

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

**From:** "Geoff Howard" <geoff.howard@centex.com>  
**To:** commentletters@waterboards.ca.gov  
**Date:** Mon, Jun 9, 2008 1:11 PM  
**Subject:** Comment Letter: Draft Construction Permit

Clerk to the Board Townsend:

As an employee of Centex Homes (Central Valley-CA Division), I am writing to express concerns regarding the proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities ("the Permit") now being considered by the State Water Resources Control Board (SWRCB).

I am troubled by the drastic changes in stormwater runoff management called for in the Permit. The extremes of those changes seem unnecessary given the track record of homebuilders' "best management practices". Instead of improving the best management practice approach, the permit will simply create confusion and uncertainty and lead to increased housing costs.

Some of the Permit's new requirements make no sense. For example, the Permit adopts complicated and costly new sediment-content standards (numeric effluent limits) that the SWRCB's own blue-ribbon panel rejected due to the current lack of data and necessary technology. This and other new requirements are proposed without any demonstration that they will produce any marked improvement water quality.

While I join with California homebuilders in supporting improvements to the management of stormwater runoff, those changes should be practicable, workable and should lead to certain improvements in water quality.

Regrettably, the Permit in its present form appears to fail at meeting those reasonable tests. Accordingly, I urge the SWRCB to resolve the Permit's defects and inconsistencies before moving forward on its adoption.

The housing industry is already suffering as it is without an increase in additional fees that seem to be proposed on a weekly basis. I am hoping to hold on during this cycle and continue to provide homes that are both high quality and affordable for future customers in the Central Valley. Please consider only passing fees and regulations that have been truly measured to achieve success and the desired outcome without continuing to put the cost of home ownership out of reach for our Valley residents.

Sincerely,

Geoff Howard  
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