



City of
SANTA CLARITA

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September 8, 2011

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

Dear Ms. Townsend:

Subject: Comment Letter – Phase II Small MS4 General Permit

Thank you for the opportunity to comment on the proposed Phase II Small Municipal Separate Storm Sewer System (MS4) General Permit. The City of Santa Clarita (City) is supportive of efforts to improve water quality.

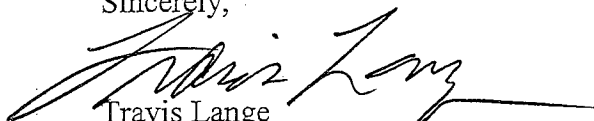
44.1 → The City has concerns about the impacts the Phase II Permit may have on new permittees. Currently, public schools are listed as Phase II facilities and will be required to meet the conditions of the permit. As currently written, the draft Phase II permit would require new permittees to meet significant requirements in a single permit term. These Phase II entities are being asked to transition from no program with no experience, no dedicated staff, and no funding to a comprehensive and costly stormwater program.

Local entities, including public schools, are contending with difficult budget constraints. A new permit compliance program requires significant additional funds and staffing to implement the new requirements. Many future Phase II permittees are working through economic issues that have already resulted in furloughs, layoffs, and hiring freezes.

44.2 → The City requests future Phase II permittees be provided with sufficient time to develop and build their stormwater compliance program. Prioritization and phase-in of new requirements over several permit terms would potentially help affected entities prepare for these regulations..

Thank you for your time and consideration of the City of Santa Clarita's concerns with the Phase II Small MS4 General Permit. Should you have any questions, please do not hesitate to contact me at (661) 255-4337 or tlange@santa-clarita.com.

Sincerely,


Travis Lange
Environmental Services Manager

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