

**California Building Industry Association (CBIA) Comments on 2009 Draft General Permit  
for Discharges of Storm Water Associated with Construction Activities**

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1	Comment Package from CBIA Coalition Group on 2009 Draft General Construction Storm Water Permit (2009 Draft CGP) Inclusive of Legal, Policy and Technical Comments, including:  <ul style="list-style-type: none"> <li>▶ Legal Comments prepared by Allen Matkins (including email attachment from SWRCB)</li> <li>▶ Technical Comments prepared by CICWQ (including 3 attachments: CBIA's Bridge Approach, NEL/NAL Report prepared by Flow Science, and Risk Assessment Report prepared by URS)</li> </ul>	CBIA	6/17/09	1
2	Comment Package from CBIA Coalition Group on the 2008 Draft CGP Inclusive of Cover Letter, Legal/Policy Comments, and Technical Issues Memorandum, including:  <ul style="list-style-type: none"> <li>▶ Legal Comments prepared by Allen Matkins (including Economic Impact Report prepared by Berkley Economic Consulting)</li> <li>▶ Technical Comments prepared by CICWA (including NAL/NEL Report prepared by Flow Science, ATS Selection Factor Sheet, Risk Analysis Report prepared by URS, and Post-Construction Controls Report prepared by GeoSyntec)</li> </ul>	CBIA	6/11/08	2
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4	Comment Letter on 2008 Draft CGP from Affirmed Housing Group	James Silverwood	6/9/08	2
5	Comment Letter on 2008 Draft CGP from American Society of Argonomy Soil Science of America	Luther Smith	6/2/08	2
6	Comment Letter on 2008 Draft CGP from Anaheim Public Utilities Department	Dick Wilson	6/10/08	2
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10	Comment Letter on 2008 Draft CGP from Bassette Unified School District	Nancy Guitierrez	6/10/08	2
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16	Comment Letter on 2008 Draft CGP from Brash Industries	Marvin Sachse	6/10/08	2
17	Comment Letter on 2008 Draft CGP from Building Industry Association of Central California	Steve Madison	6/9/08	2
18	Comment Letter on 2008 Draft CGP from Building Industry Association of Fresno/Madera Counties	Michael Prandini	6/9/08	2
19	Comment Letter on 2008 Draft CGP from Burbank Housing Development Corporation	John Lowry	6/10/08	2

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21	Comment Letter on 2008 Draft CGP from California Stormwater Quality Association	Chris Crompton	6/11/08	2
22	Comment Letter on 2008 Draft CGP from Calleguas Municipal Water District	Donald R. Kendall	5/30/08	2
23	Comment Letter on 2008 Draft CGP from CCL Engineering, Inc.	Karl Mallick	6/11/08	2
24	Comment Letter on 2008 Draft CGP from Cemetery and Mortuary Association of California	Jerry Desmond	6/10/08	2
25	Comment Letter on 2008 Draft CGP from Center for Environmental Compliance National Stormwater Center	John Whitescarver	6/10/08	2
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27	Comment Letter on 2008 Draft CGP from Cerritos Community College District	Robert Riffle	6/10/08	2
28	Comment Letter on 2008 Draft CGP from Chaffey Community College District	Stephen Menzel	6/10/08	2
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30	Comment Letter on 2008 Draft CGP from City of Anaheim Department of Public Works	Natalie Meeks	6/11/08	2
31	Comment Letter on 2008 Draft CGP from City of Burbank Public Works Department	Daniel Rynn	6/11/08	2
32	Comment Letter on 2008 Draft CGP from City of Carlsbad Public Works	Glenn Pruium	6/11/08	2
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34	Comment Letter on 2008 Draft CGP from City of Cypress	Gonzalo Vazquez	6/10/08	2
