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February 29, 2008

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

Subject: Comments on the Tentative Order for the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit

Dear Mr. Wolfe:

As a co-permittee under the San Mateo Countywide Clean Water Program (Program), the City of Redwood City appreciates this opportunity to comment on the municipal regional stormwater NPDES permit (MRP). Redwood City is committed, as are other member agencies in San Mateo County, to continuous improvement in our efforts to protect from pollution the San Francisco Bay, creeks, and local waterways.

In brief, Redwood City supports and agrees with the issues raised and the recommended solutions expressed in the Program letter dated February 29, 2008. I would like to highlight two major areas of concern to Redwood City, as follows:

Overly Prescriptive Permit Parameters

As we reviewed the content of the tentative order, we were struck by its very prescriptive nature, restricting agencies' flexibility to implement measures that can meet the goal of improving water quality. It is in the best interest of both the Regional Board and local jurisdictions to provide flexibility and creativity in implementation of pollution prevention measures that best suit the conditions of each jurisdiction.

In Redwood City, implementation of some prescribed requirements will actually hinder the effective measures already in place, and will nullify years of progress toward reducing pollution in our storm drain system and the Bay. We recommend that the Board make an effort to assess the effectiveness of the current best management practices of each jurisdiction.

Prioritized and Phased Implementation

Redwood City, like many government agencies, continues to face declining revenues due to the economic cycle. We struggle to continue providing critical services to our community. Given the current economic conditions, agencies must reassess their financial circumstances and be given the opportunity to consider how to restructure financing in order to meet new mandates. Realistically, without this opportunity many agencies will face the prospect of being in a perpetual state of non-compliance from the moment the Tentative Order is adopted.

We recommend the Board consider the resource limitations faced by municipal agencies in meeting these restrictive requirements. Redwood City recommends the Regional Board prioritize the elements of the Tentative Order and phase implementation over time, to allow agencies time to develop funding strategies.

In closing, I have kept our comments brief; however, Redwood City respectfully and strongly requests that the Board consider the broad range of concerns expressed in this letter and the communications submitted by the San Mateo Countywide Water Pollution Prevention Program, the Bay Area Stormwater Management Agencies, the Bay Area Clean Water Agencies, and the Santa Clara Valley Urban Runoff Pollution Prevention Program.

Sincerely,

A handwritten signature in cursive script that reads "Rosanne Foust".

Rosanne Foust
Mayor of the City of Redwood City