

July 13, 2007

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

Subject: Municipal Regional Permit (MRP) – Regional Water Board Working Draft – May 2007

Dear Mr. Wolfe:

Like many of the other cities, we thank you for the opportunity to submit comments regarding the 2007 working draft of the MRP. We are pleased that the Board chose to implement some of our suggestions particularly regarding provision C.3c, the single family residence exemption, and provision C 2.1, the street sweeper purchase requirements. However, the most recent MRP draft still contains a number of requirements that we believe will impose a significant and unmanageable burden on our City's limited resources.

Based on our review, the draft MRP raises our concerns in the following areas:

- Provision C.3.b.ii provides that after three years, the threshold for regulated projects will decrease from 10,000 square feet of impervious surface to 5,000 square feet. We are concerned that this requirement might not provide enough time for the Board and the cities to evaluate the effectiveness of this lowered threshold. We suggest that the MRP should require an effectiveness study after the third year and implementation of the lower threshold of 5,000 square feet in the fifth year of the MRP if the collected data warrants such a change.
- Provision C.3.b.i.4 (defining regulated road projects) is also of concern to us because the threshold of 10,000 sf of impermeable surface is still too low. We suggest that a higher threshold of perhaps 50,000 sf of impermeable surface might be a workable alternative for all permittees.
- Provision C.4.b.ii.1.c will require permittees to maintain a database listing businesses that could reasonably be considered to cause or contribute to stormwater pollution, including mobile businesses such as carpet and pool cleaners, landscaping and painting businesses. Identifying and locating the mobile businesses within the City's jurisdictions, creating the required database and subsequently inspecting these businesses would be very difficult for our city as we have very limited staff and resources.

- We are also very concerned about the increased data management and reporting that would be required by the new MRP as our City just does not have the manpower and resources to comply with this requirement. We have suggested in the past that the Board create an internet based data management program that will be accessible to all the permittees to input the data needed by the Board and the MRP. The cost reduction benefit of such a program to the permittees is huge and the Board can also benefit with more consistent data resulting in the efficient analysis of stormwater pollution prevention efforts.

The City of Campbell supports the Board and the MRP's laudable goal of reducing stormwater pollution throughout the Bay Area. However, as a small city we have very limited staff and resources. We ask the Board to join and help us in a partnership that will consider the permittees capabilities of implementing the MRP's requirements while complying with the spirit of the Clean Water Act.

Sincerely,

Michelle Quinney
Acting Public Works Director
City of Campbell