



Public Works
Department

November 23, 2009

Attn: Mr. Michael Adackapara
REGIONAL WATER QUALITY CONTROL
BOARD - SANTA ANA REGION
3737 Main Street, Suite 500
Riverside, CA 92501

Subject: Comment Letter – R8-2009-0033 for Riverside County Areawide Urban Storm Water Runoff Permit Renewal

Dear Mr. Adackapara:

The City of Riverside appreciates the opportunity to comment on the Draft Municipal Separate Storm Sewer System (MS4) Permit for Riverside County Areawide Urban Storm Water Runoff within the Santa Ana Region (Draft Permit). The City commends the efforts by the Regional Water Quality Control Board-Santa Ana Region's (Regional Board) staff to address stakeholder concerns and work with the collective Permittees to develop a permit to protect Receiving Water quality, to the extent that the permit regulates the quality of discharge from Urban Runoff.

As a discharger under this Phase I permit, the City will be significantly impacted by the additional requirements outlined in this permit. Over the last five years, the annual cost of compliance for the City's iterative implementation has increased over 150%, to over \$5 million. The Draft Permit is expected to add over \$1 million for the development of new plans and procedures, plus an additional several hundred thousand dollars each year to implement the new procedures. Nonetheless, as the nation's first Emerald City, the City of Riverside is committed to protecting the environment and supports the overall goals of this permit.

This letter supports the comments submitted by Riverside County Flood Control and Water Conservation District (RCFC) on behalf of the Permittees. The City worked diligently with RCFC and other Permittees to identify potential unintended consequences and recommend language intended to meet the goals of Regional Board staff while balancing our additional responsibility as a local government to maintain prudent fiscal management of limited taxpayer resources. This fiscal responsibility bears particularly heavy during the current recession, which, according to State budget analysts, is not expected to level State revenues until possibly 2014 or 2015. With unemployment rates over 15% and an expanding workforce, as well as a General Fund decline expected to be over 12% from less than two years ago, the City supports continuing the iterative BMP implementation process to determine compliance with all MS4 requirements, including Permittee activities and TMDL regional efforts. The City also supports ongoing task force efforts, as long as the efforts continue to maximize economies of scale and the outcomes can be considered part of regional compliance in lieu of compliance at each individual discharge of an MS4.

In closing, thank you for your consideration of our comments and for your efforts to resolve identified issues. We look forward to continuing to work with Regional Board staff to achieve an effective and efficient balance of environmental protection and other local government responsibilities. While we maintain concerns about some Draft Permit requirements, we support the goal of improving water quality.

Please feel free to contact me at (951) 826-5575 or Robert VanZanten at (951) 826-5875 if you have any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas Boyd". The signature is fluid and cursive, with the first name "Thomas" and last name "Boyd" clearly distinguishable.

Thomas J. Boyd, P.E.
Deputy Public Works Director/City Engineer