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9 1314 Second St.
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10 Attorneys for THE NATURAL
11 RESOURCES DEFENSE COUNCIL, INC.

12 STATE OF CALIFORNIA
13 STATE WATER RESOURCES CONTROL BOARD

14
15 In the Matter of the Petition of San Francisco)
16 Baykeeper and the Natural Resources Defense)
17 Council for Review of Action by the California)
18 Regional Water Quality Control Board, San)
19 Francisco Region, In Adopting the Municipal)
Regional Stormwater NPDES Permit, Order No.)
R2-2009-0074, NPDES Permit No. CAS612008)
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1 In accordance with Section 13320 of the California Water Code and Section 2050 of Title
2 23 of the California Code of Regulations, San Francisco Baykeeper (“Baykeeper”) and the Natural
3 Resources Defense Council (“NRDC”) (collectively “Petitioners”) hereby petition the State Water
4 Resources Control Board (“State Board”) to review the final decision of the California Regional
5 Water Quality Control Board for the San Francisco Region (“Regional Board” or “Board”) approving the Municipal Regional Stormwater NPDES Permit, Order No. R2-2009-0074, NPDES
6 Permit No. CAS612008, Issuing Waste Discharge Requirements for the cities of Alameda, Albany,
7 Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont,
8 Pleasanton, San Leandro, and Union City, Alameda County, the Alameda County Flood Control
9 and Water Conservation District, and Zone 7 of the Alameda County Flood Control and Water
10 Conservation District, which have joined together to form the Alameda Countywide Clean Water
11 Program (Alameda Permittees); the cities of Clayton, Concord, El Cerrito, Hercules, Lafayette,
12 Martinez, Orinda, Pinole, Pittsburg, Pleasant Hill, Richmond, San Pablo, San Ramon, and Walnut
13 Creek, the towns of Danville and Moraga, Contra Costa County, the Contra Costa County Flood
14 Control and Water Conservation District, which have joined together to form the Contra Costa
15 Clean Water Program (Contra Costa Permittees); the cities of Campbell, Cupertino, Los Altos,
16 Milpitas, Monte Sereno, Mountain View, Palo Alto, San Jose, Santa Clara, Saratoga, and
17 Sunnyvale, the towns of Los Altos Hills and Los Gatos, the Santa Clara Valley Water District, and
18 Santa Clara County, which have joined together to form the Santa Clara Valley Urban Runoff
19 Pollution Prevention Program (Santa Clara Permittees); the cities of Belmont, Brisbane,
20 Burlingame, Daly City, East Palo Alto, Foster City, Half Moon Bay, Menlo Park, Millbrae,
21 Pacifica, Redwood City, San Bruno, San Carlos, San Mateo, and South San Francisco, the towns
22 of Atherton, Colma, Hillsborough, Portola Valley, and Woodside, the San Mateo County Flood
23 Control District, and San Mateo County, which have joined together to form the San Mateo
24 Countywide Water Pollution Prevention Program (San Mateo Permittees); the cities of Fairfield
25 and Suisun City, which have joined together to form the Fairfield-Suisun Urban Runoff
26 Management Program (Fairfield-Suisun Permittees); and the City of Vallejo and the Vallejo
27 Sanitation and Flood Control District (Vallejo Permittees).
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1 The Permit regulates stormwater discharges from municipal separate storm sewer systems
2 (“MS4s”) and other designated storm water discharges within defined portions of Alameda
3 County, Contra Costa County, San Mateo County, Santa Clara County, the Cities of Fairfield and
4 Suisun City, and the City of Vallejo.

