



CHARLES C. BELL, INC.

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2717 Cottage Way, Suite One • Sacramento, CA 95825 • (916) 489-7682

October 7<sup>th</sup>, 2010

Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Dr., Suite #200  
Rancho Cordova, CA 95670  
Attn: Kathleen Cole Harder

Re: Draft permit recommendations

To Whom It May Concern,

Our company, Charles C. Bell, Inc., is a third generation, family-owned property management and development company operating in Sacramento County. We primarily lease to small office and retail businesses, as well as some used car dealers – all businesses which have been hit hard in this economic recession. We also have experience with infill development in the construction industry, an industry which has been failing for some time now. From every aspect of our business – as home developers, as landlords to small businesses, and as a small business ourselves – we **absolutely oppose** the Board's proposed draft permit recommendations.

As a landlord, we have experienced overwhelming vacancy as small businesses are unable to find start-up capital, or are forced to close their doors due to a staggering drop in business. As a developer, we have experienced first-hand the financial demands of public agencies that look to our development community to contribute to their exhausted coffers. And as a fiscally conservative small business, we have experienced the financial struggle felt by many of our peers, and the pain of having to let go of capable employees simply because we could no longer afford them.

In dire economic times such as these, the knee-jerk reaction to increased rates is a negative one, and perhaps unfairly so. However, after reading into the details of the proposed recommendations and finding that not only is the supporting science shaky at best, but that they further go well beyond anything required by the Federal EPA, there is no other way to describe our reaction other than **outrage**. According to information provided by the Sacramento Metro Chamber of Commerce, the Board would seek to raise our company's rates by up to five times the current amount, cost any potential restaurant lessee \$70,000 per 1,000 square feet in hook-up fees (ensuring that small restaurants which employ many low-income workers will not open), and raise impact fees for new home construction to \$35,000 a door, exacerbating an already catastrophic homebuilding market. In other words, in these

economically-disastrous times, while the Board is pursuing ever more unnecessarily stringent goals, they will also be contributing to an increase in unemployment and the economic stagnation of our region.

Ours is not the only voice speaking out against these proposed recommendations. It is absolutely imperative that the Board listen. Thank you for your consideration.

Sincerely,

Timothy F. Cahill  
President, Charles C. Bell, Inc.