



September 6, 2011

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000



RE: RECOMMEND REJECTION OF PROPOSED PHASE 2 DRAFT GENERAL PERMIT, WASTE DISCHARGE REQUIREMENTS FOR STORM WATER DISCHARGES FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4's) (GENERAL PERMIT).

Dear Ms. Townsend:

On behalf of the citizens of the Town of Paradise, I strongly urge the Regional Water Quality Control Board to reject the proposed Phase 2 NPDES permit for small municipal separate storm sewer systems (MS4's).

This proposed draft general permit includes 94 pages of mandated actions that many small cities (including the Town of Paradise) have absolutely no way to fund in this current economic climate. The Town of Paradise is a small city, with a population of just slightly over 26,000 people. Due to our economic realities, during the last 4 years we have eliminated (laid off or frozen) 26 positions, or about 22% of our workforce. In spite of draconian cuts across all departments, we currently find ourselves with a budget deficit that exceeds \$400,000 that we simply must eliminate before the end of our fiscal year.

The Town of Paradise has done a great job of educating our general public, obtaining compliance with state mandated SWPPP construction requirements, and making sure our own facilities use best management practices to help keep our waterways clean. We have a close working relationship with Scott Zaitz at the Redding office of the Regional Water Quality Control Board, and we have tried very hard to "do the right thing" even though the Town was not a listed Phase 1 city. This new general permit will not help us achieve our goal of clean waterways – it only serves to push the massive burden of "Reporting" from the State to the local agencies, at a time when we can least afford those burdens. It also creates a huge bureaucratic paper shuffle that will require (by EPA's own estimates) up to \$200,000 annually for the Town of Paradise to comply.

As mayor of the Town of Paradise, I can assure you that the financial and staffing burdens proposed in the current draft permit are simply not something that our town can shoulder today. I urge you and the Board to step back and review these regulations from a common sense perspective, and from the perspective of those that you seek to regulate. Please simplify the permit process, make it easy for the local agencies and non-traditional MS4's to comply, and eliminate or greatly reduce the paperwork and eliminate the proposed permit fees. This "common sense" approach will go a long ways to helping us achieve our mutual goal, of clean, safe water resources for California.

Respectfully,

A blue ink handwritten signature, appearing to be "Alan White", written over a horizontal line.

Alan White,
Mayor
Town of Paradise