5 Prior to this Permit, the Permittees were covered by the following NPDES permits: the
6 Alameda Permittees were subject to NPDES Permit No. CAS0029831 issued by Order No. R2-
7 2003-0021 on February 19, 2003, and amended by Order No. R2-2007-0025 on March 14, 2007;
8 the Contra Costa Permittees were covered by NPDES Permit No. CAS0029912 issued by Order
9 No. 99-058 on July 21, 1999, amended by Order No. R2-2003-0022 on February 9, 2003, amended
10 by Order Nos. R2-2004-059 and R2-2004-0061 on July 21, 2004, and amended by Order No. R2-
11 2006-0050 on July 12, 2006; the San Mateo Permittees were subject to NPDES Permit No.
12 CAS0029921 issued by Order No. 99-059 on July 21, 1999, amended by Order No. R2-2003-0023
13 on February 19, 2003, amended by Order Nos. R2-2004-0060 and R2-2004-0062 on July 21, 2004,
14 and amended by Order R2-2007-0027 on March 14, 2007; the Santa Clara Permittees were subject
15 to NPDES Permit No. CAS029718 issued by Order No. 01-024 on April 21, 2001, amended by
16 Order No. 01-119 on October 17, 2001, and Order No. R2-2005-0035 on July 20, 2005; the
17 Fairfield-Suisun Permittees were subject to NPDES Permit No. CAS0612005 issued by Order No.
18 R2-2003-0034 on April 16, 2003, and amended by Order R2-2007-0026 on March 14, 2007; and,
19 the Vallejo Permittees were subject to NPDES Permit No. CAS612006 issued by the United States
20 Environmental Protection Agency (USEPA) on April 27, 1999.

21
22 1. NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESSES OF THE
23 PETITIONERS:

24 San Francisco Baykeeper, Inc.
25 785 Market St., Ste 850
26 San Francisco, CA 94103
27 (415) 856-0444
28 Attention: Jason Flanders, Esq. (jason@baykeeper.org)

1 Natural Resources Defense Council, Inc.
2 1314 Second Street
3 Santa Monica, CA 90401
4 (310) 434-2300
Attention: David S. Beckman, Esq. (dbeckman@nrdc.org)
Noah Garrison, Esq. (ngarrison@nrdc.org)

5 2. THE SPECIFIC ACTION OR INACTION OF THE REGIONAL BOARD WHICH THE
6 STATE BOARD IS REQUESTED TO REVIEW AND A COPY OF ANY ORDER OR
7 RESOLUTION OF THE REGIONAL BOARD WHICH IS REFERRED TO IN THE
8 PETITION:

9 Petitioners seek review of the Regional Board's October 14, 2009 approval of the
10 Municipal Regional Stormwater NPDES Permit, Order No. R2-2009-0074, NPDES Permit No.
11 CAS612008. A copy of the Order is attached as Exhibit A.

12
13 3. THE DATE ON WHICH THE REGIONAL BOARD ACTED OR REFUSED TO ACT
14 OR ON WHICH THE REGIONAL BOARD WAS REQUESTED TO ACT:

15 The Regional Board approved the Permit at issue on October 14, 2009.

16
17 4. A FULL AND COMPLETE STATEMENT OF THE REASONS THE ACTION OR
18 FAILURE TO ACT WAS INAPPROPRIATE OR IMPROPER:

19 In approving the Permit, the Regional Board failed to act in accordance with relevant
20 governing law, acted arbitrarily and capriciously, without substantial evidence, and without
21 adequate findings. Specifically, but without limitation, the Regional Board:

22 A. Failed to assure that the Permit (and associated programs and activities
23 described in the administrative record and Permit) satisfies the Clean Water
24 Act's mandate to require "controls to reduce the discharge of pollutants to
25 the maximum extent practicable," including but not limited to failing to
26 require specific, measurable, numeric performance criteria, feasible
27 technological controls, deadlines, and well-defined best management
28 practices, including but not limited to low-impact development. 33 U.S.C. §

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1342(p)(3)(B)(iii); 40 C.F.R. § 122.26(d)(2)(iv); *Defenders of Wildlife v. Babbitt* (D.D.C. 2001) 130 F.Supp.2d 121, 131; *Waterkeeper Alliance, Inc. v. EPA* (2nd Cir. 2005) 399 F.3d 486, 499-500;

