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November 8, 2006

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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,

Thank you for the opportunity to submit comments regarding the Regional Water Board's working draft of the Municipal Regional Permit (MRP), which was issued October 16, 2006. The comments below represent the City of Mountain View staff's review of the working draft MRP, and are consistent with past comments regarding municipal NPDES stormwater permit issues. The City's staff supports the MRP concept because it ensures that implementation requirements are applied consistently among regulated local Bay Area storm water agencies. The City's staff does have concerns that the working draft MRP exceeds current baseline requirements to a degree that will place an unreasonable burden on local resources. Specifically, City's staff 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, which would require significant capital expenditure.
- 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.
- 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.
- 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.
- Provision C.10 proposes potentially extensive trash assessment and removal programs, which could be costly with unknown reductions in trash loading.

The MRP is an ambitious undertaking that will advance stormwater pollution efforts throughout the Bay Area. The City's staff feels that it is important to develop an MRP with reasonable and achievable requirements. The City's staff supports the BASMAA document that was developed following the September 8, 2006 Regional Water Board Stormwater Subcommittee Workshop, which was developed collaboratively by local governments throughout the Bay Area. Please

consider using the BASMAA document as a starting point for developing an MRP with achievable requirements. Thank you again for the opportunity to comment on the working draft of the MRP.

Sincerely,



Eric Anderson, Urban Runoff Coordinator

Cc: Kevin Woodhouse, Senior Administrative Analyst, City Manager's Office
Shelley Emerson, Senior Assistant City Attorney
Jaymae Wentker, Fire Marshal
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