



The Town of
Woodside

February 29, 2008



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

Subject: Comments on the Tentative Order for the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit

Dear Mr. Wolfe:

Thank you for the opportunity to comment on the Tentative Order for the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit. The Town of Woodside recognizes the importance of the programming to ensure clean water. To ensure successful implementation, however, the Town would recommend that the State prioritize and phase in the programming so as to allow the municipalities with adequate time to allocate resources.

By way of illustration, the Tentative Order requires the following programs for street and road sweeping and cleaning.

Street and Road Sweeping and Cleaning: By November 30, 2008, the Town will be required to prepare a map that designates roadways and public parking lots for street sweeping and submit the map to the State. High frequency roads will require sweeping at least twice per month, medium frequency roads will average sweeping once a month, and low frequency road will be at least twice before the onset of the rainy season. Where street sweeping is technically infeasible, the Town will be required to implement trash/litter control procedures to minimize pollutant discharges to storm drains. As part of this requirement, the Town will be required to submit an annual report regarding the types of sweepers used, swept curb miles, volume or weight of materials removed, and public outreach efforts or the use of additional resources in sweeping excess leaves or other material.

Implementation of this requirement will be a challenge as the Town currently utilizes street sweepers for the bike lanes and not for Town-wide streets and parking lots. Additionally, given the residential nature of the community, much of the roadside trash and leaf removal is handled by individual property owners as part of their individual property maintenance. Given these private efforts, Town staff does not know the exact volume or weight of materials removed.

To implement the required program, the Town's staff will need to produce the required maps and identify those streets that will require sweeping. The Town's staff will then need to renegotiate the existing contract for street sweeping to recognize the increased area. Additionally, the Town's staff will need to determine how to quantify that trash/litter that is being removed through private resources and ensure that public resources are not being applied where private resources are achieving the desired end.

P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

650-851-6790
Fax: 650-851-2195
townhall@woodsidetown.org

Mr. Bruce Wolfe
February 29, 2008
Page 2 of 2

Again, the Town is supportive of efforts of improve water quality. However, given the local resources that will be necessary to implement the programs contained in the Tentative Order, we encourage the Board to prioritize and phase the programming so that the municipalities can successfully implement the programs.

Thank you again for your consideration.

Sincerely,


Susan George
Town Manager