

March 12, 2009

John Muller, Chair  
Bruce Wolfe, Executive Officer  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, California 94612

Dear Chairman Muller and Mr. Wolfe:

We are writing to request that the draft Municipal Regional Permit (MRP), issued by the Board on February 11, 2009, be modified as follows due to the fiscal challenges and declining revenues facing the City of Campbell in what most expect to be a prolonged economic downturn.

- a. Specific requirements proposed for improvements in existing municipal stormwater programs need to be better prioritized and the more fiscally burdensome of these requirements need to be scaled back or further phased out into future permits.
- b. The MRP's proposed requirements for polychlorinated biphenols and mercury should be phased in more gradually and over a longer period of time than what is currently proposed.
- c. New requirements for water quality monitoring, special studies, and pilot projects need to be reduced or delayed.

The above modifications are consistent with the Federal Clean Water Act which provides the San Francisco Bay Regional Water Quality Control Board with considerable flexibility in identifying what comprises a "maximum extent practicable" level of effort for reducing pollutants in discharges of stormwater from municipal storm sewer systems.

While the improved water quality goals of the MRP are laudable, we believe that the highest priority during the MRP's five-year permit period should be to reduce the amounts of trash and litter that are reaching local waterways through stormwater conveyances.

Finally, we request that the San Francisco Bay Regional Water Quality Control Board staff assist local governments in obtaining federal and state grants and other forgivable loans that can be used to help the City of Campbell and other local jurisdictions in improving stormwater quality.

Thank you in advance for your consideration and for your further efforts in crafting a Municipal Regional Permit that is appropriate for these challenging and unusually difficult times for all concerned.

Sincerely yours,

Robert Kass  
Public Works Director

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