B. Failed to make sufficient findings “to bridge the analytical gap between the raw evidence and ultimate decision” to approve the Permit. *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515. The Board acted arbitrarily and capriciously because the ultimate decision of adopting the Permit is not supported by the findings and the findings are not supported by the weight of the evidence in the administrative record, thus resulting in an abuse of discretion. Cal. Code Civ. Proc. § 1094.5;

C. Failed to require in the Permit objective and measurable criteria for the amount of runoff that must be treated or infiltrated onsite. *In the Matter of Cities of Bellflower, et al., State Water Resources Control Board, Order WQ* 2000-11, pp. 16-18;

D. Failed to include in the Permit clear, integrated, and sufficient limitations to alternative compliance and in-lieu program provisions applicable to new development and redevelopment necessary to assure pollution reduction to the maximum extent practicable and attainment of water quality requirements;

E. Improperly adopted provisions allowing for biofiltration that fail to assure the basic low-impact development performance standards will be met, or assure that the discharge of pollutants will be reduced to the maximum extent practicable;

F. Failed to include receiving water limitations and discharge prohibitions, including but not limited to end of pipe effluent limitations, that implement both federal and state water quality standards, and further failed to estimate reduction of pollutant loadings, to demonstrate compliance with such

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G. Failed to include necessary reporting requirements to ensure transparency and compliance with applicable water quality standards;

H. Illegally delegated authority to the co-permittees and the Regional Board Executive Officer to develop critical elements of the Permit, without well-defined performance standards and adequate provision for public review. *Envtl. Def. Ctr. v. EPA*, 344 F.3d 832 (9th Cir. 2003); Cal. Water Code § 13223(a);

I. Relied upon provisions and terms that are unduly vague, ill-defined, and result in a lack of certainty and meaningful oversight to ensure that all relevant standards under state and federal law are met, including but not limited to water quality standards, TMDLs, BMPs, and pollution reductions to the maximum extent practicable;

J. Failed to adequately state in the Permit that Waste Load Allocations (“WLAs”) established by applicable Total Maximum Daily Loads (“TMDLs”) are enforceable permit effluent limitations. 40 C.F.R. § 122.44(d)(1)(vii)(B). The permit further failed to provide substantial evidence to quantify the WLA reductions expected to occur from the actions required by the permit to achieve established WLAs, and failed to require the implementation of specific feasible measures proven to reduce the discharge of such pollutants;

K. Failed to prohibit the discharge of pollutants to the MS4 with the potential to cause or contribute to a violation of water quality standards from “new sources” or “new dischargers.” 40 C.F.R. § 122.4(i);

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1 L. Improperly exempted certain types of non-storm discharges from the Clean
2 Water Act's requirement that permits for discharge from municipal sewers
3 effectively prohibit non-stormwater discharges. 33 U.S.C. §
4 1342(p)(3)(B)(ii); and,

5 M. Failed to adequately respond to factually and legally specific comments
6 from public interest organizations concerning significant matters at issue,
7 such as the Permit's compliance with the maximum extent practicable
8 standard, efficacy and practicability of low-impact development standards,
9 implementation of TMDL WLAs, and other related matters.

10

11 5. THE MANNER IN WHICH THE PETITIONERS ARE AGGRIEVED:

12 Petitioners are non-profit, environmental organizations that have direct interests in
13 protecting the quality of the San Francisco Bay, tributaries to the San Francisco Bay, and coastal
14 waters. NRDC represents over 100,000 members in California, including members in the region
15 affected by the Permit. San Francisco Baykeeper is a regional non-profit organization dedicated
16 reversing the environmental degradation of the past, and promoting new strategies and policies to
17 protect the water quality of the San Francisco Bay, for the protection and promotion of the San
18 Francisco Bay ecosystem and interdependent human communities. Petitioners' members directly
19 benefit from San Francisco Bay region waters in the form of recreational swimming, fishing,
20 surfing, photography, bird watching, and boating, each of which uses have been, are, and will
21 continue to be adversely impacted by the addition of pollutants to San Francisco Bay region waters
22 from the subject Permittees. Petitioners' members are therefore aggrieved by the Permit's
23 inadequacy to control the discharge of polluted urban stormwater, or to support the beneficial uses
24 of the receiving waters, in accordance with the Clean Water Act, California Water Code, and
25 respective implementing regulations.

