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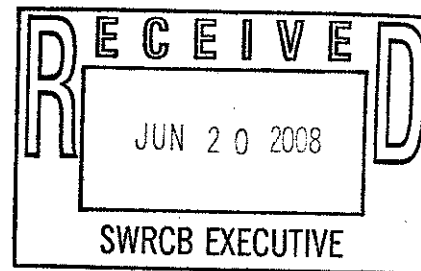
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June 20, 2008

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



Public Comment
Strategic Plan Update
Deadline: 6/20/08 by 12

Re: Comments on the Proposed Strategic Plan Update: 2008-2012

Dear Ms. Townsend:

The California Building Industry Association (CBIA) appreciates the opportunity to provide comments regarding the proposed State Water Resources Control Board ("the Board") Strategic Plan Update: 2008-2012 (May 30, 2008 draft version). We applaud the effort of the Board and staff in updating the prior Strategic Plan in a manner that enabled stakeholders to be part of the process.

CBIA is a non-profit trade association comprised of approximately 7,000 member companies that are engaged in all aspects of planning, designing, financing, constructing and selling approximately 80% of all new homes built in California each year.

CBIA shares in the Board's vision of a "sustainable California made possible by clean water and water availability for both human uses and environmental resource protection." CBIA believes that the Principles and Values identified in the Draft Strategic Plan are the keys to the success of the Board and its regional water quality control boards in developing sound, balanced policies and permits that take into account the myriad number of issues facing the boards and the regulated community.

The following comments are provided on specific elements of the Board's strategic plan proposal.

Priority 1. Protect and Restore Surface Water Quality

As an industry in general, CBIA is very supportive of the Board's approach in addressing water quality issues on a watershed-based approach. CBIA believes that all dischargers in a watershed, including the natural environment and the already built-up environment, need to be part of the solution to improve the state's water quality. To that end, CBIA is sponsoring legislation aimed at enabling a city or county to convene a watershed quality committee to maintain or achieve compliance with water quality laws and regulations, and to prepare a related integrated implementation plan. CBIA believes that bill, AB 938 (Calderon), would create an additional tool that could be used to help achieve several objectives identified pursuant to Priority 1 in the draft Strategic Plan. CBIA urges the Board to review and consider supporting this legislation as part of its strategic planning process.

In addition to AB 938, CBIA has developed comments and recommendations regarding monitoring based on the monitoring requirements proposed by Board staff related specifically to the proposed general construction permit. CBIA urges the Board to consider those comments (June 11, 2008, CBIA comments on the proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities) regarding monitoring as it relates to Action 1.2.1 in the draft strategic plan and requests being given the opportunity to work with the Board on the action items identified in Objective 1.2.

Priority 2. Protect and Restore Groundwater Quality

No comments on this priority.

Priority 3. Promote Sustainable Water Supplies

Priority 3 promotes the policy of increasing the state's sustainable water supplies through greater water-use efficiency practices and recycled water. As made apparent in a recent *Sacramento Bee* article regarding the amount of water used in the Sacramento region, education and implementation of best management practices can greatly increase water conservation and should be regularly advocated by the Board. Indeed, CBIA has long-supported efforts to help educate Californians on water conservation and water recycling. To that end, CBIA has publicly supported efforts to help water agencies develop tiered rate structures tied directly to the amount of water used by homes and businesses to reward those that conserve water. CBIA would like to be included in the stakeholder processes initiated by the Board pursuant to the actions identified in Objective 3.1 and 3.2 of the Draft Strategic Plan.

Priority 4. Water Quality Planning

For years, CBIA has supported the need for regional water quality control boards to do an extensive review of their basin plans since the creation of basin plans were done in the 1970s and no real updates have occurred since that time. CBIA believes that many basin plans were not developed in compliance with the requirements established under the federal Clean Water Act and the state Porter-Cologne Water Quality Control Act – yet the standards adopted in 1970s are still in effect today. In most cases, the original standards in these basin plans have not been reviewed to determine if they are still appropriate and applicable. At the time standards were adopted, the Regional Boards intended to review and update the standards as more information became available. Unfortunately, a lack of planning and resources has curtailed refinement as originally anticipated.

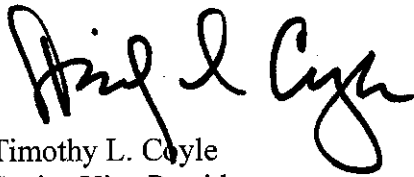
CBIA supports the Board's effort to work with stakeholder groups regarding the triennial review process. CBIA believes it is critical for any effort by the regional boards and state board to review basin plans to make sure that all aspects of Porter-Cologne are considered during this review process, including Water Code Section 13240 and 13241. CBIA would like to be given the opportunity to work with the Board and to be part of any stakeholder process related to Objectives 4.1, 4.2, and 4.3.

Advancing Organizational Performance

Finally, CBIA believes that transparency and accountability in the regulatory rulemaking process is essential in the development of regulations and CBIA also believes that consistency in the implementation and enforcement of statewide policies and regulations is critical to the success of California's water-quality program. CBIA looks forward to working with the Board in achieving the goal of greater accountability and consistency. To achieve consistency between the Board and the regional boards, CBIA recommends that an additional action item be included in Objective 6.1. Specifically, we believe that the Board should convene a special working group of key stakeholders to review and provide recommendations on the issue of governance. CBIA would be the first in line to serve on such a working group.

Thank you for the opportunity to provide our comments regarding the Draft Strategic Plan Update and look forward to working with the Board and staff on this issue and other water quality issues in the future. Please contact me at (916) 443-7933, Ext. 307 with any questions or comments.

Very sincerely yours,

A handwritten signature in black ink, appearing to read "Timothy L. Coyle". The signature is fluid and cursive, with the first name "Timothy" and last name "Coyle" clearly distinguishable.

Timothy L. Coyle
Senior Vice President