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May 2, 2012

State Water Resources Control Board  
1001 I St, 24<sup>th</sup> Floor  
Sacramento, CA 95814

- PRESIDENT**  
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Chris Dannewitz

Dear State Water Board Members and Staff:

Thank you for the opportunity to comment. We attended the first workshop, held at Eureka High School on January 28, 2009, along with several local agencies from neighboring counties, Del Norte, Trinity, etc. as well as many members of the public. We also attended the follow up workshop held in Redding in late October of 2011, after revisions were made based on the 2008 draft version workshops.

Here are our comments:

1. Please come closer to our region of Humboldt, Del Norte and Trinity Counties to hear our community's input. Redding and Santa Rosa are not close enough to allow meaningful input from our public agencies and interested persons.
2. Please analyze further the burden (financial and time costs) of landowner requirements to meet Tier 1 requirements when their property is not located near an "impaired water body". It may take local agencies several years to develop their Tier 2 programs. Landowners and developers are under increasing pressure in the State of California to develop housing that is affordable, these requirements most certainly affect the cost of housing in areas that do not have municipal sewer systems, yet are not near impaired water bodies.

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Without your Board knowing the potential costs to Local Agencies and individual Property Owners, we ask that you consider the future financial burden these regulations will place on regions that are already successfully protecting the environment, with their existing regulations and requirements within their own local jurisdictions. For Humboldt County, I have been told that preparing our Local Agency Tier 2 Program may involve hiring additional staff, which translates into higher costs. It is appreciated that we do get more input at the local level, but will have to pay for it. Again for systems that we already have in place, to regulate problems we do not have.

We thank you for your review and consideration of our comments and concerns.

Sincerely,

*Matt Babich*  
Matt A. Babich  
President

*Victoria Copeland*  
Victoria Copeland  
Government Relations