26 The Regional Board's failure to adequately control urban stormwater runoff through this
27 Permit, or to assure that the Permit's provisions meet the requirements of the Clean Water Act,
28 California Water Code, and respective implementing regulations, and assure that pollution in

1 stormwater discharges will be reduced to the maximum extent practicable, has enormous
2 consequences for the region and its residents. Urban stormwater runoff is one of the largest
3 sources of pollution to the coastal and other receiving waters of the nation, and is particularly
4 problematic in this region. Pollutants in stormwater pollution adversely impact avian, aquatic, and
5 plant life in receiving waters and can cause serious human health impacts. Receiving waters in the
6 Permittees' jurisdiction continue to be impaired for a variety of pollutants, and monitoring data
7 show that stormwater discharges continue to contain pollutants at levels that can cause or
8 contribute to these impairments.

9 Urban development increases impervious land cover and exacerbates problems of storm
10 water volume, rate, and pollutant loading. Consequently, the San Francisco Bay Area's
11 urbanization and water quality problems demand that the most effective storm water management
12 tools be required. The Permit, however, lacks clear, enforceable standards to ensure that new and
13 redevelopment projects in the region employ best management practices based on low-impact
14 development techniques ("LID")—demonstrated to be the most effective tools to control storm
15 water runoff volume and pollutant loading—to the maximum extent practicable. The Permit also
16 fails to require pollution controls mandated by statewide design standards for SUSMPs.

17 Petitioners and their members are further aggrieved by the Regional Board's failure to
18 implement meaningful and enforceable limits and reductions for TMDL WLAs, including but not
19 limited to, WLAs for PCBs and mercury. High mercury levels in the Bay make regular
20 consumption of Bay fish unsafe. PCBs are toxic and persistent organic pollutants that cause
21 adverse health effects to humans and wildlife, including cancer, liver damage, skin irregularities,
22 and impacts to child development. Urban stormwater discharges have and will continue to add
23 unhealthy levels of these toxic contaminants to Bay waters. Petitioners' members are therefore
24 aggrieved by the Permit's inadequacy to control the discharge of pollutants with these and other
25 established TMDLs, in accordance with the Clean Water Act.

26 All of these documented facts demonstrate the considerable negative impact on Petitioners'
27 members and the environment that continues today as a result of the Regional Board's inability to
28 control storm water pollution through the Permit.

1 6. THE SPECIFIC ACTION BY THE STATE OR REGIONAL BOARD WHICH
2 PETITIONER REQUESTS:

3 Petitioners seek an Order by the State Board that:

4 Overturns the Regional Board's approval of the Municipal Regional Stormwater
5 NPDES Permit, Order No. R2-2009-0074, NPDES Permit No. CAS612008; and,

6 Remands the matter to the Regional Board with specific direction to the Board to
7 remedy each of its violations of law as further described herein.

8 7. A STATEMENT IN SUPPORT OF LEGAL ISSUES RAISED IN THE PETITION:

9 See section 4, above. Petitioners request that this Petition be held in abeyance, and reserve
10 the right to supplement the legal arguments and authorities in support of this Petition.

11
12 8. A STATEMENT THAT THE PETITION HAS BEEN SENT TO THE
13 APPROPRIATE REGIONAL BOARD AND TO THE DISCHARGERS IF NOT THE
14 PETITIONER:

15 A true and correct copy of this Petition, with exhibits, was mailed via First Class mail on
16 November 13, 2009 to the Regional Board and the Principal Permittees. A letter notifying
17 Permittees of the Petition's filing was also mailed via First Class mail on November 13, 2009 to all
18 remaining Permittees. (See Proof of Service, attached hereto.)


