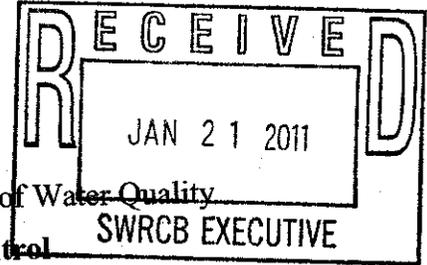


B A S M A A



Alameda Countywide
Clean Water Program

Contra Costa
Clean Water Program

Fairfield-Suisun
Urban Runoff
Management Program

Marin County
Stormwater Pollution
Prevention Program

Napa County
Stormwater Pollution
Prevention Program

San Mateo Countywide
Water Pollution
Prevention Program

Santa Clara Valley
Urban Runoff Pollution
Prevention Program

Sonoma County
Water Agency

Vallejo Sanitation
and Flood
Control District

January 21, 2011

Paul Hann
Chief, Planning Standards and Implementation Unit
California State Water Resources Control Board, Division of Water Quality

Subject: Draft Policy for Toxicity Assessment and Control

Dear Mr. Hann:

On behalf of the Bay Area Stormwater Management Agencies Association (BASMAA)¹, I am writing to provide comments regarding the proposed WET Policy.

BASMAA generally agrees with and incorporates by reference the comments of the California Stormwater Quality Association (CASQA) and the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP). Additionally, we believe establishment of sampling and analysis details in a Policy (section III.B.3) is an inappropriate level of detail for a statewide policy document. Even if the details reflect the current minimum amount of monitoring (which we do not believe) in the many tens of stormwater permits and Sampling and Analysis Plans currently in implementation, such details change somewhere in the State on a regular basis, so that portion of the Policy will soon be obsolete at best and incorrect at worst. Such details could be addressed more appropriately in the guidance being developed now by SCCWRP with the assistance of the Municipal Stormwater Toxicity Testing Committee.

Please contact me at (510) 670-6548 if you have any questions or would like to discuss our comments further.

Sincerely,

James Scanlin
Chair, Bay Area Stormwater Management Agencies Association
Stormwater Manager Representative-Northern California, Municipal Stormwater
Toxicity Testing Committee

cc: Charles Hoppin, Chair, State Water Board
Tam Doduc, State Water Board member
Tom Howard, Executive Director, State Water Board
Jonathan Bishop, Chief Deputy Director, State Water Board
Vicky Whitney, Deputy Director, State Water Board
Bruce Fujimoto, Chief - Stormwater, State Water Board
Bruce Wolfe, Executive Officer, San Francisco Bay Regional Water Board
Tom Mumley, Asst. Executive Officer, San Francisco Bay Regional Water Board
BASMAA Board of Directors

Bay Area

Stormwater Management

Agencies Association

P.O. Box 2385

Menlo Park, CA 94026

510.622.2326

info@basmaa.org

¹ BASMAA is a 501(c)(3) non-profit organization comprised of the municipal stormwater programs in the San Francisco Bay Area representing 96 agencies, including 84 cities and 7 counties. BASMAA is focused on regional challenges and opportunities to improving the quality of stormwater that flows to our local creeks, San Francisco Bay and Delta, and the Ocean.