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City of Monte Sereno

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July 13, 2007

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

RE: Municipal Regional Permit (MRP) May 2007 Draft

Dear Mr. Wolfe,

We appreciate the opportunity to review and comment on this latest draft of regulations. The City supports the Board's efforts to improve water quality and we have incorporated reviews and requirements for public and private projects that we believe will be instrumental in achieving worthwhile outcomes.

However, as previously noted in our December 2006 letter, we still have concerns about proposed regulations and their timing. Generally, we would like to have easily understood handouts to be given to design professionals, contractors and residents to aid them in implementing whatever regulations are adopted. As a small city with few staff, we would appreciate the Board taking on the task of collecting Best Management Practices from other agencies that have implemented these practices. This would encourage compliance without placing an undue burden on our staff, who are generalists rather than water quality specialists.

We would like to review specific issues as well, as follows:

1. Section C.2.b Street Sweeping- As stated before, we neither own nor operate a sweeper; the regulation should be modified to reflect contracted operations and allow sufficient time to modify contract provisions to allow either municipal or private equipment owners to comply with the intent of the measure.
2. Section C.3.a(7) Vector Control- first, please define systems; second, provide guidance on which systems may cause ponding, third, our understanding is that mosquitoes do not hatch unless water is impounded for at least 5 days, so the 1 day limit is unrealistic and unnecessary

3. Section C.3c Single Family Homes- As an entirely low-density residential community, imposition of a 5,000 square foot trigger of new or replaced impervious surface places a significant burden on our residents; we would like to review the evidence that this is the correct level at which to begin implementation. Alternately, if this level is adopted, lengthen the time before it becomes effective to allow for evaluation over time of benefit/cost ratios in implementing regulations for larger projects.
4. Section C.3.e ii(3) Vector Control Access- In order to avoid an undue burden on residents and Vector Control staff, consider some “trigger” size or other metric that allows a focus on the more likely systems rather than on 100% of those installed before requiring verification access.
5. Section C.10.a.i Assess Trash in Urban Tributaries- Better definition of urbanized watershed and urbanized area is needed. As a low-density, rural environment, if we find no evidence of trash generation in one or two annual surveys, might we be able to be exempted from the burden of annual assessment?

In conclusion, Monte Sereno would like to continue to improve its water quality for streams and tributaries but would like to minimize unnecessary burdens on our staff and residents. Secondly, at the time when regulations are imposed, we would appreciate having public information developed for us to use to educate and inform stakeholders about their responsibilities.

Respectfully,

Gordon Siebert, P.E.
City Engineer

Cc: Cheri Donnelly, WVCWP
Jill Bicknell, SCVURPP
Brian Loventhal, City Manager