AMERICAN COUNCIL OF ENGINEERING COMPANIES OF CALIFORNIA  
ASSOCIATED GENERAL CONTRACTORS OF AMERICA – SAN DIEGO CHAPTER  
ASSOCIATED GENERAL CONTRACTORS OF CALIFORNIA  
BAY PLANNING COALITION  
CALIFORNIA ALLIANCE FOR JOBS  
CALIFORNIA ASSOCIATION OF REALTORS®  
CALIFORNIA BUSINESS PROPERTIES ASSOCIATION  
CALIFORNIA CHAMBER OF COMMERCE  
CALIFORNIA CONSTRUCTION AND INDUSTRIAL MATERIALS ASSOCIATION  
CALIFORNIA MANUFACTURERS AND TECHNOLOGY ASSOCIATION  
COALITION FOR ADEQUATE SCHOOL HOUSING  
CONSTRUCTION EMPLOYERS’ ASSOCIATION  
REGIONAL COUNCIL OF RURAL COUNTIES

June 24, 2009

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

Re: Comments on the Draft National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Construction Activities

Dear Ms. Townsend:

The above-listed organizations appreciate the opportunity to provide comments on the National Pollutant Discharge Elimination System Draft General Permit for Discharges of Storm Water Associated with Construction Activities (Draft Permit) released for public review and comment on April 23, 2009.

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 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 Permit.

We urge the State Water Resources Control Board to consider the comments and concerns identified in CBIA’s comment package and to make the necessary changes to the Draft Permit in order to adopt a permit 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 storm water runoff that will create serious complications for and excessive costs of development projects.

Sincerely,

Paul Meyer
American Council of Engineering Companies of California

Jim Ryan
Associated General Contractors of America, San Diego Chapter

Thomas T. Holsman
Associated General Contractors of California

Ellen Johnck
Bay Planning Coalition

Joe Cruz
California Alliance for Jobs

Elizabeth Gavric
California Association of REALTORS®
Rex S. Hime
California Business Properties Association

Valerie Nera
California Chamber of Commerce

Gary Hambley
California Construction and Industrial Materials Association

Mike Rogge
California Manufacturers and Technology Association

Ian Padilla
Coalition for Adequate School Housing

Michael Walton
Construction Employers’ Association