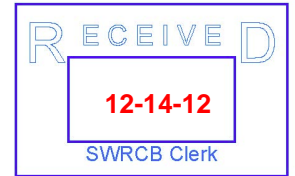


City of Carmel-by-the-Sea

POST OFFICE BOX CC
CARMEL-BY-THE-SEA, CA 93921
(831) 620-2000

Public Workshop
Revised Draft Phase II Small MS4 Permit
Deadline: 12/17/12 by 12 noon



December 10, 2012

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4s) Revised Draft Tentative Order

Reference: Notice of Opportunity to Comment, Notice of Board Workshop, and Notice of Adoption Meeting, Dated November 30, 2012

Dear Ms. Townsend:

This letter responds to the SWRCB's Notice of Opportunity for Public Comment and Notice of Public Hearing, Dated November 30, 2012, subject as above. The table below contains the specific comments of the City of Carmel-by-the-Sea regarding the proposed requirements contained in the Revised Draft Tentative Order. Our comments only apply to the SWRCB's "Responses to Comments" on the comments we submitted in our letter dated June 19, 2012.

Sincerely,



Jason Stilwell
City Administrator

Enclosure

CITY OF CARMEL-BY-THE-SEA SPECIFIC COMMENTS

On the

“National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4s) Revised Draft Tentative Order” dated November 16, 2012

PAGE	SECTION OR PARAGRAPH NO.	TOPIC	PREVIOUSLY SUBMITTED COMMENT	SWRCB RESPONSE	CURRENT COMMENT
27	E.7.b.2.a). (ii)	Construction Training	<p>The Permit requires Permittee staff to have training including Qualified SWPPP Developer (QSD) or Qualified SWPPP Practitioner (QSP) for staff members involved in reviewing development Plans and/or inspecting sites. This was not previously required unless the development projects were > one acre in size. The cost and effort associated with having Permittee staff members obtain and maintain these certifications is not warranted, if those staff members are only reviewing and/or inspecting small projects such as single family residential construction or remodeling, or small additions or remodels of commercial establishments. These certification requirements should only be applicable to staff members involved in reviewing and/or inspecting projects that are > one acre in size.</p>	<p>This permit provision has been revised to address this comment.</p>	<p>The revision does NOT address the heart of this comment, namely that smaller entities that will not have larger projects (projects greater than one acre in size) will still be required to obtain training and certification for at least one individual on their staff as a QSD and as a QSP. This will cause these smaller cities to incur unnecessary costs to provide training and obtain certifications that will not be necessary or applicable to review and inspect the storm water pollution prevention measures that will be incorporated into the design of the smaller projects that occur in these entities.</p>