

*Scenic Pacifica*

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CITY HALL

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December 8, 2006

Mr. Bruce Wolfe  
Executive Officer  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Dear Mr. Wolfe:

This letter details the City of Pacifica's response to the Water Board Staff's proposed "working draft" Municipal Regional Permit (MRP) to regulate the discharge from seventy six municipal agencies located throughout the bay area. We greatly appreciate your consideration of these comments in relation to the MRP.

**MRP Matrix- Page 1 Column 4: RWQCB staff additions (Items have not been supported by BASMAA):** Requirement to create electronic data base for detailed reporting of ALL inspections data including enforcement follow-up data/records:

1. This is a great idea however, it does not stand to reason that the RWQCB can require City's to spend thousands of dollars on a database of their (RWQCB) choice that may not integrate with existing City network infrastructure. It is my opinion that if the RWQCB requires new database applications to be used as a standard method of reporting inspections/detail pertaining to inspections of all sites that qualify-this database should be at least partially funded up front by the RWQCB and to cover the shortfall- grants should be available. This seems a rather large request given that many Cities' chose what electronic applications/network infrastructures support their specific needs based on multiple variables including existing network IT support, Knowledge, Technologic City wide infrastructure and cost. I am not aware of City's who have standardized their technology based on what other City's use.

**MRP Matrix- Page 1 Column 4: RWQCB staff additions (Items have not been supported by BASMAA):** Requirement to inspect NOI sites for Regional Board

2. This will work only if the RWQCB implements a method to ensure that those who are inspecting the site are educated and capable of inspecting at a level that is consistent with RWQCB and SWQCB requirements. A





3. training Course should be implemented at which, a test would be given at the end that is pass/fail so that only those who have a true grasp of the inspection process and clear knowledge of all potential types of violations will be able to conduct inspections on behalf of the RWQCB. The test should be re-taken along with a refresher training course every few years (if not more frequently) to ensure that the most recent requirements/changes in process are offered in an educational format to those who inspect for RWQCB, and to ensure that City Staff is up on the most current laws/policies, so that they are not held accountable for standards they are not aware of.

**MRP Matrix- Page 7 Column 4: RWQCB staff additions (Items have not been supported by BASMAA):** Requirement to map all storm drains and inlets and annually inspect and repair and report cleaning on an inlet by inlet basis

4. This would require additional funding for City's that do not currently have Engineering staff to generate such detail and or Collection staff to conduct the additional inspections required. The RWQCB would need to educate all staff that is required to do inspections/generate reports associated with additional work suggested to be conducted by staff. There should be a testing mechanism, which calls for recurring testing to ensure staff is abreast of all issues pertaining to the newly implemented inspection requirements and to ensure standard levels of capabilities. Funding should be provided by RWQCB to each City if this is implemented.

**General Comment on RWQCB attempt to outsource much of their now in-house inspection and monitoring:** This will have to be supported by major funding as more City staff may be required (based on each City's specific departmental needs) in order to pick up the additional work on top of their already heavy workloads. General Additions suggested by the RWQCB all call for more staff time to attend to water quality issues where staff may already carry a full workload, may not have the knowledge/ability to be trained at the level that RWQCB would like to maintain.

**Draft of the Municipal Regional Urban Runoff NPDES Permit Provisions Dated 10.13.06**

Comments:

**Section 3-H- paragraph 2:level of Implementation:**

In relation to the parenthetical comment: "The regulated project proponent should not pay for the services of the third party conducting the review"

Currently, the City of Pacifica charges Project Proponents for all reviews conducted by third parties. Third parties are contracted to the city and are paid by the city. Will this current method be acceptable under your proposed process of third party review for Storm water?

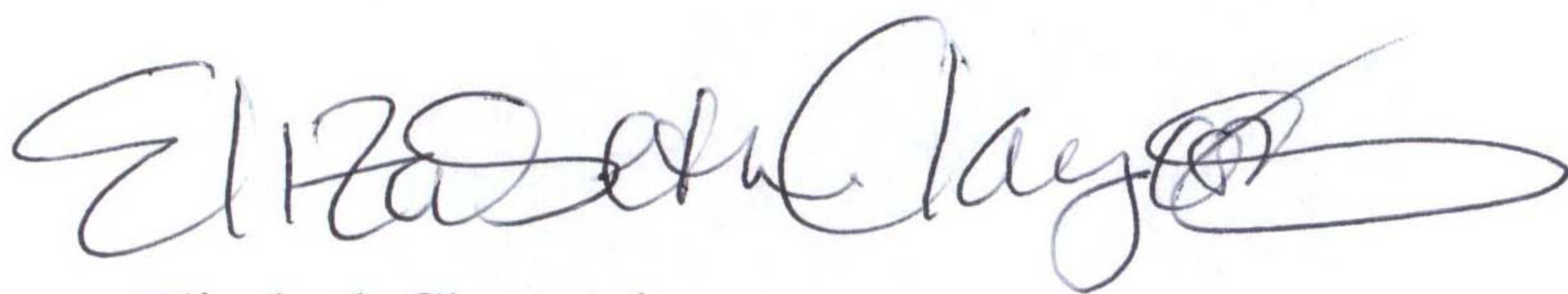


Additionally, It is requested that the RWQCB establish and circulate clearly defined parameters in relation to "Qualified Engineers" that can conduct these types of reviews so that we can comply.

In the event you would like additional information supporting our position, please do not hesitate to ask. I can be reached at the telephone numbers provided below.

Again, thank you for your consideration of these comments in relation to the "working draft" MRP.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Claycomb", with a large, stylized flourish at the end.

Elizabeth Claycomb  
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Cc: STOPPP coordinator, Matt Fabry; City of Brisbane