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**Subject:** Comments from AGC Colorado  
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Dear Martha and Steve-

Thank you for working with us, via the HB 1119 workgroup, to improve the construction storm water inspection and enforcement process. At our last meeting you asked us to send you the challenges that we see with the current system. Below are a few items that we hope to address through this process:

1. The variation in the rules among MS4's. We enjoy working with the MS4's, but we would like to explore the thought of a standardized program for all of Colorado, meaning the same program throughout the state, versus the current wide variety of programs at the estimated 84 different MS4's. In the one program approach, contractors would meet one set of rules and BMP's in one manual, and all jurisdictions (state and local governments) would inspect from the same system.
2. A standardized training requirement (for both contractors and state/MS4 inspectors) that would be recognized by all jurisdictions (similar to the OSHA 10-Hour for safety) that would focus on operating a construction site for compliance. Basic Training would be for the system and rules. Advanced Training would be for the person operating/running the construction site. We have a training program like this in our CSEP Program and it is very effective.
3. Address the time it takes from receipt of the initial notice of violation to final resolution. In your report from the first meeting, this has taken up to 3-4 years to resolve some cases. We would like to see a much shorter time such as 90 days.

We feel that one common system of compliance and training would make it easier for both contractors and inspectors and take a lot of the ambiguity and subjectiveness out of the system, while making compliance more efficient and cost effective for contractors and the state.

Thank you,

**Michael Gifford, MPA, IOM**

President

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