



December 8, 2006

ATTN: Municipal Regional Permit Staff
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Comments on MRP Working Draft dated October 13, 2006

Dear Water Board Staff:

The City of El Cerrito has been working with neighboring jurisdictions during the review of the Municipal Regional Permit (MRP) working draft. In particular, the City of San Pablo has taken a lead in this effort, and I have had the opportunity to review the comment letter prepared by Adele Ho, Public Works Director for the City of San Pablo.

I feel that letter summarizes all of the issues that have been a concern El Cerrito, and simply wish to endorse the comments Ms. Ho makes in her letter (attached for reference). El Cerrito has also been active in many of the same areas as San Pablo, particularly in the area of restoration and maintenance of creeks and open channels. One of our premier concerns is with maintaining the balance between the level of effort required and the benefits derived from any of the activities proposed in the draft MRP.

Another concern of note is the proposal to include street repaving in the C.3 requirements. Like many other cities in West County and elsewhere, we are primarily built out. This means we deal strictly with existing streets, often in very narrow rights of way, making the C.3 requirements virtually impossible to achieve. In addition, El Cerrito is already woefully under funded in the area of street maintenance (we're in the bottom 10 of street conditions in the Bay Area), and any additional financial burden would only send us further into a crisis situation.

Should you have any questions, feel free to contact El Cerrito's NPDES Coordinator, Melanie Mintz, or me at 510-215-4382.

Sincerely,

Jerry Bradshaw, P.E.
Public Works Director / City Engineer

Cc: Melanie Mintz, Environmental Analyst
Don Freitas, Contra Costa Clean Water Program Manager

Attachment