

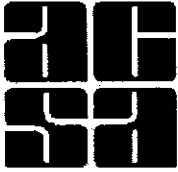


CALIFORNIA
CHAMBER of
COMMERCE

WATER

Workable Approach To Environmental Regulation

September 8, 2005



Bruce Fujimoto, Chief
Storm Water Program
State Water Board
P.O. Box 100
Sacramento, CA 95812-0100



Dear Mr. Fujimoto,

WATER is a statewide, broad-based coalition of environmentally conscious business owners, public agencies, business organizations, taxpayers, school districts, labor organizations and other entities that support storm water regulations that balance storm water quality objectives with the operational and economic realities of storm water management in the public and private sectors.



We understand that the State Water Resources Control Board has convened a panel of experts to hear from technical representatives on September 14, 2005, about the "feasibility" of a potential regulation that would include numeric storm water discharge limits. As we understand, the panel will then meet the following day to discuss the issue and create a white paper -- but that is the extent of our knowledge of the process.



We would greatly appreciate further information and clarification about the process and the extent to which the work product of this ad hoc panel will inform state and regional water board storm water policy making. Naturally, our coalition represents many stakeholders in the regulated community who are extremely concerned about the prospect of facing requirements that may be attainable in theory, but are impossible to achieve in practice. We are seeking assurances that you, and State Water Board members will take our concerns into account, starting with the process leading up to and following the September 14-15 meeting.



In particular, we would appreciate your response to the following questions:



- What happens after September 15th?
- Will the "white paper" be publicly distributed, and will there be opportunities for public review and comment?
- Will there be any more hearings or listening sessions?
- Who will actually determine if the "feasibility" standard has been met and when will that determination be made?
- Is there a deadline or a specific regulatory action driving this effort?



CMAC
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Association of California



Please know that we share the goal of protecting the waters of the state from contaminants in storm water, but we also share the concern that a new storm water policy or regulation that contains “numeric limits” (chemical-specific, bright line discharge standards) and related enforcement requirements cannot, and should not, be developed in a day. The panel’s recommendations – whatever they may be – should be subject to public review and comment before they become the foundation for state policy.

Finally, please do not misconstrue this letter as an objection to further public discussion of alternative storm water management policies. Rather, we are encouraged that the state board is taking this step. We are simply trying to understand the process and how we can participate most effectively and constructively in it. We look forward to your response.

Sincerely,

Valerie Nera
Agriculture, Water, Resources & Privacy Director
California Chamber of Commerce

Michael Rogge
Legislative Director, Environmental Quality
California Manufacturers & Technology Association

Larry Forester
Steering Committee
Coalition for Practical Regulation

Patti Krebs
Executive Director
Industrial Environmental Association

Cathy Reheis-Boyd
Chief Operating Officer
Western States Petroleum Association

Martha Cowell
Executive Director
State of CA Auto Dismantlers Association

Bill Wiggins
Legislative Committee Chair
Metal Finishing Association of Southern CA

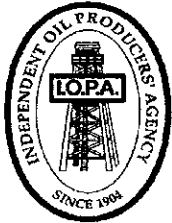
John Ulrich
Senior Consultant
Chemical Industry Council of California

Paul Smith
Vice President, Government Relations
California Grocers Association

Anna-Marie Stouder
Senior Legislative Director
California Restaurant Association

Eric A. Daniels
Director, State & Local Government Affairs
California Space Authority

Bob Wells
Executive Director
Association of CA School Administrators



CALIFORNIA



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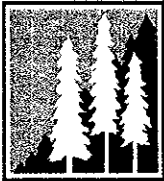




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Chief Executive Officer
CA Independent Petroleum Association

Ed Yates
President/CEO
California League of Food Processors



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