35	Comment Letter on 2008 Draft CGP from City of Dana Point	Brad Fowler	6/10/08	2
36	Comment Letter on 2008 Draft CGP from City of Encinitas	Peter Cota-Robles	6/11/08	2
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39	Comment Letter on 2008 Draft CGP from City of Industry	John Ballas	6/9/08	2
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41	Comment Letter on 2008 Draft CGP from City of Los Angeles	Sharham Kharaghani	6/10/08	2
42	Comment Letter on 2008 Draft CGP from City of Mission Viejo	Rich Schlesinger	6/10/08	2
43	Comment Letter on 2008 Draft CGP from City of Orange Public Works Department	John Sibley	6/3/08	2
44	Comment Letter on 2008 Draft CGP from City of San Jose Office of the City Attorney	Mollie J. Dent	6/11/08	2
45	Comment Letter on 2008 Draft CGP from City of San Jose Office of the City Manager	Ed Shikada	6/11/08	2
46	Comment Letter on 2008 Draft CGP from City of San Marcos	Paul Malone	6/11/08	2
47	Comment Letter on 2008 Draft CGP from City of Temecula	Aldo Licitra	4/23/08	2
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50	Comment Letter on 2008 Draft CGP from Coldwell Banker	Pat Evans	6/11/08	2
51	Comment Letter on 2008 Draft CGP from College of Marin	Al Harrison	6/10/08	2
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54	Comment Letter on 2008 Draft CGP from Copper Mountain College	Joseph Olson	6/10/08	3
55	Comment Letter on 2008 Draft CGP from The Corky McMillin Co.	Walter Heiberg	6/9/08	3
56	Comment Letter on 2008 Draft CGP from County of Imperial Public Works Department	Frank Fiorenza	6/9/08	3
57	Comment Letter on 2008 Draft CGP from County of Los Angeles Department of Public Works	Mark Pestrella	6/11/08	3
58	Comment Letter on 2008 Draft CGP from County of Sacramento	Kerry Schmitz	6/11/08	3
59	Comment Letter on 2008 Draft CGP from County of Sanitation Districts of Los Angeles County	Raymond Tremblay	6/11/08	3
60	Comment Letter on 2008 Draft CGP from County of Ventura Public Works Agency	Jeff Pratt	6/11/08	3
61	Comment Letter on 2008 Draft CGP from CTA Engineering & Surveying	David Crosariol	6/10/08	3
62	Comment Letter on 2008 Draft CGP from DBG Plumbing, Inc.	Danny Green	6/9/08	3
63	Comment Letter on 2008 Draft CGP from Delphi	Herb Williams	6/9/08	3
64	Comment Letter on 2008 Draft CGP from Department of Defense	C.L. Stathos	6/10/08	3
65	Comment Letter on 2008 Draft CGP from Diamond Creek Partners, Ltd.	Stephen L. Des Jardins	6/4/08	3
66	Comment Letter on 2008 Draft CGP from Dolan Building Materials Co., Inc.	Will Eber	6/10/08	3
67	Comment Letter on 2008 Draft CGP from Downey Unified School District	Buck Weinfurter	6/6/08	3
68	Comment Letter on 2008 Draft CGP from Eastern Municipal Water District	Jayne Joy	6/11/08	3
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70	Comment Letter on 2008 Draft CGP from Empire West Development	Bruce Maize	6/9/08	3
71	Comment Letter on 2008 Draft CGP from Engineering & Utility Contractors Association	Tara McGovern	6/10/08	3
72	Comment Letter on 2008 Draft CGP from Etiwanda School District	Douglas Claflin	6/11/08	3
73	Comment Letter on 2008 Draft CGP from Far West Industries	Scott Lissoy	6/10/08	3
74	Comment Letter on 2008 Draft CGP from Flow Science	Gary Lorden	6/11/08	3
75	Comment Letter on 2008 Draft CGP from Focus Realty Services	Walter McEnerney	6/9/08	3
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78	Comment Letter on 2008 Draft CGP	Diane Janssen	6/9/08	3
79	Comment Letter on 2008 Draft CGP	Barry Scherman	6/9/08	3
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81	Comment Letter on 2008 Draft CGP	Ted Cavallini	6/10/08	3
