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To: "Xavier Swamikannu" <seconddraftVCMS4@waterboards.ca.gov>
Date: Mon, Oct 15, 2007 2:12 PM
Subject: Letterhead

Tri-Counties District Office

October 15, 2007

1:30 PM

Regional Board Members

Regional Water Quality Control Board

ATT: Dr. Xavier Swamikannu

RE: Proposed Ventura County Stormwater Draft Permit

Dear Regional Board Members:

AGC is the largest construction trade organization in the country and the state of California. The California chapter, AGC of California represents over 1,200 companies statewide and 100 locally. On behalf of those members we must state our very serious concerns over several items in Ventura County's draft Permit currently under consideration. Several of these restrictions are extremely detrimental to the construction industry particularly those involved in grading. These over stringent requirements* (based on national & state data rather than local data)

will cause work delays and stoppages that will also affect other steps in the construction process. They will add months if not years to project schedules that would not only make the project financially unfeasible, but ultimately cause a harmful impact on the environment itself.

These excessive restrictions will drive up all construction costs and impact hundreds of jobs. While work sites are idle, jobs will be lost because many companies will be unable to support their workforce during shut downs and/or may be forced out of business all together. Ventura County cannot afford this unnecessary setback to its economy.

Our current BMPs are some of the strongest in the nation and are working well. Those of us in the construction industry want to have a positive impact on the environment too, but we must all work together to create a mutually beneficial permit. We request that the regional board work closely with the local construction business community to modify the draft permit's requirements to support not only our environment, but the practical needs of the community and business as well.

* We find the following requirements of particular concern : " F. Development Construction Program...1. Grading prohibitions...(a)...(1) No grading shall occur between October 1 - April 15....(A) On hillsides with slopes 20%...(C) Within or adjacent to an environmentally sensitive area (ESAs)." The latter is especially problematic because it is very open ended and does not clearly define the ESAs. Such imprecise statements are often open to such a wide variety of interpretations that they can be easily abused.

We appreciate your sincere consideration in this very critical matter that impacts all the citizens of Ventura County.

Thank you,

Tony Morelli

District Manager

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