

**Associated General Contractors of California
California Business Properties Association
California Chamber of Commerce
California Hotel & Lodging Association
California Manufacturers and Technology Association
California Retailers Association
California State Association of Counties
Consulting Engineers and Land Surveyors of California
Regional Council of Rural Counties**

May 4, 2007

Members of the State Water Resources Control Board
Attn: Ms. Song Her
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comments on the Preliminary Draft General Permit for Discharges of Storm
Water Associated With Construction Activities

Dear Board Members:

The above-listed organizations appreciate the opportunity to provide comments on the Preliminary Draft General Permit for Discharges of Storm Water Associated with Construction Activities dated March 2, 2007 (Draft General Permit).

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 General 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 General Permit.


We urge the State Water Resources Control Board to consider the comments and concerns identified in CBIA's comment package. To that end, our organizations believe that we need to work constructively with the Board to develop an approach 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 stormwater runoff.

Sincerely,



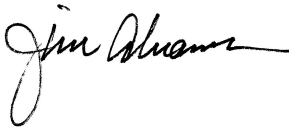
Thomas T. Holsman
Associated General Contractors of California



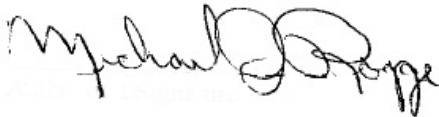
Rex S. Hime
California Business Properties Association



Valerie Nera
California Chamber of Commerce



Jim Abrams
California Hotel & Lodging Association



Mike Rogge
California Manufacturers and Technology Association



Bill Dombrowski
California Retailers Association



Karen Keene
California State Association of Counties



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Staci Heaton
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