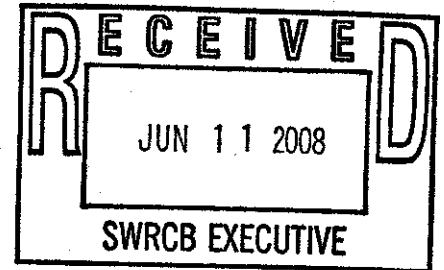




June 11, 2008

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



Re: Comment Letter – Draft Construction Permit

Dear Ms. Townsend:

URS is pleased to present this comment to the Draft Construction Permit.

Due to the range of potential site-specific conditions for which an Active Treatment System (ATS) may be required for a project, the use of the runoff coefficient of 1.0 in the calculation of the design storm volume is overly conservative, in particular for large projects. The resulting design storm volume can be extremely large and infeasible to store or treat with a conventional sized ATS. This is particularly the case on construction sites with limited staging areas on which to house an ATS with multiple plants in series. Therefore, the URS would like to suggest that the option of a site-specific runoff coefficient, acceptable to the executive officer, be permitted to more realistically design any required ATS.

If you have any questions, please contact me at (510) 874-1765.

Sincerely,

URS CORPORATION

Lois Autié P.E.
Project Manager

Cc: Terry Cooke
Lisa Hunt
Maureen Dunn