19
20 9. A STATEMENT THAT THE SUBSTANTIVE ISSUES OR OBJECTIONS RAISED
21 IN THE PETITION WERE RAISED BEFORE THE REGIONAL BOARD, OR AN
22 EXPLANATION OF WHY THE PETITIONER WAS NOT REQUIRED OR WAS
23 UNABLE TO RAISE THESE SUBSTANTIVE ISSUES OR OBJECTIONS BEFORE
24 THE REGIONAL BOARD:

25 Petitioners have previously raised and presented all the issues addressed in this Petition in
26 comment letters submitted to the Regional Board on, including but not limited to, April 3, 2009,
27 April 2, 2009, February 29, 2008, September 17, 2007, July 17, 2007, December 8, 2006, and
28 November 8, 2006, or in live oral testimony at public hearings on May 13, 2009 and October 14,
2009.

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Dated: November 13, 2009

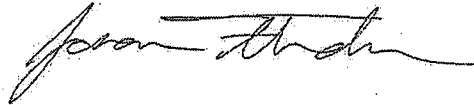
NATURAL RESOURCES DEFENSE COUNCIL, INC.



David S. Beckman,
Noah Garrison,
Counsel for the Natural Resources Defense Council, Inc.

Dated: November 13, 2009

SAN FRANCISCO BAYKEEPER



Jason Flanders
Staff Attorney, San Francisco Baykeeper

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 1314 Second Street, Santa Monica, California 90401.

On November 13, 2009 I served the within document described as PETITION FOR REVIEW OF SAN FRANCISCO REGIONAL WATER QUALITY CONTROL BOARD ACTION OF ADOPTING ORDER NO. R2-2009-0074, NPDES NO. CAS612008 on the following interested parties in said action by placing a true copy thereof in the United States mail enclosed in a sealed envelope with postage prepaid, addressed as follows:

Andy Walker
Public Works Department
City of Fairfield
1000 Webster Street
Fairfield, California 94533

James Scanlin
Program Manager
Alameda Countywide Clean Water Program
951 Turner Court
Hayward, CA 94545-2698

Clara Spaulding
Development Services Office
Santa Clara County
70 West Hedding, East Wing, 7th Floor
San José, CA 95110

Jeannette L. Bashaw
Legal Analyst, Office of Chief Counsel
State Water Resources Control Board
1001 "I" Street, 22nd Floor
Sacramento, CA 95814

Daniel Kasperson
Interim Public Works Director
Suisun City
701 Civic Center Blvd.
Suisun City, CA 94585

Rich Lierly
Senior Civil Engineer
Contra Costa County
255 Glacier Drive
Martinez, CA 94553

Daniel Woldesenbet
Director of Public Works
County of Alameda
399 Elmhurst Street
Hayward, CA 94544-1395

Ron Matheson
District Manager
Vallejo Sanitation and Flood Control District
450 Ryder St
Vallejo, CA 94590

Donald P. Freitas
Program Manager
Contra Costa Clean Water Program
255 Glacier Drive
Martinez, CA

c/o City/County Association of Governments
San Mateo Countywide Water Pollution
Prevention Program
2000 Alameda De Las Pulgas, Suite 100
San Mateo, CA 94403

1 Frank Maitiski
2 Deputy Administrative Officer,
3 Technical Services Division
4 Santa Clara Valley Water District
5750 Almaden Expressway
San José, CA 95118

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

5 Jill Bicknell
6 Assistant Program Manager
7 Santa Clara Valley Urban Runoff
8 Pollution Prevention Program
9 111 West Evelyn Avenue, Suite 110
10 Sunnyvale, CA 94086

James Pollock
City of Fairfield, Dept. of Public Works
The Fairfield-Suisun Urban Runoff
Management Program
1000 Webster Street
Fairfield, CA 94533

11 Gary Leach
12 Director, Public Works Department
13 City of Vallejo
14 555 Santa Clara Street
15 Vallejo, California 94590

Greg Connaughton
Assistant Chief Engineer
CCC Flood Control & Water Conservation
District
255 Glacier Drive

