

October 7, 2010

**Attn: Kathleen Cole Harder  
Central Valley Water Quality Control Board  
11020 Sun Center Dr # 200  
Rancho Cordova, CA 95670-6289**

**Subject: Strong concerns of impacts from CVRWQCB draft permit recommendations**

Dear CVWQB Board:

The Downtown Sacramento Partnership (DSP) represents over 400 property and business owners in Sacramento's Central Business District. Our mission is to establish downtown as the vibrant arts, entertainment, business and cultural destination of the greater Sacramento region through effective public-private collaboration for the benefits of residents, visitors and investors.

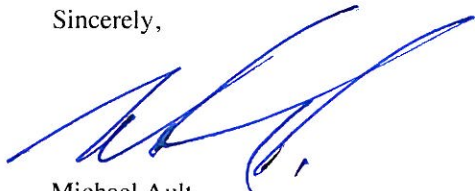
We are very troubled by the draft permit conditions that would require upgrades that could have a debilitating effect on the business climate in the Sacramento region. While we understand and support the important obligation to maintain the quality of our region's waterways, as a representative of businesses and an advocate of infill development, we ask that you exercise restraint in requiring excessive and costly upgrades based on unproven science and that exceeds federal EPA standards for effluent.

The required upgrades will stall the economic recovery in the Sacramento region. Facing an over 12% unemployment rate, additional burdens on consumers and businesses threaten to exacerbate job losses, further discourage business development and expansion, and would severely hamper efforts to attract new businesses to the region. To finance the required improvements, monthly sewage rates will triple for residential and business consumers and development impact fees for infill projects will increase to the point where projects will come to a standstill. These severe rate and impact fee increases will derail ongoing efforts to revitalize Sacramento's Central City and impede economic recovery in a region hit hard by the recession.

A local example that clearly illustrates the impacts to downtown Sacramento is as follows. A proposed infill development project with 136 smart growth, mixed income residential units with ground floor retail would see its impact fees for sanitation services increased from \$388,000 to over \$1.7 million. This 370% increase in impact fees for SCRSD will prevent numerous smart growth, infill projects from moving forward. Additionally, increases for "dine in" restaurants and bar establishments will halt efforts to create downtown as the entertainment and dining destination in the region.

As the voice of downtown Sacramento, the DSP strongly urges you carefully consider the economic consequences of requiring costly upgrades based on unproven science and in excess of existing state and federal standards. We urge you to work with the SCRSD and stakeholders to approve a permit that includes requirements based on "reasonable and necessary standards" that will protect our waterways but not drastically inhibit job creation, business development and downtown revitalization.

Sincerely,



Michael Ault  
Executive Director

CC: DSP Board of Directors  
Senator Barbara Boxer  
Senator Dianne Feinstein  
Congresswoman Doris O. Matsui District 5  
Mayor and Council, City of Sacramento  
Stan Dean, SCRSD District Engineer

916 442.8575  
FAX 916 442.2053

980 9th Street, Suite 400  
Sacramento, CA 95814