

Water Resources Management
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1515 Clay Street, Suite 1400
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SUBJECT: Municipal Regional Storm Water NPDES Permit

The current Bay Area municipal storm water programs have been underway for almost 20-years with many municipalities regulated by NPDES Permits for almost 18 years. More than \$750 million has been spent during this period. Municipalities are faced with significant budget shortfalls and compliance with and full implementation of the MRP will undoubtedly require significant additional funds. No one wants to see backsliding on the most effective program elements in the current permits or delay new program elements that will provide significant reductions in storm water pollutants. This will require that some of the MRP elements be deferred until the citizens of the Bay Area approve additional funding for their storm water programs.

I believe that dry season street sweeping, implementation of the hydromodification requirements in areas dominated by impervious Group D soils, elements of the public information program and detailed annual reporting can be deferred while program elements like trash control in high loading areas should be accelerated and implemented at this time.

The Tentative MRP represents the tremendous level of participation and conscientious effort that has been spent over the past 18 months by the storm water dischargers, environmental organizations and Regional Water Quality Control Board staff. The MRP is a significant improvement over the current countywide storm water permits and significantly increase accountability and enforceability.

Comments on the Tentative MRP are attached as Attachment I – Policy Comments, Attachment II – Technical Comments and Attachment III – Editorial Comments. Please do not hesitate to contact me if you would like clarification of my comments or copies of references I have cited.

Please thank the staff that has worked on preparing the Tentative MRP. It represents a lot of very hard work, dedication, technical skills and perseverance.

Sincerely,

Roger B. James
Senior Consultant

