaling back or further phasing out the more fiscally burdensome of these requirements into future permits

Moving forward, we earnestly request RWQCB Staff to assist local governments (and our countywide collaboration program) in obtaining federal and state grants and other forgivable loans which may be used to help our agencies improve stormwater quality through the implementation of more watershed based stormwater and urban runoff management and prevention measures.

Sincerely,

Brian Loventhal
City Manager

cc:
K. Carroll, WV CWP
J. Bicknell, SCVURPPP