



ASSOCIATED GENERAL CONTRACTORS OF MISSOURI, INC.

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October 27, 2011

Mr. John Madras
Director, Water Protection Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

ATTENTION:
NPDES Permits and Engineering Section
- Permit Comments: MO-L5

Dear Director Madras:

Thank you for the opportunity to comment on the Draft Missouri State Operating Permit MO-L5 for construction or land disturbance activity. Attached is a separate document titled “**Comments by Associated General Contractors of Missouri – Draft MO-L5XXXX**”. AGC of Missouri has 220 construction industry members throughout Missouri including 71 contractor members. Our contractor members frequently perform grading and excavation work for commercial and residential developments which would be performed under Draft Land Disturbance General Permit MO-L5.

In addition, AGC believes that there are thousands of projects throughout Missouri in which AGC of Missouri members are not involved which will be impacted by the permit conditions of Draft MO-L5. Homebuilders, small excavation contractors and thousands of Missouri businesses and individuals who are in the position of owners of projects upon which land disturbance will be performed are impacted by the proposed permit conditions.

MO-L5 is among permits issued by DNR which have the broadest coverage and the highest volume of permit applicants. We believe you will receive comments on Draft MO-L5 from a wide variety of interested parties which are directly impacted by the proposed permit. However, individual commenters such as AGC, will not necessarily be aware of comments submitted by other commenters with an opportunity to discuss those comments with Missouri DNR, before final adoption of the permit.

Therefore, AGC of Missouri recommends that the Department hold a public informational meeting before final adoption of MO-L5 to review and discuss comments received and the Department’s response to those comments.

Again, we appreciate your consideration of our comments and look forward to working with you in implementing the revised permit. Please contact our office if we may be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Jack D. Atterberry". The signature is fluid and cursive, with a large initial "J" and a stylized "A".

Jack D. Atterberry
Vice President, Governmental Relations

Jda/dm
Attachment

Copy: Carrie Schulte
Refaat Mefrakis
Leanne Tippett Mosby