

 **CELSOC**
CONSULTING ENGINEERS AND
LAND SURVEYORS OF CALIFORNIA

Public Comment
Draft Construction Permit
Deadline: 6/11/08 by 12 p.m.

June 11, 2008

Members of the State Water Resources Control Board
Attn: Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Robert Salaber
President

William L. Green
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Jane Rozga
ACEC National Director

Paul J. Meyer
Executive Director

Re: Comments on the Preliminary Draft General Permit for Discharges of Storm
Water Associated With Construction Activities

Dear Board Members:

The Consulting Engineers and Land Surveyors of California (CELSOC) appreciates the opportunity to provide comments on the National Pollutant Discharge Elimination System Proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities (Permit).

Our organization supports 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 Permit. CELSOC has reviewed the comprehensive legal and technical comments developed by the California Building Industry Association (CBIA) and fully agree with those comments.

CELSOC urges the State Water Resources Control Board to consider the comments and concerns identified in CBIA's comment package. We also agree that it is important to work constructively with the Board to develop an approach 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.

For your information CELSOC is an association of approximately 1,200 engineering and surveying firms. Our members plan and design all types of public works, residential, commercial and industrial projects.

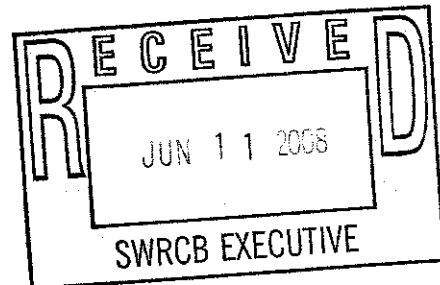
Thank you for this opportunity to comment.

Sincerely,



Paul Meyer
Executive Director

cc: Tim Coyle, CBIA




ACEC

AMERICAN COUNCIL OF ENGINEERING COMPANIES

Our expertise benefits California lives every day
Safe buildings, environment, transportation, water.