

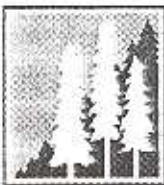


WATER

Workable Approach To Environmental Regulation



CALIFORNIA
CHAMBER of
COMMERCE



CALIFORNIA
FORESTRY
ASSOCIATION



Advancing the Business of Technology

AF&PA



April 15, 2005

Arthur G. Baggett, Jr.
Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Chairman Baggett:

We, the undersigned, are a statewide, broad-based coalition of environmentally-conscious business owners, public agencies, business organizations, taxpayers, school districts, labor organizations and other entities anxious to see the state adopt workable regulations regarding management of storm water runoff.

We share the goal of protecting our public waters from contaminants in storm water, but we also share the concern that new storm water regulations under development at the State Water Resources Control Board (SWRCB) could contain "numeric limits" (chemical-specific, bright line discharge standards) and related punitive requirements that are unrealistic, unattainable and would waste precious taxpayer dollars while also driving employers out of business.

We want to work with the state to adopt storm water runoff regulations that balance storm water quality objectives with the operational and economic realities of storm water management in the public and private sectors. We believe that this goal is best achieved through application of best management practices (BMPs) tailored to the unique circumstances at individual facilities. While we acknowledge that further changes may need to be made to the current program to satisfy statutory requirements, it is not necessary to eliminate the BMP framework to ensure an effective and legally defensible permit.

We specifically oppose proposals to insert strict, never to be exceeded numeric limits into the state's General Industrial Storm Water Permit because such an approach is unworkable given the intermittent, highly variable nature of storm water runoff. As a practical matter, it cannot be regulated in the same fashion as a predictable and controllable end-of-pipe discharge. Thus application of numeric limits to storm water would likely lead to extremely costly treatment systems that would provide little if any water quality benefit.

We strongly urge the State Water Resources Control Board to adopt regulations that permit businesses and public agencies to continue pursuing sensible efforts to improve water quality through the use of cost-effective best management practices.

Thank you for your time and consideration.

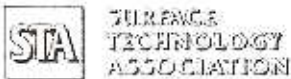
Sincerely,

Karen Keene
Legislative Representative
California State Association of Counties

Yvonne Hunter
Legislative Representative
League of California Cities



CALIFORNIA RETAILERS ASSOCIATION



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