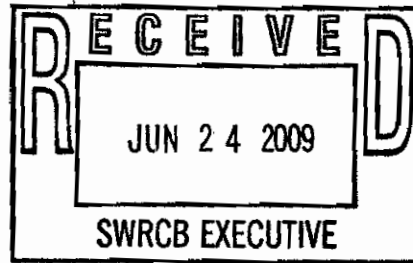


**AMERICAN COUNCIL OF ENGINEERING COMPANIES OF CALIFORNIA  
ASSOCIATED GENERAL CONTRACTORS OF AMERICA – SAN DIEGO CHAPTER  
ASSOCIATED GENERAL CONTRACTORS OF CALIFORNIA  
BAY PLANNING COALITION  
CALIFORNIA ALLIANCE FOR JOBS  
CALIFORNIA ASSOCIATION OF REALTORS®  
CALIFORNIA BUSINESS PROPERTIES ASSOCIATION  
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.

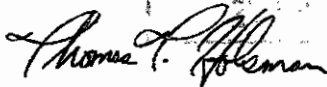
Sincerely,



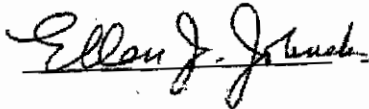
Paul Meyer  
American Council of Engineering Companies of California



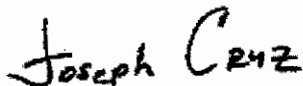
Jim Ryan  
Associated General Contractors of America, San Diego Chapter



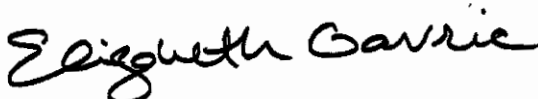
Thomas T. Holsman  
Associated General Contractors of California



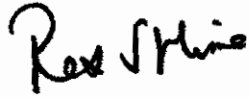
Ellen Johnck  
Bay Planning Coalition



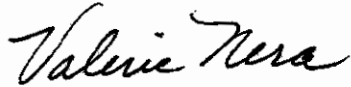
Joe Cruz  
California Alliance for Jobs



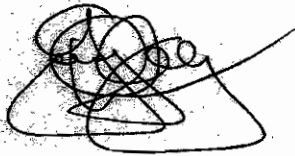
Elizabeth Gavric  
California Association of REALTORS®



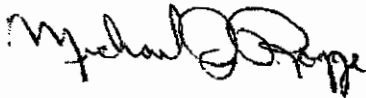
Rex S. Hime  
California Business Properties Association



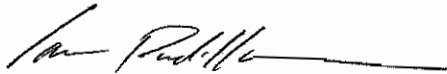
Valerie Nera  
California Chamber of Commerce



Gary Hambly  
California Construction and Industrial Materials Association



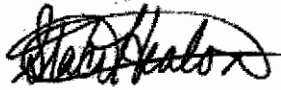
Mike Rogge  
California Manufacturers and Technology Association



Ian Padilla  
Coalition for Adequate School Housing



Michael Walton  
Construction Employers' Association

A handwritten signature in black ink, appearing to read "Staci Heaton". The signature is fluid and cursive, with a large initial "S" and "H".

Staci Heaton  
Regional Council of Rural Counties