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83	Comment Letter on 2008 Draft CGP	Donald Oliver	6/9/08	3
84	Comment Letter on 2008 Draft CGP	Angela Conley	6/9/08	3
85	Comment Letter on 2008 Draft CGP	Ed Mountford	6/9/08	3
86	Comment Letter on 2008 Draft CGP	Michael Vairin	6/9/08	3
87	Comment Letter on 2008 Draft CGP	Julie Senter	6/9/08	3
88	Comment Letter on 2008 Draft CGP	Dan Boatwright	6/9/08	3
89	Comment Letter on 2008 Draft CGP	Eric Hauser	6/9/08	3
90	Comment Letter on 2008 Draft CGP	Maury Froman	6/9/08	3
91	Comment Letter on 2008 Draft CGP	Sonny Antonio	6/9/08	3
92	Comment Letter on 2008 Draft CGP	John Young	6/9/08	3
93	Comment Letter on 2008 Draft CGP	Terrance Hirschag	6/9/08	3
94	Comment Letter on 2008 Draft CGP	Fr. Joe Bologna	6/9/08	3
95	Comment Letter on 2008 Draft CGP	Mark Guithues	6/9/08	3
96	Comment Letter on 2008 Draft CGP	James Ray	6/9/08	3
97	Comment Letter on 2008 Draft CGP	Joseph Wightman	6/9/08	3
98	Comment Letter on 2008 Draft CGP	Deric Weis	6/9/08	3
99	Comment Letter on 2008 Draft CGP from GKC Engineering Corp.	George Chan	5/31/08	3
100	Comment Letter on 2008 Draft CGP from Graniterock	Aaron Johnston-Karas	6/11/08	3
101	Comment Letter on 2008 Draft CGP from Greg Nester Construction & Development Inc.	Larry Souza	6/10/08	3
102	Comment Letter on 2008 Draft CGP from Gresham, Savage, Nolan & Tilden	Garry Brown	5/27/08	3
103	Comment Letter on 2008 Draft CGP from Harmon Enterprises	Mike Harmon	6/9/08	3
104	Comment Letter on 2008 Draft CGP from Hunsaker & Associates	Paul Huddleston	6/9/08	3
105	Comment Letter on 2008 Draft CGP from Hunton & Williams	Brooks Smith	6/11/08	3
106	Comment Letter on 2008 Draft CGP from K. Hovnanian Forecast Homes Northern, Inc.	Richard Balestreri	6/10/08	3
107	Comment Letter on 2008 Draft CGP from Las Virgenes Unified School District	Karen Kimmel	June 2008	3
108	Comment Letter on 2008 Draft CGP from Lennox School District	Ken Knott	6/6/08	3
109	Comment Letter on 2008 Draft CGP from Long Beach Unified School District	Cari Matsumoto	6/10/08	3
110	Comment Letter on 2008 Draft CGP from Los Angeles County Office of Education	Ferris Tremble	6/5/08	3
111	Comment Letter on 2008 Draft CGP from Los Angeles Unified School District	Bruce Kendall	6/11/08	3

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113	Comment Letter on 2008 Draft CGP from Michael Winn Associates	Mike Winn	6/9/08	3
114	Comment Letter on 2008 Draft CGP from Monrovia Unified School District	Linda Dempsey	6/6/08	3
115	Comment Letter on 2008 Draft CGP from MSK Development Group	Joseph Gallagher	6/10/08	3
116	Comment Letter on 2008 Draft CGP from National Association of Home Builders	Susan Asmus	6/11/08	3
117	Comment Letter on 2008 Draft CGP from Ohlone College	Michael J. Calegari	6/10/08	3
118	Comment Letter on 2008 Draft CGP from Orange County Department of Education	Andrea Sullivan	6/10/08	3
119	Comment Letter on 2008 Draft CGP from California Stormwater Quality Association	Chris Crompton	6/11/08	3
120	Comment Letter on 2008 Draft CGP from Orange Unified School District	Michael Christensen	6/11/08	3
121	Comment Letter on 2008 Draft CGP from Owen PSOMAS on behalf of San Diego County Office of Education	Stephen D. Herrera	6/5/08	3
122	Comment Letter on 2008 Draft CGP from Pacific Coast Civil, Inc.	Richard Doss	6/10/08	3
123	Comment Letter on 2008 Draft CGP from Pac-West Properties	Dan Lloyd	6/9/08	3
124	Comment Letter on 2008 Draft CGP from Palomar Community College District	Kelley Hudson MacIsaac	6/10/08	3
125	Comment Letter on 2008 Draft CGP from Pulte Homes/Del Webb	Darren Warren	6/10/08	3
