



FAR WEST INDUSTRIES

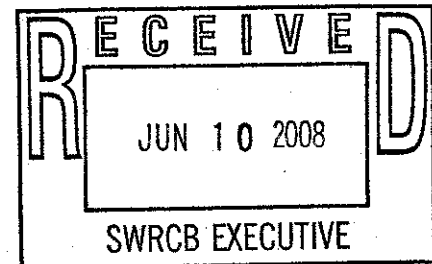
Real Estate Development
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June 10, 2008

Via E-mail

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
E-mail: commentletters@waterboards.ca.gov



Re: *Comment Letter – Draft Construction Permit*

Dear Ms. Townsend:

I am writing this letter to voice my concern regarding the proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities (the "Permit") now under consideration by the State Water Resources Control Board (the "Board"). As a homebuilder in Southern California, Far West Industries has been providing quality housing to individuals and families for over 30 years and our company has taken great care and been extremely successful in managing stormwater runoff from our various construction sites.

Our company has and always will join with other California homebuilders in supporting improvements to the management of stormwater runoff; however, those changes should be practical and lead to certain improvements in water quality. This current Permit simply does not do that. The Permit will create confusion and uncertainty and lead to increased housing costs instead of helping to provide improved control of stormwater runoff by improving the best management practice approach currently being used, all of which will assist in improved water quality.

There are better solutions than the current proposed Permit. Such alternatives are builders (commercial and residential) paying in lieu fees and the State building filtration plants at river outlets to filter out sediment and trash and treat the runoff before it enters the ocean. This would solve issues that are generated by existing developments that have no filtration systems in place, the runoff from which creates the lion's share of the existing problems facing the Board.

We urge you to rethink the current Permit and amend it to remove existing defects and take a more practical and reasonable approach prior to adoption. Thank you.

Sincerely,

Scott Lissoy
Senior Vice President
Member, Building Industry Association of Southern California