

commentletters - Comment Letter: Draft Construction Permit

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**To:** commentletters@waterboards.ca.gov  
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**Subject:** Comment Letter: Draft Construction Permit

Clerk to the Board Townsend:

There are reasonable water quality controls, which are in place now, and then there is an excessive program which will send this state further into a spiral decent into job killing, business leaving and housing which is too expensive to build. Clean water is being achieved right now. Let the current program work and save jobs. Remember the school children and the fire fighters.

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).

Projects currently have been successfully managing runoff from construction sites. I am troubled, therefore, by the drastic changes in 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 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.

Food, gas, medicine, health care, energy, education, home ownership and rent are all going up in cost. Stop the insanity. Show control and stop government's wasteful spending and don't make us spend more dollars beyond current practices for water quality and housing. Where do you think you kids and mine can afford to live with this current budget buster, draped over the already distressed housing market.

Sincerely,

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