16 James Porter
17 Director, Department of Public Works
18 San Mateo County
19 555 County Center 5th Floor
20 Redwood City CA 94063

21 On November 13, 2009 I additionally served a letter notifying parties that the document
22 described as PETITION FOR REVIEW OF SAN FRANCISCO REGIONAL WATER QUALITY
23 CONTROL BOARD ACTION OF ADOPTING ORDER NO. R2-2009-0074, NPDES NO.
24 CAS612008 has been served on the above referenced parties, on the following interested parties in
25 said action by placing a copy of said letter in the United States mail enclosed in a sealed envelope
26 with postage prepaid, addressed as follows:

27 Adam Olivieri
28 Program Manager
SCVURPPP
1410 Jackson Street
Oakland, CA 94612

Laura Hoffmeister
Assistant to the City Manager
City of Clayton
6000 Heritage Trail
Clayton, CA 94517

Al Oxonian
Senior Civil Engineer
City of Campbell
70 North First Street
Campbell, CA 95008-1423

Lawrence Rosenberg
Director of Public Works
City of Piedmont
120 Vista Avenue
Piedmont, CA 94611

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Alex Ameri
Deputy Director of Public Works
City of Hayward
24499 Soto Road
Hayward, CA 94544

Lesley Estes
Watershed Program Supervisor
City of Oakland
250 Frank H. Ogawa Plaza, Suite 5301
Oakland, CA 94612-2034

Alex Stroup
Assistant Engineer
City of Martinez
525 Henrietta Street
Martinez, CA 94553

Lorrie Gervin
Environmental Division Manager
City of Sunnyvale
650 West Olive Avenue, P.O. Box 3707
Sunnyvale, CA 94088

Ann Chaney
Director of Community Development
City of Albany
1000 San Pablo Avenue
Albany, CA 94706-2295

Lynne Scarpa
Environmental Manager
City of Richmond
450 Civic Center Plaza
Richmond, CA 94804

Anthony Docto, Jr.
Director, Department of Public Works
City of East Palo Alto
1960 Tate Street
East Palo Alto, CA 94303

Mark Lander
City Engineer
City of Dublin
100 Civic Plaza
Dublin, CA 94568

Brian Loventhal
City Manager
City of Monte Sereno
18041 Saratoga-Los Gatos Rd.
Monte Sereno, CA 95030

Martha DeBry
Director, Department of Public Works
Town of Hillsborough
1600 Floribunda Avenue
Hillsborough, CA 94010

Cathleen Terentieff
Associate Engineer
City of Orinda
22 Orinda Way
Orinda, CA 94563

Mary Lim
Environmental Services Manager
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551-9486

Cheri Donnelly
Environmental Programs Manager
City of Cupertino
10300 Torre Avenue
Cupertino, CA 95014

Matthew Naclerio
Public Works Director
City of Alameda
950 West Mall Square, Room 110
Alameda, CA 94501-7575

1	Chris McCann	Maurice Kaufman
2	Storm Water Pollution Control Manager	Director of Public Works
3	Town of Danville	City of Emeryville
4	510 La Gonda Way	1333 Park Avenue
	Danville, CA 94526	Emeryville, CA 94608-3517
5	Claudette Ford	Melanie Mintz
6	Director of Public Works	Environmental Analyst
7	City of Berkeley	City of El Cerrito
8	1947 Center Street, 4th Floor	10890 San Pablo Avenue
9	Berkeley, CA 94704-1155	El Cerrito, CA 94530
10	Darren Greenwood	Melody Tovar
11	Water Resource Division Manager	Environmental Services Department
12	City of Livermore	City of San José
13	101 W. Jack London Boulevard	170 West San Carlos Street
14	Livermore, CA 94551	San José, CA 95113
15	Donna Feehan	Michael Bakaldin
16	Administrative Analyst	Director of Public Works
17	City of Lafayette	City of San Leandro
18	3001 Camino Diablo	835 E. 14th Street
19	Lafayette, CA 94549	San Leandro, CA 94577
20	Duncan L. Jones	Mintze Cheng
21	Director, Public Works Department	Director of Public Works
22	Town of Atherton	Union City
23	93 Station Lane	34009 Alvarado-Niles Road
24	Atherton CA 94027	Union City, CA 94587
25	Eric Anderson	Nancy Voisey
26	Urban Runoff Coordinator	Management Analyst, Environmental
27	City of Mountain View	Compliance
28	1000 Villa Street	City of Pinole
	Mountain View, CA 94041	2131 Pear Street
		Pinole, CA 94564-1774
29	Erwin Blancaflor	Paul Nagengast
30	Public Works Director	Director, Public Works Department
31	City of Hercules	Town of Woodside
32	111 Civic Drive	2955 Woodside Road, P.O. Box 620005
33	Hercules, CA 94547	Woodside, CA 94062
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Howard Young
Director, Public Works Department
City of Portola Valley
765 Portola Road
Portola Valley, CA 94028

