



September 8, 2011

Charles "Charlie" R. Hoppin
Chair,
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-2000



RE: Draft NPDES General Permit for Small Municipal Separate Storm Sewer Systems (MS4s)

Chair Hoppin and Board Members Spivey-Weber and Doduc:

The Contractors Association of Truckee Tahoe (CATT) is a regional, non-profit trade association representing the broad cross section of the building trades and related professions. CATT has 265 member companies encompassing thousands of families who make their living in the Truckee Tahoe area. It has long been our contention that costs for development and construction in this area are higher here than in other parts of the State due to the increased regulatory requirements for water quality and other environmental values.

At every opportunity, we have sought a pro-active and collaborative approach to meet community needs and resolve water quality concerns. We are proud of our track record in supporting reasonable regulation and heightening the awareness level of our industry to further the cause of clean water. CATT has proactively supported an erosion control BMP requirement for all new single family residential construction since 2007 and will continue to seek out water quality-related collaborative opportunities, such as the Truckee River Watershed Council's voluntary residential BMP retrofit program.

60.1 ↘ We strongly support the points raised in the letters sent to you by the Town of Truckee, the CA Stormwater Quality Association, and the Statewide Stormwater Coalition. Simply put, we oppose the draft permit as written. Please consider these issues:

60.2 → 1) The cost for the commercial/industrial BMP retrofits is another nail in the coffin for small business and another reason why businesses are leaving the state.

60.3 ↘ 2) The inclusion of Truckee in the permit demands reconsideration because the rate of growth (rationale for placing Truckee under this permit) has significantly slowed down.

60.4 ↘ 3) We oppose one size fits all State mandates. They rarely serve the purpose intended.

60.5 → 4) The State should provide grants, loans, and other financing mechanisms for those industrial and commercial property owners who voluntarily want, and can afford, to retrofit their sites with water quality BMPs. It makes no sense to mandate costly compliance in this economic slowdown. We have seen other state agencies offer help and funding for green energy and green building retrofits. Why can't State Water Resources Control Board follow that example and turn a losing proposition into a win-win for all involved?

Thank you for this opportunity to comment on the draft Phase II Small MS4 General Permit. Please keep me on your mailing list to receive future Board meeting notices and staff reports related to this issue. My direct email address is pat@ca-tt.com.

Sincerely,
CONTRACTORS ASSOCIATION OF TRUCKEE TAHOE

Pat Davison
Executive Director