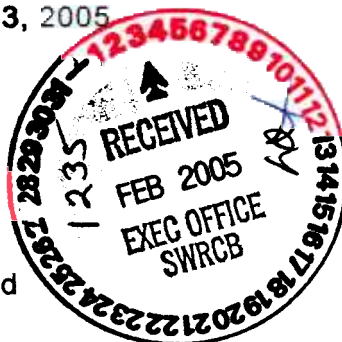




SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

February 3, 2005

Hand Delivered



Ms. Debbie Irvin
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

JAMES O. ABRAMS
President & CEO

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**AMERICAN
HOTEL & LODGING
ASSOCIATION
DIRECTOR**

DON JOHNSON, CHA
*Vagabond Franchise Systems, Inc.
Los Angeles*

Re: SUPPORT of Draft General Industrial Storm Water Permit

Dear Ms. Irvin:

I am writing to you on behalf of the 1,500+ members of the California Hotel & Lodging Association (**CH&LA**) to express the lodging industry's **support** for the current version of the Board's draft General Industrial Storm Water Permit.

The current draft deals with a very important and complex issue – from both a legal/regulatory standpoint and from a practical, operational standpoint – in a rational, cost-effect manner.

Dealing with the need to address the issue of storm water runoff is particular problematic of segments of the business community like the lodging industry. The vast majority of hotels, inns, spas, guest ranches, and other lodging establishments in California are truly small businesses. Approximately 2/3 of the state's lodging properties are under 150 rooms in size, and approximately half of them are under 75 rooms in size. In addition, the wide range of geographic, topographic, seismic, and related conditions that apply to our diverse lodging establishments makes it difficult to adopt any sort of one-size-fits-a approach. That is why the lodging industry supports the approach to dealing with storm water runoff as set forth in the current version of the draft General Industrial Storm Water Permit.

CH&LA is concerned, however, that some interested parties are seeking amendments to the draft to require numeric limits for storm water discharges. We believe that such an approach violates both California and federal requirements for storm water management. Moreover, we believe that a numeric-limit approach would be significantly less effective due to the very nature of storm water. Lastly, we have concluded that a numeric-limit approach will be very costly, especially for smaller businesses of the type which make up the majority of California's lodging establishments.

PROTECTING THE RIGHTS & INTERESTS OF THE CALIFORNIA LODGING INDUSTRY.



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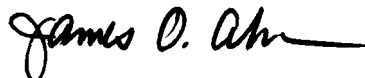
Ms. Debbie Irvin
February 3, 2005
Page 2

For the Board's reference, the California Hotel & Lodging Association is the largest statewide lodging industry trade association in the country, with 1,300 lodging members representing 175,000 guest rooms in hotels, motels, inns, guest ranches, resorts, spas, condominiums, timeshares, and vacation home rentals located throughout California.

California's lodging industry employees more than 170,000 individuals, and it is one of the primary sources of entry-level jobs for people from other countries, people leaving the welfare system, people with limited education, and those with no work experience. Unfortunately, the lodging industry is very labor intensive, and any increase in operating costs ultimately translates into pressure to reduce labor expenses.

Thank you for your consideration of CH&LA's views. We would appreciate it very much if you could keep me apprised of future developments regarding this permit.

Sincerely,

A handwritten signature in black ink that reads "James O. Abrams" with a long horizontal flourish extending to the right.

James O. Abrams
President & CEO