Construction General Permit – Stormwater Deadline: 5/4/07 5pm

Associated General Contractors of California California Business Properties Association California Chamber of Commerce California Hotel & Lodging Association California Manufacturers and Technology Association California Retailers Association California State Association of Counties Consulting Engineers and Land Surveyors of California Regional Council of Rural Counties

May 4, 2007

Members of the State Water Resources Control Board Attn: Ms. Song Her Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814



Re:

Comments on the Preliminary Draft General Permit for Discharges of Storm Water Associated With Construction Activities

Dear Board Members:

The above-listed organizations appreciate the opportunity to provide comments on the Preliminary Draft General Permit for Discharges of Storm Water Associated with Construction Activities dated March 2, 2007 (Draft General Permit).

Our organizations support the state's effort to protect and improve water quality in a meaningful and cost-effective way. However, we have serious concerns about many aspects of the Draft General Permit. Our organizations have reviewed the comprehensive legal and technical comments developed by the California Building Industry Association (CBIA) and believe that they accurately portray our concerns with the Draft General Permit.

We urge the State Water Resources Control Board to consider the comments and concerns identified in CBIA's comment package. To that end, our organizations believe that we need to work constructively with the Board to develop an approach that places greater emphasis on enhanced and pro-active planning, and the implementation, inspection, and management of best management practices (BMPs) instead of a permit

that will result in technically infeasible, unreliable, and unrealistic approaches in regulating construction stormwater runoff.

Sincerely,

Thomas T. Holsman

Kex Sthine

Associated General Contractors of California

Rex S. Hime

California Business Properties Association

Valerie Nera

California Chamber of Commerce

Valerie Mera

Jim Abrams

Jun Blum

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Mike Rogge

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