126	Comment Letter on 2008 Draft CGP from Pulte Homes/Del Webb	Gregg McKenzie	6/10/08	3
127	Comment Letter on 2008 Draft CGP from Rancho Cordova Chamber of Commerce	Timothy Murphy	6/9/08	3
128	Comment Letter on 2008 Draft CGP from Raymus Homes	Toni Raymus	6/10/08	3
129	Comment Letter on 2008 Draft CGP from Regional Council of Rural Counties	Staci Heaton	6/11/08	3
130	Comment Letter on 2008 Draft CGP from Rialto Unified School District	Anna Ulibarri	6/10/08	3
131	Comment Letter on 2008 Draft CGP from Riverside County Flood Control and Water Conservation District	Jason Uhley	6/11/08	3
132	Comment Letter on 2008 Draft CGP from Rowland Unified School District	Maria Ott	6/5/08	3
133	Comment Letter on 2008 Draft CGP from San Bernardino County Superintendent of Schools	David Reck	6/11/08	3
134	Comment Letter on 2008 Draft CGP from San Jacinto Unified School District	Scott Shira	June 2008	3
135	Comment Letter on 2008 Draft CGP from San Marco Unified School District	Katherine Tanner	6/11/08	3
136	Comment Letter on 2008 Draft CGP from Santa Clara Valley Urban Runoff Pollution Prevention Program	Jill Bicknell	6/11/08	3
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140	Comment Letter on 2008 Draft CGP from SNG	Ed Ghandour	6/9/08	3
141	Comment Letter on 2008 Draft CGP from Solano County Department of Resource Management	Nick Burton	6/10/08	3
142	Comment Letter on 2008 Draft CGP from Southern California Contractors Association, Inc.	William Davis	6/10/08	3
143	Comment Letter on 2008 Draft CGP from Southern California Edison	Hazem Gabr	6/11/08	3
144	Comment Letter on 2008 Draft CGP from State Center Community College District	Douglas Brinkley	6/11/08	3
145	Comment Letter on 2008 Draft CGP from Stoel Rives	Barbara Brenner	5/28/08	3
146	Comment Letter on 2008 Draft CGP from Storm Water Compliance Specialists	Hossain Kazemi	6/11/08	3
147	Comment Letter on 2008 Draft CGP from Storm Water Resources, LLC	Jeanne Duarte	6/10/08	3
148	Comment Letter on 2008 Draft CGP from SunCal Companies	Steve Howell	6/11/08	3
149	Comment Letter on 2008 Draft CGP from Taft College	William Duncan	6/11/08	3
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151	Comment Letter on 2008 Draft CGP from Tory R. Walker Engineering, Inc.	Tory Walker	6/9/08	3
152	Comment Letter on 2008 Draft CGP from Treasure Homes Mgmt. Co.	Jim Bayless	6/9/08	3
153	Comment Letter on 2008 Draft CGP from Tri-TAC	Jim Colston	6/11/08	3
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155	Comment Letter on 2008 Draft CGP from West Hills Community College District	Ken Stoppenbrink	6/10/08	3
156	Comment Letter on 2008 Draft CGP from Western Electrical Contractors Association	Richard Markuson	6/9/08	3
157	Comment Letter on 2008 Draft CGP from Western States Petroleum Association	Kevin Buchan	6/11/08	3
158	Comment Letter on 2008 Draft CGP from Whittier Union High School District	Bob Whittenberg	6/11/08	3
159	Comment Letter on 2008 Draft CGP from William S. Hart Union High School District	Michael Otavka	6/5/08	3
160	General Construction Permit: Action Levels and Numeric Effluent Limits Analysis Recommendation of Alternatives [See Attachment 2]**	Flow Science Incorporated for CBIA	3/31/08	4
161	Evaluation of Post-Construction Hydromodification Requirements Contained in the Preliminary Draft General Construction Permit [See Attachment 2]**	GeoSyntec Consultants for CBIA	3/08	4
162	Evaluation of Active Treatment Systems (ATS) for Construction Site Runoff**	GeoSyntec Consultants for CBIA	4/11/08	4

\*\* Included as an appendix to the CBIA Technical Issues Memorandum included in the 2008 Draft CGP Comment Package.

