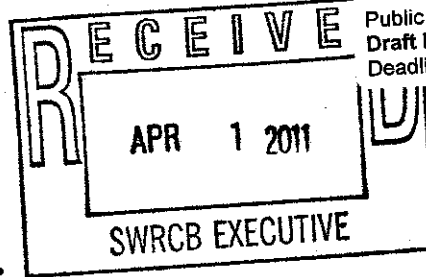




paratransit
creating independence through smart transit **inc.**



Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board

1001 I Street, 24th Floor

Sacramento, CA 95814

Date: March 29, 2011

Jeanine Townsend:

On behalf of Paratransit Inc., I am submitting comments to address the proposed storm water permit changes.

Paratransit Inc. is a private non-profit organization serving the transportation needs of the disabled and elderly in Sacramento County. Our facility includes a fleet maintenance operation triggering requirement for Industrial storm water permitting.

Paratransit Inc has established a long history of leadership in supporting environmentally friendly technologies as well as an outstanding environmental compliance record.

Paratransit Inc has yet to receive a non-satisfactory environmental compliance report in its 32 yrs of business in Sacramento County. This record of exemplary environmental compliance should be taken under consideration when proposing stricter regulatory compliance activities.

Item # 16 to be specific would impose additional burdensome costs in training and certifications for a non-profit such as Paratransit Inc. in addition to the rising cost of fuel, and worker's compensation premiums.

Item # 27 addresses conditional exclusion for dischargers that implement green storm water impact reduction. In 2001 Paratransit Inc. contracted with Jensen Pre-Cast and the City of Sacramento Utilities Dept. to install a storm vault below our bus lot.

Since the installation of the storm vault Paratransit Inc has submitted annual maintenance documentation to the City of Sacramento Department of Utilities without fault. Paratransit Inc. has yet to receive an unsatisfactory lab result in its history of participating in the storm water pollution prevention plan, even prior to the installation of the storm vault in 2001.

In addition to the significant reduction in potential pollutants discharge from Paratransit's property the storm vault is designed to provide peak flow attenuation to mitigate the physical and ecological effects on receiving water that result from urbanization.

I respectfully request the boards' consideration to implement an exemption for businesses that have already implemented proven technologies designed to reduce/mitigate storm water pollutants on their property, and can produce documentation to support ongoing, required maintenance.

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Paratransit Inc will be submitting an NEC this year in hopes that our record of compliance and efforts to exceed minimal BMP requirements will satisfy requirements for exclusion.

In closing I request the boards' consideration for a business' overall environmental "rating". If you have questions regarding these comments, please feel free to contact me at bethbh@paratransit.org.

Thank you


Beth Barker-Hidalgo

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