



Councilmember: A Curtis Wright  
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## City of Monte Sereno

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December 6, 2006

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

RE: City of Monte Sereno Comments on Regional Water Board Working Draft of Municipal Regional Permit (revised version issued October 16, 2006)

Dear Mr. Wolfe:

Thank you for the opportunity to review and comment on the working draft of the Municipal Regional Permit. The City of Monte Sereno is pleased to provide the following comments.

The City of Monte Sereno is a very small City with limited resources. The City is concerned that the MRP as currently drafted places significant and unmanageable burdens on City resources. Specifically, staff has concerns with the following proposed requirements:

Provision C.2.b.(3), pertaining to the replacement of 10,000 sq. ft. or more of existing street, which in four years becomes 5,000 sq. ft. The City believes this provision will add significant costs to already under funded capital improvement projects. In many road maintenance projects it is necessary to remove the road surface and subsurface and rebuild the street. While these projects may normally seem routine adding the additional engineering, construction, and maintenance costs associated with this regulation greatly magnify the cost and time to perform routine City functions to an unreasonable degree.

Provision C.2.1 proposes requiring agencies to replace 50% of existing street sweeping equipment with new street sweeping within five years. The City of Monte Sereno does not own its own street sweeping equipment, but rather contracts for these services. Thus, the City does not have purchasing authority with respect to the street sweepers that operate in the City. The City does not believe five years is sufficient time to reasonably amortize the cost of the equipment whether owned by the City or by a contractor.

Provision C.3.c proposes to eliminate the single family home exemption for projects that would add or replace 5,000 square feet or more of impervious surface within three years of the adoption of the MRP. The elimination of this exemption would impose significant burdens on City staff. By requiring these projects to incorporate stormwater treatment measures in addition to site design and source control measures, this provision of the MRP will require additional staffing



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both at the project review stage and at the subsequent inspection and reporting stages. The City of Monte Sereno requires through its Site Development Permit process the integration of appropriate site design and source control measures into all proposed projects (including single family homes). The City believes that this approach—i.e., promoting site design and source control measures for all projects—will be more effective and cost-efficient than imposing a blanket requirement for numerically sized, post-construction stormwater treatment measures and subsequent inspections on these types of projects (single family homes).

The City believes that a good starting point for revising the draft MRP is the BASMAA draft permit. This document was created with input from all 76 Phase I co-permittees in the Bay Area, reflects local government concerns, and provides an essential perspective on practical and realistic ways to achieve good stormwater management.

Sincerely,

Brian Loventhal  
City Manager/City Planner