

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

From: "Mike Harmon" <Mjharmon1968@aol.com>
To: commentletters@waterboards.ca.gov
Date: Mon, Jun 9, 2008 4:28 PM
Subject: Proposed SWPPP

Clerk to the Board Townsend:

I am writing to you in response to the latest round of proposed changes to the SWPPP regulations and construction activities. You are going to make the construction and development industries even tighter while farmers are exempt? Why is it that your own documentation places 90% to 95% of runoff and pollution to farming activities and 5% to 10% to development and construction activities. Given the fact that farmers are exempt from the regulations, it seems the SWRCB has a priority problem. The issue that 90% of contamination to our water ways is attributed to a segment of the society which is overlooked is another example of government wasting the money of the taxpayers of this country. There is already a housing shortage in this state, and houses are almost unaffordable for a majority of people. You are going to make the price of a house 2 million dollars for a 2000 SF house. I truly hope you will re-consider this initiative, and think of going after the real problem, not the building industry.
Michael Harmon

On behalf of my company, 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).

As a homebuilding professional, I have had regular experience in successfully managing stormwater runoff from construction sites. I am troubled, therefore, 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.

Sincerely,

Mike Harmon
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