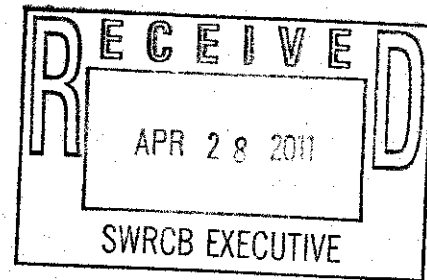


**GRANITE
CONSTRUCTION
INCORPORATED**

Submitted via e-mail to commentletters@waterboards.ca.gov

April 28, 2011

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



Re: Comment Letter – Draft Industrial Permit

Dear Board Members:

We respectfully submit the comments below in response to the Draft Industrial Permit released for comment by the State Water Resources Control Board. As the Board will be receiving detailed technical comments from other organizations we have kept our comments short and focused on key points we wish to emphasize.

Our interest in this matter is tied to the over 70 construction materials facilities we operate throughout California. These facilities produce construction aggregates and asphalt for important infrastructure projects, most of which serve the public in some way.

The draft permit is very onerous and will impose economic hardship on facilities subject to the permit. Granite has been in business since 1922 and in the last few years has experienced the worst economic conditions in the history of the company. At the same time we continue to be subject to significant regulatory initiatives that are a substantial burden to business. There have been the diesel off-road regulations, diesel on-road regulations, then the general construction storm water permit and now a very onerous general industrial storm water permit. The cumulative impact of these regulations is harmful to California businesses struggling to create job growth in these serious economic times.

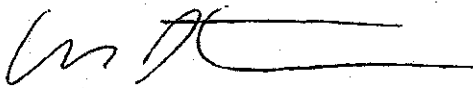
The permit established Numeric Action Levels (NALs) and Numeric Effluent Limits (NELs) that are not feasible in the "one size fits all" approach the draft permit takes. The state's own blue ribbon panel of experts recommended that any numeric limits be data driven and preferably specific to California; however, the draft permit does not accomplish this. Monitoring data available on the board's web site does not support the feasibility of the NALs and NELs across all industries. The NALs and NELs must be specific to individual industries and supported by data to avoid serious and costly implementation problems.

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After a long hiatus this draft permit seems to have come out on the fast track. Considerably more work and stakeholder engagement is required to draft a permit that is appropriate for each industry it affects. Given the seriousness of establishing NALs and NELs and the numerous impractical and unnecessary requirements in the permit, we ask that the Board slow down the process so that the permit can be adequately considered and stakeholders have the opportunity to work with staff to develop requirements that are more appropriate.

Thank you for considering our comments and we look forward to working with staff on potential draft permit amendments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Geoff Boraston', with a long horizontal flourish extending to the right.

Geoff Boraston, P.E.
Director of Environmental Affairs