



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

September 1, 2011

Subject: NPDES Phase II Stormwater Draft General Permit

Dear Mr. Hoppin,

On behalf of the Board of Directors of the Sonoma Valley Chamber of Commerce, representing 500 businesses, I am writing to express serious concern about the potential negative impacts of the NPDES Phase II Stormwater Draft General Permit to businesses and the economy.

130.1 → The Draft Permit appears an unfunded mandate whose costs will be passed on to local public agencies, residents and businesses. The proposal requires increased inspections and the retroactive installation, implementation and maintenance of several new stormwater Best Management Practices that would increase costs to businesses that are already struggling in these difficult economic times.

130.2 → Many of the BMPs can be implemented as part of our business practices but each of the proposed BMPs come with a cost. The Chamber is concerned with those BMPs that could require extensive modifications to businesses operations and commercial properties. Some of the proposed mandates may not even be permissible under existing local and state regulations, yet there is nothing in the Draft Permit to address instances that are not feasible due to cost, local regulation or site constraints.

The expectation that the business community can afford to implement these drastically increased requirements, and that local agencies can enforce them is simply unrealistic. Further, it is concerning that the State Board has not attempted to notify the business community of the substantial new regulatory requirements that greatly impact the cost of doing business contained this proposed regulation.

130.3 → We request the State Board re-examine this Draft Permit and determine a way to more cost-effectively consolidate inspections to conserve local public agency staff time and to minimize the drain of valuable business resources that are needed to support jobs and the local economy.

Respectfully,

Jennifer Yankovich, CEO