



TOWN OF HILLSBOROUGH

1600 FLORIBUNDA AVENUE
HILLSBOROUGH
CALIFORNIA
94010-6413

DEPARTMENT OF PUBLIC WORKS

December 7, 2006

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

Subject: Regional Water Board Working Draft MRP (revised version dated October 14, 2006)

Dear Mr. Wolfe:

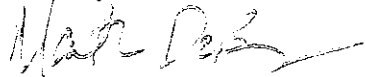
I'm writing to express the Town's concerns regarding the significant changes in Provision C.3 requirements in the latest version of the Water Board staff's working draft for the new Municipal Regional Permit (MRP). We find these changes highly burdensome for the following reasons:

1. Provision C.3 was recently approved by the RQWCB in 2003-4 and we are still implementing these new requirements consistent with the implementation plan. Hillsborough is still modifying policies and procedures to better implement Provision C.3 and can not yet measure their effectiveness. The Town of Hillsborough strongly urges the RWQCB to allow adequate time to evaluate and improve our current policies and procedures dealing with the current Provision C3 before changing the C.3 requirements.
2. The proposed requirements to make projects that consist of one single-family home, projects that create and/or replace 5,000 square feet of impervious area, and street replacement projects subject to additional requirements are excessive, unnecessary, and detrimental to smart growth. The cost of the new requirements in Provision C.3 will impose great financial burden to our jurisdiction. We anticipate additional cost impacts of approximately \$250,000 to \$500,000 per year in the future if the new draft requirements related to single family projects are included in the new MRP. The impact on street improvement projects will also be prohibitive.

We strongly urge the RWQCB to leave Provision C.3 unchanged for this permit cycle.

Should you have any questions regarding these comments, please contact me at 650-375-7444.

Sincerely,

A handwritten signature in black ink, appearing to read "Martha DeBry", with a long horizontal flourish extending to the right.

Martha DeBry

Public Works Director
Town of Hillsborough

Cc: Mayor
City Manager
City Engineer