



August 25, 2011



Charles R. Hoppin  
Chairman of the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

**Subject: Draft General NPDES Permit for Small MS4s (Phase II Permit)**

Dear Chairman Hoppin and Members of the Board:

The Woodland Chamber of Commerce Board of Directors respectfully submits this comment letter on the draft General NPDES Permit for Small MS4s (draft Permit) on behalf of our membership. Our organization includes 565 large and small local businesses and is dedicated to maintaining and sustaining a healthy local and regional economy.

The City of Woodland has a proud heritage as a historical and agricultural community, which is evident in strong community ties and pride in the local environment. We appreciate the value of preserving our community's attributes and the need to protect our vital water supplies and other natural resources.

**151.1** → We are very concerned that many provisions of the draft Permit, while well intentioned, would undermine our community's ability to preserve these values by requiring the City and businesses to divert scarce resources, at a time of overall economic stress, away from community priorities to activities that will not provide measurable environmental benefits.

**151.2** → Overall, permit compliance would require a substantial new commitment of City staff and budget at a time when other essential City services, such as police and fire protection, parks and cemetery maintenance, road maintenance, and planning, library, and code compliance services are being cut back. Of particular concern to the business community are the provisions in Section E.11 requiring that the City:

- compile a detailed inventory and mapping of a wide array of business types, their activities, and the materials they handle on-site;
- categorize at least 20% of them as high-priority facilities and inspect these 20% annually regardless of actual need; and
- require, retroactively, that all inventoried businesses install, implement, and maintain 11 categories of stormwater best management practices (BMPs) to be inspected and monitored by City staff.

What the Chamber does: Promote the Community - Create a Strong Local Economy  
Provide Networking Opportunities - Present Business Interests to Government

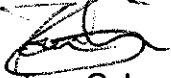
151.3 → Many of the BMP categories, such as conducting good housekeeping and maintenance activities, are actions that can be easily implemented. However, others could not be achieved without expensive retrofits or site modifications, for example item (a), minimizing the exposure of material storage areas to runoff through the use of roofing, grading, berming and other means; item (i), eliminating non-storm water site discharges from industrial and commercial sites; and item (f), managing runoff through on-site infiltration, reuse, and containment.

151.4 → In addition to the costs to businesses and property owners associated with implementing these BMPs, City staff time would be required to process plans, permits, entitlements, and environmental review documentation, undoubtedly leading to further permitting and processing fees, in addition to new inspection fees.

151.5 → We are very concerned about the severe fiscal impact these requirements would have on local businesses and City services and we are disappointed that the State Board did not conduct outreach to the business community about the regulations. We request that the State Board prepare an analysis of the effects of proposed regulations on businesses, engage the business community in refinement of the draft Permit provisions, and prioritize and scale back the requirements before adopting a second draft Permit. We also respectfully request the State Board remove the retrofiting requirements from the draft Permit.

Thank you for your consideration of our comments.

Sincerely,



Tom Galeazzi, President

cc: Senator Lois Wolk  
Assembly Member Mariko Yamada