



SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

February 3, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, CA 95812-0100

RE: Draft NPDES General Permit for Discharges of Storm Water Associated with Industrial Activities

Dear Ms. Irvin:

California Manufacturers & Technology Association (CMTA) is a trade association with the mission to improve and preserve a strong business climate for California's 30,000 small and large manufacturers, processors and technology-based companies. California manufacturers employ 1.5 million Californians and contribute billions of dollars to the state's economy. CMTA membership includes over 600 businesses representing chemical, aerospace, high-tech, biotech, pulp and paper, glass, oil, steel and others. CMTA lobbies the state legislature and regulatory agencies to promote policies on issues such as the one before us today to assure the continued viability of California's manufacturing community

Many of our members have testified in Rancho Cucamonga, here today, and/or submitted written comments about specific problems with the draft permit. CMTA supports the iterative BMP approach and benchmarks; however, we strongly believe that the draft permit should be implemented consistent with USEPA's general permit guidelines.....no less and no more. As it is, compliance with the draft permit is manpower intensive and unnecessarily costly without increasing the beneficial impacts to stormwater quality. We believe it would be much more cost effective to apply more resources to agency inspections and oversight of facilities needing to improve their performance. Contrary to public opinion, regulated facilities, that are striving to achieve compliance, value inspections when they are consistent across industry sectors. This enables a level economic playing field and prevents the conscientious company from being disadvantaged because the "bad eggs" never get caught.

Your decision on how you proceed will have an impact far beyond simply stormwater pollution mitigation. Overly cumbersome and costly regulations put California's industries at an economic disadvantage compared to their counterparts in other states. Jobs are at stake. Companies that have left California, continually cite energy cost, high taxes and over-regulation as major factors. With California in the throes of a major budget crises, this is not the time for us to be implementing overly burdensome, unnecessary regulations that jeopardize our remaining economic base.

Sincerely,

A handwritten signature in blue ink, which appears to read "Michael J. Rogge", is written over a light blue circular stamp.

Michael J. Rogge
Director, Environmental Quality