

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

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To: commentletters@waterboards.ca.gov
Date: Mon, Jun 9, 2008 3:48 PM
Subject: Comment Letter: Draft Construction Permit

Clerk to the Board Townsend:

On behalf of my client, Western Electrical Contractors Association (WECA-IEC), I am writing to express the concerns of the 200 contractor members of WECA-IEC 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).

Our contractor members have had regular experience assisting in the successful management of stormwater runoff from construction sites. WECA-IEC is 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 WECA-IEC joins 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, WECA-IEC urges the SWRCB to resolve the Permit's defects and inconsistencies before moving forward on its adoption.

Sincerely,

Richard Markuson
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