



City of Huntington Beach

2000 Main Street

PO Box 190

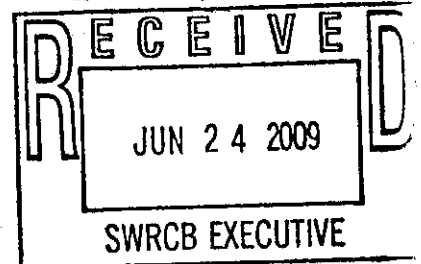
CA 92648

Travis K. Hopkins, PE
Director

Department of Public Works
(714) 536-5431

June 24, 2009

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Submitted via email commentletters@waterboards.ca.gov

Subject: Comments on the April 2009 Draft Construction General Permit

Dear Ms. Townsend and Members of the Board:

Thank you for the opportunity to provide comments on the April 2009 draft Construction General Permit (CGP) covering waste discharge requirements for discharges of stormwater runoff associated with construction activity disturbing one acre or more. The City of Huntington Beach appreciates the efforts of the State Water Resources Control Board (SWRCB) to receive written comments as well as hold the June 3, 2009 public workshop on this latest (third) version of the draft CGP. As a municipal agency responsible for building road, sewer, water, and storm drain facilities as well as improving existing infrastructure, the substantial changes to the CGP from the current Order (No. 99-08-DWQ) will have a significant impact on the City.

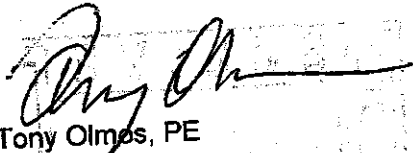
Although the City is not a member of the California Stormwater Quality Association (CASQA), we strongly support the comments detailed in the CASQA letter dated June 24, 2009. Furthermore, the City supports the County of Orange's recommendation with regard to Permit Enrollment as detailed in the County's comment letter dated June 24, 2009.

The City would like to comment on a few additional items of concerns or request clarification:

1. Section I.H.53 – Clarify the establishment of a 5 year, 24-hour Compliance Storm Event.
2. Section I.J.61 – Construction sites may be considerable distances from receiving water bodies and site run-off may be influenced with storm drain systems or surface flows. Eliminate the requirement to conduct receiving water monitoring or develop an alternative process for conducting the receiving water monitoring, such as a County contracted laboratory paid by the dischargers on a permit basis.
3. Section I.L.72 – Is it the intent for the Post-Construction Requirements to be in compliance with the California Regional Water Quality Control Board - Waste Discharge Requirements?
4. Section II.B.4 – Reiterate the County's comment regarding payment of an annual fee to the SWRCB for Phase I MS4 Permits.

Thank you for your attention to our concerns. Please contact Terri Elliott at (714) 536-5431 if you have any questions on these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Olmos", written over a faint rectangular stamp.

Tony Olmos, PE
City Engineer

TO/TE:cs

CC: Mark Smythe, Santa Ana Regional Water Quality Control Board