

At C.4.b.ii.II, the proposal requires ensuring that a SWPPP is available and onsite. It is not clear that a SWPPP has been required for all commercial/industrial facilities to date. While the current ordinance allow a SWPPP to be required when appropriate, there is no such blanket requirement. This will create a new level of administration and policing.

At C.4.d, the proposal directs what the content of inspector training should be. It also directs the co-permittees to develop a Bay-Area specific Guidebook. Current training agendas cover the topics listed, but it is unclear why co-permittees need to suffer the expense to develop a guidance manual for inspectors.

### **Construction Site Stormwater Pollution Management**

This entire section is a duplication of the activity required by the State General Construction Permit, but makes no mention of or reference to that permit. This creates the potential of uncoordinated requirements, and local agencies potentially being held to two conflicting sets for requirements. All of the requirements and authorities required here are present elsewhere in existing ordinances and other parts of the proposed MRP. At the very least, to avoid conflicts and confusion, this section should invoke the General Construction Permit, or state "as required by the State General Construction Permit".

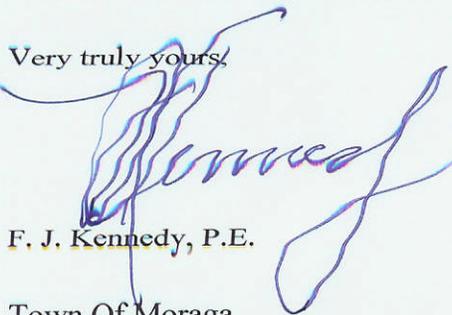
At C.6.f, the proposal includes inspection frequencies. Current practice is to inspect during the construction season for general site housekeeping practices, before the rainy season for implementation of the SWPPP in preparation for the rainy season, during regular site engineering inspections and after each storm. Dictating three screening inspections a week has no basis. At C.6.j, in the reporting of the inspections, the proposal is now determining what format of inspection form for hard copy and electronic forms and the establishment of a yet another database to record the information. Unless the Board is willing to provide these tools, it seems an intrusion and imposition on the local agency in how it is to do business.

### **Water Quality Monitoring**

The proposal contains requirements that clearly are beyond the ability, and resources of the local agency. The financial impact of these requirements is too great to estimate but will create an enormous burden and perhaps could best be absorbed by the resources of the state.

Please consider these comments in your further deliberations.

Very truly yours,



F. J. Kennedy, P.E.

Town Of Moraga  
Stormwater Program Coordinator

Bruce Wolfe, Executive Director  
Municipal Regional Permit  
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cc: Jill Mercurio, P.E.  
Town Engineer