Peggy Claassen
Director of Public Works
City of Newark
37101 Newark Boulevard
Newark, CA 94560-3796

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Clean Water Program Manager
City of Concord
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Concord, CA 94520

Ramon M. Towne
Director, Department of Public Works
City of Pacifica
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Pacifica, CA 94044

Jill Mercurio
Town Engineer
Town of Moraga
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Randy Breault
Director, Department of Public Works
City of Brisbane
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Brisbane, CA 94005

Joe Teresi
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City of Palo Alto
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Palo Alto, 94303

Ray Towne
Director, Department of Public Works
Foster City
610 Foster City Boulevard
Foster City, CA 94404

John Cherbone
Public Works Director
City of Saratoga
13777 Fruitvale Avenue
Saratoga, CA 95070

Richard Chiu
Public Works Director
City of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022

John L. Fuller
Director, Department of Public Works
Daly City
333 90th Street
Daly City, CA 94015

Interim Director, Public Works Department
City of Half Moon Bay
501 Main Street
Half Moon Bay, CA 94019

Jolan Longway
Civil Engineer II
City of Pittsburg
65 Civic Avenue
Pittsburg, CA 94564-1774

Rick Mao
Director, Public Works Department
Town of Colma
1188 El Camino Real
Colma, CA 94014

1	Karen Borrmann	Rick Mauck
2	Interim Director, Department of Public	Director of Streets & Automotive Services
3	Works	City of Santa Clara
4	City of Belmont	1500 Warburton Avenue
	One Twin Pines Lane, Suite 385	Santa Clara, CA 95052
	Belmont, CA 94002	
5	Karineh Samkian	Rinta Perkins
6	Environmental Program Analyst	Clean Water Project Manager
7	City of San Pablo	City of Walnut Creek
8	13831 San Pablo Avenue	1666 North Main, P.O. Box 8039
	San Pablo, CA 94806	Walnut Creek, CA 94596
9	Kathleen Phalen	Robert Weil
10	Utility Engineer	Director, Public Works Department
11	City of Milpitas	City of San Carlos
12	455 East Calaveras Boulevard	600 Elm Street
	Milpitas, CA 95035	San Carlos, CA 94070
13	Kathy Cote	Rod Wui
14	Environmental Services Manager	Associate Civil Engineer, P.E.
15	City of Fremont	City of Pleasant Hill
	39550 Liberty Street, P.O. Box 5006	100 Gregory Lane
	Fremont, CA 94537-5006	Pleasant Hill, CA 94523
16	Kelly Carroll	Ron Popp
17	West Valley Clean Water Program	Director, Department of Public Works
18	West Valley Communities	City of Millbrae
19	18041 Saratoga Los Gatos Road	621 Magnolia Avenue
	Monte Sereno, CA 95030	Millbrae, CA 94030
20	Kent Steffens	Stephen Cusenze
21	Director, Public Works Department	Utility Planning Manager
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 13, 2009, at Santa Monica, California.



Jessica Wall