



Advocacy: the voice of small business in government

Via Electronic Mail

September 1, 2010

Mr. Alexander Cristofaro (MC-1804A)
Small Business Advocacy Chair
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: SBAR Panel for Stormwater Regulations to Address Discharges from Developed Sites

Dear Mr. Cristofaro:

The Office of Advocacy (Advocacy) has received electronically your August 17, 2010 formal notification regarding the Small Business Advocacy Review Panel (Panel) for the forthcoming regulatory proposal, "Stormwater Regulations to Address Discharges from Developed Sites." Advocacy generally concurs with the revised list of Small Entity Representatives (SERs) that EPA provided this morning. We agree with EPA's plan to have approximately 30 small entity representatives, with roughly half representing industry and builders/developers, and one half representing local governments. We have some specific suggestions for additional representatives in both sectors, supplied in Attachment A. In particular, EPA appears to be short of representatives in the industrial sector.

We look forward on working with EPA on planning the next steps, including the appropriate time when the formal panel should be convened. We will be reviewing the general outline of regulatory alternatives that EPA provided earlier today.

We look forward to working with you through this process.

Sincerely,

/s/ _____

Winslow Sargeant, Ph.D.
Acting Chief Counsel for Advocacy

cc: The Honorable Cass R. Sunstein, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

Attachment A

Builder/Developers

Leah Pilconis, Associated General Contractors

Industry

David Waggoner, Institute of Scrap Recycling Industries, Inc.
Jeffrey Longworth, Federal Storm Water Association

Local Government

Dave Ulrich, Great Lakes and St. Lawrence City Initiative, Illinois
Randy Neprash, Minnesota Cities Storm Water Coalition
Ken Carper, WK Dickson And Company, North Carolina
Eric Larson, City of Georgetown, Kentucky
Richard Sustich, Village of Lake Zurich, Illinois
Randy Stambaugh, Kentucky Stormwater Association
Normand Goulet, Northern Virginia Regional Commission (also Chesapeake Bay)
Laurie Hawkes, Georgia Association of Water Professionals Stormwater Committee
Jim Eckrich, City of Crestwood, Missouri
Champ Adcock, City of Meridian, Mississippi
Ryan Cummins, City of Brunswick, Ohio (also NACWA nominee)
Sam Amerson, City of Stuart, Florida