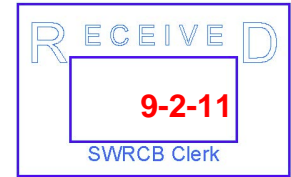
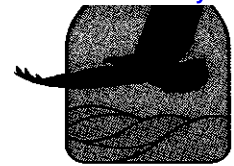
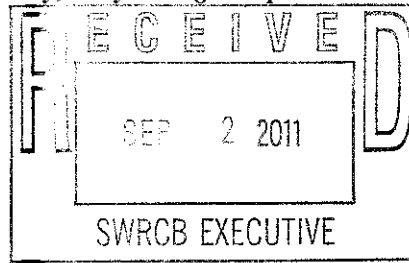


CITY OF WATSONVILLE

"Opportunity through diversity; unity through cooperation"

September 7, 2011

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



Subject: COMMENT LETTER – DRAFT PHASE II SMALL MS4 GENERAL PERMIT

Ms. Townsend:

The City of Watsonville would like to submit the following comments regarding the State Water Resources Board Phase 2 Small MS4 General Permit.

The City of Watsonville is a disadvantaged community of approximately 52,000 people located next to Monterey Bay. Our median household income is just over \$47,000 per year, which is almost \$13,000 less than the State's median household income. The City's 2011 unemployment rate is 29%.

The City does not have a Stormwater utility and the requirements of Proposition 218 make it extremely unlikely that we would ever be able to institute such a utility. As such, the City has had to be extremely creative in how it operates its current storm water management program. The City's program is, by necessity, tightly focused. Despite these significant limitations, the City's program has been recognized as exemplary by the Monterey Bay National Marine Sanctuary and Monterey Coast Keeper.

53.1

The proposed permit represents an inflexible, unfunded mandate. Implementation of this permit would not only create severe financial hardship for the city, it will also likely reduce the effectiveness of the city's existing stormwater program. Failure to comply with the new permit is inevitable, leaving the State Board in the unenviable position of having to penalize Watsonville simply because it is poor. Neither the community nor the environment will benefit from this approach.

The City respectfully requests that the Board direct staff to work with local government representatives in crafting a general permit that effectively addresses water quality concerns in a fiscally responsible manner.

Sincerely,

Daniel Dodge, Mayor

CC Senator Sam Blakeslee
Assembly Member Luis Alejo
Assembly Member Bill Monning