



# Alameda Countywide Clean Water Program

A Consortium of Local Agencies

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July 13, 2007

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

Member  
Agencies:

Alameda

Albany

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County

Alameda  
County  
Flood Control  
and Water  
Conservation  
District

Zone 7 of  
the Alameda  
County  
Flood Control  
District

Dear Mr. Wolfe:

SUBJECT: COMMENTS ON MAY 1, 2007 ADMINISTRATIVE DRAFT MUNICIPAL REGIONAL PERMIT

This letter provides the Alameda Countywide Clean Water Program's (ACCWP) comments on Water Board staff's May 1, 2007 Administrative Draft (Draft) municipal regional stormwater permit (MRP). The ACCWP agrees with and strongly supports comments submitted by the Bay Area Stormwater Management Agencies Association (BASMAA). However, given the significant length of the Draft, relatively short turnaround time for providing comment, and the series of meetings between Board staff and BASMAA managers to discuss the Draft, there has been insufficient time to fully engage co-permittees in the review and comment process. Therefore, these comments do not reflect all co-permittee concerns.

I would like to express my appreciation to you and your staff for meeting with us to discuss details of the May 1, 2007 administrative Draft MRP. As you know, our member agencies were very frustrated and disappointed with this revised draft MRP. While this Draft is more clearly written, the regulatory provisions, for the most part, have remained substantially unchanged from the October 13, 2006 version. After providing comments during the two all-day workshops in November and sending numerous comment letters, we were hoping that our comments would be reflected in this revised draft. For the most part, they were not.

We have come to understand that the primary purpose of this May 1 Draft was to provide a clear and internally consistent framework from which to address the numerous substantive issues that have been raised. We appreciate the improved clarity and consistency the document provides, and we look forward to reviewing the next revision that incorporates consideration of the comments we submitted previously and the discussions we have had since the release of this May 1 Draft. While we do not repeat in detail in this comment letter our specific concerns and suggest changes, as noted above, we agree with the specific comments set forth by BASMAA in their comment letter.

We also look forward to continuing our cooperative working relationship as we endeavor to address the significant challenges in reducing stormwater pollution, an objective to which the Alameda Countywide Clean Water Program is firmly committed.

Sincerely,

Jim Scanlin,  
Program Manager

Cc: Jan O'Hara