

Comment 51



September 7, 2011

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Subject: Comment Letter – Phase II Small MS4 General Permit

Dear Ms. Townsend and Members of the Board:

Thank you for the opportunity to respond to the draft Phase II Small MS4 General Permit. Please accept this letter as the formal comment from the City of Ukiah, Department of Public Works to the State Water Resources Control Board (Board) on the Draft NPDES General Permit and Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Draft Permit).

The City of Ukiah has faced substantially decreased revenues over the last several years. In particular, the City's General Fund, where the City's storm water efforts are funded, has been drastically reduced the last couple of years. In addition, City staff have taken a 10% salary cut and are now working only four days per week. The Draft Permit as written requires the City to accomplish significantly more work with reduced revenue and reduced staff availability.

Specifically, the City has comments on the following:

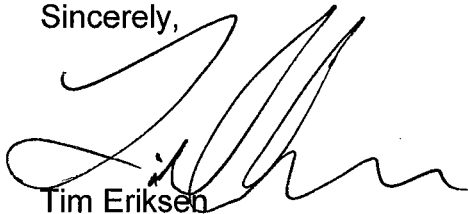
- 51.1 → 1) Section E.4.c.(ii)(d,e,&f) These sections essentially require the City to perform the Board's duties of enforcement. With reduced staffing and reduced general fund revenue, the City requests that the Board retain their enforcement responsibilities at this time.
- 51.2 → 2) Section E.4.d.(iii) This section requires the City to expend extra costs to track expenditures for the annual fiscal analysis. The City recommends eliminating this section.
- 51.3 → 3) Section E.5.b.(ii) (a) This section requires the City to expend resources not currently available to perform Community-Based Social Marketing (CBSM) strategies. The City would need to retain a consultant to perform CBSM which would require additional time and expense to prepare an RFP, consultant contract, etc. The City recommends eliminating this section.

51.4 → 4) Section E.7.c.(ii) This section requires the City to perform field screening and water sampling. This section places a burden on the City to perform additional costly work that may not be necessary if BMP's are followed throughout the City.

Overall, the Draft Permit has many onerous requirements which will severely affect the City in this time of reduced general fund revenues and reduced staff work weeks. The City requests that the Draft Permit be rewritten through a process that includes input from affected Phase II agencies.

Thank you for your consideration of these comments. I look forward to working with the Board to develop a practical and workable Phase II Small MS4 General Permit.

Sincerely,



Tim Eriksen
Director of Public Works/ City Engineer

cc: Thomas Howard, SWRCB Executive Director
Catherine Kuhlman, RWQCB – Region 1 Executive Officer
Noreen Evans, California Senator
Wesley Chesbro, California Assembly Member
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