



Protecting Alameda County Creeks, Wetlands & the Bay

October 6, 2011

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

399 Elmhurst St.
Hayward, CA
94544
p. 510-670-5543

Dear Mr. Wolfe:

SUBJECT: AMENDMENT OF THE MUNICIPAL REGIONAL PERMIT

Thank you for the opportunity to comment on the proposed Tentative Order that would amend the Municipal Regional Stormwater Permit (MRP) for Special Development Projects, Biotreatment Soil, and Green Roof Specifications. First of all, we would like to thank your staff for the time and effort they have devoted to working with us to develop a proposal for Special Projects that both they and our member agencies support.

Our member agencies are committed to protecting our creeks, wetlands and the San Francisco Bay. We agree that vegetated soil media treatment systems are usually the best option for treating stormwater runoff. However, there are times when the land area required for vegetated treatment systems conflicts with the development of dense infill and transit oriented development. These types of projects have tremendous environmental benefits including reducing green-field developments, reducing automobile use and saving energy. Options for equivalent stormwater treatments systems should be provided for these types of projects. The proposed MRP amendment provides an approach that balances our and the Water Board's preference for vegetated treatment systems while providing flexibility where needed to provide overall environmental benefit.

The Clean Water Program also supports the comments submitted by BASMAA. As additional amendments to the MRP are necessary to address certain road projects and projects that fall under the "50% rule" in Provision C.3, we request that you adopt the proposed amendments as well as the additional amendments as set forth in the BASMAA letter.

Sincerely,

Kathy Cote, Management Committee Chair

C: Dale Boyer
Clean Water Program Management Committee Representatives

MEMBER AGENCIES:

Alameda
Albany
Berkeley
Dublin
Emeryville
Fremont
Hayward
Livermore
Newark
Oakland
Piedmont
Pleasanton
San Leandro
Union City
County of Alameda
Alameda County Flood
Control and Water
Conservation District
Zone 7 Water Agency