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9 STATE OF CALIFORNIA
10 STATE WATER RESOURCES CONTROL BOARD

11 In the Matter of the Petition of San Francisco
12 Baykeeper for Review of Action by the California
13 Regional Water Quality Control Board, San
14 Francisco Bay Region, in Adopting Order No. R2-
15 2015-0049, Municipal Regional Stormwater
16 NPDES Permit - Municipalities and Flood
17 Management Agencies in Alameda County, Contra
18 Costa County, San Mateo County, Santa Clara
19 County, and the Cities of Fairfield, Suisun City, and
20 Vallejo and the Vallejo Sanitation and Flood
21 Control District in Solano County, NPDES Permit
22 No. CAS612008.

23 SAN FRANCISCO BAYKEEPER'S
24 RESPONSE TO PETITIONS FOR
25 REVIEW OF SAN FRANCISCO BAY
26 REGIONAL WATER QUALITY
27 CONTROL BOARD ACTION ADOPTING
28 ORDER NO. R2-2015-0049, SWRCB/OCC
FILE A-2455(a thru m)

17 In accordance with the State Water Resource Control Board's letters dated March 15, 2016 and
18 April 11, 2016 in SWRCB/OCC FILE A-2455(a thru m), San Francisco Baykeeper ("Baykeeper")
19 hereby submits the following response to one issue in the Petitions and Responses filed by the Alameda
20 County Permittees to review to the final decision of the California Regional Water Quality Control
21 Board, San Francisco Bay Region ("Regional Water Board") approving the Municipal Regional
22 Stormwater NPDES Permit, Order No. R2-2015-0049, NPDES Permit No. CAS612008 (the "2015
23 Permit" or "Permit").

24 Baykeeper agrees with and supports the arguments made by Alameda County Permittees in
25 Section II.B of their Statement of Points and Authorities, entitled: "Visual Assessment Requirements of
26 Trash Load Reduction Outcomes are Unreasonable, Inappropriate, and Legally Defective." In

