



CITY OF SAN RAMON

2222 CAMINO RAMON
SAN RAMON, CALIFORNIA 94583
PHONE: (925) 973-2500
WEB SITE: www.sanramon.ca.gov

April 03, 2009

Mr. John Muller, Chair
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94621

RE: Municipal Regional Stormwater NPDES Permit Revised Tentative Order (February 11, 2009)

Dear Mr. Muller,

The City of San Ramon would like to thank you for the opportunity to comment on the Municipal Regional Stormwater NPDES Permit Revised Tentative Order for Phase I Municipal Permittees in the San Francisco Bay Region issued by the San Francisco Bay Regional Water Quality Control Board (RWQCB) on February 11, 2009. We hope that you find our comments to be helpful in the process of reviewing and adopting the Tentative Order (TO).

The City of San Ramon is very appreciative of the effort put forth by the RWQCB and staff during the creation of the Municipal Regional Permit (MRP). We appreciate the efforts you and your staff have made to meet with representatives of the Bay Area Stormwater Management Agencies Association (BASMAA) and other agencies over the past five years to discuss how to improve water quality throughout the Bay Area.

The City of San Ramon supports the comments provided by BASMAA and the Contra Costa Clean Water Program throughout the review process.

Similar to all stormwater programs throughout the Bay Area, the City of San Ramon Stormwater Program faces significant challenges providing existing levels of service to prevent pollutants from entering our local creeks and streams. Local assessments for funding stormwater activities have reached their maximum while the cost of providing services continue to increase. The prospect of increasing the existing assessment, or creating a new assessment to provide additional funding, is dim during the current and deepening recession.

The Revised Tentative Order creates many new, unfunded mandates that may or may not have an impact on local water quality. For example, Section C.10.a.v. of the Revised Tentative Order requires the installation of full trash capture devices for 30% of the retail/wholesale commercial land use within the City's jurisdiction by July 1, 2013. This section is a prime example of an expensive mandate that makes several assumptions that are not applicable to all stormwater programs throughout the Bay Area.

The first assumption is that existing trash control measures are not effective in reducing or eliminating trash from our creeks. The City of San Ramon has found that regular street sweeping (up to once per week) combined with extensive landscaping (captures trash before entering the street) and manual litter removal through a Citywide Landscaping and Lighting District has been very effective in reducing trash in our creeks. Our extensive public education efforts contribute to the reduction of littering as well.

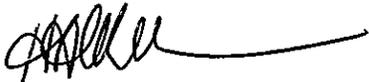
The second assumption is that local jurisdictions have the funding to install full trash capture devices. Under the proposed requirements, 30% of the retail/wholesale commercial land use in the City of San Ramon totals 82 acres. Brown and Caldwell Environmental Engineering provided a conservative estimate to the Contra Costa Clean Water Program for the installation of full trash capture devices for this area. Based on a cost of \$17,400 per acre, the City will be required to spend \$1,430,280 on treatment devices by July 1, 2013. This cost does not include funding for right-of-way acquisition or the relocation of utilities.

Finally, this section assumes that all trash enters our local creek through the storm drain system. Installation of full capture devices will not have an impact on trash that enters the creek through other conveyances such as illicit dumping and windblown trash.

The City of San Ramon will be forced to reduce services that have proven to be effective in order to attempt to implement unproven and potentially cost prohibitive mandates included in the Revised Tentative Order. The Revised Tentative order does not provide local jurisdictions with the flexibility to implement programs that best suit their unique circumstances.

We appreciate your consideration of our concerns listed above and look forward to the response from the RWQCB prior to the adoption of the TO. The City of San Ramon requests that the RWQCB make this letter an official part of the record for the public hearings on the Revised Tentative Order for Stormwater Discharges from Phase I Municipal Permittees in the San Francisco Bay Region. If you have any questions or comments, please feel free to contact Herb Moniz, City Manager, at 925-973-2500.

Sincerely,



H. Abram Wilson
Mayor, City of San Ramon

cc: Mr. Bruce Wolf, Executive Officer
Tom Mumley, Assistant Executive Officer
Shin-Roei Lee, Chief – South Bay Watershed Management Division
Dale Bowyer, Section Leader – Southeast Bay Section
Don Freitas, BASMAA Chair
Tom Daziel, Contra Costa Clean Water Program Assistant Program Manager