



Santa Clara County Creeks Coalition

Advocates for living streams

Member Organizations

Committee for Green Foothills

Northern California Council-
Federation of Fly Fishers

Santa Clara Valley Audubon Society

April 3, 2009

Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
Attn: Dale Bowyer

Re: MRP (Stormwater Permit)

Dear Mr. Bowyer,

Please include the following finding in the MRP permit:

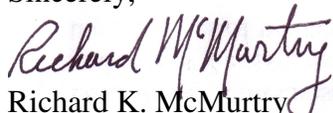
In many streams, reducing the erosive impacts of stormwater discharge will require utilizing four tools: (1) re-shaping the streams to a more hydro-geomorphically stable condition, (2) preventing increases in the erosive force of stormwater discharges from new development and (3) reducing the erosive force of stormwater discharges from existing development and (4) acquiring sufficient riparian corridor width to allow for stable stream conditions. This permit addresses only the impacts of stormwater discharge from large new development and re-development projects and therefore will not address the erosive impacts of stormwater discharges in many streams. A comprehensive approach to stormwater discharges will require implementation of other planning and permit processes to complement the actions of this permit.

Or please include the following requirement in the MRP Permit:

Submit an analysis of erosion in streams and a conceptual plan for reducing that erosion to create physically stable streams to the extent that such erosion is related to the discharge of stormwater.

Thank you for considering these comments.

Sincerely,


Richard K. McMurtry
Program Coordinator