



CITY OF CAMPBELL

Public Works Department

December 6, 2006

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

Subject: Municipal Regional Permit (MRP) - Regional Water Board Working Draft

Dear Mr. Wolfe:

The comments and suggestions below represent the City of Campbell staff's review of the working draft MRP and are consistent with past comments regarding municipal NPDES stormwater permit issues. The City of Campbell has concerns that the working draft MRP exceeds current baseline requirements to a degree that will place an unreasonable burden on local resources. Specifically, the City has concerns with the following proposed requirements:

- Provision C.2.1 proposes requiring agencies to replace 50% of existing street sweeping equipment within five years. The City of Campbell currently contracts out street sweeping services. Please clarify what the new permit will require for sweeping contractors in order to comply with this new requirement.
- Provision C.3.b proposes further reduction of the "C.3" implementation threshold from 10,000 sq. ft. to 5,000 sq. ft., which places an additional burden on local agencies' limited staff resources with unknown water quality benefits.

The co-permittees are just in the first year of implementing the latest reduction of the threshold requirement to 10,000 sq. ft. and the data to show any benefits to water quality from this reduction has not been compiled and evaluated. The City of Campbell believes that it does not have the additional labor and staff time to implement this proposal.

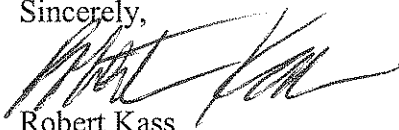
- Provision C.3.c eliminates the single family home exemption for requiring treatment controls, which places an additional burden on local agencies' limited staff resources with unknown water quality benefits. We do not support the removal of the exemption for single family housing without any supporting data that shows corresponding benefits to water quality.

- Provision C.3.j proposes increased new development data collection and reporting for projects greater than 1,000 sq. ft. which would require extensive staff time and cost for unknown benefit or use. We recommend keeping the data collection limited to projects with 5,000 sq. ft. in this permit cycle and to consider lowering the threshold to 1,000 sq. ft. in the subsequent permit if studies determine that there will be significant water quality benefits to do so.
- Provision C.10 proposes potentially extensive trash assessment and removal programs, which could be costly with unknown benefits in water quality from reductions in trash loading. While this may be a worthwhile new provision as far as water quality is concerned, this permit requirement will require additional personnel and funding in addition to the staff and volunteers that are working on trash control/prevention. The City of Campbell does not have the resources and funding to comply with this new requirement.

The MRP is an ambitious undertaking that will advance stormwater pollution efforts throughout the Bay Area; however, it is important to develop an MRP with reasonable and achievable requirements that smaller cities like Campbell can implement without undue financial hardship. The City of Campbell supports the Bay Area Stormwater Management Association Agencies (BASMAA) document that was developed collaboratively by local governments throughout the Bay Area following the September 8, 2006 Regional Water Board Stormwater Subcommittee Workshop. Please consider using the BASMAA document as a starting point for developing an MRP with achievable requirements.

We look forward to our meeting on December 19, 2006, and may wish to submit additional comments or clarification after we have discussed the above issues.

Sincerely,



Robert Kass
Public Works Director



Sharon Fiero
Community Development Director

Cc: Michelle Quinney, City Engineer
Adam Olivieri, SCVURPPP Program Manager
Cheri Donnelly, WVCWP Program Manager