



BLA Member Organizations

Asian Business Association
Associated Builders & Contractors
Associated General Contractors
BIOCOM
Building Industry Association of San Diego
Building Owners & Managers Association
California Apartment Association,
SD Chapter
California Restaurant Association,
SD Chapter
CleanTECH San Diego
CommNexus
CanaMexa
CONNECT
Downtown San Diego Partnership
Engineering & General Contractors Association
Filipino American Chamber of Commerce
Hospital Association of San Diego & Imperial Co's
Klein Leadership Foundation
NAIOP San Diego
NextGen
San Diego Association of Realtors
San Diego County Apartment Association
San Diego East County Chamber of Commerce
San Diego East County EDC
San Diego North Chamber of Commerce
San Diego Port Tenants Association
San Diego Regional Chamber of Commerce
San Diego Regional EDC
San Diego Software Industry Council
San Diego Sports Innovators
San Diego Venture Group
Strategic Roundtable
Tech America
Tijuana EDC
Union of Pan Asian Communities
Urban League of San Diego County

Ex Officio

Junior Achievement
LEAD San Diego
San Diego County Taxpayers Association
San Diego Workforce Partnership
Urban Land Institute, San Diego / Tijuana

September 14, 2012

David Gibson
Executive Director
San Diego Regional Water Quality Control Board
9174 Sky Park Ct., Suite 100
San Diego, CA 92123-4340

Dear Mr. Gibson

The purpose of this communication is to add the voices of our member organizations in opposition to the Draft Administrative MS 4 permit released on April 9th of this year. Our organization includes over forty business organizations throughout the San Diego region, including Chambers of Commerce, Economic Development Corporations and trade organizations that range from CleanTech to the Hospital Association of San Diego and Imperial Counties. Our member organizations in turn represent over 17,000 businesses that provide jobs to San Diego County residents.

On August 4, 2012, our member organizations voted unanimously to support the BIA's coalition comment letter advocating a regional, watershed-based approach to improving stormwater water quality. Our member organizations fully support efforts to reduce pollution to our watershed, beaches and bays, but we believe in a realistic, regional approach rather than a property-by-property approach. The lot-by-lot approach proposed in the draft administrative permit is cumbersome, unrealistic to implement, costly to local business, and will take more than a lifetime to achieve actual positive results.

The BLA supports the BIA coalition comment letter and the solutions presented there. We believe this regional approach is the most wide-reaching, direct and cost effective solution to a problem that has been years in the making, yet minimizes the negative effects that a proscriptive permit will cause to employers and local governments in the region. Please consider incorporating the comments provided by the BIA and supported by the Business Leadership Alliance when revising your Administrative Draft MS4 permit.

Working collaboratively, we can achieve better water quality faster with more reasonable financial impacts to our communities.

Sincerely,

Laurie Madigan
Executive Director