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164	Analysis of Data Requirements Necessary to Establish Action Levels for pH and Sediment in Storm Runoff from Construction Sites [ <i>See Attachment 165</i> ]	Flow Science Incorporated for CBIA	8/07	4
165	Proposed Risk-Based Proactive BMP Approach to Water Quality Regulation of Construction Sites (With Exhibits) ("Bridge Approach")	CBIA	8/28/07	4
166	Comment Package on Preliminary Draft CGP (PCGP) from CBIA Coalition Group (Inclusive of Legal/Policy Comments and Technical Issues Memorandum and all appendices thereto), Including: <ul style="list-style-type: none"> <li>▶ Legal Comments prepared by CBIA, BILD, CICWQ and CEA</li> <li>▶ Technical Comments prepared by CBIA, BILD, CICWQ and CEA (including List of CDEC Stations; Silt Percentages; Comment Table for Sections IX, X, and XII; Comment Table for Attachment D; Sediment BMP Comparison; SCCWRP Hydromodification Study Information Data Gathering Needs; Nautilus Environmental Report; and Fuscoe Engineering Report)</li> </ul>	CBIA/Timothy Coyle	5/4/07 & 5/8/07	4
167	Comment Letter on PCGP from Unified Port of San Diego	Allison Gutierrez	5/10/07	4
168	Comment Letter on PCGP from City of Fullerton	Trung Chanh Phan	5/9/07	4
169	Comment Letter on PCGP from Building Industry Association of San Joaquin Valley	Michael Prandini	5/8/07	4
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174	Comment Letter on PCGP from Baywood Land Management Company	Julie Young	5/4/07	4
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181	Comment Letter on PCGP from California Department of Transportation	G. Scott McGowen	5/4/07	4
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187	Comment Letter on PCGP from City of Riverside	Michael J. Beck	5/4/07	4
188	Comment Letter on PCGP from City of Roseville	Rob Jensen	5/4/07	4
189	Comment Letter on PCGP from Coachella Valley Water District	Mark L. Johnson	5/4/07	4
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195	Comment Letter on PCGP from Executive Advisory Committee—Storm Water Program—County of Los Angeles	Gerald Greene	5/4/07	4
196	Comment Letter on PCGP from Forest Lawn Memorial-Park Association	Maria Pilar Hoye	5/4/07	4
197	Comment Letter on PCGP from Fresno Metropolitan Flood Control District	Bob Van Wyk	5/4/07	4
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201	Comment Letter on PCGP from Los Angeles Unified School District	Bruce Kendall	5/4/07	4
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203	Comment Letter on PCGP from Orange County Business Council	Kristine Murray	5/4/07	4
204	Comment Letter on PCGP from Orange County Sanitation District	Michael Moore	5/4/07	4
205	Comment Letter on PCGP from Pacific Gas & Electric Company	Tammie Candelario	5/4/07	4
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211	Comment Letter on PCGP from San Marcos Unified School District	Katherine Tanner	5/4/07	4
212	Comment Letter on PCGP from Sempra Energy Utilities	Bernie Orozco	5/4/07	4
213	Comment Letter on PCGP from Sisler & Sisler Construction	Phil Vercuyssen	5/4/07	4
214	Comment Letter on PCGP from Southern California Edison	Hazem Gabr	5/4/07	4
215	Comment Letter on PCGP from The Board of Regents, University of California	Jack Zimmerman	5/4/07	4



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234	Comment Letter on PCGP from San Mateo Countywide Pollution Prevention Program	Matthew Fabry	5/1/07	4
235	Comment Letter on PCGP from City of Laguna Niguel	Nancy Palmer	4/30/07	4
236	Comment Letter on PCGP from Flowers & Associates, Inc.	Michael Viettone	4/26/07	4